



VIRGINIA DEPARTMENT OF
SOCIAL SERVICES

Trafficking Prevention Designation, IV-E Review, & Sponsored Residential

CSA Office Hours – February 20, 2026





Trafficking Prevention Designation

Aaran Kelley & Victoria Sims

Trafficking Prevention Designation

Family First allows states to access IV-E funding for placements in “settings providing high-quality residential care and supportive services to youth who have been found to be, or are at risk of becoming, sex trafficking victims.”

VDSS has developed a plan to implement a provider designation and set youth eligibility to meet FFPSA requirements.

This designation is an opportunity to both improve the quality of care provided to youth in congregate care settings and to maximize federal funding available for foster care placements.

Definitions & Eligibility

High Quality Residential Care

- Standards currently in licensing regulations for child residential facilities (VDSS) and therapeutic group homes (DBHDS) institutions
- Trained staff

Supportive Services

- Screening for trafficking experience
- Referral for treatment for those who have experienced trafficking
- LDSS notification
- Prevention education for all youth in designated placements

Youth Eligibility

- All youth in foster care are inherently at risk of trafficking
- Ages 13+

High Quality Residential Care

Licensed CRF & TGH

- VDSS licensed Child Residential Facilities (CRFs) & DBHDS licensed Therapeutic Group Homes (TGH)
- *DJJ facilities, PRTFs, and A&D programs are excluded*

Trained Staff

- Mandatory Reporter training
- VDSS Normalcy training
- Human trafficking awareness training

Supportive Services – Screening & Referrals

Screening

- History of victimization
- Documented &/or disclosed by youth
- First 90 days of placement

Reporting

- CPS Mandated report (new allegations)
- Notify foster care worker

Service Referral

- Services that address the trauma
- In partnership with the youth's team

Supportive Services – Prevention Education

Timeframe

- First 90 days of placement
- Annually

Core Competencies

- Understanding what trafficking is
- Identifying warning signs & trafficker behaviors
- Ways youth can reduce their own risk
- Where to find help

Curriculum

- Preapproved:
- FreewayNC – provider facilitated and available free & online
- Alternate

Trafficking Prevention Designation – Implementation

Beginning April 1, 2026, placements of youth 13+ in CRFs & TGHs are only eligible for IV-E and CSA funds if the CRF/TGH has the Trafficking Prevention Designation from VDSS.

Applies to all VDSS licensed Child Residential Facilities (CRF) and DBHDS licensed Therapeutic Group Homes (TGH). Collaboration with providers has supported the development of the implementation plan.

Providers apply for the designation through VDSS, with a goal of having it added to licensing requirements when possible. Provider requirements, application, and additional information is on FamilyFirstVirginia.com

VDSS is awaiting final approval of the updates made to our foster care and IV-E guidance, as well as approval from the Children's Bureau. LDSS will receive transmittal training for the changes in March.



Title IV-E Review Update

Kristie Jones

Federal Review Results

80 Cases
Reviewed

Allowed 4
case errors

Virginia had 6
case errors

Not in
compliance

Virginia has
filed an
appeal

Errors



Kinship Claiming

Claiming title IV-E funds for kinship homes back to the beginning of the month the COA is issued



Placement and Care

Claiming title IV-E funds after the child has left the DSS custody

Claiming IV-E Funds for Kinship Foster Homes

Upcoming change

- To claim IV-E funding for Kinship Foster Homes, the following requirements must be met:
 - Fingerprint checks must be completed for the foster parent(s)
 - The results of these checks must indicate the foster parent(s) are “eligible”
 - A Certificate of Approval (COA) must be issued
- Please note that title IV-E funding will not be used for placement costs until the day the COA is issued.



Kinship Foster Home Claiming Example

- The child is placed in a resource home on March 30th.
- The background checks' results indicating the foster parents are "eligible" are received and reviewed on April 4th.
- The COA is issued on April 4th.
- If the child meets all other AFDC eligibility requirements, title IV-E funding could begin April 4th.

***Updated guidance will state the IV-E funding would not go back to April 1st**

Placement and Care

Title IV-E: Claiming & Audit Logic

- **Payment Windows**
 - Start: Month all eligibility requirements are met.
 - Stop: The exact day Placement & Care (P&C) authority ends.
 - Resume: First day of placement in the month P&C is regained.
- **Audit Findings (All Ineligible Claims = Disallowance)**
 - Non-Error Case: Ineligible period falls Outside the PUR.
 - Error Case: Ineligible period falls Inside the PUR.

Placement and Care Example

Upcoming clarification

- Child entered foster care through a CHINS Order and was placed on April 10th, in a home meeting full approval criterion.
- The child was returned home via court order May 11th.
- The last day title IV-E funds may be utilized would be May 10th (the last date of placement before the child is deemed to have left agency custody).

Next Steps

- The Quality Assurance and Accountability (QAA) team will not write these two findings as errors on the report until guidance can be updated.
- The QAA team will collaborate with agencies during their regularly scheduled quarterly new case validations and annual ongoing reviews to ensure compliance with these two changes.
- QAA will notify the agencies when transmittal training will occur.



Sponsored Residential

Em Parente & Samantha Brooks

Youth Likely to Receive Maximum Benefit

Youth with ID/DD diagnoses

- Stepping down from secure/acute placements, after other options have been exhausted
- Requiring long-term residential or assisted living services, who are unlikely to be able to live on their own into/throughout adulthood

Youth with complex medical needs

- Discharging from inpatient hospital settings, after being medically cleared and other options have been exhausted
- Requiring long-term residential or assisted living services that are unlikely to be able to live on their own in adulthood

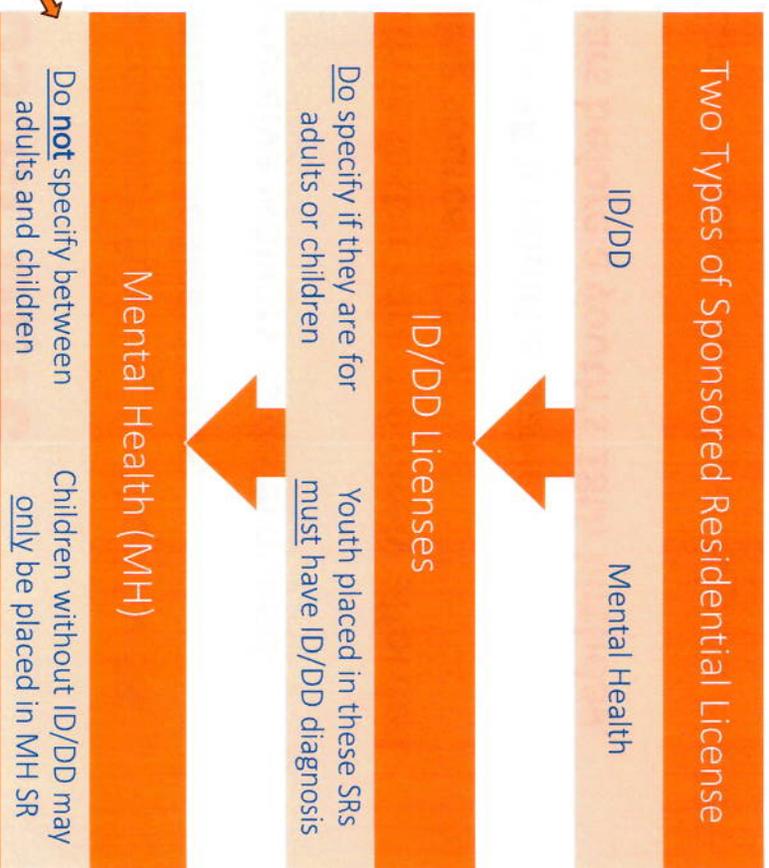
Youth with dual diagnoses of ID/DD & complex medical needs.

SR may be appropriate short-term for high acuity youth without ID/DD (mental health diagnoses only) when all other approved options have been exhausted.

Licensing: What to Know & Look For

- The SR agency/sponsor must hold the appropriate SR license, as indicated by the child's diagnosis.
- SR agency/sponsor can be licensed to provide both ID/DD and MH residential services to both adults and children.
- Verify SR license type through the **DBHDS Office of Licensing Provider Search Tool.**

The SR must still also be licensed to serve children!



Waivers for Youth in Foster Care

- ID/DD waivers are the traditional and most common funding method for SR services/placements and align with standardized Medicaid rates;
- Youth who are in foster care are eligible to receive waivers as determined through the assessment process.
- **HOWEVER**, despite assessed eligibility, youth in foster care are rarely afforded waivers due to having an "alternative funding source" (CSA);
- **AND**, youth in foster care cannot remain in an SR without a waiver.
 - Transition planning should begin 1-2 years before a youth's 18th birthday, involving LDSS and the CSB.
 - The CSB ID/DD waiver representative/case manager should participate in FAPT meetings.