To: Directors, PCSA, Private Agencies, IV-E Courts

From: Jeffery Van Deusen, Deputy Director
Office of Families and Children

Subject: QRTP Level of Care Assessment

Background
As we continue our implementation work on the Family First Prevention Services Act (FFPSA), we would like to share some additional information on the Qualified Residential Treatment Program (QRTP) assessment requirement and how it connects to the broader, cross-system transformation work we are undertaking with our sister agencies.

QRTP Level of Care Assessment
The QRTP Level of Care Workgroup reviewed existing assessment tools and narrowed the options down to the Child and Adolescent Needs and Strengths (CANS) and the Child & Adolescent Service Intensity Instrument (CASII). As the Ohio Department of Job and Family Services (ODJFS) continued conversations with sister agencies and stakeholders, it was determined that utilization of the CANS assessment will be the required QRTP level of care tool effective October 1, 2021. This will allow for continuity of evaluation, data collection, streamlined care coordination, further financial assistance and alignment with OhioRISE (Ohio Resilience through Integrated Systems and Excellence). ODJFS is working with the Ohio Department of Medicaid (ODM) on an Ohio-specific version of the CANS. Until this version is available, counties may choose an existing version of the CANS to use. The Ohio-specific version will be phased in before statewide implementation.

To address previous concerns with the CANS, we will be leaning on lessons learned to make improvements to better meet the needs of both the PCSAs and the families and children we serve.

Qualified Individual - QRTP Level of Care Assessment
The Family First Prevention Services Act Section 475A(c)(1)(D) states that “the term ‘qualified individual’ means a trained professional or licensed clinician who is not an employee of the State agency and who is not connected to, or affiliated with, any
placement setting in which the children are placed by the State.” In line with the FFPSA requirements, the CANS must be administered by a qualified individual outside of the PCSA or QRTP agency.

The Leadership Committee voted on four models for the Qualified Individual:

- **Option 1**: State Contractor/State Staff will be the Qualified Individual
  - ODJFS will contract with a vendor or use State staff to be the Qualified Individual and present the findings to the Family Permanency Team and the Court. The Qualified Reviewer must be knowledgeable on local resources to support a child’s ongoing needs. The State Contractor/State staff must not be in the chain of command of a fiscal or licensing bureau.

- **Option 2**: Agency Employee will be the Qualified Individual
  - PCSAs will use staff who are not in the chain of command for the case oversight and placement decision-making to fulfill the role of the Qualified Individual. For example, agencies with a separate unit able to conduct the assessment will have the Qualified Individual report to someone outside of the chain of command for the case.

- **Option 3**: Community Resource will be the Qualified Individual
  - The PCSA will identify and enter into an agreement with a local community resource to conduct the assessments. The community resource may be from the local Mental Health and Addiction Services Board, Family and Children First Council, or other service provider. If a service provider is under PCSA contract (e.g. Family and Children First), their objectivity is compromised, and cannot be used for this assessment.

- **Option 4**: Administrative Agency will be the Qualified Individual
  - One PCSA, serving as the administrative agent, will establish and maintain an agreement (e.g. Memorandum of Understanding or Regional Council of Government [http://codes.ohio.gov/orc/167]) with at least one other PCSA to provide a Qualified Individual. The administrative agent will be the fiscal agency and direct the Qualified Individual to agreement PCSAs. Although the Qualified Individual will conduct assessments for partner counties, no such assurance can be made for assessments done for the administrative agent.

ODJFS will be requesting a waiver from the United States Department of Health and Human Services Administration for Children and Families for the options above, where a state or PCSA staff person is the qualified individual.

**Communities of Support – Capacity Building**

While we work toward our long term approach through OhioRISE (Option 1), ODJFS released the Communities of Support Request for Grant Agreement (RFGA) on November 9, 2020 to assist communities in creating local networks for these assessments. The goal of these grants is to provide funding for communities to plan for Option 2, 3, or 4 above to meet the qualified individual requirement, secure partners and necessary agreements, and build capacity if needed. This RFGA was created in partnership with the
Ohio Department of Mental Health and Addiction Services and the Ohio Family and Children First Council to provide support to existing and new community service delivery. These grants allow counties to apply for funding for CARA Plans of Safe Care, QRTP Level of Care assessments and aftercare planning. ODJFS will provide additional guidance on the Communities of Support grant opportunity in the coming weeks. Applications are open until March 31, 2021. The RFGA can be found here: https://procure.ohio.gov/proc/viewProcOpps.asp?oppID=22018

There are many projects moving across multiple agencies, and we appreciate your patience as we continue to finalize the details of our joint path forward. Our goal is to leverage funding effectively and reduce redundancy where possible to create a more efficient system for our partners and for the children and families we serve. While we cannot commit to a timeframe for CANS training at this time, we will continue providing status updates and information as it becomes available. I appreciate your continued partnership with us on this critical work. If you have any questions, please reach out to Help-Desk-OFC@jfs.ohio.gov.