



Administrative Costs Drive Foster Care Claims and Are Increasing Per Child as Caseloads Decline

Trends in Title IV-E Foster Care Expenditures FY2019-FY2023

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KEY POINTS

- From fiscal year (FY) 2019 to 2023, administrative costs – and not other program costs like payments to foster parents – have been the largest driver of Title IV-E foster care reported expenditures and reimbursements.
- In-placement administration costs were the largest category of administrative expenses – over \$1 billion larger than any other expense category – during this period.¹
- For pre-placement administration costs, nearly all Title IV-E foster care reported expenditures (97 to 99 percent) have been spent on case planning and management, with only a small portion (one to three percent) spent on legal representation.
- Average monthly administrative expenses per child have increased 40 percent from FY2019 to FY2023 as the average monthly number of children served through administrative-related Title IV-E foster care activities has declined; further, total administrative reported expenditures have remained relatively stable during this time period.
- Per child in FY2023, states and territories had, on average, monthly reported expenditures of \$2,576 on in-placement administration (range of \$263 to \$10,041), \$869 on pre-placement administration (range of \$0 to \$7,210), and \$530 (range of \$0 to \$8,555) on other administration (runaway and sex trafficking prevention) costs. The average monthly combined administrative reported expenditures per child ranged across states from \$420 to \$12,659.

BACKGROUND

The Children's Bureau at the U.S. Department of Health and Human Services is responsible for developing and funding programs that assist children and families in improving their overall health and well-being; this includes administering federal programs that support child welfare services.ⁱ For over a decade, total federal child welfare spending has remained relatively flat in real terms.ⁱⁱ Among all federal

¹ In-placement administration costs were over \$1 billion larger than any other expense category from FY2020-FY2023. In FY2019, demonstration project costs were the greatest expense because the waiver demonstration projects were phasing out but in-placement costs were still the second greatest expense.

child welfare spending, the most comes from Title IV-E of the Social Security Act. Title IV-E funding has remained relatively stable over the past few years, though it dropped by one-third in inflation-adjusted dollars from FY2003 to FY2023.ⁱⁱⁱ

As of FY2023, the majority of Title IV-E program funds have been spent on the Title IV-E foster care program. Through the Title IV-E foster care program, states, participating territories, and Tribes are able to provide eligible children and youth with safe and stable out-of-home care until they are safely reunified with their families, permanently placed with adoptive families or legal guardians, or transitioned to another planned arrangement for permanency.^{iv} Similar to overall Title IV-E program funding, Title IV-E foster care spending has also remained relatively stable over the past few years, though it has declined in real terms from FY2019 to FY2023.

This brief analyzes Title IV-E foster care program reported expenditures and reimbursements using the most recent years of publicly available claims data (from FY2019 to FY2023, adjusting all costs to 2023 dollars²). It explores administrative costs, identifies how average monthly costs per child have changed over time,³ and provides a snapshot of the variation seen across states in FY2023. The data highlight the Federal Financial Participation (FFP) reimbursements, which represent the federal share of the total reported expenditures, as well as the Total Computable (TC) reported expenditures, which combine both the federal share and the state/Tribe share to get an overall total.⁴ There are limitations to the data, including that some states, Tribes, and territories misreported or did not report certain expense categories in their claims and caseload data, although the Children's Bureau monitors the data and works with states to identify and correct reporting issues as feasible. For Figures 1 to 7, the *National Total* (which include states, territories, and Tribes) numbers were used as presented in the Title IV-E Programs Expenditure and Caseload Data spreadsheets;⁵ no states, territories, or Tribes were excluded. For Figures 8 and 9, which specifically focus on comparing states and territories in FY2023, some states were excluded due to data issues identified in the spreadsheet.

² Expenses were cost-adjusted to 2023 dollars to account for inflation using Consumer Price Index (CPI) annual averages from the Bureau of Labor Statistics.

³ To account for caseload sizes being reported as monthly averages in the publicly available claims data, reported expenditures were de-annualized by dividing by 12 in order to estimate the average monthly costs per child. There are limitations to this approach and other methods of estimating annual or monthly costs per child could yield different results. To calculate in-placement and pre-placement costs per child, Case Planning and Management Caseloads were used, without adding in Legal Representation Caseloads, to avoid double-counting children as there is likely significant overlap between these caseload categories.

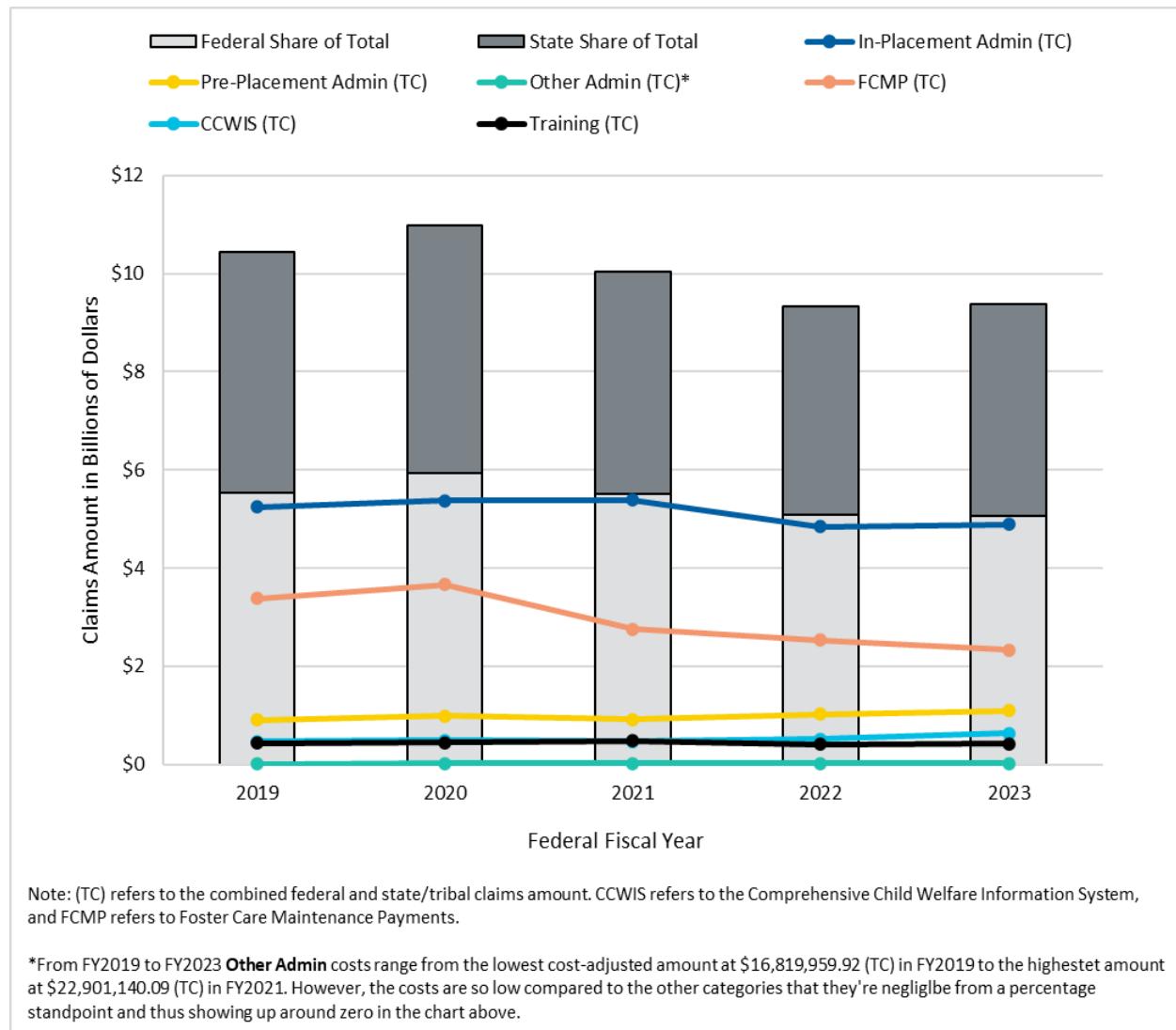
⁴ Each Title IV-E foster care funding category is reimbursed at a different federal rate. FCMP costs are reimbursed at the state's FMAP rate; Pre-Placement, In-Placement, Other Administration, and CCWIS cost categories are reimbursed at a 50% rate; and training costs are reimbursed at either 50% or 75%.

⁵ See <https://acf.gov/cb/report/title-iv-e-programs-expenditure-and-caseload-data> for more information.

Title IV-E Foster Care Administrative Costs, and Not Foster Care Maintenance Payments, are the Largest Driver of Title IV-E Foster Care Expenditures

Title IV-E foster care funding is classified into different expense categories that include both administrative and non-administrative costs (see Appendix A for definitions). Between FY2019 and FY2023, administrative costs (combined across all administrative categories) have been the largest driver of Title IV-E foster care reported expenditures and reimbursements. Specifically, in-placement administration costs — the allowable administrative costs claimed on behalf of a child after they enter a Title IV-E eligible foster care placement — were the largest reported expenditure by over one billion

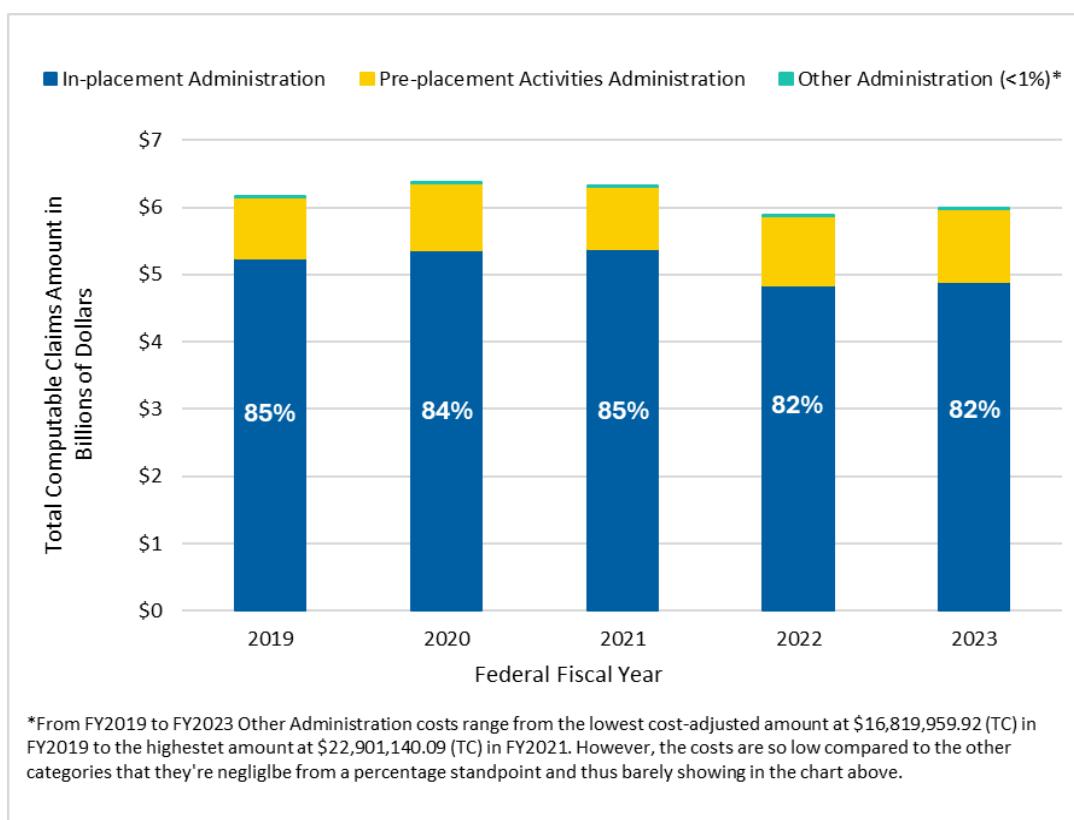
Figure 1. In-Placement Administration Costs Have Been the Largest Share of Title IV-E Foster Care Spending, FY2019-FY2023



dollars each year compared to all other expense categories (see Figure 1⁶).⁷ Reported expenditures across all expense categories have remained relatively stable throughout the years, with the biggest decline happening in Foster Care Maintenance Payments (FCMP).

Administrative Costs Breakdown. From FY2019 to FY2023, the total administrative costs (in-placement, pre-placement, and other) have remained relatively stable, rising slightly in FY2020 and FY2021, and then decreasing to slightly below FY2019 costs in FY2022 and FY2023 (see Figure 2⁸). Across all years, in-placement administration has accounted for the majority of administrative costs based on reported expenditures (82 to 85 percent), followed by pre-placement administration and then other administration (runaway and sex trafficking prevention) costs (which accounted for <1 percent).

Figure 2. In-Placement Administration Made up the Vast Majority of Foster Care-Related Total Title IV-E Administrative Costs from FY2019 to FY2023



⁶ The numbers for this chart were calculated by using Title IV-E Foster Care Claims Data from FY2019 to FY2023. Categories analyzed include the total computable (TC) claims and the federal financial participation (FFP) claims for the following Title IV-E expense categories: FCMP, In-Placement Administration, Pre-Placement Activities Administration, Other Administration, CCWIS, and Training. The data in this chart reflects the national totals for these categories. State share was calculated by subtracting the FFP from the TC.

⁷ For this and other national calculations, the national totals were used as reported and do not account for potential state data reporting issues. For more information, see: <https://acf.gov/cb/report/title-iv-e-programs-expenditure-and-caseload-data>

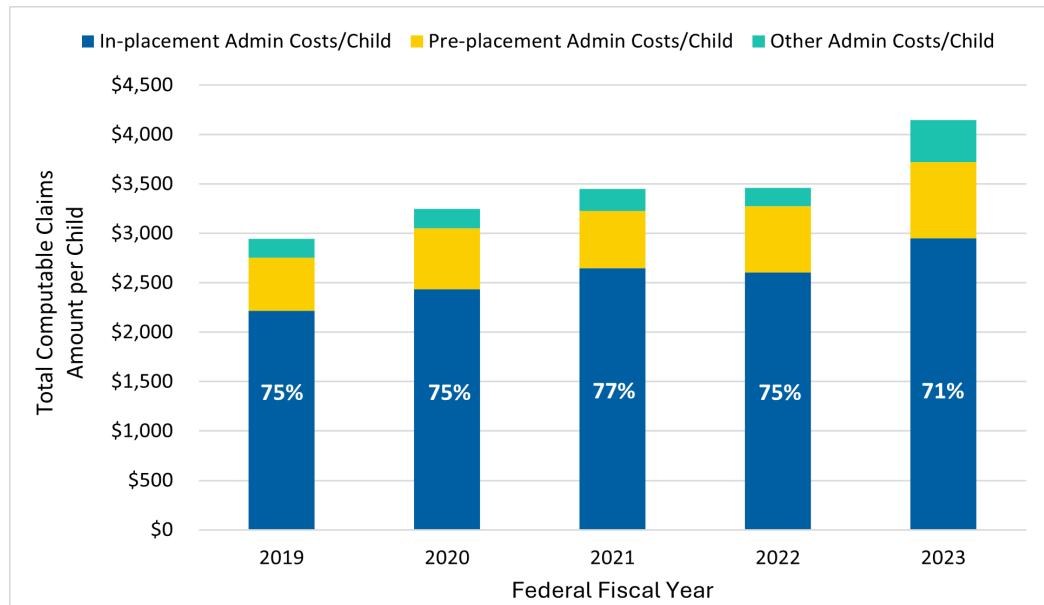
⁸ The numbers for this chart were calculated by using Title IV-E Foster Care Claims Data from FY2019 to FY2023. Categories analyzed include the National Total for administrative costs by category, which include the TC for In-Placement Administration, Pre-Placement Administration, and Other Administration.

Per Child Administrative Costs Increased Over 40 Percent, FY2019 to FY2023

Combined Administrative Per Child Costs. Average monthly administrative costs per child are on the rise by 40 percent. At the same time, the total average monthly number of children served through Title IV-E foster care administrative activities has declined each year between FY2019 and FY2023;⁹ in FY2019 the total average monthly number of children served was 344,377, falling to 259,452 in FY2023 (a 25 percent reduction). This coincides with an overall decline in foster care caseloads as the number of children entering foster care has continued to go down.¹⁰ With this decline in caseload size and the relative stability of reported administrative expenditures during this time period, average monthly administrative costs per child have increased from \$2,945 per child in FY2019 to \$4,147 per child in FY2023 (see Figure 3¹⁰).

To help explain this trend, Children's Bureau staff noted that Title IV-E administrative costs largely reflect the fixed infrastructure required to operate a child welfare system. While caseloads may fluctuate year to year, some administrative functions must remain in place, in part, to meet federal requirements, resulting in relatively stable administrative spending overtime. In comparison, total average monthly costs per child have reduced slightly for Foster Care Maintenance Payments (FCMP),

Figure 3. Average Monthly Costs per Child Increased for Title IV-E Foster Care Administration between FY2019 and FY2023



⁹ Calculated by totaling the caseload sizes for Pre-Placement Administration Case Planning and Management, In-Placement Administration Case Planning and Management, and Runaway and Sex Trafficking Prevention.

¹⁰ The numbers for this chart were calculated by using Title IV-E Foster Care Claims and Caseload Data from FY2019 to FY2023. Categories analyzed include the total category claims and caseload for the following: In-Placement Administration, Pre-Placement Activities Administration, and Other Administration. Additionally, the following categories were analyzed for caseload data: In-Placement Title IV-E Case Planning and Management Caseload, Pre-Placement Title IV-E Case Planning and Management Caseload, and Runaway and Sex Trafficking Prevention Caseload. The annual expenditure amounts were divided by 12 to match the reported average monthly caseload data.

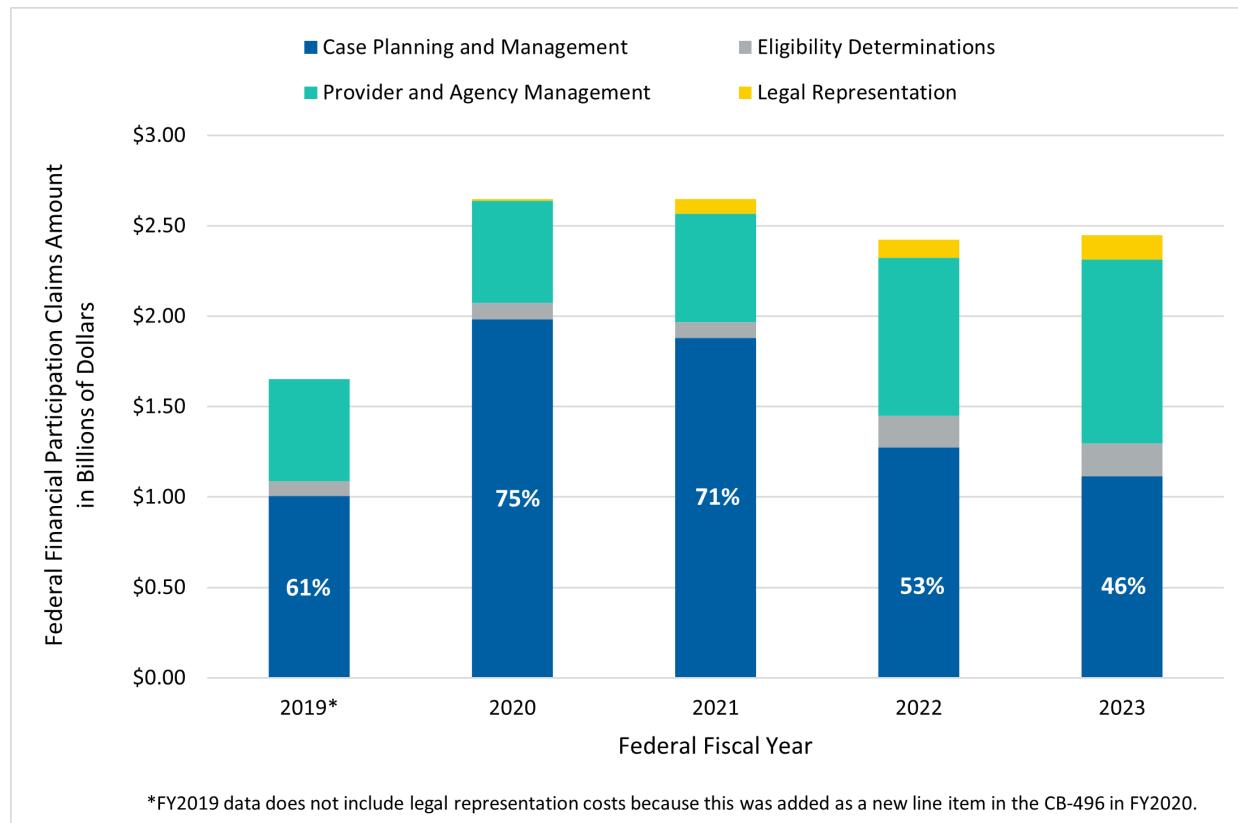
the largest non-administrative category, from \$1,717 per child in FY2019 to \$1,598 per child in FY2023, as reported expenditures for FCMP have declined along with caseload size.

In-Placement Administration Costs Have Been the Largest Title IV-E Foster Care Expenditure by Over a Billion Dollars Each Year from FY2019 to FY2023

From FY2019 to FY2023,¹¹ in-placement administration costs were the largest Title IV-E foster care reported expenditure compared to all other categories' reported expenditures by over a billion dollars. For example, in FY2023, the reported in-placement administration total computable claims amount was nearly five billion dollars; the next largest category claims amount (FCMP) was just over two billion dollars (see Figure 1 on page 3).

In-Placement Administration Costs. Within in-placement administration, from FY2019 to FY2023, case management and planning was generally the largest category for reimbursement claims, though starting in FY2021, it began to decline. Meanwhile, reimbursement claims for provider and agency management

Figure 4. Case Management and Planning Was Generally the Largest Category of In-Placement Administration Reimbursement Claims from FY2019 to FY2023, though Other Categories Grew Over Time

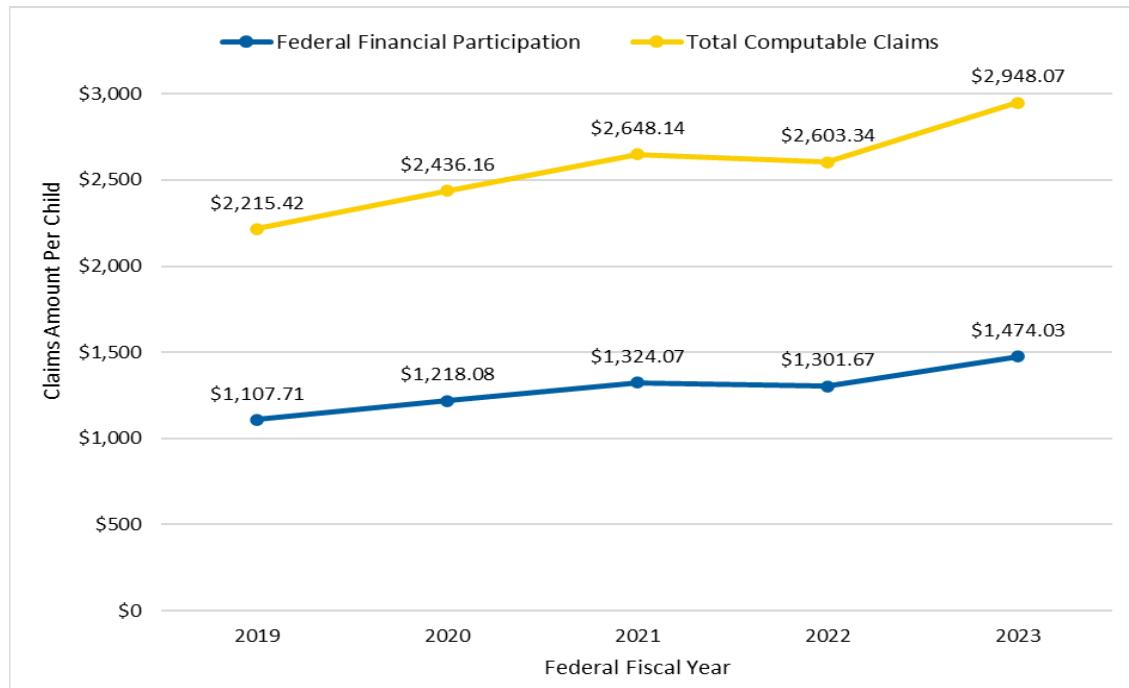


¹¹ In FY2019, the demonstration costs for the program were the largest reported expenditure and then drop to near zero after that. However, since the demonstration costs were excluded from this analysis (see above for explanation) In-Placement Administration costs were highest for all years.

increased over this time period, as did claims for legal representation and eligibility determinations (see Figure 4¹²). This increase in reimbursement claims for legal representation, and potentially some of the corresponding decline in claims for case management and planning, may have been influenced by concurrent policy efforts to clarify and broaden guidance on legal representation and to create a separate, distinct reporting category for legal representation.^{vi}

In-Placement Administration Caseloads. The average monthly number of children served through in-placement administration case planning and management has declined each year between FY2019 and FY2023, similar to how it has for the overall number of children served through administrative-related reported expenditures. In FY2019, the average monthly number of children was 197,245, declining in FY2023 to 138,163 children. With this decline in caseload size for in-placement administration, the estimated average monthly expenditures per child have begun to gradually grow from around \$2,215 in FY2019 to around \$2,948 in FY2023 (see Figure 5¹³).

Figure 5. Average Monthly Foster Care In-Placement Administration Costs per Child Grew between FY2019 and FY2023



¹² The numbers for this chart were calculated by using Title IV-E Foster Care Claims Data from FY2019-FY2023. The national totals for the subcategories of the FFP In-Placement: Case Planning and Management, Eligibility Determinations, Provider and Agency Management, and Legal representation were analyzed. Demonstration project costs tied to In-Placement Administration are not included in this visual.

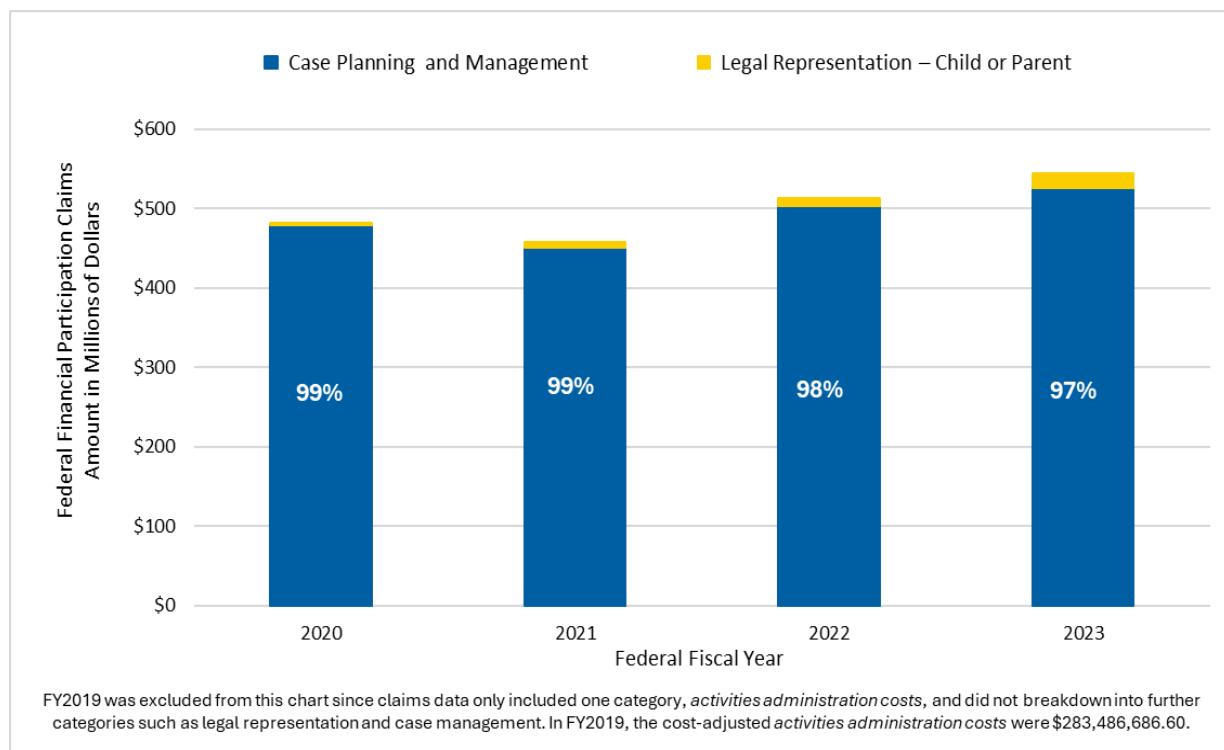
¹³ The numbers for this chart were calculated by using Title IV-E Foster Care Claims and Caseload Data from FY2019 to FY2023. Categories analyzed include the federal financial participation (FFP) and total computable (TC) Total Title IV-E In-Placement Administration claims and the Title IV-E Case Planning and Management caseload. The annual expenditure amounts were divided by 12 to match the reported average monthly caseload data.

Nearly all of Pre-Placement Administration Expenditure and Reimbursement Claims are for Case Management and Planning

Case Management. Pre-placement administration, which accounted for 15 to 18 percent of combined Title IV-E administrative costs between FY2019 and FY2023, includes reported expenditures and reimbursements for case planning and management, legal representation (child or parent), and operational costs for demonstration projects (excluded from Figure 6). Case planning and management accounts for nearly all federal pre-placement administrative reimbursement claims (97 to 99 percent), with only a small portion (one to three percent) of reimbursement claims going towards legal representation (see Figure 6¹⁴).

Legal Representation. From FY2019 to FY2023, reimbursement claims for legal representation increased by more than seven-fold (\$2,442,371 in FY2019 to \$17,960,362 in FY2023). This is again possibly related to concurrent policy changes that broadened and clarified guidance so that agencies could submit reimbursement claims for legal representation costs.^{vii}

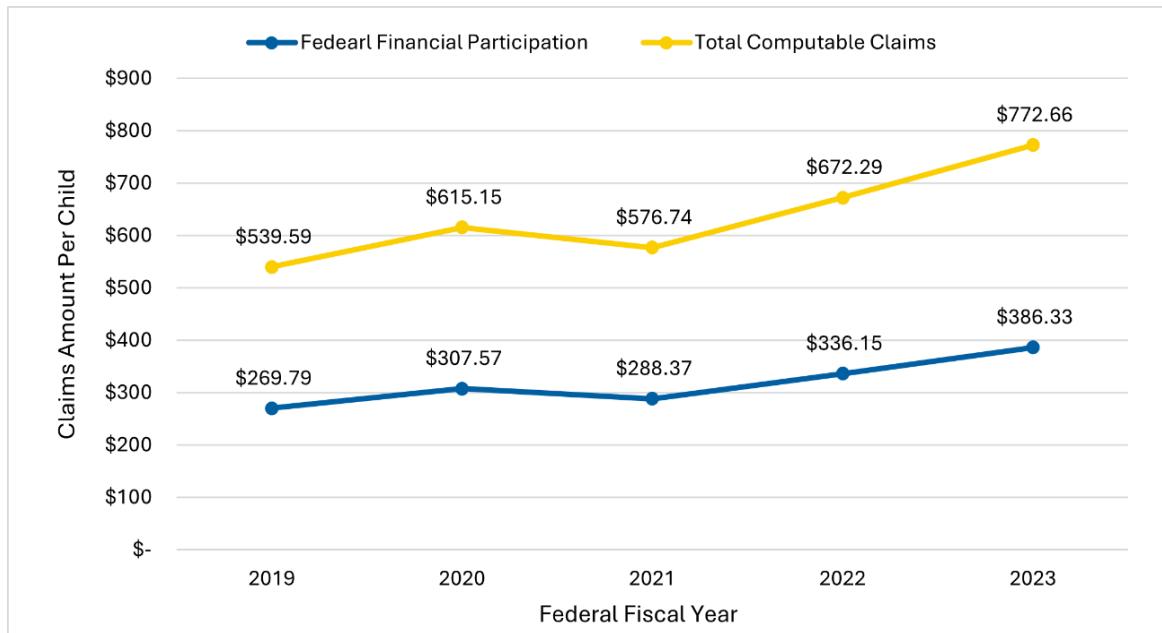
Figure 6. Case Planning and Management Represented Nearly All Federal Title IV-E Pre-Placement Administration Reimbursement Claims between FY2020 and FY2023



¹⁴ The numbers for this chart were calculated by using Title IV-E Foster Care Claims Data from FY2020 to FY2023. Categories analyzed include subcategories of the Pre-Placement Activities Administration category, which include the FFP for Case Planning and Management, and Legal Representation.

Pre-Placement Administration Costs Per Child. Similar to the trend with average monthly in-placement administration costs per child, the average monthly reimbursement claims for pre-placement administration costs per child have increased from \$270 in FY2019 to \$386 in FY2023, as the monthly average caseload size decreased from 139,750 in FY2019 to 117,336 in FY2023 (see Figure 7¹⁵). The total amount of reported expenditures (depicted as Total Computable Claims) for pre-placement administration also rose from FY2019 to FY2023.

Figure 7. Title IV-E Foster Care Average Monthly Pre-Placement Administration Costs per Child Rose from FY2019 to FY2023



There was Wide Variation Across State Title IV-E Foster Care Administrative Expenditures in FY2023

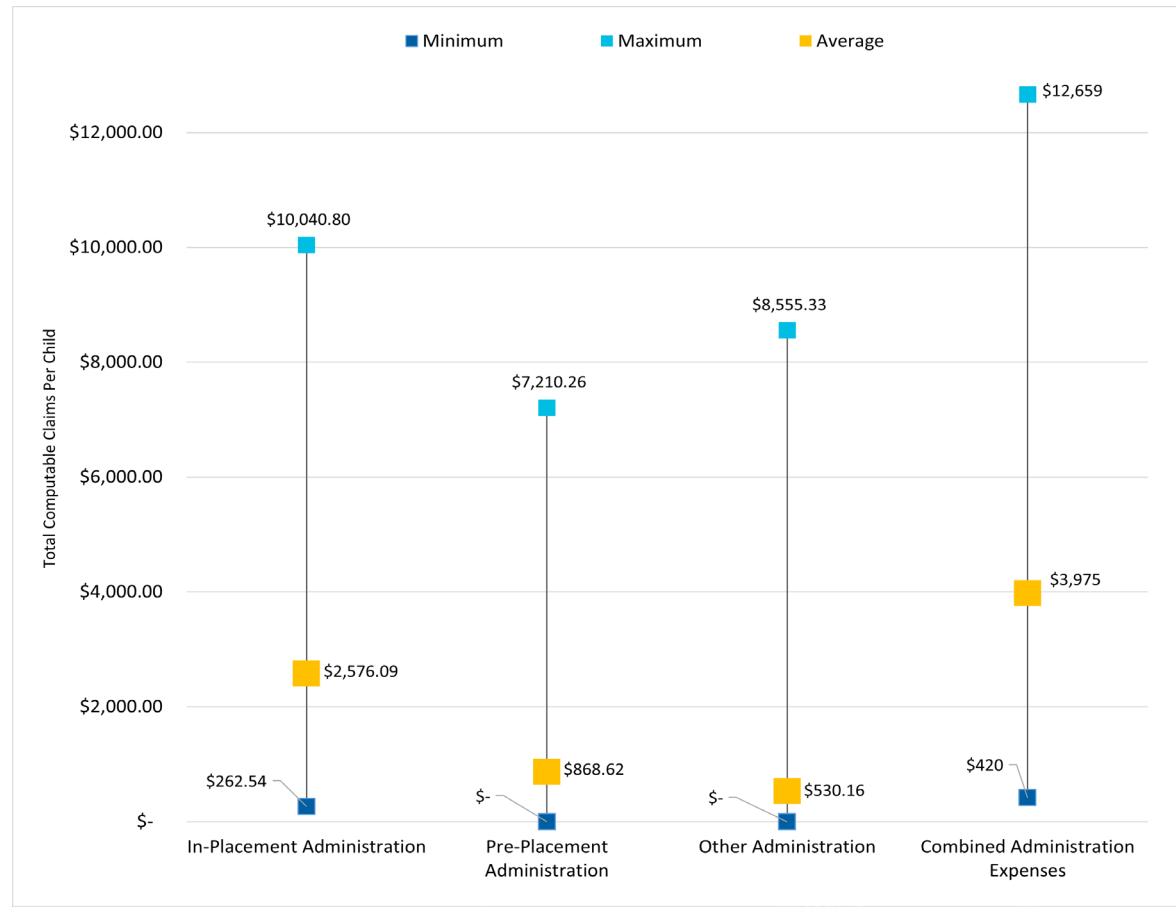
In FY2023, states' average reported expenditures for administrative-related activities were: \$92.5 million on in-placement administration, \$24 million on pre-placement administration, and almost \$450,000 on other administration (runaway and sex trafficking prevention) costs;¹⁶ if California's reported expenditures are excluded, the costs fall to \$63 million on in-placement administration, almost \$16.5 million on pre-placement administration, and \$295,000 on other administration costs.

¹⁵ The numbers for this chart were calculated by using Title IV-E Foster Care Claims Data from FY2019 to FY2023. Categories analyzed include the Federal Financial Participation (FFP) and Total Computable (TC) claims amount for Total Title IV-E Pre-Placement Administration and the Title IV-E Case Planning and Management Caseload. The annual expenditure amounts were divided by 12 to match the reported average monthly caseload data.

¹⁶ The data was pulled from ACF's Title IV-E Foster Care Claims and Caseload data for FY2023. Calculated by adding all the Title IV-E In-Placement Administration claims for each state in FY2023 and dividing by 42 (the number of states included in this state level analysis). The same was done for pre-placement and other administration costs to get the averages. States not included due to data issues identified by ACF in the spreadsheet: Arizona, Arkansas, Colorado, Mississippi, New Mexico, Ohio, Oklahoma, Oregon, Puerto Rico, Virgin Islands, Washington.

Combined Administrative Expenditures. Based on reported expenditures, the average monthly cost of combined Title IV-E administration (in-placement, pre-placement, and other administration) per child across states was \$3,975 (see Figure 8¹⁷). Maryland, Texas, and Washington, DC reported the highest combined average monthly administrative expenditures per child (see Figure 9¹⁸). Maryland's highest average monthly expenditures per child were for pre-placement administration, while Washington, DC's highest average monthly costs per child were for in-placement administration, and Texas's were for other administration. Maryland, in general, had higher reported expenditures, exceeding the average in

Figure 8. Average Monthly Administrative Costs Per Child for Title IV-E Foster Care Range across States, FY2023

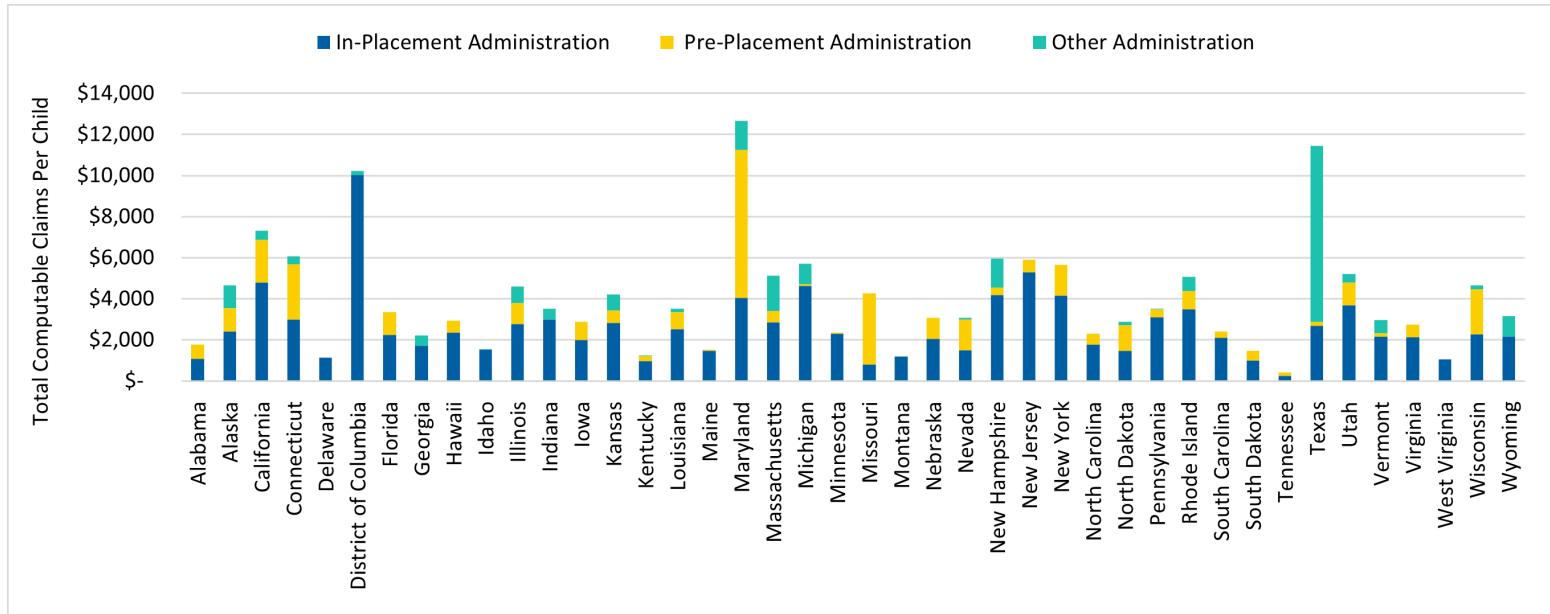


¹⁷ The numbers for this chart were calculated by using the FY2023 Title IV-E Foster Care Claims and Caseload Data. Categories analyzed include the TC values for In-Placement, Pre-Placement, Other Administration, and combined administration expenses by state. For each of the administrative cost categories, Title IV-E Case Planning and Management Caseload data was used to calculate cost per child for each administrative cost category and the combined administrative expenses. To calculate the minimum, maximum, and average for each administrative expense category used the =Min, =Max, and =Average functions in excel. The annual expenditure amounts were divided by 12 to match the reported average monthly caseload data.

¹⁸ The numbers for this chart were calculated by using the FY2023 Title IV-E Foster Care Claims and Caseload Data. Categories analyzed include the Total Computable (TC) values for In-Placement, Pre-Placement, and Other Administration costs per a child by state. States removed due to data issues identified in ACF spreadsheet: Arizona, Arkansas, Colorado, Mississippi, New Mexico, Ohio, Oklahoma, Oregon, Puerto Rico, Virgin Islands, Washington. The annual expenditure amounts were divided by 12 to match the reported average monthly caseload data.

each of the administration expense categories (the only other state to do that was Rhode Island, however Rhode Island was much closer to the averages in each of the categories than Maryland). Tennessee had the lowest combined average monthly administration costs per child, totaling to \$420; followed by West Virginia at \$1,058 per child and Delaware at \$1,128 per child. There are many possible factors influencing the variance in administrative expenditures across jurisdictions, including differences in state-level policies, as well as costs related to litigation and consent degrees for states involved in court cases, among others.^{viii} Examining such factors, however, is beyond the scope of this analysis.

Figure 9. States' Average Monthly Title IV-E Foster Care Overall and Categorical Administration Expenditures Per Child Varied Widely in FY2023



In-Placement Administration. Per child, the average monthly reported expenditures for states and territories were \$2,576 for in-placement administration, \$869 for pre-placement, and \$530 for other administration costs (see Figure 8). Average monthly in-placement administration costs range across states from \$263 up to \$10,041 per child, with about ten percent of states and territories reporting expenditures between \$0 and \$999, 64 percent reporting expenditures between \$1,000 and 2,999, 21 percent reporting expenditures between \$3,000 and \$4,999, and five percent reporting expenditures of \$5,000 or more. Washington, DC had the highest average monthly in-placement administration costs totaling to \$10,041 per child, which was \$4,756 dollars more per child than New Jersey, the state with the second highest average monthly in-placement administration costs. However, when looking at other administrative categories, Washington, DC reported zero dollars on pre-placement administration and under \$200 per child for average monthly “other administration” costs.

Pre-Placement Administration. Average monthly pre-placement administration costs ranged from zero dollars up to \$7,210 per child (see Figure 8). Most of the states and territories reported less than \$1,000 in average monthly expenditures per child on pre-placement administration costs, with about 69 percent of states and territories reporting expenditures between \$0 and \$999, 19 percent reporting

expenditures between \$1,000 and \$1,999, seven percent reporting expenditures between \$2,000 and \$2,999, and five percent reporting expenditures over \$3,000. Maryland had the highest average monthly pre-placement administration costs at \$7,210 per child, while eight states reported zero dollars for cost per child.¹⁹

Other Administration. Average monthly “other administration” costs ranged from zero dollars to \$8,555 per child across states (see Figure 8). The majority of states and territories, 86 percent, reported less than \$999 in average monthly expenditures on other administration costs per child. Texas had the highest average monthly cost per child for other administration costs; however, when looking across administration expense categories, Texas reported about \$100 more in average monthly expenditures than the average in-placement cost per child, and \$670 below the average monthly expenditures for pre-placement administration cost per child.

Conclusion

The majority of Title IV-E program funds have been spent on the Title IV-E foster care program in recent years, with the goal of providing eligible children and youth with safe and stable out-of-home care until they are safely reunified with their families, permanently placed with adoptive families or legal guardians, or transitioned to another planned arrangement for permanency. Between FY2019 and FY2023, the largest driver of reported Title IV-E foster care expenditures and reimbursements has been administrative costs, with in-placement administration costs being over \$1 billion larger than any other expenditure category during this period. Average monthly administrative-related costs per child have increased over time as caseload numbers have declined and reported expenditures have remained relatively stable. Across states and territories, there is a wide amount of variation in reported administrative expenditures and costs per child.

There are a few limitations to this analysis that suggest the potential for future work. The trends identified in this analysis may partially be influenced by concurrent policy and reporting changes that occurred during these fiscal years, as well as the COVID-19 pandemic, in which child welfare agencies had to make significant changes to their operations – though there is limited research available on the correlation, details, and magnitude of these factors’ influence. While some administrative costs are caseload dependent, others may be more fixed overhead expenses, though this is not information currently reported by jurisdictions. As previously mentioned, there are limitations to the self-reported data that states, Tribes, and territories submit to the Children’s Bureau. Variation across jurisdictions’ expenditures could also be reflective of other state-level policies and factors that are beyond the scope of this analysis, as well as court cases and consent decrees. Further exploration into additional years of data, the drivers of variation in jurisdictions’ administrative costs per child, and the reasons administrative expenditures are so high compared to non-administrative expenditures for Title IV-E foster care may help identify opportunities to ensure Title IV-E funds are being spent in effective and efficient ways to protect the well-being of children and youth.

¹⁹ Indiana reported \$320 in pre-placement administration claims, but reported serving a caseload of zero, so the cost per a child comes to zero dollars.

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ⁱⁱⁱ Zach Laris, "20 Years of Federal Foster Care Spending, Plus FY23 State Comparisons," March 26, 2025. Available from: <https://www.childwelfarewonk.com/p/20-years-of-federal-foster-care-spending-5da>

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^{vii} Ibid.

^{viii} Bipartisan Policy Center, "Accountability in the Courtroom: Review of Child Welfare Litigation and Required Reforms", December 11, 2025, Available from: <https://bipartisanpolicy.org/issue-brief/accountability-in-the-courtroom-review-of-child-welfare-litigation-and-required-reforms/>

Appendix A. Title IV-E Foster Care Expense Categories

Title IV-E Expense Categories

Defined in this brief as administrative expenses or administration costs:

Pre-placement administration costs refer to the administrative activities, such as case planning and management and legal representation, performed on behalf of a child who has been determined by the Title IV-E agency to be at imminent risk of removal and potentially eligible for Title IV-E foster care.

In-placement administration costs are the allowable administrative costs claimed on behalf of a child after they enter a Title IV-E eligible foster care placement. These costs include case planning and management, eligibility determination and redetermination, independent legal representation, and provider or agency management activities necessary to carry out the Title IV-E foster care program.

Other administration costs refer to allowable administrative activities related to addressing or preventing the runaway and sex trafficking of children in foster care.

Defined in this brief as non-administrative costs:

Foster care maintenance payments (FCMP) “cover the cost of (and the cost of providing) food, clothing, shelter, daily supervision, school supplies, a child's personal incidentals, liability insurance with respect to a child and reasonable travel to the child's home for visitation and reasonable travel for the child to remain in the school in which the child is enrolled at the time of placement” (from: <https://cwpm.acf.gov/pdfs/CW%20Policy%20Database%20-Section%208.3B%20Policy%20Questions%20&%20Answers.pdf>)

Child Welfare Information System (CCWIS) is “a case management information system that state and tribal Title IV-E agencies may develop to support their child welfare program needs” (from: https://acf.gov/sites/default/files/documents/cb/ccwis_faqs.pdf)

Training costs are the allowable expenses for training staff, foster parents, providers, and professional partners.

Demonstration Project costs* include the project development, operation and evaluation costs for Title IV-E waiver demonstration programs.

* Given the focus of this brief on FY2019 to FY2023 and the conclusion of the waiver demonstration programs in FY2019, we did not include the stand-alone expense category titled “Demonstration Project-Non-Title IV-E Funding Category Costs” in this analysis but did include demonstration project costs tied to other categories of spending (including under FCMP, training, in-placement administration, and pre-placement administration).

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