



TO: IV-E Project Coordinators

FROM: Chris Mathias

DATE: November 4, 2003

SUBJECT: Private Agency Practicum Placements

I received a copy of a letter from Sharon Fujii, Regional Administrator of the Department of Health and Human Services, to Susan Chandler, Director of the Hawaii Department of Human Services, in response to the question of whether placement of IV-E stipended students in private agencies is allowable under IV-E regulations. I enclose a copy of the letter.

Please note Sharon Fujii's response that "private agency practicum placements are allowable if the caseloads are 100 percent Title IV-E eligible children."

This is important information for you to know as you plan field placements for your IV-E stipended students in private practice.



DEPARTMENT OF HEALTH & HUMAN SERVICES

Administration for
Children and Families

Refer To:

APR 2 1998

Region IX
50 United Nations Plaza
San Francisco, CA 94102

Susan M. Chandler, M.S.W., Ph.D.
Director
Department of Human Services
P.O. Box 339
Honolulu, Hawaii 96809

Dear Dr. Chandler:

This is in response to your letter of March 12, 1998 where you requested confirmation on whether the placement of students in private agencies is allowable under Federal Title IV-E training regulations.

In our conference call of February 5, you mentioned that the State was planning to use private agency practicum placements for some students in the Master of Social Work (M.S.W.) training program being developed and you wanted to know if this was allowable. I responded that we would check on the allowability and get an answer to you.

After researching your question and consulting with our Central Office, we verified that private agency practicum placements are allowable if the caseloads are 100 percent Title IV-E eligible children. The basis for the caseloads being exclusively Title IV-E is found at 45 CFR 235.63 (c)(1) and (4) respectively. It states "...Grants are made for an educational program that is directly related to the agency's program" and furthermore, each grant must describe "...objectives in terms of how the educational program is related to the financial assistance programs and how it is designed to meet the State or local agency's manpower needs."

These regulations clearly indicate that in order for a university to claim Federal financial participation there must be a direct relationship between the training the university provides (including its development) and costs related to it, and the Title IV-E program. Therefore, the State must insure that the M.S.W. student trainees in private agency placements will only work with Title IV-E eligible children during their internships. This information was subsequently provided to Tom Tizard of your staff and we regret any confusion that the misunderstanding may have caused.

However, to avoid future misunderstandings especially related to policy interpretation questions, we request that such questions be submitted in writing and we are obligated to respond likewise.

Although, we will continue to discuss policy issues and questions with you and your staff, we believe that it is a good practice to follow-up these discussions with a request for confirmation of what was said as you did in this instance.

If you have questions, please call Elmer Franklin at (415) 437-8420.

Sincerely,

Sharon M. Fujii

Sharon M. Fujii
Regional Administrator

cc: Thomas Tizard