

**REPORT/RECOMMENDATION TO THE BOARD OF SUPERVISORS
OF SAN BERNARDINO COUNTY
AND RECORD OF ACTION**

March 29, 2022

FROM

TRACY REECE, Chief Probation Officer, Probation Department

SUBJECT

Contract with Justice Benefits, Inc. for Title IV-E Administrative Claiming Services

RECOMMENDATION(S)

Approve a **Contract No. 22-223** with Justice Benefits, Inc., to provide Title IV-E Administrative Claiming Services, in an amount not to exceed \$1,270,000 for the five-year period of April 1, 2022 to March 31, 2027.

(Presenter: Tracy Reece, Chief Probation Officer, 387-5692)

COUNTY AND CHIEF EXECUTIVE OFFICER GOALS & OBJECTIVES

Improve County Government Operations.

Operate in a Fiscally-Responsible and Business-Like Manner.

Provide for the Safety, Health and Social Service Needs of County Residents.

FINANCIAL IMPACT

Approval of this item does not impact Discretionary General Funding (Net County Cost). The Probation Department (Department) estimates it will receive Title IV-E revenue of approximately \$2,000,000 annually for five years (Title IV-E Revenue), of which \$1,270,000 will be utilized to contract Justice Benefits, Inc. (JBI) as a service provider that will provide Title IV-E Administrative Claiming Services. The Department will compensate JBI using Title IV-E Revenue as follows: i) a total fixed amount of \$1,000,000 (\$200,000 annually); ii) incentive fees of two percent (2%) of the Title IV-E Revenue, which is approximately \$40,000 per year over the term of the contract; and iii) quarterly travel expense reimbursements not to exceed \$3,500 for actual expenses incurred. The total cost of this contract is summarized in the following table:

Year	Fixed Amount	Estimated Incentive Fee	Per Diem Travel	Total
One	\$200,000	\$40,000	\$14,000	\$254,000
Two	\$200,000	\$40,000	\$14,000	\$254,000
Three	\$200,000	\$40,000	\$14,000	\$254,000
Four	\$200,000	\$40,000	\$14,000	\$254,000
Five	\$200,000	\$40,000	\$14,000	\$254,000
Total	\$1,000,000	\$200,000	\$70,000	\$1,270,000

Sufficient appropriation and revenue have been included in the Department's 2021-22 budget and will be included in future recommended budgets.

BACKGROUND INFORMATION

Title IV-E is a federally funded program that allows probation departments to seek reimbursement for activities associated with providing preventative services to youth at imminent risk for foster care placement. A federal review of Title IV-E cases for two Northern California probation departments indicated systemic issues with the claims process used in those two probation departments. As a result, claiming activities for all probation departments in the State of California were suspended by the federal government until deficiencies were addressed.

The Chief Probation Officers of California (CPOC) worked directly with both the state and federal governments to develop an approved plan to address the systemic issues. CPOC has also collaborated with JBI to define a consistent and complete Title IV-E administrative claiming option for probation departments in California, if a county probation department chooses to utilize their services. Utilizing JBI will ensure that the Department is meeting all federal requirements to minimize the risk of audit exceptions while maximizing revenue and allow the reimbursement of claims to recommence.

On April 17, 2018 (Item No. 31), the Board of Supervisors (Board) approved a four-year contract with JBI to provide Title IV-E Administrative Claiming services from April 18, 2008 through March 31, 2022, for a total estimated cost of \$1,016,000. Under the recommended agreement, JBI would implement a web-based time keeping system; provide ongoing time study training to staff; compute claims for Department review; monitor to ensure appropriate reimbursements; and work closely with the California Department of Social Services (CDSS) and County personnel to update claiming policies when needed.

PROCUREMENT

For the last 24 years, JBI has specialized in federal revenue maximization for state and local political entities, including Enhanced IV-E Administrative Claiming Services for juvenile justice departments. JBI is the only service provider filing Title IV-E claims on behalf of local juvenile justice departments in seven states and is presently the only firm engaged with California counties on Title IV-E Administrative Claiming Services/Assistance. JBI's Web Based Random Moment Sampling (RMS) has also been recognized by CDSS as an approved method for the documentation of time and submission of claims. CDSS is the responsible state agency for submitting Title IV-E claims to the federal government. Based upon the specialized expertise listed above, the Department recommends a non-competitive agreement with JBI as a professional partner for overseeing the Department's Title IV-E revenue enhancement activities for a five-year period beginning April 1, 2022. Purchasing concurs with the specialized credentials of JBI for Title IV-E Administrative Claiming Services.

County Policy 11-04 requires Board approval of contracts for services that exceed \$200,000 and for services obtained without a competitive process.

REVIEW BY OTHERS

This item has been reviewed by County Counsel (Jamie Ryan, Deputy County Counsel, 387-5455) on March 3, 2022; Purchasing Department (Bruce Cole, Supervising Buyer I, 387-2063) on March 3, 2022; Finance (Kathleen Gonzalez, Administrative Analyst III, 387-5412) on March 10, 2022; and County Finance and Administration (Robert Saldana, Deputy Executive Officer, 387-5423) on March 14, 2022.

**Contract with Justice Benefits, Inc. for Title IV-E Administrative
Claiming Services
March 29, 2022**

Record of Action of the Board of Supervisors
San Bernardino County

APPROVED (CONSENT CALENDAR)

Moved: Joe Baca, Jr. Seconded: Dawn Rowe
Ayes: Col. Paul Cook (Ret.), Janice Rutherford, Dawn Rowe, Curt Hagman, Joe Baca, Jr.

Lynna Monell, CLERK OF THE BOARD

BY 
DATED: March 29, 2022



cc: Probation- Epps w/agree
Contractor- C/O Probation w/agree
File- w/agree
LA 03/31/2022