



Tapping Federal Funding for School-of-Origin Transportation **The Special Challenge of Home-of-Parent Cases**

As part of a larger project related to school-of-origin transportation, it has come to our attention that many California county child welfare agencies may not be tapping into federal funding that can be available for youth in family maintenance, including youth who have been returned to a parent after being removed from their home.

The Problem

California youth who have an open WIC § 300-petition but who have been placed in the home of a parent by direct order of the court generally don't qualify for federal¹ funding for school-of-origin transportation because they are not in federally defined foster care. This poses a challenge for at least two groups of children and youth:

1. Post-Reunification Family Maintenance

These are youth returned to the parent from whom were originally removed after a period of out-of-home care. If the youth attended a new school after their initial removal, it is often in their best interest to continue in that school to avoid a second school disruption, especially when there is a risk that reunification may not succeed.

Youth have the right to continue at the school they were enrolled in while in out-of-home placement for as long as the case remains open and until, at least, the end of the school year in which the case closes. However, recently reunified parents often lack the capability to transport the youth to that school.

2. Non-Custodial Parent Family Maintenance

Youth placed with a previously non-custodial parent after being removed from the custodial parent. In this situation the youth is attending their original school but needs transportation to maintain stability if the previously non-custodial parent does not have the capability to transport them every day.

An Often Untapped Funding Stream

While youth in family maintenance may no longer count as "in foster care" for federal purposes, if they qualified for federal funding while in out-of-home care, they will almost certainly meet the criteria for "candidates for foster care" while in family maintenance. This would make them eligible for the *same level* of federal funding.

¹ School districts can still get 60% of their foster youth transportation costs reimbursed from California state funds; this brief covers cost reimbursement for the county child welfare agency.

There is explicit federal guidance that youth who have been returned to their parent but meet the other criteria can qualify for reimbursement of Title IV-E administrative costs.² Allowable administrative costs include transportation to a student's school of origin.³

In California, youth returned home but who continue to have open WIC § 300 cases should meet all of the criteria: they must have case plans, documented services, goals, and the court must make a finding that there is some continuing risk of return to out-of-home care in order to keep the petition open.

Limitations

Due to outdated and complicated income requirements, not every youth qualifies for traditional federal Title IV-E foster care funding, regardless of whether they are in out-of-home or in-home care. Since around half of foster youth qualify and the federal reimbursement rate is fifty percent, this would cover roughly twenty five percent of child welfare agency costs, if the program was offered to all foster youth.

However, those income requirements do not apply to youth receiving an approved FFPSA service, such as motivational interviewing or parent-child interaction therapy. So if your county has integrated clearinghouse-approved services into your family maintenance program, then all youth could qualify and the federal cost share could rise to fifty percent.

Next Steps

Talk to your child welfare agency eligibility team and leadership! Your county should already be drawing down Title IV-E funds to pay for the child welfare agency's share of school-of-origin transportation for youth in out-of-home care. However, your leadership and eligibility team may be unaware that youth who have returned to the home of their parent still can have school stability challenges.

Questions

We will be coming out with a full report on school-of-origin issues in the future. However, we felt that it was important to raise awareness of this funding issue as soon as possible due to the long lead time often needed to establish budget procedures. In the meantime, feel free to contact Dylan Quigley (dquigley@ylc.org) with any questions.

² Child Welfare Policy Manual, 8.1D. Candidates for title IV-E foster care, Question 3 (eligible in a trial home visit) & Question 4 (eligible in aftercare following reunification)
<https://cwpm.acf.gov/citations/title-iv-e/title-iv-e-administrative-functionscosts/candidates-title-iv-e-foster-care> (Accessed 5/1/25).

³ Child Welfare Policy Manual, 8.3B.1, Allowable Costs, Question 4,
<http://cwpm.acf.gov/citations/title-iv-e/title-iv-e-foster-care-maintenance-payments-program/title-iv-e-foster-care-23> (Accessed 5/1/25) (stating "transportation associated with the child's attendance at his/her school of origin is an allowable administrative cost under title IV-E because such transportation is related to case management and therefore necessary for the proper and efficient administration of the title IV-E plan.")