



March 28, 2025

To: The Honorable Dr. Akilah Weber Pierson  
Chair, Senate Budget Subcommittee No. 3

Honorable Members  
Senate Budget Subcommittee No. 3

The Honorable Dr. Corey Jackson  
Chair, Assembly Budget Subcommittee No. 2

Honorable Members  
Assembly Budget Subcommittee No. 2

From: Carlos Marquez, Executive Director, CWDA

**RE: CHILD WELFARE SERVICES (CWS): ADDITIONAL  
COMMENTS ON CWS PROPOSALS**

The County Welfare Directors Association (CWDA) is respectfully submitting this follow-up budget memorandum to our budget memorandum dated March 6, 2025, to provide additional comment and response based on discussions held in the Assembly Budget Subcommittee No. 2 hearing on March 12, 2025. This budget memorandum will specifically build on our prior comments on the Integrated Practice-Child and Adolescent Needs and Strengths (IP-CANS) assessment tool and Child and Family Teaming (CFT) model fidelity implementation work, and implementation of AB 2906 (Bryan, Statutes of 2024).

**IP-CANS and Child and Family Teams – Model Fidelity**

The IP-CANS and CFT meetings are critical to the successful implementation of the Tiered Rate Structure (TRS). County child welfare and probation agencies are required to complete the IP-CANS assessment tool for every youth in foster care, with input from the CFT, which includes foster youth, birth families, resource families, key family supporters, community-based providers, and other system partners such as education, regional centers, and behavioral health. The IP-CANS tool will be used as part of the Tiered Rate Structure (TRS) to identify the strengths and needs of foster children and informs the care and supervision payment, the level of strength building and maintenance payment, and an immediate needs payment to purchase

or procure direct services and supports. In preparation for the implementation of the TRS, county child welfare and probation agencies will begin implementing several new mandates related to the IP-CANS and CFTs effective July 1, 2025.

In our previous budget memorandum and as noted in our testimony to Assembly Budget Subcommittee No. 2, CWDA has three concerns related to IP-CANS and CFT as it relates to the proposed FY 2025-26 State Budget:

1. **Model Fidelity:** The Administration's proposed model fidelity funding of \$1.7 million total funds (\$1.2 million State General Fund) is likely insufficient for county child welfare and probation agencies to support model fidelity activities to improve the quality and timeliness of IP-CANS and CFT meetings. This can result in delayed rate setting and inaccuracies in the IP-CANS that may misclassify foster youth into the incorrect tier of the TRS, potentially resulting in insufficient funding to resource parents and other care providers to adequately support the foster child/youth. Misclassification and the resulting inadequate funding for resource parents and the foster child/youth in their care can result in insufficient supports, care, and enrichment activities that fail to draw upon the foster child/youth's strengths and needs, thereby resulting in worse outcomes for youth and families. Currently the Regional Training Academies (RTAs) receive very little funding to support counties and CFT meeting facilitators in IP-CANS and CFT model fidelity. In most cases, each of the four RTAs have less than one full-time equivalent position that supports multiple counties.
  - o Unknown new mandated activities for county child welfare and probation agencies to comply with model fidelity requirements, pursuant to guidance to be issued by the California Department of Social Services (CDSS), commencing July 1, 2025, makes it difficult to project the level of new funding needed to support these activities.
2. **IP-CANS and CFT Existing Workload:** State funding to counties to support CFT and IP-CANS implementation does not cover the full cost of counties' workload.
  - Per Fiscal Year (FY) 2023-24 data, county child welfare agencies are overspending the State's allocated funding to complete IP-CANS and conduct CFTs by 25 percent, equal to a \$17.5 million gap. Probation agencies overspent by \$1.75 million in FY 2023-24.
  - CDSS uses an outdated workload methodology that assumes a social worker hourly rate based on 2017 costs, equaling \$99.46 per hour. Based on 2024 actual county expenditure data, the current average statewide social worker cost is \$192.46 per hour.
3. **IP-CANS and CFT New Workload:** There is also no additional funding proposed to cover new, mandated activities pursuant to guidance that has been finalized by CDSS related to IP-CANS. Beginning July 1, 2025, this includes:

- Entering the IP-CANS into the Child Welfare Services – California Automated Response and Engagement System (CWS-CARES) no more than ten (10) calendar days following completion or by the end of the month in which it is completed, whichever is sooner ([ACL 25-10](#)). This will require expedited data entry that is not currently mandated for counties.
- Changing conditions that trigger a new or updated IP-CANS, including for placement changes, new eligibility for regional center services, or hospitalization of the foster youth. ([ACL 25-10](#)).

### ***Recommended Funding for IP-CANS and CFT Activities***

CWDA believes additional General Fund investment is needed to support the successful implementation of the TRS and importantly, ensure foster children, youth and resource families are appropriately supported. Specifically, CWDA recommends the following:

IP-CANS and CFT Model Fidelity: **\$1,154,346 General Fund** (\$4.6 million total funds) beginning in 2025-26 and ongoing to Regional Training Academies and Los Angeles County (which has its own training unit) and is proposing the following Budget Bill Language:

- 1. Of the amount appropriated, \$1,154,346 General Fund shall be provided to regional training academies and Los Angeles County to support model fidelity in the administration of the Integrated Practice-Child and Adolescent Needs and Strength (IP-CANS) and Child and Family Team (CFT) meetings. Supported activities shall include, but are not limited to: CFT meeting observation, targeted training, data review, cross-system integration support, supplemental instructor-led training, assistance with policy and procedure development, and building sustainability plans for fidelity workgroups. The Department of Social Services shall consult with regional training academies, Los Angeles County, and the County Welfare Directors Association, to finalize technical assistance and capacity-building deliverables.*
- 2. The Department of Social Services and Department of Health Care Services shall convene county child welfare, probation and behavioral health agencies to develop a coordinated training plan and shall report to the Legislature during the FY 2026-27 budget hearings, on any changes or additional funding that may be needed to support IP-CANS and CFT model fidelity activities.*

Note that the General Fund portion across our estimates in this memo are roughly approximated and CWDA recommends refinement of this amount with technical assistance from CDSS.

IP-CANS New Workload: **\$1,881,159 General Fund** (\$2.6 million total funds) ongoing to support expedited data entry requirements and new IP-CANS triggering events.

IP-CANS and CFT Existing Workload: \$16,455,000 million General Fund (\$22.4 million total funds) one-time funding in FY 2025-26 to address persistent underfunding of the IP-CANS and CFT existing workload. This amount reflects average overspending across the last three fiscal years of county child welfare and probation expenditure data. CWDA also requests adoption of the following BBL:

*The Department shall work with the County Welfare Directors Association and Chief Probation Officers of California to update the county administrative budgeting methodology for the Integrated Practice-Child and Adolescent Needs and Strengths assessment tool and Child and Family Teaming beginning fiscal year 2026-27, and shall include updated staffing costs as reported by counties.*

**Total Funds Needed: \$19,490,254 million General Fund (\$29.5 million total funds)**

Please note the above estimates are generally exclusive to county child welfare agencies and do not encompass funding needs for probation agencies or tribes, with the exception of the IP-CANS and CFT existing workload fiscal which is reflective of expenditure data for both county child welfare agencies and probation agencies.

### **Social Security Survivor's Benefits (AB 2906, 2024)**

AB 2906 (Bryan, Statutes of 2024) prohibits county child welfare agencies from offsetting the costs of care in the foster care system with the child's Social Security survivors' benefits, instead requiring counties to conserve those funds in financial accounts for the child's use. Again, CWDA supports the policy merits of AB 2906, but we are concerned that the Governor's Budget does not provide counties any backfill for the higher local costs that counties will incur as a result of conserving Social Security survivor's benefits. Pursuant to the provisions of Proposition 30, counties are not obligated to implement new laws that result in higher costs unless those costs are covered through a state General Fund appropriation. CWDA believes AB 2906 results in new, net costs to counties. Please refer to the attachment which illustrates the impact of AB 2906. Ultimately, without backfill, foster youth may not have access to conserved Social Security funds that can help enable them to successfully transition to adulthood.

***Recommendation:*** Preliminarily, CWDA estimates that the funding needed at a minimum is roughly in the range of \$4 to \$5 million General Fund annually, though we note caseload can fluctuate year-to-year and youth benefit amounts can drastically vary across counties depending on the case. Please note this estimate is based on a sampling of four counties across the state and average abated amounts per foster youth, extrapolated for estimated caseload across all 58 counties.

## Concluding Remarks

CWDA welcomes an opportunity for further engagement with the Administration and Legislature to address any questions regarding our fiscal estimates, and we look forward to the implementation of these important initiatives.

Attachment: AB 2906 Funding Cost Example

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