



# Checklist

## Family First Prevention Services Act: Implementing the Provisions that Support Kinship Families

The Family First Prevention Services Act (Family First Act) makes historic reforms to the child welfare system to better support children, families, and kinship caregivers, and promote a [kin-first culture](#). Many of the reforms have significant implications for connecting children to kinship caregivers and further promoting permanency through kin guardianships. In keeping with previous laws, including the Fostering Connections to Success and Increasing Adoptions Act of 2008, the Family First Act emphasizes the vital importance of kinship caregivers to child well-being.

Roughly 2.7 million children in the United States are in kinship care—meaning they are being raised by grandparents, other relatives, or “fictive” kin or close family friends like godparents. Throughout this document, unless otherwise stated, use “kin” or “kinship caregivers” includes fictive kin.

[Research, data, and practice](#) clearly show that family connections are critical to healthy child development and a sense of belonging. Children in care who are placed with kin or maintain connections with kin face fewer placement disruptions and experience lower levels of trauma. By utilizing provisions of the Family First Act, child welfare agencies can consistently engage kin to prevent entry or reentry into foster care, promote kinship placements when a child must be removed from parents, help children in care maintain connection with kin, and meet the unique needs of kinship families.

This checklist is designed to help child welfare agency leadership and staff, Family First project managers, and kinship caregivers and their community service providers take advantage of those opportunities. The tool provides concrete steps throughout to authentically engage and consult kinship caregivers, youth, birth parents, and other community stakeholders on reform

efforts. It begins with general kinship readiness tasks that are necessary to incorporate when implementing the following five key areas in the Family First Act that impact kinship caregivers:

- Kinship Navigator Programs
- National Model Family Foster Home Licensing Standards
- Title IV-E Prevention Programs
- Engaging Family for Children and Youth Placed in Qualified Residential Treatment Programs
- Improvements to the Interstate Placement for Foster Care, Guardianship, and Adoption

This checklist will address the federal requirements and which steps are necessary for their effective implementation in your jurisdiction.

### Related Resources:

For more information on how to use the Family First Act to support kinship families, see two other briefs in this series:

- [New Opportunities for Kinship Families: Action Steps to Implement the Family First Prevention Services Act in Your Community](#)
- [Leveraging the Family First Prevention Services Act to Improve Use of Title IV-E GAP](#)


## General Kinship Readiness

To effectively implement the kinship provisions of the Family First Act, a child welfare agency should first assess their kinship readiness by reviewing current kinship law, policy, philosophy, and practice. The basic building blocks must initially be in place to create a “kin first” culture—one in which child welfare systems consistently promote kinship placement, engage kin to safely prevent the entry or reentry into foster care, help children in foster care maintain connections with their family, and tailor services and supports to the needs of kinship families.



### Identify, Notice, Engage, and Place with Kin

Actions	Steps to Complete (stakeholders, timeframes)
<input type="checkbox"/> <b>Determine how your jurisdiction defines “relative” or “kin” for various purposes (e.g., notice, placement, licensing).</b>	
<input type="checkbox"/> <b>Implement a more expansive definition of “relative” or “kin” to engage a broader range of potential caregivers (i.e., include relatives by blood or marriage and “fictive kin” such as godparents and close family friends).</b>	
<input type="checkbox"/> <b>Review existing policies and practices related to kinship placement and permanency to determine if they promote a kin first culture. (See the <a href="#">Kinship WikiHow</a>)</b>	
<input type="checkbox"/> <b>Engage stakeholders from tribes and communities of color to provide consultation on culturally competent kinship engagement practices.</b>	
<input type="checkbox"/> <b>Create diligent search procedures and policies, which establish how kin are identified, notified, and engaged as soon as a child comes to the attention of the child welfare agency and continuing until permanency is achieved.</b>	

Actions	Steps to Complete (stakeholders, timeframes)
<ul style="list-style-type: none"> <li>❑ <b>Ensure that diligent search includes family finding procedures that begin at the time of referral to the child welfare agency.</b> <ul style="list-style-type: none"> <li>• Work with courts to ensure that family finding requirements are held as accountability measures.</li> <li>• Efforts should include both the maternal and paternal side of the family.</li> </ul> </li> </ul>	
<ul style="list-style-type: none"> <li>❑ <b>Direct agency staff that children must be placed with kin whenever possible and that placements with non-kin must be an exception. This directive should be incorporated in agency policy, training, practice, contracts, and accountability/continuous quality improvement (CQI).</b></li> </ul>	
<ul style="list-style-type: none"> <li>❑ <b>Establish permanency options that recognize the complex relationships within families, including guardianship assistance and tribal customary adoption.</b></li> </ul>	
<ul style="list-style-type: none"> <li>❑ <b>Develop materials to inform kinship families of their full range of legal relationship options for serving as a resource for supporting the child and family. Include public benefits, other supports and services that are available for each option. (See below re: training child welfare staff on the use of these materials.)</b></li> </ul>	
<div style="display: flex; align-items: center;">  <h3 style="margin: 0;">Support Kinship Families</h3> </div>	
<ul style="list-style-type: none"> <li>❑ <b>Identify and coordinate resources to support licensed and unlicensed kin families (e.g., financial support, community referrals, other services). These resources may be provided by multiple agencies, programs and community organizations.</b></li> </ul>	

Actions	Steps to Complete (stakeholders, timeframes)
<ul style="list-style-type: none"> <li>❑ Establish relationships with community organizations, such as kinship navigator programs and Area Agencies on Aging, that provide tailored, culturally responsive services for kinship families, as well as agencies and organizations that provide respite care, meals, nutrition services, housing assistance, and training and supports to care for children with special medical or other needs. Deliberately engage organizations that provide culturally appropriate tailored services to communities of color and tribes.</li> </ul>	
<ul style="list-style-type: none"> <li>❑ Convene a kinship care oversight committee that meaningfully and authentically engages kinship caregivers and youth to coordinate resources across departments and remove barriers to supporting kin. Include youth from communities of color and tribes.</li> </ul>	
<ul style="list-style-type: none"> <li>❑ Ensure kinship foster families have the same financial supports as non-kin foster families, including permanency supports. Improve access to financial supports, such as TANF child-only, for those families who are not child welfare system-involved.</li> </ul>	
<ul style="list-style-type: none"> <li>❑ Determine how to collect data and establish targets to measure success (e.g., percentage of children diverted from child welfare to kin, placed with kin, placed with kin who become licensed, exit to permanency with kin). Include targets that explicitly consider race equity.</li> </ul>	
<ul style="list-style-type: none"> <li>❑ Establish practices for holding child welfare staff accountable for meeting kinship targets.</li> </ul>	
<ul style="list-style-type: none"> <li>❑ Develop policies, financing, practices, and procedures for supporting kinship families with immediate needs (e.g., help filling out required paperwork, navigating the licensing process, obtaining car seats or cribs, meals, rental assistance, internet access, child care, and other needs).</li> </ul>	



## Train Staff and Develop Accompanying Agency Kinship Policies

Actions	Steps to Complete (stakeholders, timeframes)
<p><input type="checkbox"/> Designate staff who will be tasked with identifying kin for placement and support, facilitating immediate placement with kin, and supporting and providing tailored training for kin. Whenever possible, create a dedicated kinship support staff team to accomplish these tasks.</p>	
<p><input type="checkbox"/> Produce specialized trainings for child welfare staff, legal, and other stakeholders on the value of kin generally, and how to:</p> <ul style="list-style-type: none"><li>• effectively engage kin;</li><li>• actively discuss and explore permanency and placement options with kin;</li><li>• navigate the unique dynamics of kinship families; and</li><li>• determine the appropriateness of each kinship placement.</li></ul>	
<p><input type="checkbox"/> Adapt existing training protocols for non-kin resource families on the importance of maintaining family connections. See guidance from HHS, <a href="#">ACYF-CB-IM-20-06</a>.</p>	
<p><input type="checkbox"/> Establish guidelines for the involvement of kin as a part of the family support network when kinship placement is not an option or when removal of the child is not necessary.</p>	
<p><input type="checkbox"/> Provide or coordinate a complete range of postpermanency services for kinship families, such as behavioral health supports.</p>	

## Title IV-E Prevention Program

The Family First Act provides federal funds to jurisdictions that choose to offer proven (“evidence-based”) prevention services to eligible children at “imminent risk” of entering foster care, their birth parents, and kinship caregivers, so children can stay safely with family and not enter foster care. Services may include mental health and substance use treatment and prevention, and in-home parent (caregiving) skill-based services. The Family First Act also clarifies that children whose adoption or guardianship arrangement is at risk of disruption or dissolution that would result in a foster care placement are also eligible for these prevention services.



### Identify and Evaluate Prevention Services and Programs

Actions	Steps to Complete (stakeholders, timeframes)
<p><input type="checkbox"/> <b>Conduct a survey and analysis of prevention services and programs used by the child welfare agency, including mapping where resources are located, which communities and families they serve (e.g., which serve kin and which don't, which serve children and kinship caregivers within and outside child welfare system), whether any services or programs are designed to serve specific populations in culturally appropriate ways, and program eligibility criteria. Disaggregate data to determine if prevention services are being provided in communities of color and on tribal lands.</b></p>	
<p><input type="checkbox"/> <b>If services and programs have not been used for kin, determine if the model can be adapted to include kin, while maintaining fidelity to the program. Conduct the same assessment for services and programs that only serve kin outside child welfare.</b></p>	
<p><input type="checkbox"/> <b>Engage kin, birth parents, and youth to provide consultation about existing services and programs that are effective in preventing the need for foster care (including what makes them effective) and about changes needed to current policies and practices. Be sure to engage kin, birth parents, and youth from communities of color and tribes if they are present in the jurisdiction.</b></p>	
<p><input type="checkbox"/> <b>Identify how your state defines “candidate for foster care”</b></p>	



Actions	Steps to Complete (stakeholders, timeframes)
<ul style="list-style-type: none"> <li><input type="checkbox"/> <b>Decide which policies and practices are currently in place that can be applied or adapted to candidates for foster care.</b></li> </ul>	
<ul style="list-style-type: none"> <li><input type="checkbox"/> <b>Contact other departments and agencies to see what other services and programs are being offered across your jurisdiction to kinship families (e.g., Medicaid, TANF, Area Agencies on Aging, the juvenile justice system, schools, and mental health and substance use providers).</b></li> </ul>	
<ul style="list-style-type: none"> <li><input type="checkbox"/> <b>Determine which prevention services and programs may qualify for reimbursement under the new Title IV-E Prevention Program.</b></li> </ul>	
<ul style="list-style-type: none"> <li><input type="checkbox"/> <b>Engage kin to provide consultation about the types of services and programs that would be most beneficial to meeting their unique needs and to prevent foster care entries and reentries. Include kin who are the legal guardians or adoptive parents of a child who is at risk of reentering foster care because of a disrupted or dissolved guardianship or adoption.</b></li> </ul>	
<ul style="list-style-type: none"> <li><input type="checkbox"/> <b>Identify the current gaps in services for kinship caregivers and determine which gaps in services can be filled under the parameters of the new Title IV-E Prevention Program (i.e., can existing services be enhanced or expanded through Family First to meet the needs of kin and prevent foster care entry?)</b></li> </ul>	
<ul style="list-style-type: none"> <li><input type="checkbox"/> <b>Identify additional services that are needed for kin outside the scope of the new Title IV-E Prevention Program and how to secure funding to provide those services.</b></li> </ul>	

Actions	Steps to Complete (stakeholders, timeframes)
<ul style="list-style-type: none"> <li>❑ Develop processes to refer kin to the kinship navigator program. If one does not exist, encourage its creation and develop processes to refer kin to other community-based organizations and services that can help them support children.</li> </ul>	
<ul style="list-style-type: none"> <li>❑ Determine what training is needed to educate child welfare staff on the unique needs of children at imminent risk of foster care entry/reentry and the needs of the kin caring for them and how best to meet those needs through prevention services. Ensure that kinship caregivers have an authentic role in developing and providing training.</li> </ul>	
<ul style="list-style-type: none"> <li>❑ Identify what staffing changes are needed to better meet the unique needs of kin caring for candidates (i.e., creating or reassigning positions/teams that work exclusively on supporting kin). Determine whether the child welfare agency can partner with other public agencies and community-based organizations to support kin.</li> </ul>	
<ul style="list-style-type: none"> <li>❑ Identify what practices are needed to engage both the birth parents and kin together in order to strengthen the prevention plan (i.e., family-centered team meetings to help families make the best decision for the child, roundtables, and other multidisciplinary team meetings).</li> </ul>	
<ul style="list-style-type: none"> <li>❑ Identify which practices and supports can help to ensure healthy and smooth transitions for children between parents and kinship caregivers. How can Family First help support shared care to prevent the need for foster care? See guidance from HHS, <a href="#">ACYF-CB-IM-20-06</a>.</li> </ul>	
<ul style="list-style-type: none"> <li>❑ Create policies for how child welfare staff are to continue engaging kin who are caring for a child through a prevention plan to monitor their ongoing needs.</li> </ul>	



Actions	Steps to Complete (stakeholders, timeframes)
<ul style="list-style-type: none"> <li>❑ Create written materials that easily explain to kin their rights, responsibilities, and the services they are entitled to during prevention services. Make sure to include what kin can and cannot expect from the child welfare agency and the prevention service provider.</li> </ul>	
<ul style="list-style-type: none"> <li>❑ Provide kin with written materials about the different long-term options for caring for children should the prevention plan fail.</li> </ul>	
<ul style="list-style-type: none"> <li>❑ Develop benchmarks and continuously review data on candidates placed with kin to better understand the outcomes for those children, what is working well, what other services and programs are needed, and other areas for improvement. Data on utilization of services should be disaggregated to analyze availability and effectiveness of culturally appropriate services for kin and whether kin and families of color are referred to these services.</li> </ul>	

All materials created to be given to families should be translated into all languages present in the community served. When producing any materials to be provided to children, birth families, or kin, it is crucial that agencies engage stakeholders from any communities of color, minority faiths, and tribes that are present in the jurisdiction to ensure materials are culturally appropriate.




## Kinship Navigator Programs

The Family First Act allows jurisdictions to receive ongoing federal reimbursement for evidence-based kinship navigator programs, which provide information, referral, and follow-up services to grandparents and other kin raising children to link them to critical benefits and services. It is critical that kinship navigator programs serve kinship families who are not child welfare agency-involved, so that the many more children raised by kin outside that system will be better supported and less likely to need foster care.

To help states, territories, and tribes meet the requirements of the Family First Act and access ongoing reimbursement, Congress appropriated \$20 million each in FY 2018, 2019, and 2020 for grants to assist in developing, enhancing or evaluating kinship navigator programs. Virtually all states, territories, and eligible tribes applied for and received these grants.

Kinship navigator programs may be at various stages of this checklist. Regardless of the capacity and stage of development, it may be helpful to consider all actions to ensure necessary components are in place. For additional information, see [Kinship Navigator Programs: practical tools and resources](#).

<b>Begin Development</b>	
Actions	Steps to Complete (stakeholders, timeframes)
<ul style="list-style-type: none"> <li><input type="checkbox"/> <b>Identify a child welfare agency lead or contract with an outside stakeholder who has developed trust with kinship families and reflects the community being served to begin creating a leadership team/work group made up of diverse stakeholders.</b></li>   <li><input type="checkbox"/> <b>To create the leadership team/work group, identify and include kinship caregivers and youth they raise, and nonprofit organizations and government agencies currently providing kinship care services and supports.</b> <ul style="list-style-type: none"> <li>• <b>Government agencies should include: aging, economic security, state and local housing authorities, child care, nutrition supports, and education.</b></li> <li>• <b>Nonprofit organizations should include faith-based organizations and community-based organizations providing supportive services to kinship families, including legal services.</b></li> <li>• <b>As a first step, see <a href="http://www.grandfactsheets.org">www.grandfactsheets.org</a> for your state fact sheet listing existing kinship programs. For ongoing federal reimbursement under the Family First Act, kinship navigators must collaborate with existing services and supports.</b></li> </ul> </li> </ul>	

Actions	Steps to Complete (stakeholders, timeframes)
<ul style="list-style-type: none"> <li>❑ Identify the initial goals and desired outcomes of the kinship navigator program with the authentic engagement of kinship caregivers and youth serving on the leadership team/work group.</li> </ul>	
 <b>Meet the Federal Requirements for Kinship Navigator Programs</b>	
<ul style="list-style-type: none"> <li>❑ Coordinate with other state or local agencies that promote service coordination or provide information and referral services, including the entities that provide 2-1-1 or 3-1-1 information systems where available, to avoid duplication or fragmentation of services to kinship care families.</li> </ul>	
<ul style="list-style-type: none"> <li>❑ Plan and operate the program in consultation with kinship caregivers and organizations representing them, youth raised by kinship caregivers, relevant government agencies, and relevant community-based or faith-based organizations.</li> </ul>	
<ul style="list-style-type: none"> <li>❑ Establish information and referral systems that link (via toll-free access) kinship caregivers, kinship support group facilitators, and kinship service providers to: <ul style="list-style-type: none"> <li>• each other;</li> <li>• eligibility and enrollment information for federal, state, and local benefits;</li> <li>• relevant training to assist kinship caregivers in caregiving and in obtaining benefits and services; and</li> <li>• relevant legal assistance and help in obtaining legal services.</li> </ul> </li> </ul>	
<ul style="list-style-type: none"> <li>❑ Provide outreach to kinship care families, including by establishing, distributing, and updating a kinship care website or other relevant guides or outreach materials.</li> </ul>	

- ❑ Promote partnerships between public and private agencies, including schools, community-based or faith-based organizations, and relevant government agencies, to increase their knowledge of the needs of kinship care families to promote better services for those families.
- ❑ Ensure the program meets at least the evidence-based requirements of “promising” as determined by the federal [Title IV-E Clearinghouse](#). Kinship navigator programs and services must target outcomes in the domains of (a) child safety, (b) child permanency, (c) child well-being, (d) adult well-being, (e) access to services, (f) referral to services, and/or (g) satisfaction with programs and services. (See [ACYF-CB-PI-18-11](#) and [Title IV-E Clearinghouse Manual](#))
- ❑ Under federal law, kinship navigator programs may also establish and support a kinship care ombudsman with authority to intervene and help kinship caregivers access services; and may support any other activities designed to assist kinship caregivers in obtaining benefits and services to improve their caregiving. The Children’s Bureau has explicitly noted in a September 2020 written communication to child welfare directors that this last provision allows kinship navigator programs to use federal funds for “short-term support such as bus tokens, gas vouchers, grocery store gift cards and to provide cell phones, tablets or other technology for kin caregivers.”



## Implement Elements to Strengthen Kinship Navigator Programs

Actions	Steps to Complete (stakeholders, timeframes)
<p><input type="checkbox"/> Engage an evaluator from the inception, if evaluating your own kinship navigator program. If you hope to base your program on another model that is working to be included in the Title IV-E Clearinghouse, partner with the jurisdiction developing that model and strive to follow it with fidelity. When commissioning an evaluation ensure the evaluator has worked with diverse communities and is including stakeholders in formulating the design and methodology. (For more information, see <a href="http://leadershiplearning.org/system/files/multicult_eval_rpt.pdf">http://leadershiplearning.org/system/files/multicult_eval_rpt.pdf</a>)</p>	
<p><input type="checkbox"/> Invest in data collection, data collection partnerships, computer systems, and technical support, whether evaluating your own program or not. You will need skilled data collection whether you evaluate your own program or show fidelity to an eventual model included in the Title IV-E Clearinghouse. Also consider various forms of data collection that are consistent with the way populations being served tell their stories.</p>	
<p><input type="checkbox"/> Serve kinship caregivers regardless of child welfare involvement and try to be as jurisdictionwide as possible. If not possible, consider starting in a few pilot areas and planning for expansion in an intentional way as capacity is developed.</p>	
<p><input type="checkbox"/> Explore contracting with community-based organizations to manage the leadership team, house the program, and host the website. Strive to find trusted providers who reflect the communities being served.</p>	
<p><input type="checkbox"/> Develop a comprehensive website with legal tools and practical resources that can help families understand their legal and financial options, and how to navigate educational and health care needs for children they raise. Consider including a user-friendly tool to help families find public benefits and community supports available to them, e.g., the locator tool developed by Nevada's Foster Kinship at <a href="http://www.fosterkinship.org/resource-locator/">www.fosterkinship.org/resource-locator/</a></p>	

Actions	Steps to Complete (stakeholders, timeframes)
<ul style="list-style-type: none"> <li>❑ Ensure that the program is not simply a website but includes a phone number and person-to-person navigation.</li> </ul>	
<ul style="list-style-type: none"> <li>❑ Hire and train kinship caregivers and/or adults who grew up in kinship care and reflect the race and ethnicity of the populations being served to serve as navigators.</li> </ul>	
<ul style="list-style-type: none"> <li>❑ Determine the training plan and train navigators and community partners on the strengths and needs of kinship caregivers and how best to serve them. Ensure that community partners—such as 2-1-1 and 3-1-1 with whom federal law requires coordination—are aware of the kinship navigator and know to refer families to it.</li> </ul>	
<ul style="list-style-type: none"> <li>❑ Implement the use of a kinship assessment tool to determine the service and support needs of each kinship caregiver client.</li> </ul>	
<ul style="list-style-type: none"> <li>❑ Use person-to-person peer navigation to connect caregivers to public benefits such as TANF, SNAP/food stamps, free and reduced school breakfast and lunch, Medicaid, child care, housing assistance, and other supports. Note that the Children’s Bureau has explicitly allowed kinship navigator funds to also be used for “brief legal services.” See <a href="#">Technical Bulletin</a>.</li> </ul>	
<ul style="list-style-type: none"> <li>❑ Use the kinship navigator program to provide and disseminate tangible supports, such as “bus tokens, gas vouchers, grocery store gift cards, and to provide cell phones, tablets, or other technology for kin caregivers” as allowed by federal law and Children’s Bureau guidance.</li> </ul>	

❑ **Once an initial kinship navigator plan is developed, determine a communication plan for sharing it with jurisdiction-wide stakeholders.**

❑ **Convene regional stakeholder meetings of caregivers and youth they raise, staff from the agencies and organizations represented in the leadership team/work group, and other service systems to seek their input on program development, enhancement, and evaluation and to assist with outreach. Other service systems include entities that do not traditionally serve kinship families as separate programs, but serve them as part of their client base: e.g., Boys and Girls Clubs; Big Brothers/Big Sisters; legal aid and law school clinics; courts; schools of social work; educators; special educators; child care providers; and health care and respite providers.**

❑ **Implement additional outreach strategies to engage kinship caregivers and other stakeholders, e.g., creating flyers that are shared at pediatrician, school offices, houses of worship, and through social media. New York’s kinship navigator program provides a “permission to contact form” to their child welfare and TANF/family assistance offices. When caregivers go to those agencies, the staff ask if they will complete and sign the form and then staff faxes the form to the kinship navigator who reaches out to the caregiver.**

❑ **Compile the results from the stakeholder meetings and other outreach strategies, and make any necessary adjustments to the program plan.**

❑ **Finalize your written plan for a kinship navigator program.**





## Implement Kinship Navigator Program Plan and Evaluate

### Actions

### Steps to Complete (stakeholders, timeframes)

- Implement the elements of your plan, set benchmarks for reviewing the plan, and monitor its implementation and outcomes with data.
  
- Adjust the plan as needed with the input of the leadership team/work group, which includes kinship caregivers, youth, and birth parents.
  
- Once the model you follow is included in the Title IV-E Clearinghouse, ensure you are following it with fidelity to receive the ongoing federal reimbursement in accordance with your submitted state plan. You must complete the [Title IV-E Plan Pre-Print Attachment XII - Kinship Navigator Program](#).
  
- If you are evaluating your own program, ensure that the evaluator has input in all phases of development and implementation, and consults on any modifications that are necessary. You must complete the [Title IV-E Plan Pre-Print Attachment XII - Kinship Navigator Program](#).
  
- Once your model is approved as meeting evidence-based standards, obtain ongoing federal reimbursement of 50 percent of all your program costs, including direct support to kin, such as gas or grocery cards. This money is new federal money and is considered an entitlement, meaning reimbursement is not capped. As your expenses increase, the reimbursement amount will increase as well.

## National Model Family Foster Home Licensing Standards

The Family First Act calls for reviewing and improving licensing standards for foster family homes and requires the federal government to identify reputable model licensing standards for foster family homes. Title IV-E agencies must then compare their standards against the model standards and report to the Children’s Bureau on the comparison and their practices related to waiving nonsafety licensing standards. For information about each state’s report, see Appendix VII in the GAO report, “[Child Welfare and Aging Programs: HHS Could Enhance Support for Grandparents and Other Relative Caregivers](#),” and strategies for increasing relative licensure in [ACYF-CB-IM-20-08: Use of Title IV-E Programmatic Options to Improve Support to Relative Caregivers and the Children in Their Care](#), including state information in Attachment A.

Although all states have met their reporting requirements under Family First, states must also conduct periodic reviews of their foster licensing standards. The national standards give states an important tool for that ongoing assessment. The purpose of the model standards is to assure the most critical standards necessary for a safe placement are in place and at the same time identify unnecessary barriers to licensure.



### Review, Compare, and Assess Current Standards

Actions	Steps to Complete (stakeholders, timeframes)
<ul style="list-style-type: none"> <li>❑ <b>Establish a workgroup or taskforce to review, compare, and assess current licensing standards and practices. Include legal and community stakeholders, especially kinship caregivers, as part of that workgroup.</b></li> </ul>	
<ul style="list-style-type: none"> <li>❑ <b>Track and review outcomes of licensing policies and practices including:</b> <ul style="list-style-type: none"> <li>• <b>Collect data about the time it takes kin to become licensed</b></li> <li>• <b>Identify any specific times in the process when delays occur</b></li> <li>• <b>Collect information about common barriers to licensing</b></li> <li>• <b>Track outcomes for children when licensing is delayed or denied</b></li> <li>• <b>Note any differences in the time to licensing and the rate of kin who are licensed in various communities and populations. Determine the factors that contribute to those differences.</b></li> </ul> </li> </ul>	
<ul style="list-style-type: none"> <li>• <b>Discuss and consider common barriers and delays to licensing for kin in your state. Common barriers often include nonviolent criminal history of kin, training requirements, income requirements, and housing requirements like square footage.</b></li> </ul>	

## Actions

## Steps to Complete (stakeholders, timeframes)

- Review current state foster home licensing standards, keeping in mind that they may be contained in statutes, policies, regulations, administrative codes, or some combination. Remember to include standards that allow for provisional or emergency licensing of kin in this review.

- Determine if the family foster home licensing standards are combined with other licensing standards (i.e., those for childcare, institutional care, or foster home licensing agencies).

- Verify how your state defines “related” and/or “relative” for purposes of licensing foster parents, and if they are defined differently in laws or policies for other purposes.

- Consider any consent decrees, court orders, or agreements regarding any family foster home licensing issues that may be in effect in your jurisdiction.

- Compare state licensing standards to both [Model National Family Foster Home Licensing Standards](#) created pursuant to the Family First Act and the [NARA Model Family Foster Home Licensing Standards](#) to determine areas in which your current standards differ.

- Discuss with work group or task force why existing state standards differ from model standards. How do existing standards impede or promote timely licensing? Are there kinship or community issues that are not addressed in the model standards or in existing standards?



## Revise Licensing Standards and Process

Actions	Steps to Complete (stakeholders, timeframes)
<ul style="list-style-type: none"><li><input type="checkbox"/> Decide which licensing standards must be revised to align with the National and NARA models and to ensure increased safe and appropriate placement with kin.</li></ul>	
<ul style="list-style-type: none"><li><input type="checkbox"/> Revise or create a set of provisional or emergency licensing standards to allow for immediate placement with kin. See NARA Model for guidance. Provide kin with financial support during the provisional licensing period. See <a href="#">May 2020 Program Instruction</a> for new guidance on federal financing of provisional licensure.</li></ul>	
<ul style="list-style-type: none"><li><input type="checkbox"/> Update your standards, policies, and practice guidance based on your review with the two Models.</li></ul>	
<ul style="list-style-type: none"><li><input type="checkbox"/> If family foster home licensing standards are combined with other licensing standards (i.e., those for childcare, institutional care, or foster home licensing agencies), consider separating them.</li></ul>	
<ul style="list-style-type: none"><li><input type="checkbox"/> Ensure the definition of “relative” or “related” is consistent throughout all laws, policies, and practices concerning licensing.</li></ul>	
<ul style="list-style-type: none"><li><input type="checkbox"/> Develop written licensing procedures with clear timelines and processes, including a streamlined process that includes collaboration with law enforcement for conducting background checks, fingerprinting, and initial home checks. If possible, use live scan to process fingerprints quickly. Make sure to include an appeal process for kin who are denied licensure.</li></ul>	

Actions	Steps to Complete (stakeholders, timeframes)
<ul style="list-style-type: none"> <li>❑ <b>Develop materials for kin that provide all necessary information about the licensing process. Fully educate kin on the differences between caring for a child as a licensed foster parent and as an alternative to foster care so they can make an informed decision about which is best for their family. Make sure to include information on requirements, expectations, timeframes, and financial assistance.</b></li> </ul>	
<ul style="list-style-type: none"> <li>❑ <b>Establish specialized and trained staff who can facilitate and, if possible, expedite the licensing process for kin and assist kin with completing the necessary paperwork.</b></li> </ul>	
<ul style="list-style-type: none"> <li>❑ <b>Develop procedures and cultivate resources to help kin by providing items required for licensing, such as beds or fire extinguishers, making any reasonable home modifications, such as child proofing cabinets, and paying fees for any required third party assessments, such as from health care providers or fire marshals.</b></li> </ul>	
<ul style="list-style-type: none"> <li>❑ <b>Create or implement kinship-specific training aimed at educating kin about their unique role and the expectations of the agency. Trainings should be culturally appropriate, trauma-informed, recognize the unique family dynamics associated with kinship care, and include examples that reflect the life circumstances of the kin participating. Consider including kin as peers to assist with mentoring and training new caregivers.</b></li> </ul>	
<ul style="list-style-type: none"> <li>❑ <b>Develop a strategy to communicate any changes to your family foster home licensing standards and procedures to your providers.</b></li> </ul>	



### Refine Use of Waivers and Variances

- ❑ **Determine if your jurisdiction uses federal authority to grant waivers or variances on a case-by-case basis for nonsafety related licensing standards for kin family foster homes.**

Actions	Steps to Complete (stakeholders, timeframes)
<ul style="list-style-type: none"> <li>❑ If waivers or variances are used, assess which standards are most commonly waived. Explore what contributes to the decisions to waive these standards and whether they differ for kin in various communities, or with specific characteristics. Determine if the use of waivers and variances help in expediting kin homes or cause delays. Consider revising your licensing standards to allow for more commonsense flexibility around these issues and thereby reduce the need for waivers or variances for kin.</li> </ul>	
<ul style="list-style-type: none"> <li>❑ If waivers and variances are not commonly used, determine the barriers to their use (e.g., complicated and time-consuming processes, general lack of awareness that waivers exist, and how to use them) and remedy these barriers.</li> </ul>	
<ul style="list-style-type: none"> <li>❑ Implement clear criteria, timeframes, and an easy process for requesting and granting timely waivers and variances for nonsafety licensing standards that are barriers to the safe and appropriate placement of children with kin.</li> </ul>	
<ul style="list-style-type: none"> <li>❑ Develop training and useful tools for child welfare staff on the use of waivers and variances. Include information about the appeal process for the denial of applications.</li> </ul>	
<ul style="list-style-type: none"> <li>❑ Ensure that the licensing materials for kin also include information about possible waivers, variances, and appeals.</li> </ul>	
<ul style="list-style-type: none"> <li>❑ Train child welfare staff and encourage the use of waivers and variances to increase the use of safe and immediate placement of children with kin.</li> </ul>	

## Engaging Family for Children and Youth Placed in Qualified Residential Treatment Programs

To ensure higher quality care for children, the Family First Act defines a new treatment intervention model for nonfamily settings, the Qualified Residential Treatment Program (QRTP). One of the federal requirements for a QRTP is that the setting must engage a family and permanency team and must provide six months of family-based post-discharge services. The family and permanency team—which must include a child’s birth family members, kin and other emotionally significant individuals, and other relevant professionals—must provide input on the process of determining the most appropriate and least-restrictive environment for the child. The team also helps to develop a list of child-specific short- and long-term mental and behavioral health goals. The Family First Act intends family and permanency teams to ensure that those adults closest to a child and who best know the child’s needs can share their perspectives as part of the process of determining the most appropriate setting for the child. To ensure the voice and perspective of youth is a part of this process, for children 14 and older, the team must include individuals that the young person selects.

Identify Kin to Engage	
Actions	Steps to Complete (stakeholders, timeframes)
<input type="checkbox"/> <b>Establish procedures for comprehensive family outreach, including how family members are identified, how outreach is conducted, the frequency with which families are contacted, and who is invited to join the family and permanency team. In creating these procedures, engage stakeholders from communities of color and tribes to ensure procedures are culturally competent.</b>	
<input type="checkbox"/> <b>Create protocols maintaining contact information for any known birth family and fictive kin of the child, including family members and fictive kin who are not directly engaged in the family and permanency team.</b>	
<input type="checkbox"/> <b>Create materials that aid child welfare staff in working with families to identify family members who should be contacted and engaged.</b>	
<input type="checkbox"/> <b>Create developmentally appropriate protocols for soliciting feedback from youth to determine which family members should be involved.</b>	





## Create Materials to Facilitate Kin Engagement

### Actions

### Steps to Complete (stakeholders, timeframes)

Create easily understandable written materials for family members, available in multiple languages, which detail their role in making decisions for youth in residential care.

Build templates for materials that explain to the family, in easily understandable language, the decision that a qualified assessor made for why the child in question must be placed in a QRTP.

Create materials that explain the child and family's rights and the services they are eligible for in these settings.

Build templates for materials that explain, in easily understandable language, the child's treatment plan to the family.



## Engage Kin in Treatment

Establish protocols governing how each child's family (which includes parents, extended family, siblings, and fictive kin) will be integrated into their treatment.

Evaluate current policies and procedures to determine areas where kin could be more actively engaged for youth in residential care.



Engage kin to provide consultation about current policies and procedures and about how kin can be effectively engaged and supported as resources for children in group care.

Engage kin to provide consultation to determine (1) how kin can be effectively engaged and supported as resources for children in group care, (2) the types of support kin can provide for children in group care, (3) how kin can help expedite the child’s progress to permanency, and (4) the information and support that kin need to be effective resources for children during and after placement in group care (including as permanency resources). Deliberately engage kin from tribes and communities of color to provide consultation.

Create procedures for family team meetings.

Establish processes and reviews to ensure that the views and opinions of members of the family and permanency team are meaningfully included in assessments.

Establish protocols for planning meeting logistics (scheduling meeting times, locations, etc.) that facilitate family engagement.



Actions	Steps to Complete (stakeholders, timeframes)
<ul style="list-style-type: none"> <li><input type="checkbox"/> Create visitation policies and processes to ensure that children maintain frequent, meaningful contact with family (parents, extended family, siblings, and fictive kin) while in QRTP settings.</li> </ul>	
 Engage Kin in Permanency Plans	
<ul style="list-style-type: none"> <li><input type="checkbox"/> Devise policies for assisting kinship caregivers who wish to become therapeutic foster parents or to provide other forms of care and support, to help youth step down from residential care to family-based care.</li> </ul>	
<ul style="list-style-type: none"> <li><input type="checkbox"/> Create protocols for working with families to collaborate on discharge planning, including the required six months of family-based post-discharge services and aftercare supports they feel they need to successfully transition the child out of group care.</li> </ul>	
<ul style="list-style-type: none"> <li><input type="checkbox"/> Establish protocols governing how families will continue to be integrated into a child's post-discharge treatment.</li> </ul>	
<ul style="list-style-type: none"> <li><input type="checkbox"/> Create protocols for balancing the transition needs identified by the family with those of the agency.</li> </ul>	
 Document Efforts	
<ul style="list-style-type: none"> <li><input type="checkbox"/> Institute documentation procedures regarding how family will be integrated into a child's treatment while in care and post-discharge and how sibling connections will be maintained.</li> </ul>	

Actions	Steps to Complete (stakeholders, timeframes)
<ul style="list-style-type: none"> <li><input type="checkbox"/> Institute procedures for documenting in the child's case plan that the agency has taken efforts to identify and include a family and permanency team for the child.</li> </ul>	
<ul style="list-style-type: none"> <li><input type="checkbox"/> Institute policies for providing notice in writing of family outreach and tools for tracking continued contact.</li> </ul>	
<ul style="list-style-type: none"> <li><input type="checkbox"/> Institute procedures for documenting, if the placement preference of the family and permanency team is different than that of the qualified assessor, why the recommendations are different.</li> </ul>	
<ul style="list-style-type: none"> <li><input type="checkbox"/> Institute procedures for documenting evidence that the child's parent provided input if reunification is the permanency goal.</li> </ul>	
<ul style="list-style-type: none"> <li><input type="checkbox"/> Institute procedures for documenting evidence that meetings were held at a time and in a location convenient for the family and permanency team.</li> </ul>	
<ul style="list-style-type: none"> <li><input type="checkbox"/> Institute procedures for documenting in the child's case plan that the agency has engaged in discharge planning and family-based aftercare supports for at least six months post-discharge.</li> </ul>	

## Improvements to the Interstate Placement for Foster Care, Guardianship, and Adoption

To improve permanency outcomes for children, the Family First Act mandates that by October 1, 2027 all states must use an electronic case-processing system to facilitate the execution of the Interstate Compact for the Placement of Children (ICPC) in a more efficient manner. Administering the ICPC using an electronic interstate case-processing system can greatly reduce the time it takes for children and youth to be placed with safe and appropriate kin. To place a child with kin across state lines, agencies are required to conduct a home study and exchange case files. As these exchanges ordinarily occur via postal mail, there are significant delays built into the process that will be obviated when immediate transfer can occur via an electronic interstate processing system. This will greatly reduce the length of time children wait for permanent placements.

The National Electronic Interstate Compact Enterprise ([NEICE](#)) is an electronic exchange connecting state child welfare agencies to facilitate exchange of ICPC cases. While the law does not specifically name the NEICE system, HHS has been clear that their intent is for states to connect with NEICE and not to build their own systems.

 Assess Interstate Placement Practices	
Actions	Steps to Complete (stakeholders, timeframes)
<input type="checkbox"/> Document current practices for placing children across state lines, including measures for secure transfer of information between states, and how they differ between kin and non-kin placements.	
<input type="checkbox"/> Analyze data related to current practices—including average time to placement, permanency outcomes, and associated costs (staff time, printing, mailing, etc.)—and how the data differs between kin and non-kin placements and whether there are differences in outcomes for specific groups of children, kin, and communities, including along racial, ethnic, or tribal lines.	
<input type="checkbox"/> Evaluate approval rates and timelines for kin and non-kin interstate placements to determine if there are specific barriers preventing kin from being approved in a timely manner.	
 For States That Do Not Already Use NEICE	
<input type="checkbox"/> Establish a NEICE working group with staff from relevant departments, including ICPC, General Counsel, Security, Budgeting, Contracting, Information Technology, and Administration, and gain their buy-in on the importance of using NEICE.	

Actions	Steps to Complete (stakeholders, timeframes)
<ul style="list-style-type: none"> <li>❑ <b>Determine whether linking to NEICE is feasible for your state or what changes would need to be made to implement NEICE. (Note: All states are required to link to NEICE by October 1, 2027)</b></li> </ul>	
<ul style="list-style-type: none"> <li>❑ <b>Determine whether you have IT capacity to build NEICE into your CCWIS or SACWIS system or whether you would use the Modular Case Management System (MCMS).</b></li> </ul>	
<ul style="list-style-type: none"> <li>❑ <b>Work with state budgeting office to appropriate funds for connection fee and annual licensing fee for NEICE. (Note: Fees for NEICE are eligible costs under PSSF, SSBG, and Title IV-E Admin)</b></li> </ul>	
<ul style="list-style-type: none"> <li>❑ <b>Contact APHSA to begin Memorandum of Understanding and setup process for NEICE.</b></li> </ul>	
<ul style="list-style-type: none"> <li>❑ <b>Once NEICE is set up, create protocols for training child welfare staff on managing cases through the NEICE system.</b></li> </ul>	
<ul style="list-style-type: none"> <li>❑ <b>Create protocols to expedite background checks, home visits, and licensing for interstate kin placements.</b></li> </ul>	

## Actions

## Steps to Complete (stakeholders, timeframes)

- ❑ **Revise current family-finding procedures to ensure out-of-state kin with whom the child has an emotional relationship are identified in a timely manner and are given the same preference afforded to in-state kin.**
  
- ❑ **Develop a plan for monitoring outcomes and reevaluating interstate placement practices, as well as any differences among kin and non-kin placements and different populations of children, kin, and communities.**

## Resources

For more information, see:

- **wikiHow for Kinship Foster Care**  
[www.grandfamilies.org/wikiHow-for-Kinship-Foster-Care](http://www.grandfamilies.org/wikiHow-for-Kinship-Foster-Care)
- **Fact Sheet- Grandfamilies: Strengths and Challenges**  
[www.grandfamilies.org/Portals/0/Documents/Grandfamilies-GeneralFactSheet%20%287%29.pdf](http://www.grandfamilies.org/Portals/0/Documents/Grandfamilies-GeneralFactSheet%20%287%29.pdf)
- **New Opportunities for Kinship Families: Action Steps to Implement the Family First Prevention Services Act in Your Community**  
[www.grandfamilies.org/Portals/0/Documents/FFPSA/new-opportunities-kinship-families.pdf](http://www.grandfamilies.org/Portals/0/Documents/FFPSA/new-opportunities-kinship-families.pdf)
- **Leveraging the Family First Prevention Services Act to Improve Use of Title IV-E GAP**  
[www.grandfamilies.org/Portals/0/Documents/FFPSA/Title%20IV-E%20GAP%20Brief.pdf](http://www.grandfamilies.org/Portals/0/Documents/FFPSA/Title%20IV-E%20GAP%20Brief.pdf)
- **Kinship State Fact Sheets**  
[www.grandfactsheets.org](http://www.grandfactsheets.org)
- **Kinship Navigator Programs: practical tools and resources**  
[www.grandfamilies.org/Portals/0/Documents/FFPSA/KN-tip%20sheet%20final2%20%281%29.pdf](http://www.grandfamilies.org/Portals/0/Documents/FFPSA/KN-tip%20sheet%20final2%20%281%29.pdf)
- **Title IV-E Prevention Services Clearinghouse**  
<https://preventionservices.abtsites.com/>
- **Nevada Kinship Resource Locator Tool**  
[www.fosterkinship.org/resource-locator/](http://www.fosterkinship.org/resource-locator/)
- **Model National Family Foster Home Licensing Standards**  
[www.federalregister.gov/documents/2018/08/01/2018-16380/notice-for-proposed-model-family-foster-home-licensing-standards](http://www.federalregister.gov/documents/2018/08/01/2018-16380/notice-for-proposed-model-family-foster-home-licensing-standards)
- **NARA Model Family Foster Home Licensing Standards**  
[www.grandfamilies.org/Portals/0/documents/Model%20Licensing%20Standards%202018%20update.pdf](http://www.grandfamilies.org/Portals/0/documents/Model%20Licensing%20Standards%202018%20update.pdf)
- **Relative Foster Care Licensing Waivers in the States: Policies and Possibilities**  
[www.grandfamilies.org/Portals/0/Relative%20foster%20care%20licensing%20waivers%20in%20the%20states.pdf](http://www.grandfamilies.org/Portals/0/Relative%20foster%20care%20licensing%20waivers%20in%20the%20states.pdf)
- **NEICE Overview**  
<https://aphsa.org/AAICPC/AAICPC/NEICE.aspx>



This resource was developed in partnership with the ABA Center on Children and the Law, Casey Family Programs, Children's Defense Fund, and Generations United. Visit [www.grandfamilies.org](http://www.grandfamilies.org) for more resources.