

TITLE IV-E TRAINING SUPPORT REIMBURSEMENT  
GUIDANCE RESOURCE FOR ALLOWABLE & NON-ALLOWABLE EXPENDITURES

Allowable Expenditures

The contractor may claim the following allowable Title IV-E training costs and activities:

- 1) Title IV-E training for which the contractor makes available to its employees.
  - Employee travel and per diem as defined by Department Travel Regulations located at <http://dssweb/dpl/adman/chap7.htm>, books and registration fees for employees in training sessions away from the employees' work site, including attending institutes, seminars, or workshops related to the employees' job which are sponsored by professional organizations;
  - Salaries, honoraria, professional fees, fringe benefits, travel and per diem as defined by Department Travel Regulations for experts outside the Provider agency engaged to develop or conduct staff training;
  - Costs of rental space and equipment, postage, printing and duplication, teaching supplies, the purchase or lease of training equipment and the development of teaching materials for staff training events; and
  - Cost of books, training aids, equipment, curriculum and supplies used to maintain and operate a library as an essential resource in staff training.
- 2) For short term training and educational programs.
  - Travel and per diem, as defined by Department Travel Regulations, tuition, books and educational supplies for employees in full-time or part-time training programs that are short-term, or less than eight (8) weeks duration.
    - a. As used herein, full-time, short-term training program means training that requires the employee to be relieved of all responsibility for performance of current work to participate in the training program and that training program lasts less than eight (8) consecutive work weeks. Part-time, short-term training means training that allows employees to continue full-time in their jobs or requires only a partial reduction of work activities to participate in a training program apart from the contractor and that such training program lasts less than eight (8) consecutive work weeks. Allowability of these costs is further conditioned upon the presence of a written agreement between the contractor and the employee which provides for the employee retaining his or her rights and benefits with the contractor while on full-time or part-time short term training leave.
- 3) Salaries and fringe benefits, travel and per diem as defined by the Department Travel Regulations for:
  - Staff development personnel, including support staff, assigned full-time to training function; and

- Staff development personnel, but NOT support staff (e.g. clerical or supervisory staff), assigned part-time to training functions to the extent time is spent performing such functions, and the PROVIDER develops and implements a methodology which allocates time spent by such staff to training functions.

4) The following are examples of Title IV-E allowable activities that may be claimed at the seventy-five (75) percent rate:

- Social work practice, such as family centered practice and social work methods including interviewing and assessment.
- Cultural competency related to children and families.
- Title IV-E policies and procedures.
- Child abuse and neglect issues, such as the impact of child abuse and neglect on a child and general overviews of the issues involved in child abuse and neglect investigations, if the training is not related to how to conduct an investigation of child abuse and neglect.
- Permanency planning including using kinship care as a resource for children involved with the child welfare system.
- General substance abuse, domestic violence, and mental health issues related to children and families in the child welfare system, if the training is not related to providing treatment or services.
- Effects of separation, grief and loss, child development, and visitation.
- Communication skills required to work with children and families.
- Activities designed to preserve, strengthen, and reunify the family, if the training is not related to providing treatment or services.
- Assessments to determine whether a situation requires a child's removal from the home, if the training is not related directly to conducting a child abuse and neglect investigation. Training on how to conduct specialized assessments such as psychiatric, medical or educational assessments are not permitted.
- Ethics training associated with a Title IV-E State plan requirement, such as the confidentiality requirements in section 471(a)(8) of the Act.
- Contract negotiation, monitoring or voucher processing related to the IV-E program.
- Adoption and Foster Care Analysis and Reporting System (AFCARS), Statewide Automated Child Welfare Information System (SACWIS) or other child welfare automated system functionality that is closely related to allowable administrative activities in accordance with 45 CFR 1356.60(d) that the State has chosen to claim as Title IV-E training rather than as SACWIS development or operational costs (see AT-ACF-OISM-001).
- Independent living and the issues confronting adolescents preparing for independent living consistent with section 477(a)(15) of the Act and the Child Welfare Policy Manual (CWPM), Section 3.1 H, Q/A #1.
- Foster care candidate determination and pre-placement activities directed toward reasonable efforts in 471(a)(15), if the training is not related to providing a service.
- Training on referrals to services, not how to perform the service.

### Non-Allowable Expenditures

The contractor shall not be reimbursed for the following unallowable training activities and costs:

- Day-to-day supervision of staff whether or not such supervision is ongoing or remedial;
- Employment of interns or students on a temporary basis, such as summertime;
- All costs resulting from training where the emphasis of such training is acquainting the employee with the terms, rights, benefits, and policies of employment;
- All costs resulting from training where the emphasis of such training is the personal enrichment of the employee's life, such as the operation of an employee assistance program;
- All costs resulting from training where the emphasis of such training is not directly related to child welfare practice and theory, the treatment and care of children, or the development, implementation, and administration of child welfare programs;
- All costs resulting from training procured from an educational institution that is not accredited by a generally recognized national accrediting body;
- Salaries and fringe benefits paid to trainees; and
- Any other activity or cost that the Department may, after review, determine to be not allowable for Federal Financial Participation (FFP). The determination of the allowability of any activity or cost shall be exclusively reserved to the Department whose decision on such matters shall be final.

Examples of training topics that are not allowable under the Title IV-E program include, but are not limited to:

- How to address or treat child or family problems or behaviors because it supports the delivery of social services rather than the administration of the Title IV-E State plan.
- Conducting child abuse and neglect investigations because such specialized skills are required for staff activities that occur prior to a child's entering foster care or adoption, and even prior to a child's becoming a candidate for foster care.
- CPR/First Aid Training;
- Medication Certification;
- Bloodborn Pathogen Training;
- Purchase of Audit Guides;
- Therapeutic Counseling (counseling that is therapeutic in nature – typically delivered by a licensed therapist or counselor);
- Physical Training;
- Finance Training; and
- Staff meetings.