### Title IV-E Chart

### **Locality Responsibilities:**



- Locality refers to the City (for the New York City providers) and the counties (for the rest of the state).
- Enters into an MOU with OCFS. MOU must be executed by an authorized government official or designated employee of the locality.
- Submits claims for reimbursement to OCFS consistent with Attachment B of 21-OCFS-INF-05.
- As required by Attachment C of 21-OCFS-INF-05, the locality requests a meeting with ILS and sends information to start developing a Quality Enhancement Plan (QEP). The QEP must receive ILS approval by April 2022 for the locality to continue to receive Title IV-E reimbursement.
- Per the monitoring metrics developed during the QEP process, generates annual reports for OCFS/ILS.

# NYS Office of Indigent Legal Services (ILS) Responsibilities:



- State agency responsible for improving the quality of mandated representation.
- Responsible for working with localities to develop and finalize an ILS-approved QEP for incorporation into the locality's MOU with OCFS.
- During QEP process, helps develop quality improvement monitoring metrics so localities can demonstrate improvement consistent with purpose of Title IV-E funding.

### Office of Children and Family Services (OCFS) Responsibilities:



- The designated Title IV-E fiscal pass-through entity which, in turn is responsible for all matters regarding locality claiming and disbursement of the federal funding.
- The agency with which the locality enters into a Memorandum of Understanding (MOU).

## **Federal Government Responsibilities:**

 Children's Bureau of the United States Administration for Children and Families adopted a policy change to expand eligibility for federal reimbursement for legal representation under Title IV-E of the Social Security Act.



- Previously, eligibility for reimbursement for legal representation was limited to the cost of Title IV-E agency attorneys.
- Now states may access the funds for eligible costs of independent legal representation for Title IV-E eligible children and their parents throughout all stages of foster care related legal proceedings.
- Reimburse funds to the designated state Title IV-E entity under the Social Security Act for allowable expenditures associated with independent legal representation for parents in child welfare proceedings.