



**REVENUE MAXIMIZATION and
CERTIFICATION OF LOCAL FUNDS
AS STATE MATCH
ANNUAL REPORT 2020**

Department of Children and Families
Office of Child Welfare

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Executive Summary

Sections 409.017(3)(h), and 409.26731, Florida Statutes, authorize the use of certified local funding for federal matching programs to maximize federal funding of local preventive services and local child development programs. Section 409.26731, Florida Statutes, establishes the authority of the Department of Children and Families (department) to certify publicly appropriated, local funds as state match for eligible Title XIX and Title IV-E expenditures.

A public agency, or “local government,” is defined by sections 472, 474(a)(1) and 474(a)(3)(C) of the Social Security Act, as a county, municipality, city, township, local public authority, school district, intrastate district, council of governments (whether or not incorporated as a non-profit corporation under state law), any other regional or interstate government entity, or any agency or instrumentality of a local government.

The local match process currently applies to all counties having local public agencies that meet the federal requirements pursuant to 42 Code of Federal Regulations (CFR) 433.51 - Public Funds as the State share of financial participation and 45 CFR 235.66 – Sources of State Funds provisions of services to eligible children. The local match process enables public agencies to use expended publicly appropriated, local funds as a match for earning federal funds.

This process has been in place since 1998 and local agencies have received significant Federal reimbursement because of the partnership with the department and agencies expending local funds on allowable reimbursable expenditures. While the State was under the Title IV-E Federal Waiver, reimbursement opportunities with the local agencies for Title IV-E expenditures were significantly reduced. Instead, Title IV-E waiver dollars were used to reimburse the local agencies for expenditures incurred on traditionally ineligible costs.

With the expiration of the Title IV-E waiver, effective September 30, 2019, additional claiming for Title IV-E costs has occurred in 2020. The Administration for Children and Families (ACF) released revised policy guidance in 2019 and 2020 that has authorized state agencies to claim Title IV-E foster care reimbursement for the costs of independent legal representation for children and parents. In response to this pivotal shift in federal guidance, multiple legal agencies have expressed interest in leveraging public dollars to obtain federal reimbursement. Two children’s services councils (CSCs), in Broward and Palm Beach Counties, entered into interagency agreements for the legal services that are provided to children involved in the child welfare system in their counties.

As of October 1, 2019, four interagency agreements were approved for pass-through funding for post-adoption services (Palm Beach County), adoption recruitment and retention services (CSC of Broward), information and outreach support for Medicaid and Supplemental Nutrition Assistance Program (SNAP) (CSC of Martin County) and the two for legal representation for child representation.

In addition, a newly established children services council, the Children's Trust of Alachua County, expressed interest in leveraging some of their public funding to claim Medicaid and SNAP funding. As a result of the Family First Prevention Services Act passed in 2018, with implementation October 2021, additional children services councils have expressed interest in determining how evidence-based practices may be used upon initiation.

As a result of the widespread interest in claiming Title IV-E for legal representation, a legislative budget request was submitted in June for State Fiscal Year 2021-2022. The request for pass-through funding for Medicaid and SNAP costs was also included in the budget request, as well as continued funding for the executed contracts. At the current time, the budget request through the Legislative Budget Commission is pending. Without approval of this budget request, the department's ability to negotiate agreements will be limited.

Beginning in Federal Fiscal Year 2021, the department will have the authority to implement the Family First Prevention Service Act statewide. Several Children Services' Councils (CSCs) are funding prevention services in their county. For the CSCs to claim for the array of prevention services that are provided, the department must have a federally approved Prevention Plan. The Prevention Plan will outline how Title IV-E claiming will be done for children at risk of out of home placement and considered a candidate, as well as what evidence-based programs will be approved. The department anticipates working with the CSCs and county governments who are interested in supporting the prevention focused approach to ensure child well-being and safety of Florida's children.

**Department of Children and Families
Revenue Maximization and
Certification of Local Funds as State Match for Federally Funded Services**

Fiscal Year 2020 Annual Report

Section 409.017(3)(h), Florida Statutes, authorizes the use of certified local funding for federal matching programs to maximize federal funding of local preventive services and local child development programs.

409.017 Revenue Maximization Act; legislative intent; revenue maximization program. —

(3) (h) Each agency, respectively, shall annually submit to the Governor, the President of the Senate, and the Speaker of the House of Representatives, no later than January 1, a report that documents the specific activities undertaken during the previous fiscal year under this section. The report must include, but is not limited to, a statement of the total amount of federal matching funds generated by local matching funds under this section, reported by federal funding source; the total amount of block grant funds expended during the previous fiscal year, reported by federal funding source; the total amount for federal matching fund programs, including, but not limited to, Temporary Assistance for Needy Families and Child Care and Development Fund, of unobligated funds and unliquidated funds, both as of the close of the previous federal fiscal year; the amount of unliquidated funds that is in danger of being returned to the Federal Government at the end of the current federal fiscal year; and a detailed plan and timeline for spending any unobligated and unliquidated funds by the end of the current federal fiscal year.

Section 409.26731, Florida Statutes, establishes the authority of the department to certify publicly appropriated, local funds as state match for eligible Title IV-E expenditures. This statute gives the department the authority to reimburse local governmental agencies for expenditures that are determined allowable and eligible under Title IV-E, on behalf of dependent children who are eligible under Title IV-E of the Social Security Act.

409.26731 Certification of local funds as state match for federally funded services. The department is authorized to certify local funds as state match for eligible Title IV-E expenditures more than the amount of state general revenue matching funds appropriated for such services by the General Appropriations Act. Title IV-E funds provided to the state as federal financial participation consequent to certified local matching funds shall automatically be passed through to the local entity that provided the certified local match. Notwithstanding the provisions of s. 215.425, Florida

Statutes, all such federal funds earned for the current fiscal year as a result of using certified local match, except for up to five percent of such earnings that the department is authorized to retain for administrative purposes, shall be distributed as set forth in this section and this process shall not impact the department's allocation to any district. All the provisions of this section are based upon federal approval of the provisions as specifically limited in this section and shall not become effective if any further modifications are required of the state, unless and until federal approval has been obtained. The department shall annually prepare a report to be submitted to the Legislature no later than January 1 documenting the specific activities undertaken during the previous fiscal year pursuant to this section.

This report is specific to Title XIX – Medicaid, Supplemental Nutrition Assistance Program, and Title IV-E funding as no other funding sources have uncapped resources. Additionally, there are no unliquidated funds in danger of being returned to the Federal Government at the end of the federal fiscal year.

Federal Funding Supporting Local Initiatives

Part E – Federal Payments for Foster Care & Adoption Assistance

Under Title IV-E, several partially federally funded programs are authorized, which are designed specifically to care for eligible children residing in fully licensed and eligible out-of-home care placements, and to provide adoption subsidy payments for children who are in adoptive placements.

There are eligibility criteria that must be met to claim Title IV-E reimbursement on behalf of a child. The department completes a determination of a child's eligibility for each specific program and maintains the child's eligibility status throughout the entire time the child is in out-of-home care. For any period, the child does not meet the eligibility criteria, Title IV-E reimbursement may not be claimed for the child. The department is the single state agency authorized to enter into an interagency agreement with another public agency for the purpose of making a pass-through of Title IV-E reimbursements. When a public agency certifies that local funds have been appropriated and expended for eligible, allowable Title IV-E expenditures, federal reimbursement grant funds provided to the state are passed through to the public agency that provided the "certified match."

Under state statutes, the local match process is available to all public agencies and taxing authorities and enables those agencies to use locally appropriated public funds as a match for earning federal funds.

As of October 1, 2019, Florida's Title IV-E Foster Care Waiver expired, requiring that Title IV-E eligibility be reviewed under the traditional processes for determination of eligibility. In March 2006, the department received approval from the Department of Health and Human Services, Administration for Children and Families (ACF), to implement a Title IV-E Foster Care Demonstration Waiver starting October 1, 2006.

On February 9, 2018, the Family First Prevention Services Act (FFSPA) of 2018 was passed. This legislation opens Title IV-E claiming opportunities to include children who remain in the home of the parents or relatives, further supporting the department's vision of becoming a prevention focused agency. This opportunity allows the department to partner with local communities to maximize funding sources and federal earnings to serve our families in a more coordinated effort. No longer is Title IV-E committed to the children who enter the foster care or adoption assistance system of care. While the department is extending the start date for FFSPA to begin, the benefits of this opportunity will afford CSCs and local county governments the opportunity to claim additional funding reimbursement when funds are committed to support the objectives of the program.

Through the 2018 Legislative Session, the department was provided authority to implement a Title IV-E reimbursable Extension of Foster Care Program (EFC), Extended Maintenance Adoption (EMAS), and Title IV-E Guardianship Assistance Program (GAP). The expansion of Title IV-E services will enhance the opportunities to support aging out youth as well as supporting children remaining with relatives or fictive kin. In addition, these programs will also allow the expansion of the local agencies to support children who are served under these new programs. Implementation for EFC and EMAS began on January 1, 2019, and GAP on July 1, 2019. These new programs are potential areas for local agency participation in the coming year. At least one agency is supporting children who are adopted and are claiming for the costs associated with post-adoption services to children in adoptive homes.

On January 7, 2019, ACF released a policy in the Child Welfare Policy Manual (CWPM) that allows for a Title IV-E state agency to claim administrative costs for legal representation provided by public agency or tribal attorneys for legal activities related to all stages of foster care proceedings. In addition, ACF provided further clarification in the CWPM on July 26, 2019, that costs associated with independent representation under an agreement with the state agency may be claimed.

Title XIX – Medicaid Administrative Claiming

Title XIX of the Social Security Act allows for a portion of the administrative costs incurred in support of the necessary administration of the Medicaid state plan. Under section 1903 (a)(7) of the Act, federal payment is available at a rate of 50 percent for amounts expended by a state or through a contracted local entity. The costs must meet the following requirements, they must be:

- “proper and efficient” for the state’s administration of its Medicaid state plan.
- supported by an allocation methodology that appears in the state’s approved Public Assistance Cost Allocation Plan; and
- provided on behalf of an eligible child.

Allowable services claimed for federal reimbursement for Medicaid will consist of either case management services or referrals and assistance and information to establish eligibility for a child and their family.

Supplemental Nutrition Assistance Program

In 7 CFR, beginning in Part 271, guidance for implementation of The Supplemental Nutrition Assistance Program (SNAP) is outlined. SNAP is an entitlement program that offers nutrition assistance to millions of eligible, low-income individuals and families and is administered by the U.S. Department of Agriculture Food and Nutrition Service (FNS). In addition to the distribution of funds, reimbursable costs include providing informational activities designed to

provide food resources to families who qualify. The administrative functions that agencies may claim for reimbursement include providing informational activities designed to inform low-income households about the availability, eligibility requirements, application procedures, and the benefits of SNAP.

Participating Counties

Prior to implementation of the Title IV-E Foster Care Demonstration Waiver, the department had interagency agreements with the local agencies listed below. These agreements were revised when possible to accommodate reimbursements under the waiver and potential claiming for Title IV-E Waiver Funds, Title IV-E Adoption Assistance, or Medicaid.

1. Brevard County Board of County Commissioners
2. Children's Services Council of Broward County
3. Children's Board of Hillsborough County
4. Manatee County Board of County Commissioners
5. Children's Services Council of Palm Beach County
6. Palm Beach County Board of County Commissioners
7. Children's Services Council of Martin County

During the 2019 – 2020 Fiscal Year, and with the expiration of the Title IV-E Foster Care Demonstration Waiver, the following local agencies maintained interagency agreements with the department:

1. Children's Services Council of Broward County
2. Palm Beach County Board of County Commissioners
3. Children's Services Council of Martin County
4. Children's Services Council of Palm Beach County

A newly added agreement was approved with the Children's Services Council of Palm Beach County.

Progress Toward Expansion

In SFY 2019-2020, CSC Broward, continued claiming federal reimbursement for eligible services under the Title IV-E Waiver until the ending on September 30, 2019. This array of services provided resources to support keeping children in their home when at risk of further abuse and neglect or removal from the home, as well as recruiting prospective adoptive families. CSC Broward also continued claiming Title IV-E adoption assistance through providing retention and recruitment services for children to obtain permanent homes. CSC Broward financially supported the Heart Gallery Program by financing the professional portraits of children available for adoption. CSC Palm Beach paid for services for pre-and post-adoption services to support adoptive families and children. Beginning October 2019, CSC Broward began negotiating an agreement with the department that would allow claiming for independent legal representation for children involved in the child welfare system.

CSC Palm Beach continues to provide post-adoption services through the Title IV-E Adoption Assistance Program.

Throughout this year, CSC Martin has continued to claim for Medicaid reimbursement for allowable costs through the Whole Child Connection Program. This program has provided children and their families in Martin County access to medical care and referral services. In addition, in SFY 2019-2020, the taxing authority has also added claiming SNAP costs through the funded Whole Child Connection.

In addition, with changes to federal policy in 2019, ACF made additional Title IV-E claiming available for local agencies. ACF established policy that allows for the costs of attorneys for children and their families to be claimed through the state agency with an interagency agreement. Discussions have been initiated and agreements are being finalized with CSC Broward and CSC Palm Beach to begin the process of claiming reimbursement.

At the beginning of Federal Fiscal Year 2021, the department will have a

Allowable costs for claiming, which includes the local match and federal share as of June 30, 2020, for the SFY 2019-2020 totaled \$2,168,548.76. This substantial increase over the previous year represents approximately a 96.13% increase in the claims submitted by the CSCs for independent legal representation of children in the child welfare system. Cumulatively since 1998, participating agencies have claimed \$25,230,360.63 and received \$ 13,375,806.17 in federal reimbursements through this process. The federal reimbursement amount per year is as follows:

State Fiscal Year	Federal Reimbursement	Match	Total
1998-2008	\$ 5,948,343.62	\$ 4,923,813.70	\$10,872,157.32
2008-2009	\$ 847,256.49	\$ 753,961.43	\$ 1,601,217.92
2009-2010	\$ 998,137.26	\$ 792,409.61	\$ 1,790,546.87
2010-2011	\$ 977,931.15	\$ 937,858.89	\$ 1,915,790.04
2011-2012	\$ 779,655.98	\$ 769,960.37	\$ 1,549,616.35
2012-2013	\$ 781,470.23	\$ 401,932.08	\$ 1,183,402.31
2013-2014	\$ 577,528.72	\$ 440,966.27	\$ 1,018,494.99
2014-2015	\$ 261,252.70	\$ 261,252.70	\$ 522,505.40
2015-2016	\$ 325,030.86	\$ 325,030.86	\$ 650,061.72
2016-2017	\$ 289,371.16	\$ 289,371.16	\$ 578,742.32
2017-2018	\$ 284,957.42	\$ 284,957.42	\$ 569,914.84
2018-2019	\$ 279,540.90	\$ 279,540.90	\$ 559,081.80
2019-2020	\$ 1,084,274.38	\$ 1,084,274.38	\$ 2,168,548.76

For programmatic purposes, administrative expenditures necessary for the proper and efficient administration of the Title IV-E State Plan and the Title XIX Medicaid State Plan are detailed in Appendix A of this report and outlined in 45 CFR 1356.60(c). The department is authorized in s. 409.26731, Florida Statutes, to

retain up to 5% of local match earnings to administer the program, although the department has never exercised that option. Beginning with new agreements, retaining 5% is planned as the workload for existing staff will increase with additional agreements in place and the significant reimbursement that is expected from the legal entities making Title IV-E claims.

Lessons Learned

Prior to implementation of the Title IV-E Foster Care Waiver, earnings were restricted mainly in two areas. One area imposed 1996 Aid to Families with Dependent Children (AFDC) look-back eligibility criteria, and the other area related to federally allowable costs. The Title IV-E Foster Care Waiver removed these two restrictions for reimbursements for foster care services, thus streamlining the claiming and reimbursement process. Even though the ability to increase such earnings for foster care services did not exist under the waiver, agencies have been encouraged to consider claiming opportunities under the uncapped programs, Title IV-E Adoption Assistance and Medicaid Administration. Participating agencies have been provided with information regarding claiming under the two uncapped programs.

With the passage of the Local Funding Revenue Maximization Act, state agencies are required to work more closely with the local agencies and to certify local public agency funding for other federal matching programs to maximize federal funding of local preventive services and local child development programs within the state. Title IV-E, unlike Temporary Assistance for Needy Families or Child Care Development Block Grant, maintains restrictions on what type funds can be used as match for reimbursement. The costs must be expended by the cognizant agency receiving the Title IV-E grant or Medicaid, or another public agency or a county-based agency that has an interagency agreement in place. A public agency may use certified public expenditures to leverage Title IV-E reimbursement when those funds are paying for Title IV-E eligible costs and are not used as match for other federal funds. No private provider funds can be used to match Title IV-E expenditures unless the private provider transfers funds into a public agency. In addition, steps will need to be taken by the department to ensure that local agency funds are handled in a manner to ensure Title IV-E, specifically the provisions outlined in 42 CFR 433.50 and 45 CFR 235.66(b) (1-3).

Eligibility Under Title IV-E

Title IV-E Requirements:

On October 1, 2019, the federal waiver authority for Title IV-E waiver projects expired. As a result, the department is working with local public funded agencies supporting the children within the child welfare system to support their future claiming of Title IV-E funding through the funded programs they have in place.

Currently, no agency that has entered into an interagency agreement is claiming costs related to the maintenance costs of the children in foster care. However, the eligibility of children in foster care plays a major role in the administrative claiming of Title IV-E foster care and adoption. Based on the child's eligibility, an eligibility rate is created to apply toward all administrative and training costs for either foster care or adoption. The creation of the eligibility rate is calculated in this manner:

Numerator (eligible children) include:	Denominator (ineligible children) include:
<ul style="list-style-type: none">• Children determined Title IV-E eligible• Children who are living with a relative/kin while the placement is being licensed• Children who are receiving Supplemental Security Income	<ul style="list-style-type: none">• Children who are ineligible• Children who are not determined, but pending determination

The department relies on the Florida Safe Families Network (FSFN) for establishing Title IV-E eligibility following the entry of eligibility criteria for both the initial and ongoing eligibility for Title IV-E. The eligibility criteria are extraordinarily complex, and steps of the process require staff to make extremely subjective determinations, especially in the required judicial determination. The following is a basic description of the criteria that must be met:

1. **Removal Situation**. Title IV-E stipulates that several conditions must have existed at the time of a child's removal from the home for the child's costs to be eligible for reimbursement. At the time of the child's removal, the child's family must have been receiving AFDC or would have qualified for such, if they would have applied, per requirements under the Title IV-A State Plan dated July 1996 (this is referred to as the AFDC look-back date).
 - a. The child must have lived with a specified relative within six months of the petition filing date which led to the court-ordered judicial removal. Specified relatives include any blood relative, such as parents, grandparents, siblings, aunts, uncles, cousins, and stepfamily.

- b. The child must have been living with and removed from the same specified relative.
 - c. The child must have been in financial need, meaning that the family income and resources were below certain established levels.
 - d. The child must be deprived of one or both parents because of death, separation, abandonment, incapacity, or disability, or under- or unemployment.
2. **Removal Order.** Title IV-E requires that a formal removal petition be filed with the court and that the court issues a removal or shelter order removing the child from his or her home.
3. **Legal Stipulations.** The court order that results in a child's removal and placement into foster care must clearly stipulate that:
- a) The child was removed because remaining in the home would be contrary to the welfare, safety, or best interest of the child.
 - b) Reasonable efforts were made by the department to prevent removal and keep the child at home, or that no reasonable efforts could be made.
 - c) The department (single state agency) maintains court-ordered full responsibility for the placement and care of the child.
4. **Placement Requirements.** To satisfy Title IV-E requirements, an out-of-home placement must be fully approved or licensed by the department and be one of the following: foster family home, group home, public institution of 25 children or fewer, or private non-profit or for-profit child care institution. The department has the discretion to determine what independent living settings are Title IV-E eligible based on guidance in the CWPM (8.3A.8d TITLE IV-E, Foster Care Maintenance Payments Program, Eligibility, Facilities requirements, supervised independent living, Question 1).

Ineligible Placements. Children or youth in detention facilities, forestry camps, training schools, facilities operated primarily for detention, medical facilities, psychiatric hospitals, jails, state training schools, mental hospitals, public facilities serving more than 25 children, and hospitals.

If the child is placed in a non-licensed placement or a public facility with over 25 beds or any other ineligible placement, neither maintenance nor administrative expenditures may be claimed for that child during the period the child is in that placement.

5. **Ongoing Eligibility for Title IV-E Funds**. After the initial eligibility criteria for Title IV-E are met, certain conditions in the child's life must continue for reimbursement to continue. As these conditions change, the child may move in and out of reimbursable status. Because the department and the Community-Based Care Lead Agencies (CBCs) are responsible for determining a child's ongoing eligibility and reimbursability status, it is important for local contracted agencies to keep the department and CBCs apprised of changes that occur in each Title IV-E case. If Title IV-E is claimed during any period in which a child is temporarily not reimbursable due to a change in the child's condition, any funds received will need to be returned.

The conditions that must continue for a child's Title IV-E reimbursability to continue are as follows:

- (1) **Continued financial need**. If the child is in foster care, the child must remain in financial need.
 - (2) **Continued placement in licensed placements**. All foster care placements must be fully licensed placements. Title IV-E cannot be claimed for any period during which a child is not in a licensed placement.
 - (3) **Continued placement in eligible placement**. Placements considered outside the scope of foster care cannot be reimbursed.
 - (4) **Permanency hearing**. All children in the foster care system must have a hearing no less than 12 months from the date of removal that finds that the department is making reasonable efforts to finalize a permanency plan. A subsequent hearing must be held no less than 12 months from the date of the last permanency hearing.
6. **Runaway Status**. When a child is on runaway status, the local agency is not eligible for Title IV-E reimbursement because the child is not in a licensed placement. Once the child returns to a licensed placement, the agency may file a claim for room and board reimbursement once again, but not for that time during which the child was on runaway status.
 7. **Adjustments to Title IV-E Claims**. Should a claim be filed for a child during a period in which the child is temporarily not eligible for reimbursement, an adjustment can be made to correct the error. The local agency should contact the department every quarter as to any adjustments that must be made for that quarter and forward a copy of any incorrectly claimed invoice(s) with a written explanation for the error.

Key Advantages to the Local Match Initiative

The value of the local match initiative provides a significant contribution to the children and families in their specified areas and allows for local communities to expand Florida's focus on prevention of child maltreatment while improving child and family well-being. Whether it is a CSC, a county, or another agency, the benefit has been tremendous. The needs of a community outweigh the funding provided to the department or a CBC. The ability to leverage public dollars for services and resources for children in the child welfare system is a benefit to the children. In addition, the reimbursement from the federal government provides the publicly funded entity to reinvest additional dollars to provide further support to the child welfare system.

Appendix A

Public Agency Procedures

A public agency, or local government, is defined and governed by 2 CFR Part 200—Uniform Administrative Requirements, Cost Principles, And Audit Requirements for Federal Awards.

For a public agency to claim federal reimbursement for an expenditure related to the maintenance and/or administrative costs for the care of eligible children, the public agency must:

1. Enter into an interagency agreement with the Department of Children and Families: An interagency agreement must be executed prior to any Title IV-E, Medicaid, and SNAP claims being submitted.
2. Develop cost allocation plans (if applicable): A cost allocation plan must be submitted as partial documentation of Title IV-E, Medicaid, and SNAP administrative expenditures in accordance with 45 CFR 200.
4. Document the child's eligibility: Document that the expenditure was made for a child who was eligible for Title IV-E at the time the expenditure was made. Eligibility for Medicaid or SNAP is not required to be established to claim the administrative costs associated with promoting the programs.
5. Provide certification of match: Provide documentation, such as invoices and billing receipts that include the amount of the expenditure and certify that the expenditure was made from public funds.
6. Develop expenditure projections: Along with the quarterly claim, the agency must submit projections for the upcoming quarter.

Appendix B

Department Accounting Procedures

Upon completion of documentation as set forth in the interagency agreement between the public agency and the department, the following accounting procedures are initiated to reimburse local agencies for their Title IV-E expenditures:

1. The public agency must require the local public agency to submit to the public agency quarterly documentation of Title IV-E expenditures and an estimate of eligible expenditures for the upcoming quarter.
2. The public agency will submit documentation to a local match liaison of the Office of Child Welfare to certify that the expenditures were made with public funds. The local match liaison will review the documentation for payment approval.
3. The expenditures will be claimed, and the upcoming quarter estimates will be included on the CB-496 Statement of Expenditures Report on a quarterly basis.

Office of Child Welfare/Region Procedures

Eligibility and reimbursability determination. Each department circuit or region will ensure that expenditures are made per the Title IV-E program, Medicaid program, and/or SNAP program.

Interagency Agreement

The department has established guidance through the interagency agreement that will guide the local match process and must be signed by all key local county officials and the regional department contract staff. Compliance and review of the application of the requirements will be provided by regional contract staff with support from the Office of Child Welfare.