

PROGRAM IMPROVEMENT PLAN TITLE IV-E ELIGIBILITY



**ARKANSAS
DEPARTMENT OF HUMAN SERVICES**

DIVISION OF CHILDREN AND FAMILY SERVICES

**January 2004
Revised per ACF Request April 15, 2004
Revisions are underlined on pages 5, 6, 24, and 25**

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INTRODUCTION

During the week of June 23-27, 2003, Administration for Children and Families (ACF) staff from the Central and Region VI Offices and State of Arkansas Division of Children and Family Services (DCFS) staff conducted an eligibility review of Arkansas' Title IV-E foster care program in Little Rock, Arkansas. The purpose of the Title IV-E foster care eligibility review was (1) to determine if Arkansas was in compliance with the child and provider eligibility requirements as outlined in 45 CFR 1356.71 and Section 472 of the Act; and (2) to validate the basis of Arkansas' financial claims to ensure that appropriate payments were made on behalf of eligible children and to eligible homes and institutions. The Division of Children and Family Services received a report on the results of the review on October 17, 2003.

FINDINGS FROM THE IV-E REPORT

ACF commends the State for its excellent efforts to improve its Title IV-E foster care eligibility determination process, resulting in a more accurate Title IV-E foster care eligibility program. The report identifies program strengths and provides recommendations for further improvement. Further, ACF determined the State of Arkansas' Title IV-E foster care maintenance program not to be in substantial compliance with Federal child and provider eligibility requirements for the period April 1, 2002 through September 30, 2002.

Therefore, pursuant to 45 CFR Section 1356.71(i), Arkansas is required to develop a Program Improvement Plan (PIP) designed to correct those areas needing corrective action as identified in the report. The PIP is not to exceed 1 year. It will be developed by the State, in consultation with ACF Regional Office staff, and must be submitted to the ACF Regional Office by January 13, 2004.

The PIP must include the following components:

- Specific goals;
- Action steps required to correct each identified area needing improvement;
- A date by which each of the action steps is to be completed; and
- A description of how progress on the plan will be evaluated by the State and reported to the ACF Regional Office, including the frequency and format of the evaluation procedures.

Also, pursuant to 45 CFR Section 1356.71(j)(2), a secondary review must be held following the completion of the PIP. The sample for the secondary review will be 150 cases (plus a ten (10) percent over sample of fifteen (15) cases) drawn from the State's most recent Adoption and Foster Care Analysis and Reporting System (AFCARS) data. The financial penalty to be taken for this primary review will be for the payments, including the administrative costs, associated with the error cases.

The original ACF finding was a disallowance of \$67,067.04 in Federal Financial Participation (FFP) for Title IV-E foster care maintenance payments and related administrative costs is the penalty assessed by the Federal Agency based on the review of a sample of 80 cases drawn from a universe of Title IV-E payments for the review period, April 1, 2002, through September 30, 2002. The review team determined that ten (10) cases were ineligible for Federal funding. However, on November 13, 2003, the State of Arkansas filed an appeal of the disallowance amount. In a December 9, 2003, letter ACF rescinded \$17,853 of the \$18,967 administrative cost disallowance. Therefore, the total disallowance has been reduced to \$49,214.04.

CASE RECORD SUMMARY AND DISALLOWANCE

The review included a sample of eighty (80) cases. The sample was drawn from a universe of cases that received at least one Title IV-E foster care maintenance payment during the 6-month period of April 1, 2002, through September 30, 2002. Ten (10) cases out of the eighty reviewed were determined not to be eligible for funding under Title IV-E foster care. Pursuant to 45 CFR 1356.71(j), a disallowance in the amount of \$49,214.04 in Federal Financial Participation (FFP) is assessed for the period of time that these cases were determined to be in error. The following table details the error cases, reasons for the error, appropriate citations, and disallowance amounts:

Sample Case #	Reason for Error	Citation	Disallowance Amount
OS1	Lack of documentation that provider safety requirements were met before the child was placed. DCFS could not provide documentation approving the foster home in which the child was placed.	Section 471(a)(20), 475(1), and 45 CFR 1356.30	<u>Originally \$1,686.66</u> <u>Reduced to \$956.66</u>
18	Lack of documentation that the foster care provider safety requirements were met before the child was placed. Community Counseling Associates, a foster care contract provider, could not provide documentation that criminal background checks were performed for the foster home in which the child was placed for the entire review period, 04/01/2002 through 09/30/2002.	Section 471(a)(20), 475(1), and 45 CFR 1356.30	<u>Originally \$20,583.50</u> <u>Reduced to \$16,340.50</u>
27	Lack of documentation that the foster child's AFDC eligibility was established. DCFS failed to enter the child's Title II (SSA) income into CHRIS and, as a result, the case was incorrectly determined to be IV-E eligible although the household's income exceeded the maximum limit.	Section 472(a)(1) and (4), 45 CFR 1356.71(d)(1)(v)	\$3,888.33
29	Lack of documentation that the foster care provider was fully licensed or approved before the child was placed. DCFS could not provide documentation that a re-evaluation was conducted for the foster home	45 CFR 1356.71(d)(1)(iv), 1355.20	<u>Originally \$8,821.77</u> <u>Reduced to \$5,916.77</u>

	(pre-adoptive placement) in which the child was placed for the entire review period, 04/01/2002 through 09/30/2002.		
50	Lack of documentation that the foster care provider was fully licensed or approved before the child was placed. DCFS could not provide documentation that a re-evaluation was conducted for the foster home in which the child was placed from 06/10/2002 through 8/12/2002.	45 CFR 1356.71(d)(1)(iv), 1355.20	<u>Originally \$636.08</u> <u>Reduced to 178.08</u>
55	Lack of documentation that the foster care provider was fully licensed or approved before the child was placed. – DCFS could not provide documentation approving the foster home in which the child was placed. DCFS could not provide documentation that a criminal background check has been performed until 7/22/2002. The case was determined to be in error from 2/23/2001 to 8/21/2002.	45 CFR 1356.71(d)(1)(iv), 1355.20	<u>Originally \$7,091.92</u> <u>Reduced to \$4,020.92</u>
57	Lack of documentation that foster care provider safety requirements were met before the child was placed. Mid-South Health Systems, a foster care contract provider, could not provide documentation approving the foster home in which the child was placed from 09/18/2000 through 09/15/2002.	Section 471(a)(20), 475(1), and 45 CFR 1356.30.	<u>Originally \$21,320.97</u> <u>Reduced to \$16,144.96</u>
59	Lack of documentation that the foster care provider was fully licensed or approved before the child was placed. DCFS could not provide documentation approving the foster home in which the child was placed from 6/30/2002 to 5/28/2003.	45 CFR 1356.71(d)(1)(iv), 1355.20	<u>Originally \$580.30</u> <u>Reduced to \$329.30</u>
67	Lack of documentation that the foster care provider was fully licensed or approved before the child was placed. Counseling Services of East Arkansas, a foster care contract provider, could not provide documentation that a criminal background check was conducted for the foster home in which the child was placed from 4/19/2002 to 4/16/2003.	45 CFR 1356.71(d)(1)(iv), 1355.20	<u>Originally \$619.28</u> <u>Reduced to \$368.28</u>
69	Lack of documentation that the foster care provider was fully licensed or approved before the child was placed. DCFS could not provide documentation that a re-evaluation was conducted for the foster home in which the child was placed from 06/17/2002 to 05/26/2003.	45 CFR 1356.71(d)(1)(iv), 1355.20	<u>Originally \$1,838.23</u> <u>Reduced to \$1,070.23</u>
Total Disallowance			<u>Originally \$67,067.04</u> <u>Reduced to \$49,214.04</u>

ACF RECOMMENDED AREAS NEEDING IMPROVEMENT

The Administration for Children and Families (ACF) made the following recommendations in its review findings regarding areas that need improvement. Each recommendation is addressed below.

ACF Recommendation 1

The foster home approval process should result in clearly documented approvals. At a minimum, a signature, title, and approval date should appear in every child's case file for every foster care placement and should coincide with the Arkansas Children's Information and Reporting System (CHRIS) data.

State Response

The State, in principle, concurs with this recommendation. DCFS policy stipulates that an approval letter is to be sent to foster homes advising that the facility has been approved. To standardize the letter content as well as to ensure that the approval letters are consistently sent, DCFS plans to generate the approval letters from CHRIS. Templates of the system-generated letters are included as Attachment A, Foster Home Approval Letter, and as Attachment B, Foster Home Re-evaluation Letter, to this Plan. Refer to Strategy II-A that discusses a statewide one-time review and clean up of existing foster homes in CHRIS. Refer to Strategy II-B and Strategy II-C that discuss system-generated letters for approval and re-evaluation of foster homes.

DCFS does not concur that a copy of the foster home approval letter is to appear in every child's case file for every foster care placement. Foster home records are maintained in the county offices. IV-E Eligibility records are maintained centrally in Little Rock. It is an unnecessary administrative burden to file a copy of the foster home approval letter in each child's eligibility file. DCFS will enhance the CHRIS IV-E claims processing as discussed in Strategy II-F to ensure that IV-E claims are not made for children when the foster home approval or re-evaluation has not been completed timely.

ACF Recommendation 2

Court order language regarding "contrary to the welfare" and "reasonable efforts" should be used consistently and statewide. Court orders should be more child specific.

State Response

DHS understands, through post-review conversations with ACF, that this recommendation was made as a result of Federal findings on a national scale wherein court language has been problematic. There were no cases reported to be in error from the Arkansas IV-E review due to "contrary to welfare" or "reasonable efforts" language. Therefore, the State contends that no corrective action is required with regard to this ACF recommendation. However, the DHS Office of Chief Counsel (OCC) has updated the templates used to create Emergency Custody Orders. These updates occurred to assist in clarifying "contrary to welfare" language. Templates designed by the OCC are included as Attachment C, Order for Emergency Custody - Protect Child, and as Attachment D, Order for Emergency Custody - Prevent Removal, to this Plan. The updated templates were

presented to and discussed by the DHS attorneys in a statewide forum held in Little Rock by the DHS Office of Chief Counsel on October 17, 2003. The new templates have been implemented.

ACF Recommendation 3

Child placing agencies (CPA's) providing contracted child placing services must comply with foster home approval and criminal background check requirements.

State Response

The State concurs with this recommendation. DCFS plans to include in its contracts with foster care providers appropriate language to ensure that this recommendation is met. Refer to Strategy II-G in this Plan that addresses the corrective action planned for this recommendation.

ACF Recommendation 4

All child placement locations and their corresponding payment histories should be directly accessible through the State's SACWIS system (CHRIS) and the Adoption and Foster Care Analysis Reporting System (AFCARS) regardless of whether the child was placed by DCFS or a contracted child placing agency. Lack of this capability resulted in most of the difficulties during the preparation and implementation of this review. In addition, extensive manual research was necessary to document unallowable payments for children placed by child placing agencies.

State Response

The State concurs with this recommendation and recognized this issue as problematic prior to the IV-E review. Child Placing Agency information in CHRIS had been updated prior to the review to capture placements within CPA's at the foster home level. However, identification of specific foster homes within CPA's providing Therapeutic Foster Care was an effort that was not completed until September 2002. Identification of Individual Specialized DDS foster homes was not completed until February 2003. Due to the timing of the review and due to the period under consideration, many of these foster homes were not specifically identified on CHRIS for the review period. Therefore, the Review Team did spend time seeking the specific foster homes in which children were placed during the review period. However, since CPA placements in CHRIS now have foster home level placements identified, the State does not believe that this area will be problematic during future reviews.

As a part of the SACWIS Plan, analysis was already being conducted to determine the most efficient and effective means for incorporating all payment histories into CHRIS. Child Placing Agency information in CHRIS was also being updated prior to the review to capture placements within these agencies at the foster home level. Refer to the SACWIS Plan that discusses payment histories in CHRIS and the State's plans for improvement in this area.

ACF Recommendation 5

Residential facility staff records should be reviewed at least yearly to monitor whether safety requirements have been met. Results should be clearly documented.

State Response

The State is already reviewing residential facilities on an annual basis. The DCFS Licensing Unit, comprised of five staff and one supervisor, conducts the annual reviews. The DCFS Licensing Unit uses form CFS-521, Child Welfare Agency Licensing Unit Licensing Compliance Record to document the results of each facility audit. A copy of the CFS-521 is included as Attachment E to this Plan.

All licensed child placement agencies are monitored once annually. Licensing staff do not visit individual foster homes. However, the Unit visits the offices of child placement agencies and reviews the records of the foster homes.

The monthly number of placement agencies visited will vary, subject to the itinerary of the Licensing Specialist. Each Licensing Specialist will monitor every agency on his/her caseload once annually. Residential childcare facilities are monitored quarterly. The DCFS Licensing Unit has the right to visit any licensed agency, as often as deemed necessary, to ensure they remain in substantial compliance with licensing standards. The above comments are a description of the minimum review levels.

ACF Recommendation 6

Narrative case documentation should specify the child's name and include information about the father as well as the mother of the child.

State Response

There were no deficiencies noted from the Arkansas review due to inadequate documentation of parents. Therefore, DHS concludes that this recommendation has been added to the ACF report as deficiencies of this nature were found in IV-E reviews from other States. The State plans no corrective action as a result of this recommendation since this area is not applicable to deficiencies found during the Arkansas review.

ACF Recommendation 7

The State should consider enhancing CHRIS to include a tickler feature to ensure eligibility redeterminations are completed timely.

State Response

The State concurs with this recommendation. CHRIS already has a tickler feature that informs caseworkers a redetermination is due. The tickler file is accessible both to the caseworker and to the caseworker supervisor. Following the IV-E review, DCFS made a change to CHRIS with regard to redetermination ticklers. CHRIS now uses the anniversary date of the child's

removal as the due date for each annual redetermination. This procedure is consistent with the Federal policy that requires an annual IV-E redetermination. The State also plans to implement new re-evaluation reports that can be accessed through CHRIS. The reports will be available to all CHRIS users who have sufficient security to access online reports. The reports are discussed in Strategy I-B of this Plan.

ACF Recommendation 8

DCFS should implement training and monitoring of both DCFS field staff and child placing agencies regarding their responsibility to maintain IV-E eligibility requirements and documentation. Contracts with child placing agencies should include agreements ensuring adequate record keeping and time frames for providing requested documentation.

State Response

The State concurs with this recommendation. Refer to Strategies II-E and II-G in this document that address the Department's plans to improve this program area.

ACF Recommendation 9

DCFS should develop a communication protocol with both County offices and child placing agencies so DCFS can readily resolve eligibility issues quickly and efficiently.

State Response

The State concurs with this recommendation with regard to eligibility reviews. The IV-E Review Team found it problematic to secure information from child placing agencies during the review. There were fewer problems requesting information from county offices but communication problems did occur with both CPA's and with county offices in that information was not sent immediately upon request. The State does acknowledge that a formal protocol will facilitate communication regarding eligibility issues among State stakeholders during future reviews. Refer to Strategy III-A that addresses the Department's plans to improve this area.

ACF Recommendation 10

Children's case files should include all IV-E Eligibility documentation.

State Response

The State finds this recommendation too vague to address in the Program Improvement Plan. Children's eligibility files in Arkansas contain identification documents, court orders, application forms, correspondence, budgeting documentation, and narrative entries that address each IV-E eligibility factor. Additionally, the paper eligibility record contains screen prints from CHRIS, the state's SACWIS, and ACES, the state's IV-A/Medicaid system. The paper case file clearly documents each eligibility factor on form DCO-93 with the final determination documented in the final panel of each form. The only eligibility related error identified during the review resulted from income that was clearly documented in the paper eligibility file. The State believes that its eligibility record sufficiently includes documentation to support each child's IV-E determination.

ACF Recommendation 11

DCFS should collaborate with the State Office of Chief Counsel and the Court Improvement Program in the development and implementation of the Program Improvement Plan.

State Response

DCFS plans to include the DHS Office of Chief Counsel (OCC) as a reviewer and commenter on the Plan. DCFS recognizes the critical role that OCC has with regard not only to the initial IV-E determination but also to continuing claimability of children determined to be IV-E eligible. DCFS and OCC have and will remain partnered in efforts to serve our mutual clients by exercising best practices in our casework.

ANALYSIS OF FINDINGS FROM THE IV-E REPORT

Based on the reasons for errors, the ten cases identified during the review can be grouped into two categories:

- AFDC Eligibility - Case 27 was determined to be in error due to lack of documentation that the foster child's AFDC eligibility was established.
- Provider Approval and Safety - Cases OS1, 18, 29, 50, 55, 57, 59, 67, and 69 were determined to be in error due to lack of documentation that the foster care provider was fully licensed or approved or that provider safety requirements were met before the child was placed.

In the following Improvement Area sections, the Plan addresses Agency actions to be employed to resolve the issues that resulted in these errors. Within each Improvement Area are the strategies, goals, and specific action steps to be taken in the improvement area. Where practical and appropriate, names of responsible parties and target completion dates are documented.

IMPROVEMENT AREA I - AFDC ELIGIBILITY

Sample case #27, was determined to be in error due to lack of documentation that the foster child's AFDC eligibility was established. The foster child in this case was receiving Title II Social Security benefits in excess of the income limit allowed for the IV-E Program. The information was reported to the DCFS Eligibility Analyst during the IV-E determination. The income was documented in the case file but the analyst failed to enter the income into the Children's Reporting and Information System (CHRIS), the state's automated SACWIS system. As a result, the system determined that the child was IV-E eligible and the analyst accepted the system result. CHRIS would have appropriately determined the case as non-IV-E had the user entered the income accurately. The error was identified and corrected by the State prior to the Federal review. The Eligibility Analyst responsible for this case error was not a permanent Eligibility Unit staff member and is no longer working for the Agency. All current analysts were provided instruction regarding appropriate data entry in CHRIS during their initial trainings. There were no income related eligibility errors found for

current Eligibility Unit staff. However, the State recognizes the need to ensure that all future hires are appropriately trained to enter income accurately and appropriately in the State’s SACWIS.

STRATEGY I-A – TRAIN NEW DCFS ELIGIBILITY UNIT STAFF FOR DATA ENTRY OF INCOME

Ensure that new DCFS eligibility staff receive appropriate training regarding the data entry of all income into CHRIS. This strategy will be conducted on an on-going basis as new staff are hired or promoted in the DCFS Eligibility Unit.

The action steps required to implement this strategy are depicted in the following table.

Goal: The goal is to ensure that staff are knowledgeable regarding the appropriate and accurate data entry of income data into the CHRIS automated system.

Action(s) Required	Lead Person(s)	Target Completion Date
1. Train DCFS Eligibility Unit new hires responsible for entering income data into CHRIS regarding the appropriate methods & timeliness of data entry.	Gloria Powell, DCFS Eligibility Unit	During initial training for staff
2. Second party 100% of the IV-E cases worked by DCFS Eligibility Unit new hires at least one month following training and caseload assignment.	Gloria Powell, DCFS Eligibility Unit	Ongoing as new staff are hired

STRATEGY I-B – REDETERMINATION REPORTS FOR FOSTER CHILDREN

In addition to the AFDC eligibility error identified during the IV-E Review, ACF’s Recommendation 7 was that the State consider enhancing CHRIS to include a tickler feature to ensure eligibility redeterminations are completed timely. A tickler feature already exists in CHRIS as described earlier in this document. However, the State believes that implementing new reports will enhance the CHRIS tickler component. The new reports will be available to all CHRIS users who have sufficient security to access online reports.

A new online report, Redeterminations Due for Foster Children for MM/YYYY, will list all redeterminations that are due to be sent by the DCFS caseworker in the upcoming month. DCFS management may use this report to monitor the redetermination process. It will provide an instrument that lists upcoming redeterminations by worker, by county, and by area.

A new online report, Redeterminations Overdue for Foster Children, will list all redeterminations that should have but have not been sent by the DCFS caseworker. DCFS management may also use this report to monitor the redetermination process.

The action steps required to implement this strategy are depicted in the following table.

Goal: The goal is to implement a tool in CHRIS to assist in identifying IV-E redeterminations that are not completed timely.

Action(s) Required	Lead Person(s)	Target Completion Date
1. Initiate request for new online reports.	Steve Sorrows, DCFS Eligibility Unit	Three weeks following receipt of Plan approval.
2. Develop specifications for new online reports.	Darcy Dinning, Office of Systems & Technology	Two weeks following completion of previous Action.
3. Obtain approval of report specifications from DCFS.	Darcy Dinning, Office of Systems & Technology	Two weeks following completion of previous Action.
4. Analyze, program, and test new online reports.	Darcy Dinning, Office of Systems & Technology	One month following completion of previous Action.
5. Advise field staff regarding the availability and use of the new online reports.	Darcy Dinning, Office of Systems & Technology	Three weeks following completion of previous Action.
6. Implement new online reports.	Darcy Dinning, Office of Systems & Technology	Three weeks following completion of previous Action.

IMPROVEMENT AREA II - FOSTER CARE PROVIDER SAFETY REQUIREMENTS

Sample cases OS1, 18, 29, 50, 55, 57, 59, 67, and 69, were determined to be in error due to lack of documentation that the foster care provider was fully licensed or approved before the child was placed.

Sample case #OS1 was determined to be in error due to lack of documentation that provider safety requirements were met before the child was placed. DCFS could not provide documentation approving the foster home in which the child was placed.

Sample case #18 was determined to be in error due to lack of documentation that the foster care provider safety requirements were met before the child was placed. Community Counseling Associates, a therapeutic foster care contract provider, could not provide documentation that criminal background checks were performed for the foster home in which the child was placed.

Sample case #29 was determined to be in error due to lack of documentation that the foster care provider was fully licensed or approved before the child was placed. DCFS could not provide documentation that a re-evaluation was conducted for the foster home (pre-adoptive placement) in which the child was placed.

Sample case #50 was determined to be in error due to lack of documentation that the foster care provider was fully licensed or approved before the child was placed. DCFS could not provide documentation that a re-evaluation was conducted for the foster home in which the child was placed.

Sample case #55 was determined to be in error due to lack of documentation that the foster care provider was fully licensed or approved before the child was placed. DCFS could not provide documentation approving the foster home in which the child was placed. DCFS could not provide documentation that a criminal background check has been performed timely.

Sample case #57 was determined to be in error due to lack of documentation that foster care provider safety requirements were met before the child was placed. Mid-South Health Systems, a therapeutic foster care contract provider, could not provide documentation approving the foster home in which the child was placed.

Sample case #59 was determined to be in error due to lack of documentation that the foster care provider was fully licensed or approved before the child was placed. DCFS could not provide documentation approving the foster home in which the child was placed.

Sample case #67 was determined to be in error due to lack of documentation that the foster care provider was fully licensed or approved before the child was placed. Counseling Services of East Arkansas, a therapeutic foster care contract provider, could not provide documentation that a criminal background check was conducted for the foster home in which the child was placed.

Sample case #69 was determined to be in error due to lack of documentation that the foster care provider was fully licensed or approved before the child was placed. DCFS could not provide documentation that a re-evaluation was conducted for the foster home in which the child was placed.

STRATEGY II-A – APPROVAL & RE-EVALUATION DOCUMENTATION FOR FOSTER HOMES

ACF determined the State not to be in compliance when DCFS or a contract provider was unable to provide documentation that a foster home had been approved or re-evaluated. For newly approved foster homes, ACF sought a letter of approval as is required by DCFS policy. For homes that had been in operation more than one year, ACF sought a letter of approval or other documentation such as a signed form completed by the State Agency showing that the re-evaluation had been successfully performed. DCFS plans to system generate letters of approval and re-evaluation as discussed Strategies II-B and II-C. However, as a precursor to implementation of Strategies II-B and II-C, DCFS must address any documentation missing from current foster home records. Further, DCFS must successfully perform redeterminations of foster homes that have not had re-evaluations completed timely. The results of each re-evaluation must be recorded in CHRIS. Then, in Strategy II-F, the reimbursement program will be modified not to permit IV-E claims for IV-E eligible children placed in a non-approved foster home.

Strategy II-A addresses the (1) review of each currently open foster home record, (2) performance of a re-evaluation for the home if one has not been conducted within a year from the initial approval or the last re-evaluation, (3) update of the Contracts/Status window in CHRIS, and (4) inclusion of documentation in the foster home case record that an approval or re-evaluation has been successfully completed. Foster home record reviewers for this strategy will use the CFS-475 DCFS Checklist for Compliance Family Foster Home Record. A copy of the form is included in this Plan as Attachment F. The action steps required to implement this strategy are depicted in the following table.

Goal: The goal of this strategy is to examine 100% of the open foster home records statewide and record the results in CHRIS.

Action(s) Required	Lead Person(s)	Target Completion Date
1. Revise the CFS-475 checklist to be used to examine foster home records for compliance with approval and re-evaluation documentation, to confirm that the results of the actions are entered in CHRIS, and require supervisory review and signoff.	Sheryl Alexander, DCFS Policy Unit	Four weeks following receipt of Plan approval.
2. Issue the checklist and instructions to DCFS field staff.	Quranner Cotledge, DCFS Assist. Director	Two weeks following completion of previous Action.
3. Conduct reviews of and take necessary actions for foster homes based on the checklist criteria and DCFS policy.	DCFS Area Managers	Three months following completion of Step 3 from Strategy II-D.

STRATEGY II-B – SYSTEM GENERATE APPROVAL LETTERS FOR FOSTER HOMES

System-generate approval letters for foster homes from CHRIS upon successful data entry of the approval into the online system. ACF determined the State not to be in compliance when DCFS or a contract provider was unable to provide documentation that a foster home had been approved. ACF sought a letter of approval as is required by DCFS policy.

DCFS plans to generate the foster home approval letter from CHRIS at the time that the user enters the approval on the system. A copy of the proposed approval letter is included in this Plan as Attachment A, Foster Home Approval Letter. The letter will be mailed to the home under review. A copy of the letter will also be sent to the county office, will be signed by the DCFS County Supervisor, and will be filed in the county office foster home record. In the event that the foster home is with a CPA, a copy of the letter will be forwarded to the CPA for signature and for filing in the facility’s foster home record. Additionally, DCFS plans to use form CFS-563, Foster Parent/Adoptive Parent Recruitment Log, to document the date of each step in the evaluation and development each application to become a foster parent(s). A copy of the CFS-563 is included as Attachment G to this Plan. The action steps required to implement this strategy are depicted in the following table.

Goal: The goal of this strategy is to generate a letter for each foster home approval and, therefore, document approval of all foster homes.

Action(s) Required	Lead Person(s)	Target Completion Date
1. Initiate request for new approval letters.	Steve Sorrows, DCFS Eligibility Unit accompanied by Sheryl Alexander, DCFS Policy Unit	Four weeks following receipt of Plan approval.
2. Develop specifications for new approval letters.	Darcy Dinning, Office of Systems & Technology	One month following completion of previous Action.
3. Obtain approval of specifications from DCFS.	Darcy Dinning, Office of Systems & Technology	Two weeks following completion of previous Action.
4. Analyze, program, and test new functionality.	Darcy Dinning, Office of Systems & Technology	Six weeks following completion of previous Action.

5. Advise field staff regarding the availability and use of foster home approval letters.	Darcy Dinning, Office of Systems & Technology	Two weeks following completion of previous Action.
6. Implement new approval letter functionality in CHRIS.	Darcy Dinning, Office of Systems & Technology	Three weeks following completion of previous Action.

STRATEGY II-C – SYSTEM GENERATE REDETERMINATION LETTERS FOR FOSTER HOMES

System-generate redetermination letters for foster homes from CHRIS upon successful data entry of the approval into the online system. ACF determined the State not to be in compliance when DCFS or a contract provider was unable to provide documentation that a foster home had been re-evaluated. ACF sought a letter of approval or other documentation such as a signed form completed by the State Agency showing that the re-evaluation had been successfully performed.

DCFS plans to generate a foster home re-evaluation letter from CHRIS at the time that the user enters the re-evaluation on the system. A copy of the proposed re-evaluation letter is included in this Plan as Attachment B, Foster Home Re-evaluation Letter. The letter will be mailed to the home under review. A copy of the letter will also be sent to the county office, will be signed by the DCFS County Supervisor, and will be filed in the county office foster home record. In the event that the foster home is with a CPA, a copy of the letter will be forwarded to the CPA for signature and for filing in the facility’s foster home record. The action steps required to implement this strategy are depicted in the following table.

Goal: The goal of this strategy is to generate a letter for each foster home re-evaluation and, therefore, document re-evaluation of all foster homes.

Action(s) Required	Lead Person(s)	Target Completion Date
1. Initiate request for redetermination letters.	Steve Sorrows, DCFS Eligibility Unit accompanied by Sheryl Alexander, DCFS Policy Unit	Four weeks following receipt of Plan approval.
2. Develop specifications for redetermination letters.	Darcy Dinning, Office of Systems & Technology	One month following completion of previous Action.
3. Obtain approval of specifications from DCFS.	Darcy Dinning, Office of Systems & Technology	Two weeks following completion of previous Action.

4. Analyze, program, and test new functionality.	Darcy Dinning, Office of Systems & Technology	Six weeks following completion of previous Action.
5. Advise field staff regarding the availability and use of foster home redetermination letters.	Sheryl Alexander, DCFS Policy Unit	Two weeks following completion of previous Action.
6. Implement redetermination letter functionality in CHRIS.	Darcy Dinning, Office of Systems & Technology	Three weeks following completion of previous Action.

STRATEGY II-D – TRACK FOSTER HOME STATUS FOR IV-E CLAIMS

Track the status of Foster Homes Approvals and Redeterminations in CHRIS to facilitate appropriate IV-E claims based on the status of the facility. CHRIS currently contains data on the Foster Home Contracts/Status window that may be used to indicate the type of action that was last taken with regard to the approval of the home. The following material provides a screen capture and the Help Text available regarding the contents and use of the Contracts/Status window of CHRIS. The following is a recreation of the data displayed on the CHRIS Contracts/Status window.

Contracts/Status – Name of Facility

Contracts / Status

Type	Status	Approved	Date 1	Date 2	Date 3	Case Nbr
Availability	Available		07161997			
Home Study	Approved	Y	07161997	07200998		

Status Type

- Contract
- Availability
- Home Study
- Fair

Status: **Case Nbr:**

Contract

Contract Start End

Availability

Availability Date:

Family Assessment/Home Study

Status Date: Re-evaluation Due Date:

Fair Hearing

Notice Date: Requested Family Date: Hearing Date:

Comments:

The Type “Home Study” on the Contracts/Status window indicates that the facility has had an approval or a re-evaluation conducted. If the approval or re-evaluation was favorable, then the user enters a Status of Approved. The user also enters the Status Date that represents the date for which the re-evaluation is effective. This date is assigned to the Contracts/Status grid in the Date 1 field. CHRIS then assigns a value of one year from Date 1 to the Date 2 field. Date 2 represents the date the next re-evaluation must be completed and approved in order for the facility to remain approved.

Currently, staff also enter re-evaluation information into the Resource Evaluation window of CHRIS. There is confusion about the appropriate method of data entry as the results of the re-evaluations are entered inconsistently across the enterprise. This Plan does not require changes required to the Contracts/Status Window in CHRIS. Sufficient functionality exists in the system to track approval and re-evaluation of foster homes. CHRIS also contains a report, CRS-0012 Foster Parent Reevaluations Report, that is available online through the Reports button of the CHRIS Main Menu. The report lists by Area and by County the name and system (resource) ID of each foster home including the last Home Study (approval or re-evaluation) date and the Re-evaluation Due Date. The report may be generated to print online or on paper and can be filtered to show which homes are due to re-evaluation in the next 30, 60 or 90 days. DCFS plans to heighten the awareness of the report and, in conjunction with Strategy II-A, ensure that CHRIS is updated appropriately when an approval or a re-evaluation is conducted. Further, implementation of Strategy II-F will also heighten the awareness of this strategy as IV-E funding may be significantly reduced if the Contracts/Status window is not updated timely and appropriately at approval and re-evaluation of each foster home. The action steps required to implement this strategy are depicted in the following table.

Goal: The goal of this strategy is to implement a consistent statewide method for data entry of approval and re-evaluation results into the CHRIS system.

Action(s) Required	Lead Person(s)	Target Completion Date
1. Revise policy for clarification and develop correspondence to field staff providing instructions regarding the appropriate method to be used statewide for recording approval and re-evaluation results into CHRIS for foster and adoptive homes.	Sheryl Alexander, DCFS Policy Unit accompanied by Darcy Dinning, Office of Systems & Technology	In conjunction with Step 2 of Strategy II-A.
2. Train DCFS County Supervisors regarding the material in the previous action step.	DCFS Area Managers	One month following completion of previous Action.

3. Train county office staff regarding the material in action step 1.	DCFS County Supervisors	One month following completion of previous Action.
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STRATEGY II-E – MONITOR COUNTY OFFICES TO CHECK FOSTER HOME RECORDS

ACF recommended that DCFS should implement training and monitoring of ...DCFS field staff ... regarding their responsibility to maintain IV-E eligibility requirements and documentation. The State already conducts training of field staff through the Mid-South Academies. The State already monitors DCFS field staff through the DCFS Licensing Unit and through the DCFS Quality Assurance Unit. However, the State recognizes that there is a need to strengthen the monitoring process with regard to IV-E requirements. To accomplish this goal, DCFS plans to implement a practice of conducting a review of all foster home records statewide on an annual basis. The DCFS Licensing Unit will conduct the review. Deficiencies will be noted; corrective actions will be planned and taken.

Reviews will consist of desk audits of the foster home file. The records will be sent to the DCFS Licensing Specialist and/or the Licensing Specialist will conduct the desk audit during a county office visit.

The results will be available to DCFS Executive Staff within six weeks following each county office review. The DCFS Licensing Unit staff will employ the CFS-521 form to record the results of the review for each case record. A copy of the CFS-521 is included as Attachment E to this Plan. The action steps required to implement this strategy are depicted in the following table.

Goal: The goal of this strategy is to heighten awareness of the IV-E requirement that foster homes must be approved to permit IV-E claims and to strengthen the review practices for monitoring foster homes.

Action(s) Required	Lead Person(s)	Target Completion Date
1. Prepare a schedule of counties to be reviewed for compliance with foster home records. All counties must be reviewed within a one year window.	Greg Gilliland, DCFS Licensing Unit	Four weeks following receipt of Plan approval.
2. Conduct review of each foster home record in each county and record the results.	Greg Gilliland, DCFS Licensing Unit	Per schedule developed in previous Action.
3. Complete review of all county office foster home records.	Greg Gilliland, DCFS Licensing Unit	One year from Action #1.

STRATEGY II-F – CHANGE IV-E REIMBURSEMENT PROGRAM IN CHRIS

Change in IV-E Reimbursement Program to check Approval Status of foster homes. On a monthly basis, CHRIS executes a program that processes payments to foster care providers. The program will be modified to check the data on the Contracts/Status window in CHRIS in conjunction with the determination if the payment is for a IV-E eligible child. If the payment, or any portion thereof, occurs for a facility that is not in Approved status during the payment period, then the portion of payment occurring during the non-approval period will be treated as a non-IV-E (non-Federal reimbursement) payment.

The action steps required to implement this strategy are depicted in the following table.

Goal: The goal of this strategy is to prevent inappropriate IV-E claims when a IV-E eligible child is placed in a foster home that has not satisfactorily passed all approval and/or re-evaluation requirements.

Action(s) Required	Lead Person(s)	Target Completion Date
1. Initiate request for changes to payment processing.	Steve Sorrows, DCFS Eligibility Unit	Six weeks following receipt of Plan approval.
2. Develop specifications for changes to the payment processing.	Darcy Dinning, Office of Systems & Technology	Three weeks following completion of previous Action.
3. Obtain approval of specifications from DCFS.	Darcy Dinning, Office of Systems & Technology	Two weeks following completion of previous Action.
4. Analyze, program, and test new functionality.	Darcy Dinning, Office of Systems & Technology	Six weeks following completion of previous Action.
5. Advise field staff regarding the change in functionality.	Darcy Dinning, Office of Systems & Technology	Seven weeks following completion of Action #3.
6. Revise policy to clarify the relationship of foster homes and IV-E.	Sheryl Alexander, DCFS Policy Unit	Seven weeks following completion of Action #3.
7. Implement the functionality in CHRIS.	Darcy Dinning, Office of Systems & Technology	First payment processing date following completion of Action #4.

STRATEGY II-G – CONTRACT LANGUAGE TO ENSURE PROVIDERS ABIDE BY IV-E RULES

ACF recommended that contracts with child placing agencies should include agreements ensuring adequate record keeping and time frames for providing requested documentation. The State concurs with this recommendation. Considerable time and effort were

expended during the IV-E review in attempting to secure information from Child Placing Agencies. Key staff were either not available to the reviewers or there was confusion concerning the disclosure of information to review staff.

The action steps required to implement this strategy are depicted in the following table.

Goal: The goal of this strategy is to heighten the awareness among child placing agencies regarding DCFS expectations to include in foster home records those materials that are needed to document compliance with IV-E requirements and to provide documentation on an as-requested basis.

Action(s) Required	Lead Person(s)	Target Completion Date
1. Identify specific materials from DCFS policy Appendix VI that are required to be in each foster home record. A copy of the DCFS policy is included as Attachment H to this Plan.	Sheryl Alexander, DCFS Policy Unit accompanied by Greg Gilliland, DCFS Licensing Unit and by Gloria Powell, DCFS Eligibility Unit	One month following receipt of Plan approval.
2. Amend existing current contracts with child placing agencies to include the items required from the previous action step.	Cindy Waller, DCFS Contracts Unit accompanied by Evelyn Block, Behavior Treatment Unit	Five months following completion of previous Action.

IMPROVEMENT AREA III – OTHER ACF AND/OR DCFS RECOMMENDATIONS

STRATEGY III-A – PROTOCOL FOR REVIEWS & RESOLVING ELIGIBILITY ISSUES

During the IV-E review there were a number of instances for which additional data were needed from county offices. The requests for materials were made via email to the Primary Worker listed on the CHRIS case. While many requests for materials were answered timely and appropriately, there were instances for which no data were provided. ACF has recommended and the State concurs that there should be a specific protocol, particularly during reviews, for resolving eligibility issues.

DCFS will use the steps depicted in the following table for the next IV-E review to be conducted.

Goal: The goal of this strategy is to implement a structured protocol for securing eligibility information from both County and Central Offices during IV-E Reviews.

Escalation Step	Protocol
Step 1	ACF will advise the State of the upcoming review date schedule.
Step 2	The State will select an individual from each county office to act as a liaison for the IV-E review. A formal listing of each contact's phone number, fax number, and email address will be compiled into a Review Team Contact document. The individual will be instructed regarding the expected types of materials that will be requested, including to whom the materials are to be provided and the expected turn around time for each request made. The communication will be sent through written communication from the DCFS Director's Office.
Step 3	In addition to county office contacts, DCFS will alert the Office of Chief Counsel (OCC) and the Office of Systems and Technology (OST) of the review date. OCC will be contacted in the event that there are materials that need to be provided or information to be shared prior to or during the review. The communication will be sent to OCC and OST through written communication from DCFS.
Step 4	If ample time permits prior to the onsite visit, DCFS will review the sample cases and request outstanding materials prior to the review. If materials are needed during the review, the review team will request the materials from the individuals identified in Step 2.
Step 5	For instances in which requests for information are not satisfied within acceptable time frames from Step 4, the request will be escalated to (a) the Area Manager, if the contact is from the county office, (b) Attorney, if the contact is from OCC, (c) CHRIS Manager, if the contact is from OST, and (d) appropriate Assistant Director, if the contact is from DCFS Central Office.
Step 6	For instances in which requests for information are not satisfied within acceptable time frames from Step 5, the request will be escalated to (a) Assistant Director of DCFS Community Services, if the contact is from the county office, (b) Deputy Counsel for County Legal Operations, if the contact is from OCC, (c) Chief Information Officer OST, if the contact is from OST, and (d) DCFS Director, if the contact is from DCFS Central Office.

QUARTERLY REPORT OF PROGRESS FOR PROGRAM IMPROVEMENT PLAN

DCFS will submit a Quarterly Program Improvement Plan Progress Report to the ACF Regional Office. The quarters for reporting will be based on receipt of the Plan's approval by ACF. For example, if the Plan is approved in January, the reporting quarters will be: February through April; May through July; and, if necessary, August through October. The reports in this example would be filed

on June 15, 2004; September 15, 2004; and, if necessary, December 15, 2004. This schedule anticipates a six-week interval for data analysis and review of materials prepared by DHS staff following the completion of each designated quarter.

Each Quarterly Report will include an update on progress of implementing the Action Steps of each strategy. Once a Strategy has been fully implemented, Arkansas will no longer report status for that item.

Ultimate responsible for oversight of PIP Implementation rests with the DCFS Director and the DCFS Executive Staff. They will review all quarterly report prior to submission to ACF and will take any action necessary to facilitate timely implementation of the Plan. Further, during the last month of each report quarter the Plan Coordinator will hold a meeting of the Lead Persons for each Strategy. The purpose of the meeting is to ensure that all materials for each Action Step have been completed and are available for the Quarterly Report. The Lead Persons to attend the meetings are:

- | | |
|---|---|
| Albert Marlar, DCFS <u>Financial & Administrative Support</u> | Cindy Waller, Manager, DCFS Contracts Unit |
| Darcy Dinning, Manager, CHRIS | Evelyn Block, Manager, Behavioral Treatment Unit |
| Greg Gilliland, Manager, DCFS Licensing Unit | Gloria Powell, Manager, DCFS Eligibility Unit |
| Marilyn Counts, Manager, DCFS Quality Assurance Unit | Quranner Cotledge, DCFS Assistant Director |
| Sheryl Alexander, Manager, DCFS Policy Unit | Steve Sorrows, Administrator, DCFS Eligibility Unit |

Various DHS staff are responsible for Action Steps within Strategies. Upon completion of each Action Step, the Lead Person for the Action Step will be required to provide a copy of the material(s) used to satisfy the Action Step to the Plan Coordinator who is responsible for preparing the Quarterly Progress Report. The Plan Coordinator will be appointed upon approval of the PIP by ACF.

DESCRIPTION OF THE ORGANIZATION

DCFS Director, Roy Kindle

The Director has management and administrative responsibilities for DCFS. The Division has four major offices, each with an Assistant Director.

Office of Community Services, Assistant Director, Quranner Cotledge

The Community Services office is responsible for the direct and purchased service delivery of child welfare services in each of the 75 counties of the state. Each of the ten areas has an Area Manager, County Supervisors, Family Service Workers, Family Support Specialists, and other county-based staff to provide direct services. In central office, the Office of Community Services has a Client Advocate who assists DCFS consumers who have inquiries and complaints and a Foster Parent Ombudsman who assists foster parents who have questions and concerns.

Office of Community Support, Assistant Director, Billye Burke

The Community Support office is responsible for the following services: Adoptions, Interstate Compact, Central Registry, Program Support for Out-of-Home Services, Program Support for In-Home Services, Independent Living, Child Abuse Protection Treatment Act (CAPTA) Services, Behavior Treatment Unit, Intensive Family Services (IFS), and Family Support.

Office of Financial and Administrative Support, Assistant Director, Cecile Blucker

Administrative Services provides administrative and management support to DCFS through personnel administration, budget monitoring, resource control, and contract administration. The Administrative Services office includes the following units: Personnel, Contracts, and Financial Resources. In addition, the Foster Care/Medicaid Eligibility Unit determines the eligibility for federal funding under Title IV-E (Foster Care and Adoption) and Title XIX (Medicaid), of all children in the care of the Department who are placed in Out-of-Home Placement or subsidized adoption.

Office of Legislative Analysis, Research and Planning, Assistant Director, Pat Page

The Legislative Analysis, Research and Planning office consists of the following units: Policy, Planning and Research, Child Welfare Agency Licensing, Professional Development and Quality Assurance. The office responsible for DCFS policy, training and professional development, comprehensive short-term and long-term planning initiatives for the delivery of child welfare services, Child Welfare Agency Licensing, COA Accreditation coordination and Quality Assurance. The office also plays a critical role in analyzing and implementing proposed legislation that impacts the Division.

In 1997, DHS and Arkansas State Policy entered into an interagency agreement that formed the Family Protection Unit, now known as the Crimes Against Children Division (CACD). CADC assesses all allegations of maltreatment in DHS foster homes, Human Development Centers, facilities administered by or under contract to the Division of Youth Services, and reports which name a DHS employee as an alleged offender.

ARKANSAS PROGRAM IMPROVEMENT PLAN TRACKING MATRIX

STRATEGY I-A – TRAIN NEW DCFS ELIGIBILITY UNIT STAFF FOR DATA ENTRY OF INCOME

Ensure that new DCFS eligibility staff receive appropriate training regarding the data entry of all income into CHRIS. This strategy will be conducted on an on-going basis as new staff are hired or promoted in the DCFS Eligibility Unit.

Goal: The goal is to ensure that staff are knowledgeable regarding the appropriate and accurate data entry of income data into the CHRIS automated system.

Action(s) Required	Lead Person(s)	Target Completion Date	Actual Completion Date	Date Sent to ACF
1. Train DCFS Eligibility Unit new hires responsible for entering income data into CHRIS regarding the appropriate methods & timeliness of data entry.	Gloria Powell, DCFS Eligibility Unit	During initial training for staff		
2. Second party 100% of the IV-E cases worked by DCFS Eligibility Unit new hires at least one month following training and caseload assignment.	Gloria Powell, DCFS Eligibility Unit	Ongoing as new staff are hired		

STRATEGY I-B – REDETERMINATION REPORTS FOR FOSTER CHILDREN

A new online report, Redeterminations Due for Foster Children for MM/YYYY, will list all redeterminations that are due to be sent by the DCFS caseworker in the upcoming month. DCFS management may use this report to monitor the redetermination process. It will provide an instrument that lists upcoming redeterminations by worker, by county, and by area. A new online report, Redeterminations Overdue for Foster Children, will list all redeterminations that should have but have not been sent by the DCFS caseworker. DCFS management may also use this report to monitor the redetermination process.

Goal: The goal is to implement a tool in CHRIS to assist in identifying IV-E redeterminations that are not completed timely.

Action(s) Required	Lead Person(s)	Target Completion Date	Actual Completion Date	Date Update Sent to ACF
1. Initiate request for new online reports.	Steve Sorrows, DCFS Eligibility Unit	3 weeks following receipt of Plan approval.		
2. Develop specifications for new online reports.	Darcy Dinning, Office of Systems & Technology	2 weeks following completion of previous Action.		
3. Obtain approval of report specifications from DCFS.	Darcy Dinning, Office of Systems & Technology	2 weeks following completion of previous Action.		
4. Analyze, program, and test new online reports.	Darcy Dinning, Office of Systems & Technology	1 month following completion of previous Action.		
5. Advise field staff regarding the availability and use of the new online reports.	Darcy Dinning, Office of Systems & Technology	3 weeks following completion of previous Action.		
6. Implement new online reports.	Darcy Dinning, Office of Systems & Technology	3 weeks following completion of previous Action.		

STRATEGY II-A – APPROVAL & RE-EVALUATION DOCUMENTATION FOR FOSTER HOMES

Strategy II-A addresses the (1) review of each currently open foster home record, (2) performance of a re-evaluation for the home if one has not been conducted within a year from the initial approval or the last re-evaluation, (3) update of the Contracts/Status window in CHRIS, and (4) inclusion of documentation in the foster home case record that an approval or re-evaluation has been successfully completed. Reviewers will use the CFS-475, DCFS Checklist for Compliance Family Foster Home Record form.

Goal: The goal of this strategy is to examine 100% of the open foster home records statewide and record the results in CHRIS.

Action(s) Required	Lead Person(s)	Target Completion Date	Actual Completion Date	Date Update Sent to ACF
1. Revise the CFS-475 checklist to be used to examine foster home records for compliance with approval and re-evaluation documentation, to confirm that the results of the actions are entered in CHRIS, and require supervisory review and sign-off.	Sheryl Alexander, DCFS Policy Unit	4 weeks following receipt of Plan approval.		
2. Issue the checklist and instructions to DCFS field staff.	Quranner Cotledge, DCFS Assist. Director	2 weeks following completion of previous Action.		
3. Conduct reviews of and take necessary actions for foster homes based on the checklist criteria and DCFS policy.	DCFS Area Managers	3 months following completion of Step 3 from Strategy II-D.		

STRATEGY II-B – SYSTEM GENERATE APPROVAL LETTERS FOR FOSTER HOMES

DCFS plans to generate the foster home approval letter from CHRIS at the time that the user enters the approval on the system. The letter will be mailed to the home under review. A copy of the letter will also be sent to the county office, will be signed by the DCFS County Supervisor, and will be filed in the county office foster home record. In the event that the foster home is with a CPA, a copy of the letter will be forwarded to the CPA for signature and for filing in the facility’s foster home record.

Goal: The goal of this strategy is to generate a letter for each foster home approval and, therefore, document approval of all foster homes.

Action(s) Required	Lead Person(s)	Target Completion Date	Actual Completion Date	Date Update Sent to ACF
1. Initiate request for new approval letters.	Steve Sorrows, DCFS Eligibility Unit accompanied by Sheryl Alexander, DCFS Policy Unit	4 weeks following receipt of Plan approval.		
2. Develop specifications for new approval letters.	Darcy Dinning, Office of Systems & Technology	1 month following completion of previous Action.		
3. Obtain approval of specifications from DCFS.	Darcy Dinning, Office of Systems & Technology	2 weeks following completion of previous Action.		
4. Analyze, program, and test new functionality.	Darcy Dinning, Office of Systems & Technology	6 weeks following completion of previous Action.		

5. Advise field staff regarding the availability and use of foster home approval letters.	Sheryl Alexander, DCFS Policy Unit	2 weeks following completion of previous Action.		
6. Implement new approval letter functionality in CHRIS.	Darcy Dinning, Office of Systems & Technology	3 weeks following completion of previous Action.		

STRATEGY II-C – SYSTEM GENERATE REDETERMINATION LETTERS FOR FOSTER HOMES

DCFS plans to generate a foster home re-evaluation letter from CHRIS at the time that the user enters the re-evaluation on the system. The letter will be mailed to the home under review. A copy of the letter will also be sent to the county office, will be signed by the DCFS County Supervisor, and will be filed in the county office foster home record. In the event that the foster home is with a CPA, a copy of the letter will be forwarded to the CPA for signature and for filing in the facility’s foster home record.

Goal: The goal of this strategy is to generate a letter for each foster home re-evaluation and, therefore, document re-evaluation of all foster homes.

Action(s) Required	Lead Person(s)	Target Completion Date	Actual Completion Date	Date Update Sent to ACF
1. Initiate request for redetermination letters.	Steve Sorrows, DCFS Eligibility Unit accompanied by Sheryl Alexander, DCFS Policy Unit	4 weeks following receipt of Plan approval.		
2. Develop specifications for redetermination letters.	Darcy Dinning, Office of Systems & Technology	1 month following completion of previous Action.		
3. Obtain approval of specifications from DCFS.	Darcy Dinning, Office of Systems & Technology	2 weeks following completion of previous Action.		
4. Analyze, program, and test new functionality.	Darcy Dinning, Office of Systems & Technology	6 weeks following completion of previous Action.		

5. Advise field staff regarding the availability and use of foster home redetermination letters.	Sheryl Alexander, DCFS Policy Unit	2 weeks following completion of previous Action.		
6. Implement redetermination letter functionality in CHRIS.	Darcy Dinning, Office of Systems & Technology	3 weeks following completion of previous Action.		

STRATEGY II-D – TRACK FOSTER HOME STATUS FOR IV-E CLAIMS

Track the status of Foster Homes Approvals and Redeterminations in CHRIS to facilitate appropriate IV-E claims based on the status of the facility. CHRIS currently contains data on the Foster Home Contracts/Status window that may be used to indicate the type of action that was last taken with regard to the approval of the home. The Type “Home Study” on the Contracts/Status window indicates that the facility has had an approval or a re-evaluation conducted. If the approval or re-evaluation was favorable, then the user enters a Status of Approved. The user also enters the Status Date that represents the date for which the re-evaluation is effective. This date is assigned to the Contracts/Status grid in the Date 1 field. CHRIS then assigns a value of one year from Date 1 to the Date 2 field. Date 2 represents the date the next re-evaluation must be completed and approved in order for the facility to remain approved. Currently, staff also enter re-evaluation information into the Resource Evaluation window of CHRIS. There is confusion about the appropriate method of data entry as the results of the re-evaluations are entered inconsistently across the enterprise.

Goal: The goal of this strategy is to implement a consistent statewide method for data entry of approval and re-evaluation results into the CHRIS system.

Action(s) Required	Lead Person(s)	Target Completion Date	Actual Completion Date	Date Update Sent to ACF
1. Revise policy for clarification and develop correspondence to field staff providing instructions regarding the appropriate method to be used statewide for recording approval and re-evaluation results into CHRIS for foster and adoptive homes.	Sheryl Alexander, DCFS Policy Unit accompanied by Darcy Dinning, Office of Systems & Technology	In conjunction with Step 2 of Strategy II-A.		
2. Train DCFS County Supervisors regarding the material in the previous action step.	DCFS Area Managers	1 month following completion of previous Action.		
3. Train county office staff regarding the material in action step 1.	DCFS County Supervisors	1 month following completion of previous Action.		

STRATEGY II-E – MONITOR COUNTY OFFICES TO CHECK FOSTER HOME RECORDS

ACF recommended that DCFS should implement training and monitoring of ...DCFS field staff ... regarding their responsibility to maintain IV-E eligibility requirements and documentation. To accomplish this goal, DCFS plans to implement a practice of conducting a review of all foster home records statewide on an annual basis. The DCFS Licensing Unit will conduct the review. Deficiencies will be noted; corrective actions will be planned and taken. Reviews will consist of desk audits of the foster home file. The records will be sent to the DCFS Licensing Specialist and/or the Licensing Specialist will conduct the desk audit during a county office visit. The results will be available to DCFS Executive Staff within six weeks following each county office review. The DCFS Licensing Unit staff will employ the CFS-521 form to record the results of the review for each case record.

Goal: The goal of this strategy is to heighten awareness of the IV-E requirement that foster homes must be approved to permit IV-E claims and to strengthen the review practices for monitoring foster homes.

Action(s) Required	Lead Person(s)	Target Completion Date	Actual Completion Date	Date Update Sent to ACF
1. Prepare a schedule of counties to be reviewed for compliance with foster home records. All counties must be reviewed within a one-year window.	Greg Gilliland, DCFS Licensing Unit	4 weeks following receipt of Plan approval.		
2. Conduct review of each foster home record in each county and record the results.	Greg Gilliland, DCFS Licensing Unit	Per schedule developed in previous Action.		
3. Complete review of all county office foster home records.	Greg Gilliland, DCFS Licensing Unit	1 year from Action #1.		

STRATEGY II-F – CHANGE IV-E REIMBURSEMENT PROGRAM IN CHRIS

Change in IV-E Reimbursement Program to check Approval Status of foster homes. On a monthly basis, CHRIS executes a program that processes payments foster care providers. The program will be modified to check the data on the Contracts/Status window in CHRIS in conjunction with the determination if the payment is for a IV-E eligible child. If the payment, or any portion thereof, occurs for a facility that is not in Approved status during the payment period, then the portion of payment occurring during the non-approval period will be treated as a non-IV-E (non-Federal reimbursement) payment.

Goal: The goal of this strategy is to prevent inappropriate IV-E claims when a IV-E eligible child is placed in a foster home that has not satisfactorily passed all approval and/or re-evaluation requirements.

Action(s) Required	Lead Person(s)	Target Completion Date	Actual Completion Date	Date Update Sent to ACF
1. Initiate request for changes to payment processing.	Steve Sorrows, DCFS Eligibility Unit	6 weeks following receipt of Plan approval.		
2. Develop specifications for changes to the payment processing.	Darcy Dinning, Office of Systems & Technology	3 weeks following completion of previous Action.		
3. Obtain approval of specifications from DCFS.	Darcy Dinning, Office of Systems & Technology	2 weeks following completion of previous Action.		
4. Analyze, program, and test new functionality.	Darcy Dinning, Office of Systems & Technology	6 weeks following completion of previous Action.		
5. Advise field staff regarding the change in functionality.	Darcy Dinning, Office of Systems & Technology	7 weeks following completion of Action #3.		
6. Revise policy to clarify the relationship of foster homes and IV-E.	Sheryl Alexander, DCFS Policy Unit	7 weeks following completion of Action #3.		
7. Implement the functionality in CHRIS.	Darcy Dinning, Office of Systems & Technology	1 st payment processing date following completion of Action #4.		

STRATEGY II-G – CONTRACT LANGUAGE TO ENSURE PROVIDERS ABIDE BY IV-E RULES

ACF recommended that contracts with child placing agencies should include agreements ensuring adequate record keeping and time frames for providing requested documentation. Considerable time and effort were expended during the IV-E review in attempting to secure information from Child Placing Agencies. Key staff were either not available to the reviewers or there was confusion concerning the disclosure of information to review staff.

Goal: The goal of this strategy is to heighten the awareness among child placing agencies regarding DCFS expectations to include in foster home records those materials that are needed to document compliance with IV-E requirements and to provide documentation on an as-requested basis.

Action(s) Required	Lead Person(s)	Target Completion Date	Actual Completion Date	Date Update Sent to ACF
1. Identify specific materials from DCFS policy Appendix VI that are required to be in each foster home record. A copy of the DCFS policy is included as Attachment H to this Plan.	Sheryl Alexander, DCFS Policy Unit accompanied by Greg Gilliland, DCFS Licensing Unit and by Gloria Powell, DCFS Eligibility Unit	1 month following receipt of Plan approval.		
2. Amend existing current contracts with child placing agencies to include the items required from the previous action step.	Cindy Waller, DCFS Contracts Unit accompanied by Evelyn Block, Behavior Treatment Unit	5 months following completion of previous Action.		