

AMENDED IN SENATE APRIL 23, 2008

AMENDED IN SENATE APRIL 9, 2008

AMENDED IN SENATE MARCH 24, 2008

SENATE BILL

No. 1380

Introduced by Senator Steinberg
(Coauthor: Senator Alquist)

February 21, 2008

An act to amend Sections 18358, 18358.05, 18358.10, 18358.15, 18358.20, 18358.23, 18358.25, and 18358.30 of the Welfare and Institutions Code, relating to foster care.

LEGISLATIVE COUNSEL'S DIGEST

SB 1380, as amended, Steinberg. Intensive treatment foster care program.

Existing law requires the State Department of Social Services to implement programs of intensive treatment foster care (ITFC) for eligible children, as specified.

This bill would revise various eligibility, operational, reporting, and foster parent training components of ITFC programs. The bill would expand eligibility for ITFC services to include children with a serious behavioral disorder. This bill would recast and revise the services a foster family agency would be required to provide, or arrange for provision of, on behalf of children in the ITFC program.

Vote: majority. Appropriation: no. Fiscal committee: yes.
State-mandated local program: no.

The people of the State of California do enact as follows:

1 SECTION 1. Section 18358 of the Welfare and Institutions
2 Code is amended to read:

3 18358. The definitions contained in this section shall govern
4 the construction of this chapter, unless the context requires
5 otherwise:

6 (a) “Department” means the State Department of Social
7 Services.

8 (b) “Eligible children” means children who meet all of the
9 following conditions:

10 (1) Children who are emotionally disturbed, or who have a
11 serious behavioral disorder, as evidenced by a history that may
12 include, but is not limited to, all of the specific behavior
13 management problems:

14 (A) Lying.

15 (B) Stealing.

16 (C) Verbal or physical aggression.

17 (D) Unacceptable sexual behavior.

18 (E) Attempts at self-mutilation or suicide.

19 (F) Defiant and oppositional behavior.

20 (2) Children who, as a result of their emotional disturbance or
21 serious behavioral disorder, satisfy one or more of the following
22 criteria:

23 (A) Are placed in a group home with a rate classification level
24 of nine or higher pursuant to Section 11462.

25 (B) Have been assessed by the child’s county interagency review
26 team or county placing agency as at imminent risk of psychiatric
27 hospitalization or placement in a group home with a rate
28 classification level of nine or higher pursuant to Section 11462.

29 (C) Have been identified by the child’s county interagency
30 review team or county placing agency as having had multiple
31 out-of-home placements or assessed as being at risk for multiple
32 out-of-home placements.

33 (D) Have successfully completed a group home program, except
34 children on probation or otherwise in the custody of the juvenile
35 court for any violent felony, as defined in subdivision (c) of Section
36 667.5 of the Penal Code.

1 (E) Are voluntarily placed in a group home with a rate
2 classification level of 9 or higher pursuant to Section 7572.5 of
3 the Government Code.

4 SEC. 2. Section 18358.05 of the Welfare and Institutions Code
5 is amended to read:

6 18358.05. (a) The department shall implement intensive
7 treatment foster care programs for eligible children.

8 (b) (1) The department shall implement the program in any
9 participating county that applies for and receives the department's
10 approval for an intensive treatment foster care program rate.

11 (2) Upon application to the department, the county shall do all
12 of the following:

13 (A) Identify the population of children to be served.

14 (B) Certify that participating foster family agencies have the
15 required personnel, administrative support, financial services, and
16 resources to successfully participate in the program.

17 (C) Project savings or cost neutrality to the state General Fund.

18 (D) Provide a plan for monitoring the participating foster family
19 agencies for compliance with this chapter.

20 (3) Each participating foster family agency may, with the
21 approval of the host county, accept placements from counties other
22 than the host county.

23 SEC. 3. Section 18358.10 of the Welfare and Institutions Code
24 is amended to read:

25 18358.10. Each foster family agency participating in this
26 program shall enter into a contract or memorandum of
27 understanding with the county and provide all of the following
28 personnel and administrative and support services:

29 (a) (1) Special attention to the selection and training of foster
30 parents.

31 (2) All participating intensive treatment foster care (ITFC) foster
32 parents shall be provided with at least 40 hours of training in the
33 care of emotionally disturbed children or children who have a
34 serious behavioral disorder before becoming an ITFC parent, and
35 before placement of a child pursuant to this program, 32 hours of
36 ongoing in-service training within the first 12 months after
37 becoming a certified ITFC parent, and 12 hours of ongoing
38 in-service training each year thereafter. Training shall include, but
39 not be limited to, working with abused and neglected children,
40 progressive crisis intervention, and cardiopulmonary resuscitation

1 and first aid. All training shall be completed prior to the child's
2 placement in the home. In two-parent homes, placement may be
3 made after one parent has completed 40 hours of training, provided
4 that an additional 20 hours of ongoing in-service training are
5 completed within 12 months after becoming an ITFC foster parent,
6 and provided that the second parent has completed 40 hours of
7 training and completes an additional 20 hours of training within
8 the first six months of certification of the foster parent as an ITFC
9 foster parent.

10 (3) Upon approval of the county interagency review team or
11 the county placing agency, the training requirements specified in
12 paragraph (2) for a participating foster parent in this program may
13 be waived for foster parents with prior experience that includes,
14 but is not limited to, working for at least one year with emotionally
15 disturbed children or children who have a serious behavioral
16 disorder.

17 (4) Foster parents shall be provided with all necessary support
18 services.

19 (b) Caseloads for participating social work case managers that
20 average eight children, except as provided in paragraph (1) of
21 subdivision (b) of Section 18358.30.

22 (c) The specific assignment to each certified family home of a
23 trained support counselor with experience in residential treatment.

24 (1) The support counselor shall have one of the following:

25 (A) A bachelor's degree in a social science related field and at
26 least six months of experience in working with emotionally
27 disturbed children or children who have a serious behavioral
28 disorder.

29 (B) An associate degree in a social science related field and
30 have at least one year's experience in working with emotionally
31 disturbed children or children who have a serious behavioral
32 disorder.

33 (C) Upon approval of the county interagency review team or
34 the county placing agency, the educational requirements may be
35 waived for support counselors with at least two years of experience
36 working with emotionally disturbed children or children who have
37 a serious behavioral disorder, and who demonstrate a combination
38 of education, skills, and experience that meets the specific cultural
39 and linguistic needs of the target population.

1 (2) Each participating foster family agency shall provide each
2 support counselor with 40 hours of training to include, but not be
3 limited to, working with abused and neglected children, progressive
4 crisis intervention, cardiopulmonary resuscitation, first aid, and
5 developing treatment plans for emotionally disturbed children or
6 children who have a serious behavioral disorder. All training shall
7 be completed prior to placing a child in a certified family home
8 for which the support counselor is assigned responsibility. An
9 additional 20 hours of ongoing in-service training is required within
10 the first 12 months after becoming an ITFC support counselor.

11 (3) Each support counselor shall provide support service to the
12 child and the foster family. This service shall include, but not be
13 limited to, structuring a safe environment for the child, collateral
14 contacts, and any administrative or training functions necessary
15 to implement the child's needs and services plan. The child's needs
16 and services plan shall ensure that services meet the child's needs
17 and are appropriate to and consistent with the minimum level of
18 service specified in Section 18358.30. The child's individual needs
19 and services plan shall be reviewed and approved by the certified
20 foster parents.

21 (d) Coordination services with local education agencies and the
22 service provider's nonpublic school, where applicable.

23 (e) A 24-hour on call administrator who is available to respond
24 to emergency situations.

25 SEC. 4. Section 18358.15 of the Welfare and Institutions Code
26 is amended to read:

27 18358.15. (a) Each foster family agency participating in the
28 program shall provide the services set forth in this subdivision, as
29 specified in the child's needs and services plan, agreed to by the
30 county interagency review team, or county placing agency, and
31 which are allowable care and services under California's foster
32 care program in accordance with Sections 11460 and 11463, and
33 their implementing regulations. Each foster family agency shall
34 also arrange for the services set forth in this subdivision, as
35 specified in the child's needs and services plan, agreed to by the
36 county interagency review team, or county placing agency, and
37 where the appropriate public funding is available, for mental health,
38 education, housing, and other needed services. Children in the
39 ITFC program who meet the public mental health system criteria
40 for mental health services and supports shall have those services

1 and supports funded by the Early Periodic Screening, Diagnosis,
2 and Treatment (ESPDT) program and other appropriate mental
3 health system sources. The services that the foster family agency
4 shall provide or arrange for include, but are not limited to, the
5 following:

6 (1) Individualized needs and services plans that ensure continuity
7 and stability in the placement of participating children in certified
8 family homes that meet the needs of eligible children, including
9 children making the transition from institutional placement to
10 noninstitutional placement. The needs and services plan for each
11 child in placement shall describe the specific needs of the child
12 and the appropriate level of services provided to the child pursuant
13 to Section 18358.30.

14 (2) Education and mental health services for children.

15 (3) Therapeutic after-school programs for children.

16 (4) In-home and support services necessary to implement the
17 case plan.

18 (5) Other necessary services for children in placement, including
19 medical and dental services.

20 (b) No more than one emotionally disturbed child or child who
21 has a serious behavioral disorder shall be placed in a certified ITFC
22 family home unless the participating foster family agency provides
23 the county welfare department with a written assessment of the
24 risk and compatibility of placing together two children who are
25 emotionally disturbed or have a serious behavioral disorder. More
26 than two children who are emotionally disturbed or have serious
27 behavioral disorders who are siblings may be placed together in
28 the same certified family home if the placement is approved by
29 the interagency review teams of the placing county or the county
30 placing agency and the participating county. However, there shall
31 be no more than a total of five children living in a certified family
32 home with two adults, and there shall be no more than a total of
33 three children living in a certified family home with one adult,
34 except in cases where children living in the home other than those
35 placed pursuant to this chapter are 15 years of age or older.

36 (c) Any use of physical contact to manage the behavior of a
37 child that is reported to the foster family agency pursuant to Section
38 18538.25 shall in turn be reported by the foster family agency to
39 the Community Care Licensing Division of the department as a

1 special incident pursuant to Section 80061 of Title 22 of the
2 California Code of Regulations.

3 SEC. 5. Section 18358.20 of the Welfare and Institutions Code
4 is amended to read:

5 18358.20. In addition to the requirements of Sections 18358.10
6 and 18358.15, any foster family agency that serves children under
7 this program shall have a contract or memorandum of
8 understanding with the county prior to accepting referrals of
9 children. The memorandum of understanding shall identify how
10 the foster family agency will provide or arrange for the following
11 services and activities:

12 (a) An effective 24 hours a day, seven days a week social work
13 emergency response service. The plan shall include the criteria for
14 an in-person response and define the timeframe in which in-person
15 response will be made.

16 (b) Mental health coverage available as needed for mental health
17 emergencies.

18 (c) Development of a service plan approved by the placing
19 county for each child within one month of placement that
20 thoroughly assesses the unique needs and strengths of the child
21 in the life domains specified in paragraph (1), and identifies the
22 necessary services and supports to improve outcomes.

23 (1) For purposes of this section, “life domains” means the
24 framework of important aspects of a child’s life to be assessed in
25 the child’s service plan, including, but not limited to, the following:

26 (A) Safety.

27 (B) Emotional and psychological well-being.

28 (C) Behavioral.

29 (D) Family and living situation.

30 (E) Social and recreational.

31 (F) Cultural and spiritual.

32 (G) Educational and vocational.

33 (H) Health.

34 (I) Developmental.

35 (2) Applicable services and supports associated with each life
36 domain, which may include, but are not limited to, the following:

37 (A) The child’s need for mental health service interventions, in
38 response to identified symptoms of behavior problems.

39 (B) Individual or group mental health treatment services.

40 (C) Psychotropic medication and monitoring.

- 1 (D) Behavior analysis, positive behavioral interventions, and
- 2 behavioral modification techniques.
- 3 (E) Interventions designed to prevent entry or reentry into the
- 4 juvenile justice system.
- 5 (F) Family reunification services, parent training, or other
- 6 support services needed to return the child home, or when that is
- 7 not possible, to establish, reestablish, or reinforce a lifelong
- 8 relationship with a caring adult.
- 9 (G) Family finding services to support and enhance access to
- 10 lifelong permanent relationships with relative and nonrelative kin.
- 11 (H) Targeted life skills training and resources to ensure
- 12 appropriate access to social and recreational resources and
- 13 relationships, as needed to support the achievement of important
- 14 developmental milestones.
- 15 (I) Mentoring or developing of positive adult relationships.
- 16 (J) Education supports, as needed to maintain and enhance the
- 17 child’s educational success and stability.
- 18 (K) Education liaison services as needed to maintain the child
- 19 in the classroom.
- 20 (L) Respite care.
- 21 (M) Support counselors.
- 22 (N) Case management to ensure appropriate and effective
- 23 coordination of activities and resources as identified in the plan.
- 24 (d) A system for recruiting, training, and supervising qualified
- 25 in-home support counselors.
- 26 (e) A system of record keeping that documents the delivery of
- 27 services and supports to each child. This documentation shall be
- 28 summarized and submitted on an annual basis to the county. Each
- 29 agency shall report the type and cost of the services delivered.
- 30 (f) Written policies and procedures on how the program will be
- 31 structured to ensure the safety of the child, how suicide attempts,
- 32 runaways, sexual acting out or, violent and assaultive behavior
- 33 will be handled, and what will occur to reduce or eliminate future
- 34 episodes.
- 35 (g) Written procedures on frequency of treatment plan review,
- 36 modifications of treatment plans, and the role of the foster family
- 37 and the child’s parents in development of the treatment plan.
- 38 (h) A process for recruitment, selection and training of foster
- 39 parents, including respite foster parents. The training curriculum
- 40 shall include the following areas, at a minimum:

- 1 (1) Alternative forms of discipline.
- 2 (2) Child growth and development.
- 3 (3) Behavior management techniques.
- 4 (4) Differential needs and treatment of children.
- 5 (5) Crisis prevention and intervention.
- 6 (i) Arranging for the provision of respite care services and
- 7 frequency of respite care.
- 8 (j) Social work staffing. Social workers shall have a master's
- 9 degree consistent with subdivision (e) of Section 1506 of the Health
- 10 and Safety Code, and shall have at least one year of experience
- 11 working with seriously emotionally disturbed children or children
- 12 who have a serious behavioral disorder.
- 13 (k) Other staff or contract services to be utilized in service
- 14 delivery, the tasks and responsibilities of those individuals, and
- 15 the training they will receive.
- 16 (l) An evaluation component that includes semiannual reporting
- 17 to the department of the following data, by age group. The
- 18 department shall publish the data annually.
- 19 (1) Number of children placed under this chapter.
- 20 (2) Number of prior foster care placements for each child prior
- 21 to entering the ITFC program.
- 22 (3) Outcomes for children referred to the program, including:
- 23 (A) Percentage of children discharged to a more intensive
- 24 program.
- 25 (B) Percentage of children discharged to a less restrictive
- 26 program, but not permanency.
- 27 (C) Percentage of children who drop down an ITFC level.
- 28 (D) Percentage of children discharged to reunification with a
- 29 parent or guardian.
- 30 (E) Percentage of children discharged to adoption.
- 31 (F) Percentage of children discharged to kin guardianship.
- 32 (G) Percentage of children discharged to other permanent
- 33 outcome.
- 34 (H) Percentage of children hospitalized.
- 35 (I) Number of ITFC families in which a child was placed.
- 36 (J) Percentage of children continuing in placement.
- 37 (m) A plan for surveying placing counties annually to ascertain
- 38 and report to the department on the following:
- 39 (1) Quality of services provided.
- 40 (2) Progress toward treatment goals.

1 (3) Satisfaction with services provided.

2 SEC. 6. Section 18358.23 of the Welfare and Institutions Code
3 is amended to read:

4 18358.23. In addition to the requirements of paragraph (2) of
5 subdivision (b) of Section 18358.05, participating counties shall
6 do all of the following:

7 (a) Determine the placement of eligible children in intensive
8 treatment foster care programs. All children placed in the programs
9 shall either have a completed level of care assessment indicating
10 a need for services greater than regular foster care or have their
11 placement reviewed by the participating county’s existing
12 interagency review team or county placing agency.

13 (b) Enter into contracts or memoranda of understanding with
14 participating foster family agencies signed by the county and
15 approved by the department. *agencies.*

16 (c) Provide routine case management services.

17 (d) Monitor the implementation of the case plan for the child.

18 SEC. 7. Section 18358.25 of the Welfare and Institutions Code
19 is amended to read:

20 18358.25. (a) Certified foster parents participating under this
21 chapter shall ensure the well-being of emotionally disturbed
22 children or children with a serious behavioral disorder under their
23 care. This care includes, but is not limited to, all of the following:

24 (1) Participation in initial and ongoing in-service training and
25 demonstration pursuant to Section 18358.1 and demonstration of
26 an understanding of and ability to meet the needs of emotionally
27 disturbed children or children with a serious behavioral disorder.

28 (2) Participation in the implementation of the individual case
29 plan and the needs and in the development and implementation of
30 the services plan for the child.

31 (3) Ensuring that the child’s medical and dental needs are met.

32 (b) To the extent possible, certified foster parents selected under
33 this chapter shall have a background in special education,
34 psychological counseling, nursing, or child development.

35 (c) (1) All certified foster parents selected to participate in this
36 program shall rent, lease, or own their own homes which shall be
37 certified by the foster family agency.

38 (2) The home of certified foster parents shall be within
39 reasonably close proximity to the participating foster family agency
40 or a satellite location of the agency.

1 (d) (1) All certified foster parents shall report any special
2 incident pursuant to Section 80061 of Title 22 of the California
3 Code of Regulations. Additionally, any use of physical contact to
4 manage the behavior of a child shall be reported as a special
5 incident.

6 (2) Certified foster parents shall report incidents to the
7 participating foster family agency, which shall report the incidents
8 to the Community Care Licensing Division of the department
9 pursuant to Section 18358.15.

10 SEC. 8. Section 18358.30 of the Welfare and Institutions Code
11 is amended to read:

12 18358.30. (a) Rates for foster family agency programs
13 participating under this chapter shall be exempt from the current
14 AFDC-FC foster family agency ratesetting system.

15 (b) Rates for foster family agency programs participating under
16 this chapter shall be set according to the appropriate service and
17 rate level based on the level of services provided to the eligible
18 child and the certified foster family. For an eligible child placed
19 from a group home program, the service and rate level shall not
20 exceed the rate paid for group home placement. For an eligible
21 child assessed by the county interagency review team or county
22 placing agency as at imminent risk of group home placement or
23 psychiatric hospitalization, the appropriate service and rate level
24 for the child shall be determined by the interagency review team
25 or county placing agency at time of placement. In all of the service
26 and rate levels, the foster family agency programs shall:

27 (1) Provide social work services with average caseloads not to
28 exceed eight children per worker, except that social worker average
29 caseloads for children in Service and Rate Level E shall not exceed
30 12 children per worker.

31 (2) Pay an amount of one thousand two hundred dollars (\$1,200)
32 per child per month to the certified foster parent or parents.

33 (3) Perform activities necessary for the administration of the
34 programs, including, but not limited to, training, recruitment,
35 certification, and monitoring of the certified foster parents.

36 (4) (A) (i) Provide a minimum average range of service per
37 month for children in each service and rate level in a participating
38 foster family agency, represented by paid employee hours incurred
39 by the participating foster family agency, by the in-home support
40 counselor to the eligible child and the certified foster parents

1 depending on the needs of the child and according to the following
2 schedule:

| | | |
|----|------------|-----------------|
| 3 | | |
| 4 | Service | In-Home Support |
| 5 | and | Counselor Hours |
| 6 | Rate Level | Per Month |
| 7 | A | 98-114 hours |
| 8 | B | 81-97 hours |
| 9 | C | 64-80 hours |
| 10 | D | 47-63 hours |

11
12 (ii) Children placed at Service and Rate Level E shall receive
13 crisis intervention and other support services on a flexible, as
14 needed, basis from an in-home support counselor. The foster family
15 agency shall provide one full-time in-home support counselor for
16 every 20 children placed at this level.

17 (B) When the interagency review team or county placing agency
18 and the foster family agency agree that alternative services are in
19 the best interests of the child, the foster family agency may provide
20 or arrange for services and supports allowable under California’s
21 foster care program in lieu of in-home support services required
22 by subparagraph (A). These services and supports may include,
23 but need not be limited to, the following:

- 24 (i) Permanency planning.
- 25 (ii) Preparation and family counseling to aid in family
26 reunification.
- 27 (iii) Child-specific recruitment.
- 28 (iv) Family finding services.
- 29 (v) Training and recruitment.
- 30 (vi) Case management.
- 31 (vii) Supervised foster visits.
- 32 (viii) Behavior modification.
- 33 (ix) Transportation.
- 34 (x) 24-hour per day, 7 days per week crisis intervention and
35 support.
- 36 (xi) Mentoring program costs.
- 37 (xii) Parent partners.
- 38 (xiii) Peer support.
- 39 (xiv) Support counselor services.
- 40 (xv) Social work activities.

- 1 (xvi) Interpreters.
- 2 (xvii) Education consulting.
- 3 (xviii) Education counseling to maintain the child in the
- 4 classroom.
- 5 (xix) Tutoring.
- 6 (xx) Vocation and college application assistance.
- 7 (xxi) Job training.
- 8 (xxii) Life skills assessment and planning.
- 9 (xxiii) Proper nutrition and diet instruction.
- 10 (xxiv) Substance abuse counseling.
- 11 (xxv) Activities in the Multidimensional Treatment Foster Care
- 12 (MTFC) program that are allowable costs under the California
- 13 foster care program.

14 (c) The department or placing county, or both, may review the
 15 level of services provided by the foster family agency program. If
 16 the level of services actually provided are less than those required
 17 by subdivision (b) for the child’s service and rate level, the rate
 18 shall be adjusted to reflect the level of service actually provided,
 19 and an overpayment may be established and recovered by the
 20 department.

21 (d) (1) On and after July 1, 1998, the standard rate schedule of
 22 service and rate levels shall be:

| 24 | Service | Fiscal Year |
|----|------------|---------------|
| 25 | and | 1998-99 |
| 26 | Rate Level | Standard Rate |
| 27 | A | \$3,957 |
| 28 | B | \$3,628 |
| 29 | C | \$3,290 |
| 30 | D | \$2,970 |
| 31 | E | \$2,639 |

32
 33 (2) (A) On and after July 1, 1999, the standardized schedule of
 34 rates shall be adjusted by an amount equal to the California
 35 Necessities Index computed pursuant to Section 11453, rounded
 36 to the nearest dollar. The resultant amounts shall constitute the
 37 new standardized rate schedule, subject to further adjustment
 38 pursuant to subparagraph (B), for foster family agency programs
 39 participating under this chapter.

1 (B) In addition to the adjustment in subparagraph (A),
2 commencing January 1, 2000, the standardized schedule of rates
3 shall be increased by 2.36 percent, rounded to the nearest dollar.
4 The resultant amounts shall constitute the new standardized rate
5 schedule for foster family agency programs participating under
6 this chapter.

7 (3) Beginning with the 2000–01 fiscal year, the standardized
8 schedule of rates shall be adjusted annually by an amount equal
9 to the California Necessities Index computed pursuant to Section
10 11453, subject to the availability of funds. The resultant amounts,
11 rounded to the nearest dollar, shall constitute the new standard rate
12 schedule for foster family agency programs participating under
13 this chapter.

14 (e) Rates for foster family agency programs participating under
15 this chapter shall not exceed Service and Rate Level A at any time
16 during an eligible child’s placement. An eligible child may be
17 initially placed in a participating intensive foster care program at
18 any one of the five Service and Rate Levels A to E, inclusive, and
19 thereafter placed at any level, either higher or lower, not to exceed
20 a total of six months at any level other than Service and Rate Level
21 E, unless it is determined to be in the best interests of the child by
22 the child’s county interagency review team or county placing
23 agency and the child’s certified foster parents. The child’s county
24 interagency placement review team or county placement agency
25 may, through a formal review of the child’s placement, extend the
26 placement of an eligible child in a service and rate level higher
27 than Service and Rate Level E for additional periods of up to six
28 months each.

29 (f) It is the intent of the Legislature that the rate paid to
30 participating foster family agency programs shall decrease as the
31 child’s need for services from the foster family agency decreases.
32 The foster family agency shall notify the placing county and the
33 department of the reduced services and the pilot classification
34 model, and the rate shall be reduced accordingly.

35 (g) It is the intent of the Legislature to prohibit any duplication
36 of public funding. Therefore, social worker services, payments to
37 certified foster parents, administrative activities, and the services
38 of in-home support counselors that are funded by another public
39 source shall not be counted in determining whether the foster
40 family agency program has met its obligations to provide the items

1 listed in paragraphs (1), (2), (3), and (4) of subdivision (b). The
2 department shall work with other potentially affected state
3 departments to ensure that duplication of payment or services does
4 not occur.

O