JUDICIAL COUNCIL OF CALIFORNIA
OPERATIONS AND PROGRAMS DIVISION
CENTER FOR FAMILIES, CHILDREN & THE COURTS

Federally Funded Dependency Representation Program (FFDRP)

Frequently Asked Questions

Updated October 1, 2025

This document addresses questions about FFDRP. The answers have been established based on federal guidance, directives from the California Department of Social Services (CDSS), and Judicial Branch policies and procedures. Guidelines for reimbursement are subject to change and this document will be updated as new information is received.

TABLE OF CONTENTS

SECTION A: BACKGROUND/OVERVIEW
SECTION B: FFDRP ONBOARDING
SECTION C: ELIGIBLE AND INELIGIBLE CASE SPECIFIC ACTIVITIES
SECTION D: OVERHEAD/OPERATING EXPENSES/NON-CASE SPECIFIC ELIGIBLE AND INELIGIBLE ACTIVITIES
SECTION E: INVOICE/ACTIVITY LOG/DOCUMENTATION
SECTION F: TRAINING
SECTION G: STATE FUNDING TO ADDRESS FFDRP FEDERAL FUNDING SHORTFALL
SECTION H: FFDRP STREAMLINED INVOICE PROCESSING
SECTION I: FFDRP SMALL COURT INVOICE PROCESSING

SECTION A: BACKGROUND/OVERVIEW

A-1. Where do the matching funds come from? Do the funds come from the court's existing budget?

The funds do not come from a court's existing budget. The matching funds are ~~new~~ federal dollars that ~~will~~ augment the state's $186.7 million investment in court-appointed counsel. To receive matching funds, providers must submit invoices, documenting eligible legal work and supplies, paid with the state's court-appointed counsel funds.

A-2. What funding can be matched under the Federally Funded Dependency Representation Program (FFDRP) and how do providers determine their eligible dependency percentage rate?

For the purposes of the FFDRP contract, only activities compliant with the Child Welfare Policy Manual that are funded by court-appointed counsel and/or FFDRP Enhancement funding are able

to be matched. Each county's FFDRP allocation is based on their underlying court-appointed counsel fund allocations. Only that portion of a provider's dependency practice can be reimbursed. For example: if 90% of the provider's practice is juvenile dependency and 10% is juvenile delinquency, only the 90% which pertains to juvenile dependency work is eligible for reimbursement but still must meet activity criterion.

A-3. What is the range of the FFDRP allocation available to providers?

Allocations for title IV-E funding are based on the underlying court-appointed dependency counsel contract. The level of FFDRP funding is established each fiscal year (FY) using the federal discount rate, determined by the statewide percentage of federally eligible dependency cases. This rate varies annually:

FY 2020–2021: 55%
FY 2021–2022: 54%
FY 2022–2023: 54%
FY 2023–2024: 53%
FY 2024–2025: 53%
FY 2025–2026: 53%

FFDRP funds are allocated to legal services providers in a county based on their court's allocation of the total Judicial Council Juvenile Dependency Counsel budget and in proportion to their contracted services representing parents or children.

Each court's FFDRP funding allocation represents the available funding, and reimbursement is limited to actual eligible FFDRP expenses. It is important to note that because allocations and reimbursement rates fluctuate from year to year, contract amounts need to be amended yearly.

Due to fluctuations in the federal discount rate, expenses that cross fiscal years may need to be prorated. For example, for FFDRP contracts beginning July 1 and ending June 30: an electricity bill covering the period of June 15~~, 2020~~ to July 14~~, 2020~~ must be prorated for June and July expenses. The portion of the bill covering June should be claimed on the June FFDRP invoice; and the July portion should be claimed on the July FFDRP invoice.

Providers are currently eligible for allocations as low as $12,000 and as high as $19 million. Providers have utilized FFDRP funding to implement various enhancements to support their selected attributes of high-quality representation for children and parents in child welfare proceedings. For example, ~~for~~ a larger firm~~:~~ may hire~~ing~~ 45 attorneys~~,~~ and administrative staff in human resources or IT to support the attorney's practice, ~~such as human resources and IT staff or for~~ and a smaller group may expand~~ing~~ the use of contract investigators, social workers, or experts. To employ additional attorneys or other employees, existing organizations may need to increase their infrastructure.

A-4. Will there be matching for non-CAC funds that are otherwise claimable? For example, our office received county funding ~~in FY 2022-2023~~ to supplement our dependency work.

No. Only the state's $186.7 million investment in court-appointed counsel is eligible. For example: a firm must indicate their entire budget, but delineate the percentage (%) of the entire

budget that is court-appointed counsel, % from grants, % from the county, etc. That will determine percentage of the overall budget that can be used for claim reimbursement.

A-5. Is more information or guidance coming?

~~Children's Bureau is collecting questions about Child Welfare Policy Manual 8.1B #30 and has not yet determined if additional guidance is necessary.~~ The Children's Bureau issued an information memorandum in 2021 about high quality legal representation at all stages of child welfare proceedings for parents, children, and youth. We will continue to update the FAQs as we receive information.

In 2024, the Children's Bureau published Final Rule 89 FR 40400 that went into effect on July 9, 2024. For the purposes of matching court-appointed counsel and/or FFDRP Enhancement funding, this rule made eligible for federal financial participation (FFP) an attorney's legal representation of relative caregivers who are legal guardians and Indian custodians of children who are in title IV-E foster care or who are candidates for Title IV-E foster care.

SECTION B: FFDRP ONBOARDING

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B-2. When can an attorney's salary be increased without reducing their caseload?

FFDRP is being provided to improve the quality of representation for children and parents in the dependency courts. Retaining competent and experienced counsel is one strategy to accomplish that goal but it is not sufficient if attorney caseloads are so high that clients cannot consult with their attorneys. The salaries for court-appointed counsel in the funding model are based, in part, on the low to middle level range of county counsel salaries. Thus, when determining whether to hire more attorneys to reduce caseloads or consider salary increases for retention, the provider must consider which expenditure will do more to improve the quality of representation for their client population. If achieving the caseload guidelines requires hiring more attorneys, more attorneys should be hired. Salaries for attorneys may be increased, if needed, in order to stay competitive, and retain attorneys in counties where public sector attorneys with comparable caseloads (e.g., county counsel in child welfare proceedings) are paid significantly more or receive a more robust benefits package, such as those attorneys who are providing services in remote locations where extensive travel is necessary to reach the court site.

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B.4. If the court-appointed counsel budget is cut in a future budget cycle, may providers amend approved FFDRP application budget plans in order to seek reimbursement for existing expenses?

Yes. Providers may use the FFDRP funds to pay for existing expenses and staff, if their underlying court-appointed counsel budget is decreased, and they can no longer pay for existing services under the court-appointed counsel budget alone.

Budget amendments are required each fiscal year based on the current year's allocations.

Any substantial changes to your approved FFDRP budget plan during the fiscal year~~,~~ that significantly impact~~s~~ implementation of your FFDRP initiatives, must be approved in writing by the JCC.

B.5. Does the type of legal entity (for profit or non-profit) or type of ~~an~~ attorney agency (firm or independent attorney) matter for claiming title IV-E reiumbursement ~~if claiming, whether the agency is a non-profit or for profit or independent attorneys~~? After a state agency contract is in place with the Judicial Council (JC~~C~~), is there any restriction on the type of attorney, corporation, or agency affiliation that ultimately benefits from the claims? Are there any concerns with for-profit entities?

The legal status of a dependency provider is not germane to whether a provider can participate in FFDRP if the criteria in FAQ B-6 are met.

B.6. Who can apply to participate in FFDRP?

Legal service providers who are appointed by the trial court to represent parties in dependency proceedings are eligible to participate in FFDRP if the following criteria are met:

1. The provider has an underlying contract, with either the Judicial Council of California (JCC) or local trial court, to provide court-appointed dependency representation services;
2. the underlying contract is funded by state Court-Appointed Dependency Counsel (CAC) funding;
3. the local court participates in FFDRP; and
4. the local court approves of the provider's participation in FFDRP.

B.7. What is the process for applying to participate in FFDRP?

If the criteria in FAQ B-6 are met, approved providers will receive an FFDRP program application package, information about the program, and details regarding their FFDRP funding allocation. Providers must respond indicating their intent to participate in the program and submit the application within the timeframes specified on the application and email notification.

FFDRP funds are intended to ensure parents and children receive high quality legal representation at all stages of a dependency foster care case. The application requires that providers select two to four attributes of high-quality representation that they will incorporate into their practice. These attributes from the Family Justice Initiative (FJI) are described in Family Justice Initiative and FJI Systems Attributes ~~*Family Justice Initiative Making the Legal System Work for Children and Parents: Attributes of High-Quality Legal Representation for Children and Parents in Child Welfare Proceedings*~~.

The application also requires applicants to submit a proposed budget for training, personnel, professional services, operating expenses, and travel. The budget must include current and proposed expenditures by funding source (CAC and FFDRP).

B. 8. How long is the FFDRP onboarding process?

FFDRP applications undergo several levels of review and may require modification or clarification during different stages of review. FFDRP staff will notify applicants if additional

information is needed during the review process. The onboarding process generally takes approximately four months from the time the application is received to the time a contract is issued.

SECTION C: ELIGIBLE AND INELIGIBLE CASE SPECIFIC ACTIVITIES

C-1. What is a dependency foster care proceeding?

A dependency foster care proceeding is a proceeding for a dependent child or nonminor dependent at which the court may be making or reviewing a finding or determination required to allow for title IV-E foster care funding eligibility. FFDRP can only fund activities that are necessary for the attorney to represent the parent or child client at such proceedings and cannot support legal representation for any other purpose.

C-2. Please explain the distinction between dependency vs. non-dependency and eligible vs. ineligible.

In the FFDRP activity log, the attorney must document the percentage (%) of their time spent on case specific eligible dependency activities, as well as on training, and on eligible non-case specific activities versus non-dependency or other ineligible activities. This could include the percentage of time spent on dependency work versus criminal or family law work. In addition, there are tasks that a dependency attorney may wish to assist their client with but that are not a covered court-appointed counsel expense nor eligible for reimbursement. For example, a parent's attorney helping a parent complete a housing application is an ineligible activity as is a child's attorney helping a youth with a name change. Please review *"Eligible Activities for Attorneys."*

C-3. Are there limitations on claims for the costs of non-attorney support staff who support the legal representation work – i.e., *paralegals, social workers*, *peer partners* at the law firm who provide legal service support for an attorney?

Yes, CWPM allows the title IV-E agency to claim administrative costs of attorneys representing parents or children in child welfare legal proceedings (see *CWPM 8.1B #30*), and these activities may include certain non-attorney support staff supporting attorney activities. However, claims for the costs of non-attorney support staff are limited. For more details, please refer to "*Eligible Activities for Social Workers/Investigators* and *Eligible Activities for Peer Partners*."

C-4. Regarding legal representation, what are the appropriate activities listed in 45 CFR 1356.60(c)(2) subdivisions (ii), (ix), (x), and (xi), and 45 CFR 1356.60(c)(4)(ii) and are there any activities that are not claimable to title IV-E? What administrative activities of a law firm are claimable to title IV-E?

~~Only the~~ Claimable activities listed in 45 CFR 1356.60(c)(2) subdivisions (ii), (ix), (x), and (xi) and 45 CFR 1356.60(c)(4)(ii) are: (ii) preparation for and participation in judicial determinations; (ix) a proportionate share of related agency overhead; ~~and~~ (x) costs related to data collection and reporting - see CWPM 8.1B #1, and (xi) costs related to legal representation described in paragraph (c)(4)(ii) independent legal representation provided by an attorney representing a child in Title IV-E foster care, a child who is a candidate for Title IV-E foster care, the child's parent(s), the child's relative caregiver(s), and the child's Indian custodian(s) in foster care and other civil legal proceedings as necessary to carry out the requirements in the

agency's title IV-E foster care plan. **Although 45 CFR 1356.60(c)(4)(ii) makes claimable legal representation of a child's relative caregiver who is not the child's guardian and legal representation in civil legal proceedings, these activities are not claimable under the FFDRP program run by the JC because underlying court-appointed counsel funding in California does not cover such legal representation**. CWPM 8.1B #30 does not change or broaden allowable administrative activities under 1356.60. Claimable activities remain strictly limited to work on dependency foster care cases; work on non-dependency issues, such as child support, is not claimable. It is noted that the CWPM has been updated to allow for reimbursement for pre-petition legal work. However, because underlying court-appointed counsel funding in California does not cover pre-petition legal work, any pre-petition legal work is not eligible for reimbursement under the FFDRP program run by the JC.

C-5. Is representation for a dual status or dual jurisdiction child an eligible activity for FFDRP reimbursement?

Any representation of a dual status child related to the dependency foster care proceeding is FFDRP eligible, but representation related to the delinquency case is not eligible. If an attorney is appointed to represent the child on the dependency and delinquency matters, that attorney must track the time spent on each and exclude the time spent on delinquency matters (e.g., jurisdiction, issues relating to probation conditions or violations, record sealing) from their daily tally of case specific dependency hours on the activity log. Preparation for and attendance at hearings for dependency foster youth whose jurisdictional status is being determined pursuant to section 241.1 is FFDRP eligible.

C-6. May the title IV-E agency claim appellate work of independent attorneys representing parents or children in foster care legal proceedings? Examples of appellate work includes, appealing the court's jurisdiction, termination of parental rights, and termination of assistance and/or service provided by the title IV-E agency.

Yes, a title IV-E agency may claim title IV-E administrative costs of appellate work provided by an independent attorney for a child who is a candidate for title IV-E foster care or in foster care and his/her parent. If it: (1) is necessary for the proper and efficient administration of the title IV-E plan, (2) is allowable in accordance with the title IV-E agency's cost allocation plan, and (3) is in reference to foster care legal proceedings. 45 CFR 1356.60(c); CWPM 8.1B #30.

C-7. May a title IV-E agency claim administrative costs of paralegals, investigators, peer partners or social workers that support an attorney providing independent legal representation to a child who is a candidate for title IV-E foster care or is in title IV-E foster care, and his/her parent, to prepare for and participate in all stages of foster care legal proceedings, and for office support staff and overhead expenses?

Yes, the policy permits a title IV-E agency to claim administrative costs to the extent of providing necessary assistance in support to an attorney, such as providing independent legal representation to prepare for and participate in all stages of foster care legal proceedings for title IV-E foster care candidates, youth in foster care and his/her parents. The costs must be consistent with federal cost principles 45 CFR Part 75 Subpart E. The title IV-E agency must allocate such costs to assure the title IV-E program is charged its proportionate share of costs (see CWPM 8.1B and 8.1C).

However, attorney or social worker activity services may be requested, by court order, if necessary, to ensure a comprehensive case plan. Some of these activities, including attending Child and Family Team (CFT) meetings, or other meetings related to the child, as practical and appropriate, may be eligible.

C-8. What types of contract fees are deemed reimbursable?

Contractor fees for attorneys, social workers, investigators, bonding studies, and other experts are eligible for reimbursement, up to the proportion of their services which pertains to eligible activities.

C-9. What activities on behalf of clients who are or may be subject to the Indian Child Welfare Act (ICWA) are eligible for FFDRP?

Communication and engagement with tribal government representatives is an eligible activity as long as it is focused on providing the attorney with the information needed to represent the client in the foster care dependency proceeding. So, for example, providers may contact tribal government representatives to inquire what inquiry efforts were made by the county agency to determine whether or not the agency fulfilled its obligation of inquiry, further inquiry if necessary and notice where required. They may also contact the tribe about the tribe's position on any of the legal issues in the case, on its view of the extent to which the case plan is or is not compliant with the active efforts requirements of ICWA, as well as to determine if the tribe is proposing alternative options to that being recommended by the child welfare agency, whether the child's placement complies with ICWA placement preferences, or whether the agencies proposed qualified expert witness is knowledgeable about the tribe's child rearing practices as required. Attorneys may also gather information on whether a child is or is not eligible for tribal membership but may not claim time spent assisting a client in obtaining that membership status as those activities are outside the scope of FFDRP legal representation. Similarly, a provider may contact a tribe to determine if there are services available through the tribe that would benefit the client, and may then bring that information to the court on behalf of the client, but may not claim time for making referrals to such services as that is also a child welfare responsibility.

C-10. What scope of activities relating to the educational or developmental services needs of a child is eligible for FFDRP?

Attorneys, and social workers or investigators working on their behalf may claim as eligible time spent gathering information about a child's educational or developmental services needs including the following activities related to presenting information to the dependency court relevant to the case plan:

- meeting with the school or regional center to gather information and investigate the facts
- attending the child welfare agency's case planning meetings where educational issues are discussed
- preparing briefs, memos, and pleadings
- obtaining meeting transcripts, educational documents and reports such as an IEP, 504 plan, IFSP, or IPP
- interviewing and preparing their client and witnesses for dependency foster care hearings
- participation and presentation at the dependency foster care hearing

If an attorney is attending the IEP to further the client's case plan goals as it relates to educational activities in the title IV-E case plan, this activity is eligible for reimbursement. However, an attorney may not claim time spent attending or advocating for a client at an administrative proceeding or meeting to establish such plans or any type of school discipline proceeding as those are deemed outside the dependency foster care proceeding and thus ineligible for title IV-E match. A representative of the attorney (such as a social worker or investigator) may also attend such meetings as a means of gathering information for the attorney to present to the court in the foster care proceeding.

C-11. Are any activities related to obtaining Special Immigrant Juvenile Status findings eligible for FFDRP?

No. Even if SIJS findings are made during a dependency proceeding, any work performed by the provider to obtain those findings (e.g. filling out the form) and any time spent in the court proceeding that is focused on SIJS must be tracked separately, and cannot be claimed for FFDRP.

C-12. Are any activities related to the issuance of a restraining order FFDRP eligible?

Starting FY 2022-2023, California may claim the costs of independent legal representation to obtain an order of protection for a title IV-E eligible child or the child's parent(s) in any of the following circumstances:

- When a parent or child seeks an order protecting the child and/or parent so the child can remain in, or return to, the home or custody of the parent;
- When a child seeks an order of protection from a person who is threatening the child's wellbeing and/or harassing the child's caregiver, and the order is required to help the caregiver stop the harassment and maintain the stability of the placement;
- When a child or parent seeks an order protecting the child or parent during visits so visitation can progress from supervised to unsupervised if necessary and the family can be reunified; and
- When a sexually exploited child seeks an order blocking contact from individuals who exploited the child in order to ensure the safety and protection of the child.

The cost of legal representation in criminal court proceedings concerning these orders of protection, such as a criminal contempt hearing for violating an order of protection, is not a reimbursable title IV-E cost.

C-13. Is time spent attending or participating in collateral legal proceedings (e.g. criminal, delinquency, collaborative courts) involving a client FFDRP eligible?

Attorneys can participate in juvenile collaborative court hearings or specialized calendars if the attorney is participating in the hearing to advocate for services that are part of the client's current case plan. A social worker or investigator or any other non-attorney staff person may also count time spent at legal proceedings beyond the dependency foster care proceeding as eligible for FFDRP if the non-attorney staff person is attending the proceeding to gather information for the attorney to use when representing the client in a dependency foster care proceeding. Such proceedings include dependency specific collaborative court proceedings that involve only one party to the proceeding, and/or a different judicial officer and are not squarely focused on the dependency foster care timelines and statutory requirements. For example, time spent advocating

for a client at a dependency drug court proceeding that is assisting a parent who is addressing substance abuse issues is eligible for FFDRP. Attending adult criminal drug court or mental health calendars remain ineligible for reimbursement for attorneys or non-attorney staff as those are outside the scope of the underlying title IV-E proceeding.

C-14. May a social worker, peer partner, or investigator participate in any advocacy or service coordination on behalf of the client outside the dependency foster care proceeding context?
The work of a social worker, peer partner, or investigator as part of an interdisciplinary model that is eligible for FFDRP is limited to information gathering (including interviewing the client and therapists or other service providers), case preparation, and advising of the attorney for the dependency foster care proceeding, but does not extend to any effort that would duplicate the work of the child welfare social worker in obtaining services for a parent or child. Time by peer advocates or social workers to teach life skills or attend events or meetings with and for a client is not legal work, as these are not title IV-E activities based on the case plan.

However, time spent by a peer partner or social worker to engage with a parent or child client to support the client's compliance with their case plan may be eligible for reimbursement. For example, a child client who is struggling to maintain placement and has a pattern of leaving placement could require regular and constant contact with the attorney to remain in placement or return to placement. This contact may be by phone or in person and is likely to be done by a peer partner or social worker while the attorney is in court. A parent or child client may need regular contact with their attorney to encourage and support engagement in court-ordered services such as mental health counseling or substance abuse counseling. These activities are eligible activities because they are communication with the client to further case plan goals. Peer partners and social workers attending activities to be moral support or teaching the client life skills such as applying for housing or financial services are not matchable. The assistance they provide speaking to clients about the importance of completing their case plans and the consequences of failing to do so is eligible for reimbursement.

C-15. Are CSEC activities reimbursable at an enhanced tile IV-E rate?
No. FFDRP cannot reimburse CSEC activities at the enhanced rate. However, providers may claim standard reimbursement for CSEC work related to dependency foster care legal proceedings.

C-16. Some cases hold the required statutory hearings (i.e. no less frequent than every 6-months) as well as more frequent hearings (e.g. hearings every 90 days) to monitor the case plan, is the preparation for and participation in those additional hearings eligible for reimbursement?
Yes. Providers may claim title IV-E administrative cost reimbursement for the cost of legal representation associated with preparing for and participating in foster care legal proceedings, whenever they occur. Child Welfare Policy Manual (CWPM) Section 8.1B, Question 30.

SECTION D: OVERHEAD/OPERATING EXPENSES/NON-CASE SPECIFIC ELIGIBLE AND INELIGIBLE ACTIVITIES

D-1. How will the overhead rate be calculated?

For employer organizations and sole proprietors: The overhead rate will be calculated each month based on the average percentage of FFDRP eligible time (case specific and training time on the activity log) for all employees/sole proprietors doing case specific work that is tracked in JCATS or other case management systems to generate monthly data reports (typically this will be attorneys, social workers, investigators etc.). Non-case specific staff can invoice their time at this monthly overhead percentage, unless they perform a significant amount of work that is not related to dependency foster care proceedings, in which case they will need to track their eligible percentage for each month on an activity log. Staff that do case specific work that is not being tracked for monthly data reports must use the overhead rate, or they must track their work in JCATS or other case management system and keep an activity log to generate a higher reimbursement rate. This overhead rate will also be used to invoice FFDRP eligible non-case specific administrative activities for employees that are doing and tracking case specific work on their activity logs. It is also the rate that is to be used for all eligible operating expenses.

For panel organizations: The overhead rate will be calculated each month based on the average percentage of FFDRP eligible time (case specific, administrative, and training time on the activity log) for employee administrators and administrative support doing eligible FFDRP work.

D-2. What overhead rate is used for expenses being claimed? When does an expense get claimed on the FFDRP invoice?

The overhead rate is determined by the month in which the expense is incurred, and expenses can be claimed on an FFDRP invoice if both the invoice and proof of payment can be provided.

Example A (expense incurred and paid for in the same month):
Item purchased and paid for in May.
→include in May FFDRP Invoice
→use May OH rate

Example B (expense incurred and paid for in different months):
Item purchased in March and paid for in May.
→include in May FFDRP Invoice
→use March OH rate

Example C (expense incurred and paid for in different fiscal years):
Item purchased in May and paid for in July.
→include in a May supplemental FFDRP Invoice
→use May OH rate

D-3. What types of operating expenses are deemed reimbursable?

Operating expenses associated with an individual or an organization's CAC Dependency practice are reimbursable in proportion to the individuals or organizations' overhead rate for the month that is being billed.

If a provider has a mixed practice, operating expense claims must exclude the proportion associated with the non-CAC practice. For example, if a providers practice is 90% CAC Dependency and 10% criminal; and the provider is claiming a $100 internet expense, they would

enter $100 as the expense amount, and the funding source percentages (CAC Base & FFDRP Enhancement) combined would total 90%.

Common allowable expenses that are reimbursed at the overhead rate are:

- Rent and any tenant owed portion of tenant improvements;
- IT Expenses, such as: IT consultant, computers, servers, equipment maintenance fees, and repairs;
- Contractor fees, such as: contract human resources, contract accounting services, contract IT services, and process servers;
- Office parking fees for clients visiting the attorney's office;
- Insurance fees, such as an individual's malpractice insurance and business permit fees, or an organization's worker's compensation fees;
- Attorney State Bar annual fees for active licensees
- Legal publications dedicated to dependency representation (i.e. *California Juvenile Laws and Rules*; *Seiser & Kumli on California Juvenile Courts Practice and Procedure*);
- Online legal research tools (i.e. LexisNexis and WestLaw);
- Office Equipment, such as: printers, faxes, copiers, phones, ink, toner, paper, equipment rental fees, and code books;
- Furniture, including modifications based on ergonomic assessments; Phone Services, such as: landline and work cell phone equipment, wi-fi/internet/data, and monthly contract services fees; and
- Janitorial and security services.

D-4. What are common types of operating expenses that are deemed ineligible for reimbursement?

Common expenses deemed ineligible for FFDRP reimbursement include but are not limited to:

- Pre-licensing expenses (Application to State Bar, Moral Character Application, MPRE, etc.);
- Professional specialization expenses or local bar association memberships (i.e. Child Welfare Law Specialist);
- Food and beverage items;
- Breakroom supplies;
- Microwaves; and
- Medication (i.e., acetaminophen, ibuprofen, etc.).

D-5. Is the time of staff (e.g., administrative or clerical staff) whose work is non-case specific eligible for FFDRP?

Yes, at the same rate as other overhead or operating expenses necessary to operate the legal practice.

Staff	Activity Log Required?
1. Organizational support staff (ACCT, HR, IT).	No, can claim time and salary at the organizations overhead rate.
2. Admin/clerical staff supporting attorneys who do a majority of FFDRP eligible work.	Activity log optional, or may claim time and salary at the organizations overhead rate.
3. Admin/clerical staff supporting attorneys who are partially CAC funded and/or whose FFDRP eligible work fluctuates from month to month.	Activity log is required.
4. Admin/clerical staff supporting executives/panel administrators who do policy or fundraising work.	Executive Director/Administrator log is required.

D-6. What types of employee benefits are eligible for reimbursement?

Employee benefits such as medical, vision, and dental are eligible for reimbursement. If there are any other benefits the employer provides, please check with the Judicial Council to determine if they are eligible for reimbursement.

Additionally, the employer portion of payroll taxes are eligible for reimbursement. Payroll taxes and benefits should be included with the employee's salary on the FFDRP invoice. These expenses will be reimbursed using the percentage (%) of eligible dependency work reflected on the employee's FFDRP activity log for the month.

D-7. Is New Employee Onboarding covered under FFDRP?

Onboarding of employees is eligible at the overhead rate, for both the supervisor and new employee, unless it meets the requirements for eligible training. Time spent onboarding should be recorded in the Dependency FFDRP Eligible (Administrative/Superior/Executive) line on the Activity Log.

D-8. Is Paid Time Off (PTO) reimbursable?

Paid Time Off (PTO) can be reimbursed if it complies with the guidance received from CDSS:

> While it is true that only services provided during the award period are eligible for a federal match, the question of how to fund the costs of accrued leave is different. Title 2 Code of Federal Regulations (CFR) 200.431 (b) (Compensation - fringe benefits - Leave) details the general allowability of the costs of leave (such as PTO) under a federal award. Leave is an allowable cost of fringe benefit, as long as the cost meets the accounting methodology requirements of 2 CFR 200.431 (b)(3)(i) for cash basis of accounting, or (b)(3)(ii) for accrual basis accounting. For cash basis accounting it does not matter when the leave accrued, instead, "the cost of leave is recognized in the period that the leave is

taken and paid for." For entities eligible to use accrual basis accounting as described in (b)((3)(ii), the rule is that "allowable leave costs are the lesser of the amount accrued or funded."

Please see information below regarding cash basis and accrual basis accounting.

Cash Basis Methodology for PTO – PTO is paid to employees at the employee's current rate of pay, regardless of when the PTO was earned.

Accrual Basis Methodology for PTO – PTO is paid to employees at the employee's rate of pay when the PTO was earned. Allowable leave costs will be the lesser of the amount accrued or funded.

The FFDRP activity log includes a section for employees and organizations to certify compliance with FFDRP and legal requirements.

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D-10. What expenses relating to meeting employer obligations to accommodate the needs of lactating parents can be reimbursed?

Providers can seek reimbursement for operating expenses related to complying with Labor Code section 1031, which requires all employers of 50 or more employees to provide a space for lactation. Any items required for statutory compliance can be reimbursed, including: a table (surface for pump), a chair or other seating, extension cords or costs to include electric power for a pump, and a refrigerator or cooler for the milk. Items of a more personal/individual nature will not be reimbursed (e.g. a pump, pumping supplies, blankets, etc.).

D-11. What are the rules around reimbursement for travel?

Given the numbers of in- and out-of-state placements, travel is required for attorneys to observe children in their environments. To address this, in-state mileage is covered. Travel expenses are limited to the maximum amounts set forth by the California Department of Human Resources on https://www.calhr.ca.gov/employees/Pages/travel-reimbursements.aspx. However, at this time, out-of-state travel is NOT covered by FFDRP funds.

Please see table below for additional information.

	In-State Eligible Activity (Non-Training)	In-State Eligible Activity (Training)	Out-of-State Eligible Activity (Non-Training)	Out-of-State Eligible Activity (Training)
Costs	Yes	Yes	No	No
Time at activity	Yes	Yes	Yes	Yes*
Time travelling to activity	Yes	Yes	No	No

~~* Time spent training out of state is eligible for FFDRP if that state is not included in the list of prohibited travel states under Government Code section 11139.8. In a rare case where you cannot complete job-required training necessary to maintain required licensure or similar standards, in California or a non-prohibited travel state, time may be FFDRP eligible.~~

Parking
In addition, parking at the court for attorneys with offices not within the attorney's walking distance of the courthouse (typically more than half a mile) to represent a client in a dependency hearing are reimbursable.

Mileage
Mileage is reimbursed from residence or office location, whichever is a shorter distance. For mileage reimbursement rates, refer to the Personal Vehicle Mileage Reimbursement Rates section on https://www.calhr.ca.gov/employees/Pages/travel-reimbursements.aspx.

Lodging
Lodging reimbursement is limited to the county Maximum Lodging Reimbursement Rates per Night on https://www.calhr.ca.gov/employees/Pages/travel-reimbursements.aspx.

To claim lodging when the maximum rate has been exceeded, reduce the nightly rate to the maximum allowed and add the proportion of taxes paid that corresponds to the maximum rate.

Meals
Meals are not eligible for FFDRP reimbursement.

D-12. What other overhead expenses are reimbursable?
Other reimbursable expenses include costs for transcripts, payroll taxes, bookkeepers, accountants, mandatory 501(c)(3) audits, labor attorneys, and other costs required to operate and provide dependency representation.

Expenses that are NOT reimbursable include: software to track donations, fundraising expenses, expenses related to marketing, client enrichment activities, and coffee/water/food for provider staff.

D-13. Are recruiting expenses eligible for FFDRP?
Yes. Expenses relating to recruitment and associated activities, are eligible for FFDRP at the overhead rate for the month. Some examples are job board fees, agency fees and costs associated with background check services. Staff time spent on recruitment should be recorded in the Dependency FFDRP Eligible (Administrative/Superior/Executive) line on the Activity Log.

D-14. Is notarization of a document an eligible activity if it is related to the dependency case?
No. To the extent notarization is required relating to an adoption, those costs are eligible for a different stream of federal funding not accessible to legal representation providers, thus it cannot be included in FFDRP.

D-15. Can we apply the indirect cost rate which is already calculated?

No. Indirect costs cannot be claimed. Overhead expenses may be claimed but must be specifically identified and documented with proof of the amount and the payment (e.g. office rent can be claimed with a lease and proof of payment for the month that is being invoiced).

SECTION E: INVOICE/ACTIVITY LOG/DOCUMENTATION

E-1. What is the difference between the invoice, the monthly data report, and the activity log?

The invoice is the document where providers enter details on how they spent their court-appointed counsel (CAC) allocation and FFDRP enhancement funds. This document has tabs so that providers can show how their CAC & FFDRP allocations are used for the following expenditure categories: personnel salaries, professional services, overhead, and travel expenses.

The monthly activity log is a tool that can be used along with case management system records, personal calendar information, payroll records, and other records to determine the monthly percentage of FFDRP eligible time.

Providers should complete and submit the FFDRP activity log as part of their monthly invoice packages (please use the appropriate version: Single County, Multiple Counties or Executive Director and Admins in Single County). The FFDRP activity log should be completed contemporaneously effective July 2020. Please retain a copy of completed tools and any other relevant documentation to support the percentage of time claimed as eligible for each month.

Attorneys, social workers, paralegals, and investigators must use the FFDRP activity log to document the percentage of their time, per day, to generate a monthly percentage of time spent on eligible dependency activities. This monthly percentage will be used to determine what portion of individual's salary or contract payments is reimbursable. It's important that the percentage add up to 100% per day. The FFDRP activity log does not need to be completed by attorneys or others whose positions are solely grant funded or for those attorneys that only work on activities that are not eligible for reimbursement. (For example: an attorney that specializes in immigration and only attends immigration hearings on behalf of the child or parent.)

For independent contractors that get paid per event or by hearing, they would document 100% of their time as dependency for the days they appeared in court. They do not need to document time on days they did not complete any dependency activities.

For executive directors and others in administration operations (such as chief operating officers), please complete the monthly Executive Director/Administrator Log.

The monthly data report accompanies the invoice. In this document, the provider documents the monthly cases that were opened and closed. This document also requires the attorney, social worker, paralegal, and investigator to document the cases they worked on in the month by phase of hearing, the client, the petition type, and hearing date.

E-2. How to manage and record non-Court-Appointed Counsel (CAC) funds in your budget and invoicing?

This issue is extremely complex and most often, requires direct conversations with FFDRP staff to evaluate your program's structure to determine if activities are IV-E eligible and the impact to your dependency practice. Please contact FFDRP staff for advice on how to optimize use of your FFDRP allocation. Following are some questions to consider.

- How does non-CAC funding impact your dependency practice? What does the funding cover? Proportional share of overhead expenses? Does the non-CAC funding partially or fully cover a position?
- What happens when a position is funded by non-CAC funds and the activities are deemed not title IV-E eligible?
- Should a subcontractor receiving non-CAC funds apply a standard across the board percentage to offset operating expenses?

E-3. Can Profit and Loss (P&L) Statements be provided as supporting documentation?

Providers using Profit & Loss statements and General Ledgers may be asked to provide additional information. These documents can be used as supporting documentation if they clearly delineate the following:

1. Business Name matches the invoice
2. Amount on ledger/statement matches the amount on the invoice.
3. The ledger/statement includes proof of payment information, for example:
    a. Check number
    b. Electronic payment confirmation
    c. Last 4 digits of credit card

E-4. Do clerical staff need to complete an FFDRP activity log or record their time?

No. Clerical staff do not need to compete an FFDRP activity log to record their time. Their time will be calculated based on the firm's overhead rate, unless they complete an activity log and submit monthly data report documentation to support a higher rate based on their case specific activity. Their salary should be documented on the invoice.

E-5. In the Monthly Data Report, how do providers indicate the phase of the hearing for other hearing types such as interim hearings, restraining orders, etc.?

There are 5 phases of a case for the monthly data log.

- A – Work and Hearings Through Detention
- B – Work and Hearings Post Detention Through Disposition
- C – Work and Hearings Post Disposition Through Reunification
- D – Work and Hearings from Reunification to 366.26 Hearing, and/or Writ Preparation
- E – Work and Hearings through Post-Permanency

The excel spreadsheet allows providers to indicate the phase of the case and is a requirement of FFDRP invoicing. ~~This is needed for the retroactive period as well as for invoicing moving forward.~~ To document hearings that are not statutory, indicate where the case is. For example: if the hearing is an interim hearing on case planning, the provider can document in phase C; if the hearing is to perfect notice at a 366.26 hearing, the provider can document in phase D. For

JCATS users, the JCATS system currently tracks phases for the cases and are listed in the report, "IV-E Monthly Data Report".

E-6. How should sole providers that are paid on a monthly flat fee contract document their salary and expenses?

As a reminder, only the base court-appointed counsel and FFDRP allocations can be matched by federal funds. The monthly flat fee compensation for providers is inclusive of salary and all other expenses. The personnel or salary portion, and operating expenses are reimbursable based on the percentage (%) of eligible dependency activities from the FFDRP activity log. Sole providers with a flat fee monthly contract may choose to:

1) Allocate the entire monthly flat fee compensation as personnel which will be reduced by the percentage (%) of eligible juvenile dependency work from the FFDRP activity log, or

2) From the entire monthly flat fee compensation, allocate a portion of that to salary/personnel that will be reimbursed at the percentage (%) of eligible juvenile dependency work from the FFDRP activity log. Then, document operating expenses applying the overhead rate which for sole providers will be equal to the monthly percentage of FFDRP eligible case specific work and training.

Please note: Any expenses being claimed under FFDRP enhancements will need to be itemized and the required documentation provided (invoice and proof of payment).

E-7. What documentation must be provided to the JCC to receive reimbursement for dependency counsel representation?

An invoice which provides detailed, time-specific descriptions of legal work must be provided to the JCC, on a monthly basis. Proof of payment is also required.

Individual FFDRP activity logs must be attached to the invoice. Personnel such as administrative staff, secretaries, human resource/payroll personnel, and IT do not need to complete FFDRP activity logs but a firm may choose to have administrative staff complete logs to capture eligible activities if they also are recorded in the case management system and monthly data reports.

In addition to the invoice, a monthly data report must be provided to the JCC. The monthly data report must include:

- Staffing information (attorneys, social workers, etc.,)
- ~~The number of staff who support the attorneys;~~ The number of active clients and associated case numbers;
- The phases of the case, by hearing type and hearing date;
- The type of petition;
- The party represented; and
- A breakdown of the number of clients at the beginning of the month versus the number of clients at the end of the month, showing the number of new clients and the number of cases that closed.

E-8. Intentionally left blank.

E-9. How should panel administrators document their time?

Panel administrators that are not case carrying should document their time on the ED/Admin log as administrative costs, such as time they spend managing conflict panels. Panel administrators may not bill activities that are not reimbursable such as lobbying and policy work.

Panel administrators that are case carriers should document their time in proportion between administrative and case specific work on an activity log.

E-10. What are the deadlines to submit invoices?

Refer to the invoice deadlines document for deadlines at https://www.courts.ca.gov/43441.htm.

E-11. How should supervisory work be categorized and documented?

Supervision that is case specific may be tracked as case specific time on the activity log for both the supervisor and the supervisee provided that the organization is documenting that activity by case in its files. Other supervisory activity should be categorized as FFDRP eligible dependency administrative/supervisory/executive time and billed at the overhead rate.

E-12. How are staff meetings categorized and documented?

Staff meetings are not an eligible activity and cannot be claimed for federal reimbursement. If the meeting is a training, it should be documented as a training and may be claimed as training pursuant to the guidance on eligible training and provided that the required training documentation is submitted with the invoice. All or a portion of one-on-one case staffing between a supervisor and attorney or social worker is eligible for reimbursement, if discussing and documenting an eligible title IV-E activity, at the case-specific rate.

E-13. Should the FFDRP activity log reflect the month in which the activity occurred or the month in which the payment was issued (if different)?

The FFDRP activity log should reflect all of the activities that took place during the month when the activities occurred.

E-14. How should activities be documented on the FFDRP activity log for individuals whose work hours fluctuate day to day?

The daily percentage will be determined based on the total hours worked in the day and the work performed during that day.

If the attorney works 10 hours on day 1, 8 hours were case specific dependency and 2 hours non-dependency—80% would fall under case specific dependency and 20% would be designated as FFDRP ineligible or non-dependency.

If the next day, the same attorney works 11 hours, 9 hours were case specific dependency and 2 hours were non-dependency—82% would be designated case specific dependency and 18% would be FFDRP ineligible or non-dependency.

E-15. How do you document weekend work on the FFDRP activity log?

It is not necessary to document time spent working on a weekend. However, you may document weekend work on the FFDRP activity log by entering the percentage (%) of time spent on

eligible activities under the corresponding date on the activity log as you would for any work day.

E-16. What happens if there are billable activities that come to light after the monthly invoice has been received? For example, an attorney visited a client in January, but did not submit their travel claim until March.

Providers may submit one supplemental invoice (per month), please refer to the invoice deadlines document for deadlines at https://www.courts.ca.gov/43441.htm. An invoice must provide backup documentation that details the services provided by the attorney/law firm; without the back-up documents, the expenses cannot be paid.

E-17. If an attorney is no longer with a provider and therefore cannot sign the FFDRP activity log, how should the provider proceed?

The JCC is uncertain whether these FFDRP activity logs will be deemed acceptable. But if a provider wishes to try and match time spent by former staff, the provider should complete the FFDRP activity log for the attorney, noting that the individual is no longer with the organization. The FFDRP activity log should be signed by the Executive Director or head of the individual's office under penalty of perjury.

E-18. Do independent contractors need to complete monthly FFDRP activity logs and monthly data reports?

Yes. Independent contractors need to submit the FFDRP activity log and monthly data reporting case information, these are not monthly timesheets. In the FFDRP activity log, the attorney will document the daily percentage (%) based on their time spent on the contracted work. However, the JCC will not require an activity log for a subcontractor provided that the subcontractor's invoice contains the same daily level of information about eligible and ineligible activities that can validate the percentage of eligible IV-E activities claimed on the FFDRP invoice. Additionally, all subcontractors work must be included in the monthly data report submitted to the JCC.

E-19. How long is the processing time for FFDRP invoices?

Payment for FFDRP invoices will be issued as soon as operationally feasible. FFDRP invoice processing involves several steps including:

1. Provider submission of a complete invoice with required documentation, including proof of payment for corresponding CAC expenses;
2. Review and approval by JCC for submission to CDSS;
3. Receipt of funds from CDSS and submission of invoice to State Controller's Office (SCO); and
4. Processing by SCO.

E-20. What are the FFDRP requirements for record retention?

If Contractor receives in excess of $10,000 under the FFDRP Agreement, Contractor will be subject to Bureau of State Audits and the Federal Government audit standards. Program contracts and agreements shall be retained for three fiscal years from date of approval and invoices shall be maintained for two years from the end of the fiscal year affected and confidentially destroyed after those 2 years, if audited, or four calendar years, whichever occurs first.

Fiscal Year	Contracts *(retain for 3 fiscal years from start of contract)*	Invoices If Audited *(retain for 2 fiscal years after end of fiscal year)*	Invoices if NOT Audited *(retain for 4 calendar years)*
2021–2022	7/1/2024	6/30/2024	2026
2022–2023	7/1/2025	6/30/2025	2027
2023–2024	7/1/2026	6/30/2026	2028
2024–2025	7/1/2027	6/30/2027	2029
2025–2026	7/1/2028	6/30/2028	2030

E-21. Intentionally left blank.

SECTION F: TRAINING

F-1. What training expenses are FFDRP eligible and how should they be documented?
Certain training activities and related training costs for attorney and non-attorney staff are eligible for FFDRP reimbursement. Please see CWPM section 8.1H, Questions #8 and #10 for examples of eligible training topics. CWPM Section 8.1H, Question 11, includes examples of topics that are not allowable as a title IV-E training cost.

Eligible training costs will be calculated using the rate of 50% for non-attorney staff, and the enhanced rate of 75% for attorney staff.

Providers should consider the following when determining whether a training activity is FFDRP eligible:

- Who is the intended audience?
- Is the course dependency specific?
- Will the course enhance title IV-E client representation?

Common expenses associated with eligible training and related activities are:

- For Attendees (costs associated with attending a training)
  - Eligible: in-state travel, registration fees, time
  - Ineligible: out-of-state travel
- For Trainers (costs associated with presenting training)
  - Eligible: presenter preparation time, video communications platforms, rental space, speaker fees, travel
  - Ineligible: food and beverage

The Judicial Council will begin to advertise at the time of registration whether a training sponsored by the Judicial Council is FFDRP eligible. The Judicial Council will not evaluate outside trainings for FFDRP eligibility. Each provider should determine whether their trainings meet FFDRP eligibility requirements and keep that information in their files for audit purposes. Documents needed for FFDRP reimbursement are below.

Documentation Required (ok for items to be contained within the same document):

For Training Attendees	For Trainers and Organizations that Provide Trainings
• Course Title • Course Description with Learning Objectives • Date(s) • Agenda • Type of Training (in-person, webinar, live, etc.) • Location (if applicable) • Proof of Attendance (certificate of attendance or supervisor certification of attendance if proof of attendance is unavailable) • Invoices and Proof of Payment for Registration Fees • Invoices and Proof of Payment for Travel Costs	• Course Title • Course Description with Learning Objectives • Date(s) • Type of Training (in-person, webinar, live, etc.) • Intended Audience • Number of attendees by classification • Location (if applicable) • Invoices and Proof of Payment for all training expenses **Trainers and Organizations that provide trainings must also maintain supporting documentation in their files for audit purposes, including:** • Sign-in/attendance sheets • Course Curriculum/handouts

F-2. Is time spent on self-study eligible for FFDRP?

Time spent participating in self-study in an eligible FFDRP training is an eligible FFDRP activity if the self-study activity includes time designated for instruction, quizzes/tests, and evaluation. Self-study training can include electronic recordings of approved interactive instruction via video or internet recordings of approved training on audiotape or compact disc. See FAQ F-1 for documentation requirements for training attendees.

F-3. Is time spent filling out eligible FFDRP training surveys or course evaluations eligible for FFDRP?

Yes, time filling out FFDRP training surveys and/or course evaluations outside of the training can be claimed as administrative time.

F-4. Is time spent reviewing and/or reading materials eligible for FFDRP?

Time spent reviewing and/or reading FFDRP eligible training materials in lieu of attending the training cannot be claimed as FFDRP training time. However, this time can be claimed as administrative time.

F-5. Is time spent training out of state eligible for FFDRP?

Time spent training out of state is eligible for FFDRP ~~if that state is not included in the list of prohibited travel states under Government Code section 11139.8. In a rare case where you cannot complete job-required training necessary to maintain required licensure or similar standards, in California or a non-prohibited travel state, time may be FFDRP eligible~~. ~~This pertains only to time spent training; out of state travel costs are not eligible for FFDRP. For a list of state subject to the travel prohibition, visit~~ ~~https://oag.ca.gov/ab1887~~. See FAQ D-11 regarding reimbursement for travel.

SECTION G: STATE FUNDING TO ADDRESS FFDRP FEDERAL FUNDING SHORTFALL

G-1. Where does the state funding to address the federal funding shortfalls come from?
The Budget Act includes up to $30 million in state funds to address FFDRP funding shortfalls. This ongoing funding became available beginning FY 2021-22.

G-2. Who is eligible to access the $30 million in shortfall funding?
In order to access this funding, the court must have opted to participate in FFDRP and the provider must have a FFDRP contract, or submit a notice of intent to participate by December 31 of the fiscal year.

G-3. What FFDRP requirements must be satisfied in order to be eligible to receive a portion of the state funding available to address FFDRP funding shortfalls?
In order to be eligible to access the state funding available to address FFDRP shortfalls, providers are required to submit one invoice for each month under contract absent extenuating circumstances. Additionally, providers are to invoice aggressively to ensure the maximum federal reimbursement possible. If a provider does not submit one invoice for every month under contract, a prorated portion of the state funds will be distributed to the provider filling the shortfall only for those months with qualified invoicing.

G-4. How will the shortfall funding be distributed to eligible FFDRP providers?
Beginning FY 2022-23 and ongoing, payments will be issued quarterly to providers that meet invoice deadlines.

G-5. Is there additional information available?
For more information, please review this Judicial Council report.

SECTION H: FFDRP STREAMLINED INVOICE PROCESSING

H-1. What is FFDRP streamlined invoice processing?
Streamlined invoice processing for FFDRP is a simplified invoice process where providers who meet the criteria will submit invoices listing only their expenses. Providers are expected to hold their compiled supporting documentation for each invoice within their organization and will be subject to periodic complete invoice reviews.

H-2. What are the documents required to submit for streamlined invoice processing?
Providers will be required to submit the following:

1. Signed PDF of the completed FFDRP invoice (excluding the instructions and sample salary breakdown sheets).
2. Excel version of the FFDRP Invoice.
3. Monthly Data Report associated with the invoice submission.
4. Verification of court payment (for providers who contract directly with their local court for CAC Dependency).

Important:

- Providers are not required to submit supporting documentation (e.g., activity logs, payroll reports, proofs of payment) associated with the invoice.
- Providers should store all supporting documentation within their organizations.

- Providers should not submit supporting documentation until they receive notice from FFDRP staff that they have been selected for a complete invoice review.
- If the invoice supporting documentation is uploaded to SharePoint, this will automatically trigger a complete review of the invoice. See FAQ H-7 for additional information.

H-3. What are the requirements FFDRP providers must satisfy to be eligible for FFDRP streamlined invoice processing?

To be eligible for FFDRP streamlined invoice processing, providers must meet the criteria below.

1. Provider must be a licensed attorney or incorporated firm within California for at least 5 years;
2. Provider must have participated in FFDRP for at least 24 months; and
3. Provider must have invoicing with errors that account for less than 5% of the total amount and minimal errors identified by FFDRP staff to ensure that documents meet audit standards for:
    a. 18 months; or
    b. 6 months of invoicing for any new county.

H-4. When will a provider's eligibility for streamlined invoice processing be assessed?

FFDRP staff conduct eligibility assessments on a rolling basis and upon request by a provider.

H-5. How will invoicing errors be determined?

The invoice review process includes an invoice comments document prepared by FFDRP staff and shared with providers that identifies errors found on invoices. This document will be the basis for criteria 3 in FAQ H-3.

Errors include but are not limited to:

1. Claims for ineligible expenses and activities;
2. Missing supporting documentation;
3. Claims included in the wrong section of the invoice;
4. Claims for expenses outside of the contract period; and
5. Recurring errors that continue after FFDRP staff advise provider about the error.

H-6. How will invoices be selected that are subject to a complete invoice review?

Providers will be randomly selected 2–4 times per year to provide full invoice supporting documentation.

H-7. What does a complete invoice review entail under the streamlined invoice processing?

Providers will be notified within 1 week of submitting their invoice that they have been selected for a complete invoice review. Providers will then have 1 week to upload the full documentation to SharePoint. Providers **should not** submit supporting documentation until they receive notice to do so. Providers will lose eligibility for streamlining if they do not submit the invoice documentation by the due date or invoice documentation contains significant errors that do not meet criteria 3 in FAQ H-3.

- Providers may request a short extension to the 1 week turnaround for submission if they notify FFDRP staff at the time of the initial submission that they will be out of office and unable to upload the supporting documentation.
- Providers may be granted an extension to the 1 week turnaround for submission for emergency circumstances. Providers must notify FFDRP staff as soon as possible.
- Providers that fail to comply with notification requirements to request an extension will lose eligibility for streamlining for a period of 3 months.

In the month when providers are selected for a complete invoice review, invoices will be processed for payment per the standard invoice review process detailed at FAQ E-19.

H-8. Can a provider's eligibility for FFDRP streamlined invoicing be revoked?
Providers will lose eligibility for streamlining if they do not submit their complete invoice documentation by the due date or if invoice documentation contains significant errors that fail to meet Criteria 3 in FAQ H-3. If a provider's eligibility is revoked, the provider will be reassessed after 18 months.

H-9. Is there assistance available for FFDRP providers who would like to become eligible for FFDRP streamlined invoicing?
FFDRP staff offer technical assistance on FFDRP invoicing to providers who would like feedback and assistance on working towards eligibility for streamlined invoicing. Providers may request assistance by emailing FFDRP@jud.ca.gov.

SECTION I: FFDRP SMALL COURT INVOICE PROCESSING

I-1. What is FFDRP small court invoice processing?
Small court invoice processing for FFDRP enables small courts and their providers with limited contracts that face additional challenges in recruiting and retaining dependency representation to participate in FFDRP. Dependency providers in these courts who meet the criteria may be approved to participate in FFDRP and use FFDRP funding to increase attorney compensation (accounting for overhead and other costs borne by the law practice), and one additional attribute, in support of the Family Justice Initiative, Systems Attribute for Compensation. Additionally, providers would be allowed to submit a scaled down version of the FFDRP invoice.

I-2. What documents must be submitted for small court invoice processing?
Providers will be required to submit the following each month:

1. Activity log, for details refer to FAQ E-1.
   a. If applicable, training certificate of completion.
2. Monthly Data Report associated with the invoice submission
   a. Caseload and staffing information
   b. *Upon request of JC staff*: Data on the phase of each case and sibling set (providers must maintain this data and provide it upon request, so it is not required every month, but this information does not have to be removed from monthly data reports if it is automatically generated)
3. Verification of court payment (for providers who contract directly with their local court for CAC Dependency.

I-3. What are the requirements FFDRP providers must satisfy to be eligible for FFDRP small court invoice processing?

To be eligible for FFDRP small court invoicing, providers must meet the criteria below.

1. Court must be from cluster 1 or 2 (in the two groups of courts with the fewest authorized judicial positions) and opt into FFDRP;
2. Provider's FFDRP FY allocation must be equal to or less than $70,000;
3. Provider must opt into FFDRP and submit a simplified application;
4. Total cost of running the CAC Dependency law practice in that court must not exceed $250,000.

I-4. When will a provider's eligibility for small court invoice processing be assessed?

FFDRP staff conduct eligibility assessments at the start of each fiscal year after allocations are determined or during the fiscal year if there are changes in representation.