

February 18, 2025

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

**EXECUTIVE SUMMARY**

**ALL COUNTY LETTER NO. 25-10**

This All County Letter updates policy guidance for placing agencies including Child Welfare Services, Juvenile Probation Departments, and Tribes with California Title IV-E Agreements, related to the Integrated Practice-Child Adolescent Needs and Strengths and Child and Family Team activities necessary to prepare for operation of the Tiered Rate Structure.



JENNIFER TROIA  
DIRECTOR

CALIFORNIA HEALTH & HUMAN SERVICES AGENCY  
**DEPARTMENT OF SOCIAL SERVICES**  
744 P Street • Sacramento, CA 95814 • [www.cdss.ca.gov](http://www.cdss.ca.gov)



GAVIN NEWSOM  
GOVERNOR

February 18, 2025

ALL COUNTY LETTER NO. 25-10

TO: ALL COUNTY WELFARE DIRECTORS  
ALL CHIEF PROBATION OFFICERS  
ALL INDEPENDENT LIVING PROGRAM MANAGERS  
ALL ADOPTION REGIONAL AND FIELD OFFICES  
ALL FOSTER CARE MANAGERS  
ALL TRIBES WITH A CALIFORNIA TITLE IV-E AGREEMENT  
ALL TRANSITIONAL HOUSING COORDINATORS  
ALL FOSTER FAMILY AGENCIES  
ALL SHORT TERM RESIDENTIAL THERAPEUTIC PROGRAMS

SUBJECT: UPDATED REQUIREMENTS FOR ADMINISTRATION OF THE  
INTEGRATED PRACTICE-CHILD AND ADOLESCENT NEEDS  
AND STRENGTHS TOOL AND CHILD AND FAMILY TEAMS

REFERENCE: [ALL COUNTY INFORMATION NOTICE I-35-24](#);  
[ALL COUNTY LETTER \(ACL\) NO 16-84](#); [ACL 18-81](#); [ACL 18-23](#);  
[ACL 21-27](#); [ACL 21-113](#); [ACL 22-35](#); [ACL 22-73](#); [ACL 24-94](#);  
[ASSEMBLY BILL 161](#); [WELFARE AND INSTITUTIONS CODE](#)  
[\(WIC\) SECTION 352\(b\)](#); [WIC SECTION 706.5](#);  
[WIC SECTION 10553.1](#); [WIC SECTION 16001.9 \(A\)\(39\)\(B\)](#)

## **PURPOSE**

The purpose of this All County Letter (ACL) is to provide placing agencies<sup>1</sup> with updated requirements for completing the Integrated Practice-Child and Adolescent Needs and Strengths (IP-CANS) tool for children, youth, and nonminor dependents, to prepare for operation of California's [Tiered Rate Structure \(TRS\)](#) as the new foster care rate

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<sup>1</sup> According to [Welfare and Institutions Code \(WIC\) Section 16560 \(b\)\(4\)](#), placing agency means a county child welfare agency, a county probation department, or an Indian tribe that has entered into an agreement pursuant to [WIC Section 10553.1](#).

structure by July 1, 2027.<sup>2</sup> The TRS is the [permanent foster care rate structure](#) that replaces the interim rate structure implemented in 2017, and is designed to be responsive to a youth's individual needs and strengths, not their placement setting. Under the new TRS, foster care rates will be determined by a child, youth, or nonminor dependent's specific needs and strengths collaboratively identified through the Child and Family Team's (CFT) use of the IP-CANS, underscoring the need for accuracy and fidelity in how the tool is administered. The effective date for the updated requirements described in this letter is July 1, 2025.

## **BACKGROUND**

The TRS marks a significant step in ensuring that children and youth in out of home placements receive the support and care necessary for their well-being based on their individual assessed needs and strengths, rather than their placement setting. In addition to a Care and Supervision Rate, all children, youth, and nonminor dependents in foster care will have access to funds that support strengths-building activities. Those with complex needs will also receive resources for services and interventions.

Basing the foster care rate on the IP-CANS tool that is completed collaboratively and with fidelity, will yield an accurate depiction of a youth's individual needs and strengths, ensure funding to secure services and supports necessary for youth to reside in the least restrictive placement, and provide more equitable, individualized support for all.

To support continued improvement of the CFT process and IP-CANS practice statewide and ensure that every youth in foster care receives a rate commensurate with their individual needs and strengths, this ACL provides updated requirements for completion of the IP-CANS, including timelines for completion of the tool and for the CFT process. This letter also includes initial information about the requirement for placing agencies to adopt fidelity guidelines and standards for completion of the IP-CANS by July 1, 2025. Additional information on fidelity guidelines and standards will be issued in a separate letter. The Department will engage with Tribes with a California Title IV-E Agreement regarding these requirements during implementation of their comprehensive child welfare programs.

Per [ACL 16-84](#), the California Department of Social Services (CDSS) requires CFT meetings to serve as the primary method by which placing agencies ensure that case plans are informed by and reflective of an individual youth and family's needs and strengths. Ongoing engagement with and inclusion of CFT members throughout the life of a youth's case, including joint decision-making with an Indian child's Tribe in the case

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<sup>2</sup>Please note that state law requires the TRS to become operative on July 1, 2027, "or the date that the CDSS notifies the Legislature that the California Statewide Automated Welfare System can perform the necessary automation to implement the TRS, whichever is later." ([WIC Section 11461\(h\)\(9\)](#).) However, for purposes of this letter, a July 1, 2027, implementation date is presumed because the CDSS anticipates automation will be completed by that date.

of an Indian child, is critical to developing youth and family-centered case plans. The ratings on the IP-CANS tool identify a youth's needs and strengths and whether action is needed; these ratings inform the CFT's decisions about specific actions to be taken and inform the youth's case plan. As outlined in the [Integrated Core Practice Model](#) (ICPM), these ratings are required to be made collaboratively by all CFT members and must clearly reflect the input of the youth, family, and, in the case of an Indian child, the child's Tribe {[WIC Section 16501.1\(b\)\(1\)](#)}.

## **I. IP-CANS COMPLETION**

Beginning July 1, 2025, **all** placing agencies are required to ensure the collaborative completion of an IP-CANS tool for all children, youth, and nonminor dependents as described in this letter and in accordance with all previously issued requirements referenced above. The IP-CANS tool completed as part of the Qualified Individual assessment process meets the requirement for completion, if it is completed with fidelity and if the placing agency ensures entry of the IP-CANS results into the California Automated Response and Engagement System (CARES)<sup>3</sup> within the required timeframe specified in Section VI of this letter.

Placing agencies may enter into formal agreements with community-based organizations (CBOs) or county mental health plans (MHPs) for completion of the IP-CANS in accordance with requirements issued by CDSS. In addition, placing agencies are encouraged to contract with an Indian youth's Tribe to administer the IP-CANS in cases where the Tribe is equipped to do so. Placing agencies that use such an approach must ensure that formal agreements include language requiring adherence to CDSS's specific requirements for completion of the IP-CANS, including the required timeframes, training requirements, and version.

CDSS is aware that many county placing agencies use this approach already and have agreements with their MHPs or with CBOs to administer the IP-CANS or to facilitate CFT meetings. To encourage and support these partnerships and help them be successful, CDSS is planning to collaborate with our partners to compile or develop tools and resources that county placing agencies can adapt and use to support their local partnerships when working across systems. These may include a draft business process for sharing completed IP-CANS, suggested language to include in formal agreements to ensure CDSS's minimum requirements for IP-CANS completion are met, sample forms that could be used to record completion of training requirements, or other supports. CDSS looks forward to discovering positive outcomes that may emerge from joining the collaborative nature of youth and family-centered approaches to care with the innovation of a rate structure based on each child and youth's individual needs and strengths. Look for information from CDSS on tools for cross-system collaboration beginning in Summer 2025.

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<sup>3</sup> CARES refers to the California Automated Response and Engagement System and, in this letter, includes both CARES-Live and CWS-CARES.

## II. ALIGNING TIMELINES FOR COMPLETION OF CFT MEETINGS AND IP-CANS

### A. Initial CFT Meetings and IP-CANS

Because the IP-CANS tool must be completed collaboratively through the CFT process, it is crucial that all placing agencies share a common understanding of the timelines that must be followed. Prior guidance referencing timelines for conducting CFT meetings ([ACL 16-84](#)) and completing the IP-CANS ([ACL 18-81](#)) resulted in inconsistent implementation practices across placing agencies. The guidance in this letter is intended to address some of the complexities related to timing and offer clarification on the timelines required for each process.

### B. Frequency of CFT Meetings and IP-CANS

With respect to frequency, placing agencies are required by CDSS policy ([ACL 16-84](#) and [ACL 18-23](#)) to ensure children and families have a CFT meeting and an updated IP-CANS completed as their service needs dictate. For child welfare, a CFT meeting must take place within 60 days of a case opening and not less than every six months thereafter. CDSS updated its CFT policy in January 2025 ([ACL 25-08](#)), and youth receiving family maintenance services, whether voluntary or court ordered, are included in the population who should receive a CFT meeting. For juvenile probation, a CFT meeting must take place prior to development of the case plan when recommending the youth be placed in foster care, or prior to the disposition hearing, whichever is earliest. When the juvenile court orders a youth be placed in foster care without a recommendation from the juvenile probation department, a CFT meeting must occur as soon as possible and within 30 days of the court's order.<sup>4</sup> Ongoing CFT meetings are required for juvenile probation at least every six months.

It is important to note there are some circumstances in which a CFT meeting is required more frequently than every six months. For example, when a child or youth is receiving certain specialty mental health services (SMHS)<sup>5</sup> or is placed in a short term residential therapeutic program (STRTP),<sup>6</sup> a CFT meeting must be provided at least every 90 days. When CFT meetings are required to occur more frequently than every six months, the youth's most recent IP-CANS must be reviewed using a collaborative process during the CFT meeting and, if necessary, updated to reflect any significant changes in the youth's functioning or circumstances. The required timelines shown in the table below supersede previously issued timelines. Timelines that are new or changed from previous requirements are identified with an asterisk (\*).

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<sup>4</sup> [ACL 22-35](#)

<sup>5</sup> Certain SMHS means Intensive Care Coordination (ICC), Intensive Home Based Services (IHBS), and Therapeutic Foster Care (TFC) [{WIC Section 16001.9\(39\)\(B\)}](#)

<sup>6</sup> When a child in foster care is placed in an STRTP, a CFT meeting must be provided every 90 days. [{WIC Section 16001.9\(39\)\(B\)}](#)

**C. Timeline Requirements for CFT Meetings and IP-CANS**

Event	CFT Meeting Timeline Requirement	IP-CANS Timeline Requirement
Initial CFT Meeting & IP-CANS (child welfare - family maintenance cases <sup>7</sup> )	*Prior to completion of the case plan and within 60 days from opening of a case (ACL 25-08), or no later than the date of the dispositional hearing, if applicable, whichever is earliest ( <a href="#">ACL 18-23</a> ).	Prior to completion of the case plan and within 60 days from opening of a case, or no later than the date of the dispositional hearing, if applicable, whichever is earliest ( <a href="#">ACL 18-81</a> ).
Initial CFT Meeting & IP-CANS (child welfare - foster care cases)	Prior to completion of the case plan and within 60 days from entering foster care or no later than the date of the dispositional hearing, whichever is earliest ( <a href="#">ACL 18-23</a> ).	Prior to completion of the case plan and within 60 days from entering foster care or no later than the date of the dispositional hearing, whichever is earliest ( <a href="#">ACL 18-81</a> ).
Initial CFT Meeting & IP-CANS if probation recommends youth be placed in foster care (juvenile probation)	Prior to completion of the case plan and no later than the date of the dispositional hearing. ( <a href="#">ACL 22-35</a> ).	*Prior to completion of the case plan and no later than the date of the dispositional hearing. { <a href="#">WIC Section 16560(c)</a> }.
Court orders foster care placement without or absent a probation recommendation that the youth be placed in foster care (juvenile probation)	Prior to completion of the case plan and within 30 days of the court's order for foster care placement ( <a href="#">ACL 22-35</a> ).	*Prior to the submission of the case plan to the court { <a href="#">WIC Section 16560(c)</a> }.
Indian Children <i>Inquiries into whether a child is an Indian child should begin with the initial contact</i> ( <a href="#">WIC Section 224.2</a> )	*Prior to completion of the case plan and within 30 days of case opening or within 30 days of the child entering foster care, and before the dispositional hearing, if applicable. ( <a href="#">ACL 22-35</a> ).	*Prior to completion of the case and within 30 days of case opening or within 30 days of the child entering foster care, or before the dispositional hearing, if applicable.

<sup>7</sup> This includes youth receiving FM services following family reunification services.

Event	CFT Meeting Timeline Requirement	IP-CANS Timeline Requirement
Foster youth receiving ICC, IHBS, or TFC SMHS	At least every 90 days { <a href="#">WIC Section 16001.9(a)(39)(B)</a> }.	*Consult with CFT on most recent IP-CANS every 90 days during the CFT meeting and update if new information indicates it is necessary.
Foster youth placed in an STRTP	At least every 90 days { <a href="#">WIC Section 16001.9(a)(39)(B)</a> }.	*Consult with CFT on most recent IP-CANS every 90 days during the CFT meeting and update if new information indicates it is necessary.
Case Plan Update (typically, every six months)	*Within 30 days prior to completion of case plan update due to the court throughout the duration of the case. { <a href="#">WIC Section 16501.1(b)(1)</a> }	*Within 30 days prior to completion of case plan update due to the court throughout the duration of the case. { <a href="#">WIC Section 16501.1(b)(1)</a> }.
Triggering Conditions CANS	*Within 30 days of determining that a condition identified in Section IV below exists.	*Within 30 days of determining that a condition identified in Section IV below exists.
Case Closure	*Meet or consult with CFT no more than 60 days prior to case closure.	*No more than 60 days prior to case closure.

\* New or updated requirements

### III. FIDELITY TO CFT AND IP-CANS PRACTICE

Local CFT processes and IP-CANS practices are critical components of an integrated approach to supporting children and families involved with [California's System of Care](#), and CDSS is mindful of practice fidelity. The CFT process and IP-CANS fidelity can be understood through the accuracy, timeliness, and collaborative nature of these practices. Fidelity to CFT practice goes beyond the meeting itself, encompassing the entire CFT process, with IP-CANS fidelity being closely tied to CFT process fidelity. Placing agencies should refer to the [ICPM](#) for information and support about specific practice behaviors by staff and leaders working with youth and families. There are also existing resources identified in [ACIN I-35-24](#) to build and enhance fidelity to the CFT process, as well as IP-CANS. Placing agencies are also directed to take advantage of resources available on CDSS's [CFT and IP-CANS](#) webpages, including the [CFT Engagement Guide](#), [CFT Tribal Engagement Guide](#), [IP-CANS Flyer](#), [video library](#), [brochures](#), and other materials. Further guidance from CDSS is forthcoming regarding specific tools, training, coaching, and other supports, and processes necessary to ensure the CFT process and IP-CANS are completed with fidelity.

A key opportunity for all System of Care partners and Tribes to deepen their knowledge on current and evolving CFT and IP-CANS practice, information, and requirements is to accept a standing, open invitation to participate in the quarterly CFT and IP-CANS Statewide Forum, jointly hosted by CDSS and UC Davis Northern Academy. To join, please complete the [CFT CANS Statewide Forum Invite Request Form](#).

#### **IV. CONDITIONS REQUIRING A NEW OR UPDATED IP-CANS**

The [WIC Section 16560\(d\)\(1\)\(C\)](#) requires that guidance issued by CDSS on the use of the IP-CANS shall include conditions that trigger the completion of a new or updated IP-CANS. In partnership with stakeholders, CDSS identified the conditions below as requiring all county placing agencies to ensure the completion of a new or updated IP-CANS for children, youth, and nonminor dependents. All *updated* IP-CANS must be completed within 30 calendar days of determining that a changed condition exists.

1. Youth's open child welfare case or open probation placement case, per [ACL No. 18-81](#), [ACL 22-35](#), and [WIC Section 16560\(c\)](#).
2. Youth's entry into foster care.
3. Youth's case closure.<sup>8</sup>
4. Youth referred for placement<sup>9</sup> in an STRTP and an assessment by a Qualified Individual, pursuant to [ACL 21-113/BHIN 21-060](#).
5. Youth placed in an STRTP or receiving certain SMHS<sup>10</sup> – review for update simultaneous with CFT meeting required every 90 days ([ACL 22-35](#)).
6. Placement Preservation CFT meeting or 14-day Notice received for youth ([ACL 19-26](#)).
7. Youth placement change ([ACL 19-26](#)).
8. Youth hospitalization (psychiatric or medical).
9. Youth incarcerated.
10. Youth deemed eligible for Regional Center services.
11. Youth newly eligible for special education services or significant change in the youth's existing Individualized Education Plan.
12. Youth deemed eligible for [California Children's Services](#) due to an acute or chronic health condition.

It is important to recognize the conditions described above are not to be understood as a finite list of reasons to update an IP-CANS for a youth. Significant or sudden changes in a youth's behavior, demeanor, or functioning, may be an indication of unmet needs. Since the CFT process is critical to supporting youth throughout the life of their case,

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<sup>8</sup> For the purposes of completing updated IP-CANS in this letter, case closure refers to the following: reunification, adoption, guardianship.

<sup>9</sup> [ACL 21-113](#)

<sup>10</sup> Ongoing placement or recipient of subset of SMHS refers to youth in placement in an STRTP or a recipient of subset of IHBS, ICC, or TFC requiring a CFT meeting every 90 days [ACL 22-35](#). Placing agencies are required to review and update, if necessary, the IP-CANS during the CFT meeting.



the CFT should be seen as a first step toward identifying a youth's needs and strengths. Long-standing policy regarding CFTs holds that any member of the team may request a CFT meeting.<sup>11</sup> If a youth, family member, caregiver, or other member of the CFT raises concerns about a youth's well-being, there should be transparent discussion with the CFT about the concerns. New information learned through such a collaborative conversation may reveal a need to update the IP-CANS, which may be done during the same meeting. Updating an IP-CANS is not intended to be conducted as an "interview" style set of questions and answers. The update should focus on new or changed information and how this new or changed information affects specific items and their ratings in the IP-CANS.

## **V. TRAINING**

Individuals who complete the IP-CANS must attend CDSS-sponsored training via their county's [Regional Training Academy](#) and be certified annually via the [Praed Foundation](#). Details about these requirements can be found in [ACL 21-27](#). Since the release of ACL 21-27, the curricula of several CFT-related courses and IP-CANS courses have been updated. Information about the specific courses (or "modules") offered is available in [ACIN I-35-24](#). Placing agencies can access training by enrolling in courses offered by their local Regional Training Academy (RTA) through this page on the [California Child Welfare Training](#) (CACWT)<sup>12</sup> website. CDSS is developing processes for system and community partners to enroll in CACWT courses provided by the RTAs. Detailed guidance about these processes is forthcoming.

## **VI. IP-CANS DATA ENTRY INTO CARES**

### **Initial**

Beginning July 1, 2025, all placing agencies are required to enter data for all completed *initial* IP-CANS into CARES no more than ten (10) **calendar** days following their completion or by the end of the month in which it is completed, whichever is sooner.

### **Updated**

Beginning July 1, 2025, all completed *updated* IP-CANS must be entered into CARES no more than ten (10) **calendar** days following their completion. Updated IP-CANS may be entered into CARES after the end of the month in which it was completed, if data entry does not exceed ten (10) calendar days following completion of the tool.

These timelines must be followed regardless of the agency that completed the tool.

CDSS issued guidance requiring child welfare agencies to enter all new IP-CANS into CARES for all children with an open child welfare case, regardless of which agency

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<sup>11</sup> The FAQ attached to [ACL 18-23](#) states "A CFT meeting may be requested by any member of the CFT."

<sup>12</sup> Juvenile probation may also contact the [Chief Probation Officers of California](#) for CFT Facilitation training.

completed the IP-CANS, in [ACL 21-27](#). To meet the new timeframes required for entering IP-CANS into CARES following completion, placing agencies must work cooperatively with their system partners. Counties and their partners must agree to establish and follow policies and business processes that ensure completed IP-CANS are provided to placing agencies immediately upon their completion to enter them into CARES promptly.

As described earlier in the Purpose section of this letter, the new TRS is designed to utilize each youth's completed IP-CANS to determine the rate appropriate to meet the youth's needs for support. When this new rate structure goes "live" on July 1, 2027, completion of each youth's IP-CANS through a collaborative CFT process, followed by its prompt entry into CARES, will be critical to the smooth function of the TRS. Further information regarding new entries into foster care and other details about the TRS are available in [ACL 24-94](#).

### **Examples**

A youth who enters foster care for the first time on October 8 must have an IP-CANS completed no later than December 8. If the IP-CANS is completed on December 8, it must be entered into CARES no later than December 18 (within ten (10) calendar days and by the end of the month).

In another example, a second youth enters foster care on October 30, and must have an IP-CANS completed no later than December 30. If their IP-CANS is completed on December 30, it must be entered into CARES no later than December 31 because it also must be entered into CARES by the end of the month. This includes all initial IP-CANS completed by someone employed by a contracted provider or MHP that is working under the terms of a formal agreement with the placing agency.

IP-CANS data must always be entered into CARES within the specified timeframe, including:

- IP-CANS completed as part of the Qualified Individual assessment requirements issued in [ACL 21-113/BHIN 21-060](#).
- IP-CANS completed by Tribes for an Indian youth.
- IP-CANS completed by an MHP or contracted provider under the terms of a formal agreement with a placing agency.

## **VII. QUESTIONS**

Placing agencies and their contracted providers (if applicable), should direct their CARES questions to their county's local Information Technology Department. If local staff are unable to address the matter, please reach out to Child Welfare Digital Services Customer Relations at [CWS\\_CustRel@osi.ca.gov](mailto:CWS_CustRel@osi.ca.gov) with questions, and send service tickets or research issues to the Service Desk at [servicedesk@CWDS.ca.gov](mailto:servicedesk@CWDS.ca.gov).

If you have questions or need additional guidance regarding the other information in this letter, please contact the Integrated Services Unit at (916) 651-2752 or at [cwscoordination@dss.ca.gov](mailto:cwscoordination@dss.ca.gov).

Sincerely,

***Original Document Signed By***

ANGIE SCHWARTZ  
Deputy Director  
Children and Family Services Division

cc: All Federally Recognized Tribes  
Department of Health Care Services  
California Welfare Directors Association  
California Behavioral Health Directors Association  
Chief Probation Officers of California  
California Alliance of Child and Family Services