



COMMONWEALTH of VIRGINIA


OFFICE OF CHILDREN'S SERVICES

Administering the Children's Services Act

Scott Reiner, M.S.
Executive Director

ADMINISTRATIVE MEMO #23-03

TO: CPMT Chairs, CSA Coordinators

FROM: Scott Reiner, Executive Director 

DATE: March 3, 2023

SUBJECT: Suspension of the QRTP Designation by the Department of Social Services

On March 2, 2023, the Virginia Department of Social Services (VDSS) announced the suspension of the Qualified Residential Treatment Program (QRTP) designation for congregate care placements of youth in foster care. The rationale and DSS-relevant details can be found in the Broadcast issued by VDSS on March 2 and included at the conclusion of this Memorandum.

The impact on CSA is as follows:

- Effective April 1, 2023, Title IV-E will no longer be a funding source for room and board and daily supervision costs in Therapeutic Group Homes (DBHDS-licensed) or Children's Residential Facilities (DSS-licensed).
 - This change applies to Title IV-E eligible youth placed in a designated QRTP.
 - Room and board and daily supervision costs for youth in foster care for these settings will be billable to CSA. This applies to existing and new placements.
 - Medicaid will continue to be a payer of clinical (therapeutic services) costs for youth in foster care in these settings who are Medicaid members.
 - This does not apply retroactively to youth placed in QRTPs before April 1, 2023, for whom the requirements at the time of placement (e.g., assessment within 30 days, court approval within 60 days) were not followed. Costs for those youth cannot be shifted to or assumed by CSA for any services provided prior to April 1.
 - Title IV-E payments in QRTPs can continue for services provided through March 31, 2023, for eligible youth for whom the QRTP process was conducted correctly.
 - Other than education, all costs for Psychiatric Residential Treatment Programs (PRTF) participating in Medicaid will continue to be billed to Medicaid.
- Any CSA-funded placements are subject to the usual FAPT and CPMT processes, including emergency placements.

- Already placed and approved youth will not need to return to FAPT while they remain in their current CSA-approved placements. However, the CSA office should work with the local department of social services to determine the (previously) Title IV-E eligible monthly costs that will be shifted to CSA and gain the approval of the CPMT for those added costs promptly.
- All Office of Children's Services guidance concerning the QRTP process is suspended effective April 1, 2023.
 - This includes the QRTP Guidance Document associated with CSA Administrative Memo #21-10 (dated July 1, 2021) and any other guidance from this office through responses to technical assistance questions, presentations, etc.

Questions regarding this change may be directed to the OCS Help Desk at:

<https://www.csa.virginia.gov/Contact/TechnicalAssistance/1>

Thank you for your prompt attention and cooperation.

cc: Carl Ayers
Nikole Cox
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OCS Staff

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Suspension of QRTP Designation

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The purpose of this broadcast is to announce the Virginia Department of Social Services (VDSS) has made the decision to suspend the designation of Qualified Residential Treatment Programs (QRTP) in Virginia as of April 1, 2023. Children placed in QRTP's on or after March 2, 2023, will not require the 30-day assessment and the 60-day court approval. In addition, Local Departments of Social Services (LDSS) will no longer be able to use title IV-E funds to pay for congregate care placements that were previously designated QRTP. These placements will need to be funded through CSA beginning April 1, 2023. All children that are currently placed in QRTPs and funded through title IV-E will also need to be funded through CSA beginning April 1, 2023.

The decision to suspend designation of QRTP is based on a variety of reasons including:

- Virginia shifted to Medicaid as first payer for all children's Medicaid approved residential facilities beginning July 1, 2021 (the same date as the implementation of Family First and the QRTP designation). While VDSS incorporated this shift to Medicaid in planning for QRTP implementation, the actual impact of this shift was far greater than anticipated, resulting in significantly reduced IV-E claiming for children's congregate care placements.
- VDSS is aware that the process for accessing IV-E funds for QRTP placement is complicated and creates a significant burden on LDSS staff.
- VDSS continues to see a significant number of case errors with QRTP placements, impacting IV-E funding as well as CSA funding, resulting in a significant cost to localities. These case errors appear to stem at least partially from Virginia's outdated child welfare information system (OASIS.) In addition, because Virginia's complex congregate care system poses a barrier to requiring all residential facilities to become QRTPs, it has proved challenging for workers to navigate when QRTP rules apply and when they don't.

This decision does not impact the programs that are designated as "Mommy and Me" group homes or those designated as Family Based Residential Treatment Facilities for Substance Use Disorder. There has been no change in these facilities and title IV-E funds can be used to fund placements in the same way they have in the past. Cost code 81114 used for QRTPs will no longer be accessible when LASER opens again in June 2023. All requests for reimbursement must be submitted before this time.

VDSS is committed to ensuring that children and youth who need a level of treatment that can only be provided in a congregate care setting receive quality care which is trauma-informed. VDSS intends to work towards bringing back the QRTP designation when this can be done successfully.

Questions may be directed to the Family First QRTP Team at familyfirst@dss.virginia.gov.