

Note: The finding of “not in substantial compliance” and disallowances have been revised since the release of the 2009 Final Report. Please see the file entitled [California 2009 Revised Findings and Disallowance Letter](#) for more information.

California Title IV-E Foster Care Eligibility Review Final Report October 1, 2008 – March 31, 2009

Introduction

During the week of September 14 through September 18, 2009, the Children's Bureau (CB), in collaboration with the California Department of Social Services (CDSS), its counties, and the Judicial Council of California, conducted California's title IV-E Foster Care Eligibility Review. The review team was comprised of representatives from the State agency, county child welfare agencies, the California Judicial Council, county probation departments, the CB Regional Office, and the CB Central Office.

The purposes of the title IV-E Foster Care Eligibility Review are (1) to determine whether title IV-E foster care maintenance payments were made on behalf of eligible children and to qualified homes and institutions in accordance with 45 CFR 1356.21 and Sections 471 and 472 of the Social Security Act (the Act); (2) to identify erroneous payments (e.g., overpayments, underpayments); and (3) to identify promising practices and/or needs for training and technical assistance.

Scope of the Review

The review encompassed title IV-E foster care cases on which a half a title IV-E foster care maintenance payment was made for placement services rendered during the period under review (PUR): October 1, 2008 through March 31, 2009. A computerized statistical sample of 100 child welfare cases and 60 probation cases was drawn from the Adoption and Foster Care Analysis and Reporting System (AFCARS) data transmitted by the State agency to CB for the PUR. The sample was stratified to ensure that probation cases were included in the sample. Eighty cases (68 child welfare cases and 12 probation department cases) were reviewed. The original proportionate totals would include 59 child welfare care and 11 probation cases; however, one child probation case was incorrectly coded in AFCARS as a child welfare case. The cases represented 29 counties, including larger counties such as San Diego and Fresno and smaller counties such as Siskiyou and Lassen. The sample cases excluded cases from Los Angeles and Alameda counties because of their participation in the State's title IV-E Waiver Demonstration project.

For each case, reviewers determined whether appropriate documentation existed to substantiate compliance with the following requirements:

1. Judicial determinations regarding
 - contrary to the welfare pursuant to Section 472(a)(2)(A)(ii) of the Act and 45 CFR 1356.21(c);
 - reasonable efforts to prevent removal pursuant to Section 472(a)(2)(A)(ii) of the Act and 45 CFR 1356.21(b)(1); and
 - reasonable efforts to finalize permanency pursuant to Section 472(a)(2)(A)(ii) of the Act and 45 CFR 1356.21(b)(2);

2. Voluntary placement agreements pursuant to Sections 472(a)(2)(A)(i), 472(e), 472(f), and 472(g) of the Act and 45 CFR 1356.22;
3. State agency responsibility for placement and care pursuant to Section 472(a)(2)(B) of the Act;
4. Aid to Families with Dependent Children (AFDC) eligibility (as of July 16, 1996) pursuant to Section 472(a)(3) of the Act;
5. Placement in a licensed foster family home or childcare institution pursuant to Sections 472(b) and (c) of the Act and 45 CFR 1355.20(a); and
6. Criminal records check and other safety requirements for foster care providers pursuant to Section 471(a)(20) of the Act and 45 CFR 1356.30.

A case was determined to be in error if a title IV-E payment was made on behalf of a title IV-E ineligible child during the PUR, or on behalf of an otherwise eligible child who was placed in a home or institution that was not fully approved or licensed. A case was determined to be a “non-error case with ineligible payments” if there were title IV-E payments made on behalf of a child who was ineligible for title IV-E for a period of time solely outside the PUR or the title IV-E payments were made for unallowable costs on behalf of an eligible child in the PUR. The review also determined whether the correct amount was paid to a provider and thus whether an underpayment or an overpayment existed in or outside the PUR.

Review Findings

Six cases (Case Sample #s 5, 6, 7, 16, 74, and 80) were determined to be in error for either part or all of the PUR for reasons that are identified in the body of this report. Since no more than four error cases are permitted in order to be in substantial compliance, California’s title IV-E foster care maintenance program is not in substantial compliance with the Federal child eligibility and provider requirements for the period October 1, 2008 through March 31, 2009. Details on each case finding can be found below and summarized in Table A of this report.

The State is required to develop a program improvement plan (PIP) to address the areas of non-compliance and will have a maximum of 1 year to implement and complete the PIP unless State legislation is required. The State will have 90 days from the date it receives written notification that it is not in substantial compliance to submit the PIP to CB for approval.

Following the expiration of the approved completion date of the PIP, a secondary review will be conducted no later than during the second AFCARS reporting period that immediately follows that approved completion date of the PIP.

The reviewers also determined that there were 15 non-error cases with ineligible and/or overpayment payments (Case Sample #s 2, 20, 23, 29, 30, 32, 35, 36, 42, 43, 47, 55, 59, 61, and 72) and five cases with underpayments (Case Sample #s 18, 44, 47, 58, and 76).

Strengths

Generally, the State still continues to perform well in the areas of ensuring the required judicial determinations, AFDC re-determinations, and background clearances for licensed and approved foster family homes.

Obtaining Judicial Determinations

- Judicial determinations regarding whether it is contrary to the welfare of the child to remain in the home and regarding reasonable efforts to prevent a child's removal are being obtained in the required timeframes. Often, though not always, these occur in the initial removal order.
- The practice of seeking judicial determinations at 6-month rather than 12-month intervals about whether reasonable efforts were made by the Agency to finalize a child's permanency plan continues to be a noteworthy practice in helping to ensure that permanency plans are assessed timely.

AFDC Eligibility

- Re-determinations were consistently completed in a timely manner.

Background Clearances

- Fingerprint checks of the California criminal records, the FBI records, and the California Child Abuse Index (CACI) for licensed or approved foster family homes were consistently available for review.

Areas in Need of Improvement

Probation Cases

In preparation for the review, we learned that the State includes State-only paid probation cases in its Child Welfare Services/Case Management System automated (case management) system. We noted that many of these children are also incorrectly included in the State's AFCARS reporting population. Preliminary review of the cases required team members to review almost 40 cases before identifying 11 cases that could be included in the review sample. In addition, these cases were incorrectly coded as receiving title IV-E foster care payments.

We remind the State that Appendix A in the 45 CFR 1355 -"Foster Care Data Elements, Section II-Definitions" clarifies that the AFCARS reporting population includes "...all children in foster care under the responsibility of the State agency administering or supervising the administration of the title IV-B Child and Family Services and title IV-E State Plans...supervised by or under the responsibility of another public agency with which the title IV-B/IV-E State agency has an agreement under title IV-E and on whose behalf the State makes title IV-E foster care maintenance payments." Therefore, youth who are under the care, custody, and supervision of County Probation Departments should be reported to AFCARS only if a title IV-E foster care maintenance payment is paid on his/her behalf.

Initial AFDC Eligibility

Pursuant to Section 472(a)(1)(3) and 45 CFR 1356.71(d)(1)(v) of the Act, to meet the AFDC requirements the child must be determined to be a child who has been deprived of parental support or care, has been living with a parent or other specified relative, and has not reached the maximum age designated for program eligibility.

The following four cases did not meet the initial AFDC eligibility linkage criteria and were cited as error cases:

Case Sample # 5

Deprivation of parental support or care of the child was not met, as required at 45 CFR 233.90(c)(1)(i), for the month of removal. For determining deprivation in a two-parent household, pursuant to 45 CFR 233.10(b)(2)(ii)(a)(2) & 233.100-101, if neither parent is incapacitated, the Agency must determine whether deprivation exists due to the unemployment of the principal wage earner. The Agency did not base deprivation on the child's parent during its initial determination of eligibility.

Based on court testimony from the child's mother and boyfriend, a judge declared the mother's long term live-in companion to be the child's presumed father. There were no other legal fathers identified in the case. In the AFDC budget computations for determining financial need, the eligibility staff included the income of the presumed father; however, deprivation was based on the absent father. The staff based the decision on the fact that the couple's testimony included statements that the presumed father is not the child's biological father.

Under longstanding AFDC policy, paternity legally established by a Court or an administrative process provided for under State law is sufficient to determine parental relationship. The presumed father then, for AFDC purposes, is assessed in the same way as that of a biological or adoptive father, which means he is a mandatory member of the assistance unit; his needs and income are included in the AFDC budget computations to determine whether financial need exists for the child and he is considered in determining whether deprivation exists for the child. Therefore, in this sample case both financial need and deprivation should have been based on the presumed father, consistent with State law and AFDC regulations at 45 CFR 233.90(c)(1)(i). The Agency's reconstruction of the AFDC factors determined deprivation did not exist for the child in the removal month. The child is ineligible to have title IV-E foster care maintenance payments made on his behalf for the entire foster care episode.

Case Sample # 7

Financial need based on income and resources was not met for the child, as required at 45 CFR 233.90(c)(1)(i), for the month of removal. The child was removed from the home and placed in foster care in March 2006. The Agency's initial eligibility assessment, which was completed in September 2006, determined the child to be ineligible due to the step-father's income. In June 2007, the child was moved from his current placement and placed with the step-father while remaining under the care of the State agency. Shortly thereafter, the child

was removed from his home when a Welfare and Institutions Code (WIC) 387 petition was filed. The Agency incorrectly considered the WIC 387 petition as a new foster care episode. The eligibility staff completed another initial title IV-E eligibility assessment and determined the child title IV-E eligible; however, there had never been a reunification with the step-father. The valid removal, which remained in effect during the PUR, occurred in March 2006.

Case Sample #74

The “living with and removal from a specified relative” requirements at §472(a) of the Act and 45 CFR §1356.21(k) were not met by the same specified relative. The child was judicially removed from the home of the parents in September 2005. At the time, the child had been living with a legal guardian (grandmother) since July 2002. The Agency based the initial eligibility on the home of the parents but the child had not lived with the parents from whom he was legally removed for more than 3 years. In this case, the State could have applied the *Rosales v Thompson* court decision, which permitted the State to determine eligibility based on the grandparent (or other relative) with whom he had lived within 6 months of removal. However, the enactment of the Deficit Reduction Act (DRA) of 2006 reversed the *Rosales* decision. As a result, the child was eligible only until September 30, 2006, the month in which the eligibility re-determination was due, consistent with Program Instruction ACYF-CB-PI-06-06. Therefore, the period of ineligible payments began on October 1, 2006.

It is recommended that CDSS:

1. Develop and implement a core title IV-E eligibility training curriculum for eligibility staff.
2. Collaborate with the Administrative Office of the Courts (AOC) to develop and issue clarification to eligibility staff as to how to assess presumed fathers absent confirmation of paternity.
3. Collaborate with AOC to develop and provide guidance to staff regarding when a WIC 387 constitutes a valid removal from the home and begins a new foster care episode.
4. Develop a training curriculum that focuses specifically on AFDC linkage and home of legal removal, including the home of legal guardians.

Judicial Determination Regarding Reasonable Efforts to Finalize Permanency

Federal regulations at 45 CFR 1356.21(b)(2) require the State agency to obtain a judicial determination within 12 months of the date the child is considered to have entered foster care that the Agency has made reasonable efforts to finalize the permanency plan that is in effect. For children who entered care prior to March 27, 2000 (the effective date of the regulations implementing the Adoption and Safe Families Act), the first of these determinations must have occurred by no later than March 27, 2001. Subsequent determinations must be obtained at least every 12 months. If a determination is not obtained timely, the child is ineligible at the end of the month in which the determination was due and remains ineligible until the month in which the determination is made. There was one case that was determined to be in error because it did not meet this requirement.

Case Sample #6

The Agency failed to ensure that a reasonable effort to finalize the child's permanency plan findings was made by the courts in a timely manner. The findings should have been made in January 28, 2009 but the court finding was not made until April 21, 2009.

It is recommended that CDSS:

1. Ensure that eligibility workers review all court orders to ascertain the timeliness of determinations regarding "reasonable efforts to finalize the permanency plan" to ensure that title IV-E payments are made accurately.
2. Explore the feasibility of developing an electronic tickler system, to alert staff that a "reasonable efforts" finding is required by a certain date.

Licensing/Approval of Foster Family Homes and Childcare Institutions

Pursuant to Sections 472(b) and (c) of the Act and 45 CFR 1355.20(a), foster family homes and childcare institutions must be fully licensed or approved for the State to receive title IV-E funding on behalf of an otherwise eligible child placed in one of those settings. Title IV-E cannot be claimed until the month in which the placement is fully licensed/approved. Cases were determined to be in error if a child was placed in a home or institution and title IV-E payments were made prior to the month in which the home or institution was fully licensed/approved during the PUR. In California, homes that are approved or certified, by State statute, require annual reassessment to continue to operate as a fully-licensed or approved foster family home. One case was determined to be in error because it did not meet the State's requirement of being fully licensed.

Case Samples #16

The Agency failed to reassess the non-relative extended family member's home in a timely manner. A reassessment was due on May 1, 2008, but the home was not re-assessed and the child emancipated from the foster care system on February 24, 2009. Title IV-E payments continued to be made on behalf of the child until he emancipated even though the home was not reassessed in accordance with State statute.

It is recommended that CDSS:

1. Develop a mechanism, including exploring the feasibility of an electronic tickler system, to alert staff that a reassessment is required and must be completed before additional title IV-E payments are paid.

Safety Requirements of Provider

Childcare Institutions

Federal regulations at 45 CFR 1356.30(f) require that childcare institutions licensed on or after March 27, 2000 (the effective date of the regulations implementing the ASFA) must also meet the State's safety considerations set forth in the State's policies, procedures, or statutes. California statute, pursuant to the State's Health and Safety Code 1522, requires that employees hired by a childcare institution must be fingerprint-cleared by the Department of Justice and must

submit fingerprints for clearance with the Federal Bureau of Investigation (FBI). One case was found in error because the State’s safety considerations for staff were not met.

Case Sample #80

The Agency failed to ensure that all staff at the childcare institution cleared the State’s background clearance process prior to hire. At least one staff person had not met the State’s safety provisions prior to hire. The staff person was hired on March 29, 2009 and as of July 2009 still had not satisfied the State’s safety requirements.

Additionally, during the onsite planning process, the CB Regional Office staff learned that the process the State has in place for maintaining the results of fingerprint clearances of group home staff does not assess or monitor whether facilities are meeting the requirement of hiring staff only after they have been fingerprint-cleared in accordance with State requirements. The State’s current data base system captures the date that fingerprints were submitted on the staff but does not include the actual date of hire. In a few instances, staff noted that although an employee cleared the Department of Justice criteria for employment and fingerprints had been submitted to the FBI, the State had never received the FBI results, even after as much as two years. There currently is not a system in place to monitor for these discrepancies in the State’s requirements.

It is recommended that CDSS:

1. Work with Community Care Licensing to institute a process that ensures procedures to monitor whether group homes are adhering to the State’s requirement of hiring staff only after they meet the State’s safety requirements.
2. Develop a process to insure that a system is in place to re-check pending FBI clearances for staff hired by group homes.

**Table A
Summary of Error Cases**

<i>Case Sample Number</i>	<i>Reason for Error</i>	<i>Social Security Act (SSA) and Code of Federal Regulations (CFR)</i>	<i>Period of Ineligibility</i>
	<i>Child Ineligible -- AFDC Eligibility</i>		
1 5	<ul style="list-style-type: none"> ➤ The Agency did not base deprivation on the child’s parent. Based on testimony, the court declared a presumed father and there were no other legal fathers identified in the case. The eligibility staff based the AFDC income need on the presumed father but deprivation was based on an absent father. ➤ Ineligible title IV-E payments were made for the entire foster care episode, including the PUR. 	45 CFR 1356.21(k)(l)	11/04/2000 to Present

Case Sample Number		Reason for Error	Social Security Act (SSA) and Code of Federal Regulations (CFR)	Period of Ineligibility
2	7	<p>The Agency inaccurately considered a WIC 387 petition as a new foster care episode. The valid removal was completed in March 2006 and remained in effect. A determination was completed in September 2006 for the month of removal and determined that the child was ineligible for the entire PUR due to the stepparent's income.</p> <p>➤ In addition, the child was placed in the home of a relative foster family home but failed to produce fingerprint clearances for the two adults who were living in the home.</p>	<p>472(a)(1) and (4) 45 CFR 1356.21(k)(1)</p> <p>472(b) and(c) 45 CFR 1356.71(d)(1)(iv)</p>	<p>03/28/2006 through 07/22/2009</p> <p>02/02/2009 through 07/22/2009</p>
3	74	<p>➤ The child was legally removed from the home of the parents in September 2005. The child had been living with a legal guardian (grandmother) since July 2002.</p> <p>➤ The Agency based the initial eligibility on the home of the parents but the child had not lived with the parents from whom he was legally removed for more than 3 years. In this case, the State may have applied the Rosales v Thompson decision. However, because of the requirements of the DRA, which reversed the decision; the child would have been ineligible in October 2006.</p>	<p>472(a)(1) and (4) 45 CFR 1356.21(k)(1)</p>	<p>10/1/2006 to Present</p>
Child Ineligible – On-going Judicial Determination				
4	6	<p>The Agency failed to ensure that a reasonable effort to finalize the permanency plan finding was made by the courts timely. The finding should have been made on January 28, 2009 but was not made until April 21, 2009.</p>	<p>SSA 472(a)(1) SSA 471 (a)(15)(B)(ii) and (C) 45 CFR 1356.21(b)(2)</p>	<p>02/01/2009 through 03/31/2009</p>
Provider Ineligible -- Not Licensed				
5	16	<p>The Agency failed to reassess/re-approve the non-relative/relative family member's home prior to the child turning 18. The reassessment was due on May 1, 2008. The child turned 18 on February 24, 2009.</p>	<p>472 (b) and (c) 45 1356.71(d)(1)(iv) and 1355.20</p>	<p>05/01/2008 through 02/24/2009</p>

<i>Case Sample Number</i>	<i>Reason for Error</i>	<i>Social Security Act (SSA) and Code of Federal Regulations (CFR)</i>	<i>Period of Ineligibility</i>
	<i>Provider Ineligible -- Safety Check Not Complete</i>		
6 80	<p>The Agency failed to ensure that all staff at the childcare institution cleared the State's background clearance process prior to hire. At least one staff person had not met the State's safety considerations prior to hire.</p> <p>The staff person was hired on March 29, 2009 and as of July 2009 still had not cleared the State's safety considerations procedures.</p>	<p>472 (b) and (c)</p> <p>45 CFR 1356.30(f) and 1355.20</p>	3/29/2009 through 7/8/2009

Underpayments

There were a total of five cases (Case Sample #s 18, 44, 47, 58, and 76) in which the State could have claimed title IV-E payments, but did not. In three of the cases, reviewers determined that all requirements were documented, but the State did not claim for all of the days that could have been claimed. In one of the five cases, reviewers noted that at the eligibility re-determination the Agency considered the parents income, but should have limited the assessment of income at that time to only the child's income.

We have assessed the total amount that could have been claimed for these cases as approximately \$39,560.

Overpayments

There were a total of 15 cases (Case Sample #s 2, 20, 23, 29, 30, 32, 35, 36, 42, 43, 47, 55, 59, 61, and 72) with overpayments and/or ineligible payments. An overpayment is defined as an improper payment that was identified during the fiscal review prior to the onsite review week and occurred inside or outside of the PUR. Overpayments may include duplicate payments. There were 15 cases identified with overpayments. An ineligible payment is considered to have occurred in an error or non-error case whenever a title IV-E maintenance payment cost is claimed for an unmet eligibility criterion. There were 2 cases identified with ineligible payments outside the PUR, one of which also included overpayments. Table B below contains a summary of each case determined as an overpayment.

Table B
Summary of Cases with Ineligible Payments and/or Overpayments

# of Cases	Case Sample Number	Reason for Ineligible Payment or Overpayment	Social Security Act (SSA) and Code of Federal Regulations	Period of Ineligibility
		<i>Child Placed Prior to Home Licensed/Approved and Providers Overpaid</i>		
1	29	Relative home not re-approved timely		08/01/2007-10/10/2007
2	42	NEFRM home not re-approval timely		11/2005-1/2006
		<i>Provider paid for more days than the child was placed and/or eligible</i>		
3	2	Provider paid for full month; should have been paid for 25 days		9/26/ 2007-9/30/2007
-	29	Providers were paid for full month; should have been paid for only the number of days the child was in the home		8/2004 5/2003 2/24/2004-2/29/2004
4	23	Provider paid for full month; should have been paid for 6 days		5/7/ 2009-5/31/2009
5	30	Provider was paid for more days than it should have on two occasions		12/22/2008-12/28/2008 8/1/2008-8/3/2008
6	32	Provider was paid for the entire month; should have been paid for 18 days		2/19/09-2/28/09
7	35	Provider was paid for 27 days; should have been paid for 26 days		1/6/2005-1/31/2005
8	36	Provider was paid for the entire month; should have been paid for 23 days		1/22/2007-1/31/2007
9	43	Provider was paid for the full month; should have been paid for 12 days in one month and not at all for the next month		7/13/2005-31/2005 8/2005
10	47	Provider was paid for 29 days; should have been paid for 18 days		7/3/2006-7/21/2006

# of Cases	Case Sample Number	Reason for Ineligible Payment or Overpayment	Social Security Act (SSA) and Code of Federal Regulations	Period of Ineligibility
11	55	Provider was paid for more than it should on two occasions; should have been paid for only 10 days and 20 days, respectively		4/2005 6/21/2005- 6/30/2005
12	59	Provider was paid for the entire month; should have been paid for 5 days		6/01/2009- 6/30/2009
13	72	Providers were paid for more days than the child was placed on two occasions; providers should have been paid for 16 days each		2/17/09-2/28/09 10/15/08- 10/31/08
<i>More than one provider paid for the same time</i>				
14	20	Two providers were paid for the same period		11/20/2006- 12/1/2006 2/25-/2006- 3/01/2006 6/23/2004- 7/01/2004
-	29	Two providers were paid for the same period		8/24/2004- 8/31/2004
-	35	Two providers were paid for the same period		12/30/2005- 12/31/2005
-	36	Two providers were paid for the same period		11/30/2005
15	61	Two providers were paid for the same period on two occasions		8/31/2004 10/01/2002
<i>Duplicative Payments</i>				
-	20	Duplicative payment in the amount of \$131		6/2004
-	29	Duplicative payment in the amount of \$181		4/2004
-	47	Duplicative payments were made in the amounts of \$45		2/2007
-	59	Duplicative payment in the amount of \$4,479		10/2005

Disallowance

The State must return the Federal share of the foster care maintenance payments and, if applicable, administrative costs that are associated with the cases in error and the non-error cases with ineligible payments. Administrative cost disallowances are not assessed for the overpayments. A total disallowance in the amount of \$323,059 in Federal Financial Participation (FFP) was assessed for ineligible payments for each applicable case. (See Table C for details on each case) Disallowances, where applicable, have been calculated through September 2009.

There are three error cases (Case Sample #s 5, 11, and 74) in which the children continued in foster care following the PUR. Therefore, in addition to the disallowance, we expect the State to assure us that FFP has not been claimed for these cases in the fiscal claims beginning with October 2009.

Since the amount of \$323,059 of Federal funds disallowed was previously included in Federal payments made to the State, you must repay these funds by including a prior period decreasing adjustment on the quarterly report of expenditures (form ACF-IV-E-1), Part 1, Line 1, Columns (c) and (d). The supplemental ACF-IV-E-1 form must be submitted to us within 30 days of the date of this letter in order to avoid the assessment of interest. The supplemental submission must contain only the adjustment described above.

Payment of the disallowance must be made within 30 days from the date of the cover letter of this report to avoid the assessment of interest (See 45 CFR 30.12(a) and 30.13.). California has the right to dispute the debt. The CDSS will be liable for interest on the amount of funds disallowed by CB in accordance with the provisions of 45 CFR 30.13(a) if the disallowance is not paid within 30 days from the date of this letter. Regulations at 45 CFR 30.14 provide guidance on paying the debt or accruing interest while pending a formal review of the debt. California may appeal this disallowance to the Departmental Appeals Board within 30 days from receipt of the accompanying letter in accordance with regulations at 45 CFR 16.7(a). Please refer to 45 CFR Part 16 for procedures for appealing this disallowance.

Table C
Summary of Disallowances for all cases

CA IVE Review Aug 2009	ERRORS CASES *						INELIGIBLE PAYMENTS		OVERPAYMENTS *														TOTAL
FISCAL YEAR AMOUNTS	5	6	7	16	74	80	29	42	2	20	23	29	30	32	35	36	43	47	55	59	61	72	TOTAL
2009 Maintenance Disallowance	\$ 4,475	\$ 758	\$ 7,977	\$ 2,211	\$ 16,530	\$ 8,660	\$ -	\$ -	\$ -	\$ -	\$ 358	\$ -	\$ 115	\$ 90	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2,931	\$ -	\$ 2,758	\$ 46,863
2009 Federal Admin Disallowance	13,335	1,788	8,938	4,469	10,726	2,681	-	-	-	-	239	-	69	-	-	-	-	-	-	-	-	-	\$ 42,245
2008 Maintenance Disallowance	3,793	-	2,264	2,040	27,479	-	88	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	\$ 35,664
2008 Federal Admin Disallowance	11,284	-	10,547	4,394	10,547	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	\$ 36,772
2007 Maintenance Disallowance	4,326	-	3,074	-	29,346	-	647	-	41	-	-	-	-	-	-	96	-	23	-	-	-	-	\$ 37,553
2007 Federal Admin Disallowance	12,900	-	1,654	-	9,924	-	1,654	-	-	-	-	-	-	-	-	64	-	-	-	-	-	-	\$ 26,196
2006 Maintenance Disallowance	4,326	-	-	-	-	-	-	791	-	-	-	-	-	-	20	13	-	908	-	2,250	-	-	\$ 8,308
2006 Federal Admin Disallowance	12,437	-	-	-	-	-	-	2,365	-	-	-	-	-	-	13	8	-	-	-	-	-	-	\$ 14,823
2005 Maintenance Disallowance	4,273	-	-	-	-	-	-	-	-	-	-	-	-	-	10	-	225	-	152	-	-	-	\$ 4,660
2005 Federal Admin Disallowance	11,899	-	-	-	-	-	-	-	-	-	-	-	-	-	7	-	-	-	102	-	-	-	\$ 12,008
2004 Maintenance Disallowance	4,147	-	-	-	-	-	-	-	-	270	-	534	-	-	-	-	-	-	-	-	-	-	\$ 4,951
2004 Federal Admin Disallowance	11,127	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	\$ 11,127
2003 Maintenance Disallowance	4,114	-	-	-	-	-	-	-	-	-	-	68	-	-	-	-	-	-	-	-	-	-	\$ 4,182
2003 Federal Admin Disallowance	10,783	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	\$ 10,783
2002 Maintenance Disallowance	4,133	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	22	-	\$ 4,155
2002 Federal Admin Disallowance	10,557	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	15	-	\$ 10,572
2001 Maintenance Disallowance	3,182	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	344	-	\$ 3,526
2001 Federal Admin Disallowance	8,441	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	230	-	\$ 8,671
TOTAL MAINTENANCE DISALLOWANCE	\$36,769	\$ 758	\$ 13,315	\$ 4,251	\$ 73,355	\$ 8,660	\$ 735	\$ 791	\$ 41	\$ 270	\$ 358	\$ 602	\$ 115	\$ 90	\$ 30	\$ 109	\$ 225	\$ 931	\$ 152	\$ 5,181	\$ 366	\$ 2,758	\$149,862
TOTAL ADMIN DISALLOWANCE	\$102,763	\$ 1,788	\$21,139	\$8,863	\$31,197	\$ 2,681	\$ 1,654	\$ 2,365	\$ -	\$ -	\$ 239	\$ -	\$ 69	\$ -	\$ 20	\$ 72	\$ -	\$ -	\$ 102	\$ -	\$ 245	\$ -	\$173,197
	Child Ineligible-AFDC Eligibility	Child Ineligible -On-going Judicial Determination	Child Ineligible -AFDC Eligibility	Provider Ineligible -Not Licensed	Child Ineligible - AFDC Eligibility	Provider Ineligible -Safety Check Not Complete	Child Placed Prior to Home Licensed /Approved	Child Placed Prior to Home Licensed /Approved	Provider Paid for More Days Than the Child Was Placed	More Than One Provider Paid for Same Time	Provider Paid for More Days Than the Child Was Placed	Provider Paid for More Days Than the Child Was Placed	Provider Paid for More Days Than the Child Was Placed	Provider Paid for More Days Than the Child Was Placed	Provider Paid for More Days Than the Child Was Placed	Provider Paid for More Days Than the Child Was Placed	Provider Paid for More Days Than the Child Was Placed	Provider Paid for More Days Than the Child Was Placed	Provider Paid for More Days Than the Child Was Placed	Provider Paid for More Days Than the Child Was Placed	More Than One Provider Paid for Same Time	Provider Paid for More Days Than the Child Was Placed	
	SUBTOTAL ERROR CASES						SUBTOTAL NON-ERROR INELIGIBLE						SUBTOTAL OVERPAYMENTS						\$ 11,975				
TOTAL FFP DISALLOWANCE ALL SAMPLES	\$323,059																						