

## **Title IV-E Eligibility Program Improvement Plan**

The Title IV-E Eligibility Review was conducted July 14 -17, 2003. The findings indicated a number of areas needing improvements. This document contains a brief description of the errors noted during the review and a detailed description of the plans for program improvement. Similar areas have been grouped together with plans that address all of the areas.

### **I. Areas in Need of Improvement: Court Orders**

- Judicial determination in removal order addressing Contrary to the Welfare;
- Judicial determination of Reasonable Efforts to Prevent Removal; and
- Judicial determination of Reasonable Efforts to Finalize a Permanency Plan.

Findings from cases reviewed during the Title IV-E Eligibility Foster Care Review revealed a number of issues related to court order language and timing. Required court order language is sometimes missing or contradictory. For example, the first order sanctioning removal of a child does not always contain appropriate language regarding Contrary to the Welfare. In addition, language related to reasonable efforts to prevent removal is sometimes missing and reasonable efforts to reunite are addressed instead. In some orders, both circumstances are addressed. Reasonable efforts to prevent removal must be addressed with 60 days of removal of the child from the home. Reasonable efforts to reunite should be addressed in later court orders. Permanency orders were rarely found to address reasonable efforts to finalize the permanency plan. These orders were not very child-specific and sometimes used inappropriate permanency goals, e.g., long term foster care or independent living. Many of these orders contained contradictory information such as including Contrary to the Welfare, Reasonable Efforts to Prevent and Reasonable Efforts to Reunite in the permanency hearing order. Inclusion of this language makes the orders seem to be “canned”, and lacking in child specificity.

**Goal:** Proper language and documentation will be in court orders in 95% of cases approved for Title IV-E.

**Action 1:** Provide training for juvenile and family court judges, DHR attorneys, GALs and DHR County Directors and supervisors.

This training will be conducted jointly by the Court Improvement Project staff of the Administrative Office of Courts (AOC) and DHR staff and will emphasize ASFA requirements and requirements related to Title IV-E eligibility determinations. Training will be held in locations across the state to provide easy access and will be open to Juvenile and Family Court judges, DHR attorneys, GALs, and a specified number of DHR staff including County Directors and supervisors. The training will also cover the use of the recently revised standardized court orders and will provide instructions for accessing electronic copies of these orders. A copy of the training packets used in the sessions will be provided to judges, DHR attorneys, DHR County Directors and child welfare supervisors unable to attend the training.

**Responsible Persons:** Bob Maddox, AOC; Linda Campbell, DHR/Family Services Partnership; Rachel Watters, DHR/Contracts and Federal Claiming

**Integration:** This action step is found in the Alabama Court Improvement Plan (CIP) on Page 13 under “Title IV-E Eligibility Criteria for the Courts,” Item 1 and in P1, item 9 Step 9 and P2, Item 15, Step 1 of the Alabama CFSR Program Improvement Plan (PIP).

**Area:** Statewide

**TA:** None

**Measurement:** Memorandum, dated January 28, 2004, to County Directors from Chris Moody, Program Manager re: Registration for Court Improvement Project Regional Seminars providing locations and slot allocations for the training sessions; training packet used in training and to be provided to judges unable to attend training sessions.

**Completion Date:** April 30, 2004

**Status:** In progress

**Action 2:** Provide electronic copies of revised sample court orders to juvenile and family judges and attorneys representing DHR.

Electronic copies of the revised court orders will be placed on the DHR Intranet. This will allow access for DHR staff attorneys and will allow DHR staff to provide electronic copies via e-mail or diskette to non-staff DHR attorneys representing the Department. Placement on the Intranet provides some level of security while providing a convenient method for updating the templates if the need arises. Training on the use of these court orders will be provided as a part of Action 1 above. The first stage of implementation will be to provide electronic copies via the AOC Intranet. The second stage involves creating templates for each court order so that they may be used either as handwritten documents or templates that are completed electronically. The templates will be placed on the DHR Intranet. Paper copies of the revised orders will be used until the templates are available.

**Responsible Persons:** Cheri Martin, DHR/Center of Information Services; Bob Maddox, AOC

**Integration:** This action step is contained in the CIP Strategic plan, page 13, under “Title IV-E Eligibility Criteria for the Courts,” Item 1.

**Area:** Statewide

**TA:** None

**Measurement:** Administrative Letter announcing location of court orders on intranet and instructions for dissemination of electronic copies; copies of court orders.

**Completion Date:** June 1, 2004.

**Status:** Stage 1 is complete; stage 2 is being assessed for scope of work and projected timeline.

**Action 3:** Complete a review of court orders on 95% of open Title IV-E cases where children have been in care for 12 months or longer as of the run date of the report, November 19, 2003.

**Responsible Persons:** Rachel Watters, DHR/Contracts and Federal Claiming, Judy Bernier, DHR

**Integration:**

**Area:** Statewide

**TA:** None

**Measurement:** Date reviewed and findings for each case will be recorded on the review-tracking log. Weekly reports describing status of the project and a final report of findings will be used to document the project.

**Completion Date:** April 30, 2004

**Status:** In progress. Over 50% of cases have been reviewed and corrective actions initiated.

**Action 4:** Provide quarterly reports on denials for court order related reasons to county DHR staff and to the Alabama AOC for distribution to juvenile and family court judges.

A quarterly statistical report will be developed using data from ACWIS/FSS regarding denial reasons related to court orders. A summary report with estimated fiscal impact will be provided to AOC and the DHR staff for information. A list of cases denied with the denial reason will be provided to each county office and the juvenile and family court judge. Denial reasons that can be remedied will be identified on the summary report.

**Responsible Persons:** Rachel Watters, DHR/Contracts and Federal Claiming; Bob Maddox, AOC

**Integration:** This action step is found in the CIP Strategic Plan pages 13 – 16, under “Title IV-E Eligibility Criteria for the Courts”, items 1, 2, 3, and 4.

**Area:** Statewide

**TA:** None

**Measurement:** Copies of memoranda and reports provided

**Completion Date:** July 2003.

**Status:** Ongoing quarterly activity. Reports are provided in the second month following the end of a quarter.

**Action 5:** Issue policy reminding DHR staff of ASFA appropriate permanency goals. An Administrative Letter outlining ASFA appropriate permanency goals will be issued to child welfare staff. A time period will be given for obtaining amended court orders where inappropriate language has been used.

**Responsible Person:** Linda Campbell, DHR/Family Services Partnership

**Integration:** P1, Item 7, Step 6 and Step 11 and P1 Item 9, Step 5, and P1 Item 10, Step 1, CFSR PIP.

**Area:** Statewide

**TA:** None

**Measurement:** Copy of Administrative Letter 7035, dated August 4, 2003 and Administrative Letter 7053, dated September 25, 2003.

**Completion Date:** September 25, 2003

**Status:** Complete

**Action 6:** Issue Administrative Letter regarding time frames and language needed for court orders, including corrective actions needed.

This Administrative Letter will re-enforce the previous letter regarding ASFA requirements and will emphasize requirements specifically related to Title IV-E/FCMP.

**Responsible Person:** Rachel Watters, DHR/Contracts and Federal Claiming; Linda Campbell. DHR/Family Services Partnership

**Integration:** This action step is found in the CIP Strategic Plan under "Title IV-E Criteria for the Courts," Items 1, 2, 3, and 4 and in P1, Item 9, Step 1 of the CFSR PIP.

**Area:** Statewide

**TA:** None

**Measurement:** Copy of Administrative Letter

**Completion Date:** April 30, 2004

**Status:** Pending

**Action 7:** Conduct meetings with selected judges, County Directors, AOC and SDHR staff regarding the impact of court activity in identified counties.

The first step in this process will be identification of counties where court related denials continue to be high. Counties will be identified in the quarter following the completion of training provided on the revised court orders and ASFA/Title IV-E requirements. This will allow time to assess the impact of the training and to identify those areas where improvement is less than desired. After the counties are identified, meetings will be scheduled with local DHR staff, attorneys and Judges to discuss the issues that are continuing to result in higher than usual denial rates. These meetings will begin in the July –September 2004 quarter and will be completed by one year from the approval date of the PIP, estimated to be April 2005. A report will be written to document the meetings.

**Responsible Person:** Rachel Watters, DHR/Contracts and Federal Claiming; Linda Campbell, DHR/Family Services Partnership; Bob Maddox, AOC

**Integration:** This action step is found in the CIP Strategic Plan under “Title IV-E Criteria for the Courts,” Items 1, 2, 3, and 4, and in P!, Item 9, Step 1 of the CFSR PIP.

**Area:** Counties to be selected

**TA:** None

**Measurement:** Written report of meetings

**Completion Date:** One year from approval of Title IV-E Program Improvement Plan (PIP)

**Status:** Pending

**Action 8:** Develop an automated report of permanency hearings due to be used by DHR/Contracts and Federal Claiming/Child Welfare Eligibility staff for follow-up with county staff.

This new report will be provided to Child Welfare Eligibility staff for use in tracking permanency hearings and contacting county offices for submission of court orders related to recent hearings. The report will be produced the month following the month the hearing is due in order to allow time for receipt of the court order in the local office.

**Responsible Person:** Rachel Watters, DHR/Contracts and Federal Claiming

**Integration:** None

**Area:** Statewide

**TA:** None

**Measurement:** Copy of programming request and sample of actual report.

**Completion Date:** One year from approval of Title IV-E PIP.

**Status:** Pending

**II. Areas in Need of Improvement: Placement in Licensed Home/Facility**

- Placement in a fully licensed home or facility
- Criminal records check

A provider was approved as a foster home without documentation of criminal record check. A provisional licensed home was authorized an IV-E board payment.

**Goal:** 98% of licensed foster homes and therapeutic foster homes will meet the safety requirements and 98% homes approved as IV-E reimbursable will meet full licensing requirements.

**Action 1:** Rescind policy allowing provisional approval without satisfactory documentation of criminal record check.

**Responsible Person:** Gary Mitchell, Family Services Partnership

**Integration:** NA

**Area:** Statewide

**TA:** None

**Measurements:** Administrative Letter No. 7065 dated November 10, 2003 that rescinded policy allowing approval of a foster home prior to receipt of criminal history checks.

**Completion Date:** 11/10/2003

**Status:** Complete

**Action 2:** Complete a 100% review of homes approved on or after 11/1/2000 to insure compliance with safety checks. Develop a monitoring mechanism for compliance with criminal history check.

**Responsible Person:** County Departments of Human Resources, Child Placing Agencies, Gary Mitchell and Rachel Watters

**Integration:** None

**Area:** Statewide

**TA:** None

**Measurements:** Administrative Letter No. 7065 dated 11/10/03 which contains instructions to complete a review of provider's records prior to January 31, 2004. Ongoing random reviews of IV-E reimbursable providers' records and record results on form to be developed.

**Completion Date:** One year from approval of the PIP.

**Status:** Administrative Letter No. 7065 dated 11/10/03 has been issued. Part II of measurements is still pending.

**Action 3:** Implement new ACWIS coding for homes approved and safety checks/(ABI and FBI) hard copies are pending receipt. The status will be TAP(temporary approval without suitability letter). Provisional approved homes will be coded PRV on the computer system. These status codes will denote a non-IV-E reimbursable facility. Send administrative letter to County Departments regarding use of new coding.

**Responsible Person:** Gary Mitchell, Tom Seller and Rachel Watters

**Integration:** None

**Area:** Statewide

**TA:** None

**Measurements:** Documentation of fields on ACWIS and utilization of fields by staff.

**Completion Date:** 9/30/2004

**Action 4:** Complete a report to track changes in providers' status that will result in eligibility or ineligibility.

**Responsible Person:** Gary Mitchell, Tom Seller and Rachel Watters

**Integration:** None

**Area:** Statewide

**TA:** None

**Measurements:** Documentation of fields on ACWIS and utilization of reports by Title IV-E eligibility staff.

**Completion Date:** 9/30/2004

**Action 5:** Add two fields to ACWIS Provider Subsystem to indicate receipt of ABI and FBI clearances. Send administrative letter to County Departments with instructions regarding use of new fields.

**Responsible Person:** Gary Mitchell, Tom Seller and Rachel Watters

**Integration:** None

**Area:** Statewide

**TA:** None

**Measurements:** Documentation of fields on ACWIS and utilization of fields by staff.

**Completion Date:** 9/30/2004

### **III. Area In Need of Improvement: AFDC Eligibility**

- Eligibility for AFDC at removal

Child was placed as a result of an incoming Interstate Compact Placement of Children (ICPC) and an IV-E board payment was authorized in error. Payments were to be authorized by the sending state.

**Goal:** Assure proper systems coding so that payments will be authorize on outgoing ICPC IV-E eligible children only.

**Action 1:** A programming request will be made to identify other cases that may be coded incorrectly. Upon receipt of the requested report corrective action will be taken to correct cases coded incorrect.

**Responsible Person:** Rachel A. Watters

**Integration:** None

**Area:** Isolated error due to a conversion process to implement the payment field on ACWIS.

**TA:** None

**Measurements:** Production of report and results will be recorded on report generated.

**Completion Date:** November 30, 2004

**Status:** Pending