

**PROGRAM IMPROVEMENT PLAN (PIP) – NARRATIVE SUPPLEMENT
(7/9/04)**

- 1. The Agency needs to include an action step to address that case data is properly entered into AFCARS and that the percentage of cases coded to indicate that the child received at least one IV-E foster care maintenance payment is reflective of the District's penetration rate.***

The methodology for AFCARS reporting of children in care (greater than 24 hours) and whether or not they received IV-E foster care maintenance payments was revised March through April of 2004. The 2004A submission (in May) reflects the revised methodology. A manual comparison between the AFCARS file and the Agency's "Penetration Rate Reports" (PRR) for 1st and 2nd Quarters, FY04 suggests that all clients captured on the PRR were included in the AFCARS report and that the "yes"/"no" indicator related to IV-E claiming was correct in all instances. However, there appears to be a 3-5% over-reporting on the AFCARS data or an under-reporting on the PRR. The Agency's MIS staff is undertaking a comparison of the methodology and results of the AFCARS submission, the PRR, and "Payment Stamping" (the FACES sub-program that produces the Foster Care and Adoption Assistance maintenance claims) to rectify discrepancies. We are optimistic that the 2004B submission (within 45 days after 9/30/04) will be fully consistent with PRR and "payment Stamping" data. (See PIP Matrix – IV. AFCARS Reporting)

- 2. Under Section I.A, the Agency needs to include an action step that will address how it will ensure that a backlog of eligibility determinations will not occur in the future.***

Action steps I.A.I-2, I.B.1-2, I.C, I.D, and I.F.1-4 address any future recurrence of eligibility backlogs. The backlogs were initially created as a result of combination of issues - labor-intensive procedures with the FACES Eligibility Determination process, eligibility errors in the conversion to FACES, missing and erroneously entered data by social workers, missing data in social worker case records (court orders, family composition, and family income), and staff shortages in the IV-E Eligibility Determination Unit. The Action Objectives and Action Steps identified in I.A through I.F address these problems. In addition, the contractor identified to assist with clearing the foster care and adoption eligibility backlog is also tasked with providing recommendations and technical assistance as it relates to eligibility unit worker job descriptions and classifications; inter- and intra unit policies, procedures, and work-flows; and staffing levels. Finally, the contractor is tasked with providing recommendations and technical assistance to the Agency's ability to interface with the Family Court and the Office of Corporation Counsel (particularly with regard to "3rd Party Placements), and Agency-wide training related to eligibility. As the Agency is successful in the implementation of these procedures, eligibility backlogs determinations should not reoccur in the future.

3. ***While Section I.B addresses redesigning and modifying the eligibility determination process in FACES, tracking and editing of placement eligibility should be specified in the action step.***

See new Action Step #I.B.3. Some of the activity associated with this step has already been concluded, including simplification of some data entry items related to licensure, improving the “tickler alert” for license renewal, and implementing a system for scanning and cataloging licenses in FACES. Other activities are scheduled for completion on or before 10/1/04 at which time the logic will be tested against 4th the Quarter, FY04 IV-E.1 submission.

4. ***Action Step I.F.2. is unclear. The action step needs to specify if this is to address cases closed for IV-E foster care maintenance payments due to relative placement, adoption, etc. but the cases are still active as IV-E foster care in the system.***

During the first two-plus years of FACES operation, a significant number of “foster care episodes” (legal status & home removal) remained open after the child actually exited foster care (as historically defined in the District). The majority of such instances were the result of worker failure to enter relevant data; in other cases, however, the worker (and the Eligibility Unit staff) were unable to end-date the episode due to FACES controls (for example, if a new placement were entered prior to having end-dated the previous home removal/legal status, the old status could no longer be modified). As a result, the eligibility status of the earlier foster care episode was imposed on payments made during the new foster care episode. In almost all instances, the episode stayed open in FACES during periods of reunification or 3rd Party status. (Note that Court practice and Agency policy with regard to “3rd Party (relative) placements” caused this problem to be much more frequently experienced in the District of Columbia than would have been the case under Court practice and Agency policy in other jurisdictions.) Please note that the Report and subsequent review discussed in I.F.1 and I.F.2 of the PIP Matrix is intended to identify and correct instances of this problem. In addition to the situations referenced above, there were a small – but significant – number of instances in which workers failed to end-date the foster care episode and enter data related to an Adoption Assistance episode. Since FACES controls did not permit payment of “Adoption Subsidy” for children not fully entered as adoption clients and since many workers did not utilize the “demand payment” protocols to correct the problem, workers compounded the problem by continuing the foster care room & board payment (almost always “Room & Board – Pre-Adoptive Foster Home”). We have discovered a number of cases in which this practice occurred for one or two months after adoption finalization; we have found one case in which the practice continued for seven months. (While these instances are obviously not validly claimable as IV-E foster care maintenance costs, almost all would have been reimbursable as Adoption Assistance maintenance costs.)

5. ***Action Step I.F.4. should include more information such as when this training will be provided to staff, how often it will be repeated, how it will be incorporated into ongoing FACES training, etc.***

Historically, new worker orientation training contained a 30-minute section on IV-E eligibility issues; this training was scheduled at the beginning of the curriculum. This presentation was recently expanded to one hour and relocated at the very end of the curriculum (where the trainees now have a frame of reference for the course content). FACES training staff have also modified the data entry instruction segment of Orientation to provide more emphasis on entry of home removals, legal status, placement data, family composition, and “removal home”. The Eligibility Unit is preparing a “Title IV-E Eligibility (and SSI/SSA) Refresher” curriculum for hard copy and electronic distribution to line social workers and social work supervisors. The unit is also working with FACES and agency training staff to develop in-service training packages for Licensing and Monitoring and Corporation Counsel staff assigned to CFSA; these packages will focus on documentation and data entry elements related to IV-E eligibility (and also SSI/SSA benefits and Medicaid claiming). The “Eligibility Refresher” is targeted for distribution no later than 10/30/04; the Licensing and Monitoring and Corporation Counsel presentations are targeted for delivery no later than 12/31/04.

6. ***Under Section II, the Agency should include an action step that addresses working with the District’s Court Improvement Program to ensure that reasonable efforts to finalize a child’s permanency plan is included in court orders.***

The Agency is reasonably comfortable with current performance related to reasonable efforts to finalize a child's permanency plan - problems experienced in the Eligibility Review were primarily of an historic nature. We plan, however, to work with the Court on a number of issues (primarily 3rd Party Placement) and will include Permanency Planning on the agenda.

7. ***Under Section III, the Agency did not specifically address the issue of safety of the child’s placement and criminal record checks. While this activity is likely to be included in the District’s licensing standards, it would be useful to include an action step that reviews homes and facilities to ensure that the safety requirements have been met.***

Safety standards and criminal background checks are elements of the District’s licensing standards. We are convinced that all licensed providers have met these standards. We remain convinced that our inability to provide safety standards verification for licensed homes during the eligibility review was the result of documentation retention, storage, and retrieval problems. As discussed in #8 immediately below, we are also convinced that the structural and administrative impediments to documentation storage and retrieval have been recently resolved – problems related to historic documentation, however, remain (and may never be resolved). In addition to the steps taken thus far, a proposal is currently under review to scan criminal records check documentation into FACES (see discussion at #9 below) as well as electronic finger printing capabilities.

8. ***Action Step III.E.1. states that issues involving records retention, timely notice of renewal and a variety of other administrative coordination issues have already been resolved. It would be helpful if the Agency clarified this statement to document how these issues were resolved.***

It was our intent in III.E.1 to indicate that the District's new licensing regulations and CFSA's assumption of licensing responsibility lead to a series of transfers and structuring/re-structuring of responsibility and authority for various segments of the licensing process. (We discussed many of these issues in the exit interview and the points were again stressed in Dr. Golden's letter following-up on the exit conference.) As authority was transferred first from other District entities to SFCA and then through a series of internal reorganizations, historic documentation did not always accompany the transfers. When we assert in III.E.1 that issues were resolved, the intent was that the authority and responsibility had been permanently assigned, internal procedures and protocols had been established, and that inter-unit linkages and coordination had been finalized. It was not our intent to imply that all of the historic and transitional errors and omissions had been corrected. We did, however, intend to assert our belief that systems had been formalized that would prevent a future recurrence of previously experienced problems.

9. ***While action Step III.E.2. relies on making sure that staff will enter licensing data into FACES, the review did not see this as simply a FACES issue. The Program Improvement Plan needs to address the problem that staff could not verify that foster homes in which children were placed were licensed.***

Our previous discussion related to entering licensing data into FACES was not meant to imply that hard-copy licensing data was available (see #7 above) nor that all homes were indeed licensed. The purpose of Action Step III.E.2 was to indicate the need for electronic licensing information necessary to inform the automated IV-E claiming process. Historically, there were two data elements in FACES related to licensure. The first was a simple yes/no field entered by workers in the Monitoring and Licensing Unit (as then constituted); the second was a multi-field screen that was electronically populated from several other data input screens. Because the latter screen was almost never populated (regardless of whether the home was actually licensed or not), the former field was used in the initial claiming logic. It is clear from a variety of sources, including the 8/03 IV-E Eligibility Review, that the integrity of data entered in the yes/no field is unreliable. We have been working, and will continue to work, toward achieving accurate and consistent data entry needed to populate the multi-field screen (the screen that was designed to function in the IV-E claiming logic). Several of the screens of origin have been modified and a process for scanning licensed into FACES was recently implemented (scanning of criminal records check documentation is being considered).

10. ***Section III.G. has a completion date of January 2005. It is unclear why this action step could not be completed sooner since it would save the District from making the same errors that were identified in the review.***

In the new Action Step I.B.3 and in narrative supplements #7-9 associated with Action Steps III.E. 1& 2, we state that the FACES automated IV-E claiming process requires a reliable, electronic source of provider eligibility (i.e., licensure), which is not yet available. The field that captures licensure as reported (yes/no) by Licensing & Monitoring Unit staff is unreliable – a recent examination of “no” entries by one of the authors of this document suggests that the incidence of error for “no” entries is as high as is the error rate for “yes” entries. Although considerable progress is being made, the alternative source of electronic provider eligibility data (and the one designed as part of the IV-E claiming methodology) is not yet ready for reliable use. Other sections of this document envision working on provider eligibility screen design and data input through the 4th Quarter, FY04, testing the system against 4th Quarter, FY04 claiming data, and implementing the process with the 1st Quarter, FY05 IV-E-1 submission.

11. ***It is unclear how the Agency will evaluate progress and what reports the Regional Office will receive on the progress and what reports the Regional Office will receive on the progress being made and the frequency of these reports. Report should be provided to the Regional Office at least quarterly.***

Quarterly progress reports will be submitted within 45 days of the close of the quarter beginning with 4th Quarter, FY04. The first report will address all Objectives and Action Steps in the PIP matrix (as modified by relevant sections of the Narrative Supplement as appropriate). Subsequent reports will also address only those items not previously listed (and accepted by ACF) as completed. However, there may be some instances of relevant activity associated with an objective or action step previously reported as completed. In such cases, if any, we will provide an amended discussion of that item.

Corrective Action Objective	Corrective Action Steps	Completion	Evaluation & Reporting
I.A. Backlog of Eligibility Determinations/Re-determinations (See Narrative Supplement: #2)	I.A.1: - Approve and hire sufficient staff for ongoing foster care eligibility determinations, foster care eligibility re-determinations, and adoption assistance eligibility determinations.	I.A.1: 9/04	See Narrative Supplement: #11
	I.A.2. - Secure additional (non-permanent) staffing sufficient to complete the PIP action steps within the indicated time-frames (including the elimination of the foster care and adoption assistance eligibility backlogs).	I.A.2: 7/04	See Narrative Supplement: #11
	I.A.3. - Eliminate backlog (see Narrative Supplement: #2).	I.A.3: 9/05	See Narrative Supplement: #11
	I.A.4: - A contractor has been identified to: A. Assist with clearing the foster care and adoption eligibility backlog B. Tasked with providing recommendations and technical assistance as it relates to eligibility unit worker job descriptions and classifications; inter- and intra unit policies, procedures, and work-flows; and staffing levels. C. Tasked with providing recommendations and technical assistance to the Agency's ability to interface with the Family Court and the Office of Corporation Counsel (particularly with regard to "3rd Party Placements") D. Assist with Agency-wide training related to eligibility.	I.A.4: On-going	See Narrative Supplement: #11
I.B. Weaknesses in the Eligibility Determination/Re-determination Process.	I.B.1. - Redesign and implement eligibility determination processes in FACES (with emphasis on procedures for modifying/entering court order data, modifying household composition, and modifying/entering income data).	I.B.1: 11/03	See Narrative Supplement: #11
	I.B.2. - Redesign and implement eligibility re-determination process in FACES.	I.B.2: 2/04	See Narrative Supplement: #11
	I.B.3. - Review, modify and test the previously designed FACES logic related to provider (placement) eligibility (see Narrative Supplement: #3).	I.B.3: Methodology Review - 7-8/04 I.B.3: Test - 4thQ/04	See Narrative Supplement: #11
I.C. Conversion Errors	1.C. - Create report of all eligible clients in care as of 1/1/04 with home removal episode listed as prior to 10/1/99. Verify against manual list from previous system and manual records. If different, perform a new "Initial Determination".	1.C: Report - 6/04 I.C: Verification and Correction - 12/04	See Narrative Supplement: #11
I.D. Determinations Prior to FY92	I.D. - From the report in I.B, identify all clients with a home removal date prior to 10/1/91. Do a complete "Initial Determination" and Re-determinations through the present for all such clients (with special attention to "Reasonable Efforts" at removal).	I.D: Report - 6/04 I.D: Determinations Completed - 12/04	See Narrative Supplement: #11
I.E. Over Age	I.E. - Modify FACES logic to correct error that omitted a small percentage of status changes to ineligible upon eligibility age-out.	I.E: 11/03	See Narrative Supplement: #11

Corrective Action Objective	Corrective Action Steps	Completion	Evaluation & Reporting
I.F. Failure to End-Date Foster Care Episode	I.F.1. - Create a report of all clients in continuous care (from 10/1/99 forward) with a break in placement/R&B payment of two months or more. Complete eligibility re-determinations for all clients listed and initial determinations as necessary. Repeat report quarterly.	I.F.1: Report - 6/04 1.F.1 Determinations Complete 12/04 & Quarterly	See Narrative Supplement: #11
	I.F.2. - Create process for permitting eligibility determination workers to correct start-dates and end-dates for foster care episodes where data errors are discovered in the eligibility determination/re-determination process (see Narrative Supplement: #4).	I.F.2: 11/03	See Narrative Supplement: #11
	I.F.3. - Modify the FACES process for foster care placements to require providers to enter placement start and end dates as part of the invoicing procedure. Create an exception report of all discrepancies between provider and social worker entries and forward report to the data entry staff in the Placement Unit. In instances in which the placement start is an initial placement (or occurs after a break in placement) or the placement end is not followed by a subsequent placement, the need to start-date or end-date a foster care episode will be explored. (Note that not all placed children are in foster care.)	I.F.3: 7/04	See Narrative Supplement: #11
	I.F.4. - Develop training materials for case-carrying social workers and supervisors regarding protocols for beginning and ending foster care episodes in FACES (with special attention to case moving between 3rd party placement and foster care) (see Narrative Supplement: #5).	I.F.4: 8/04	See Narrative Supplement: #11
II. Reasonable Efforts to Achieve Permanency			
II.A. Timely Adjustment of Eligibility	II.A. - Redesign eligibility redetermination process in FACES to sequence redeterminations with Permanency Hearings.	II.A: 2/04	See Narrative Supplement: #11
II.B. Reporting Instances of Non-Compliance	II.B.1. - Create protocol to manually notify the Eligibility Unit of Permanency Hearings in which "Reasonable Efforts" language is not obtained and re-obtained (where previously missing) so that eligibility can immediately be adjusted (with relevant court orders provided).	II.B.1: 7/04	See Narrative Supplement: #11
	II.B.2. - Create protocol to manually notify Program Management of instances in which "Reasonable Efforts" language has not been obtained so that such efforts can be undertaken/documentated and a new hearing can be scheduled.	II.B.2: 7/04	See Narrative Supplement: #11

Corrective Action Objective	Corrective Action Steps	Completion	Evaluation & Reporting
	II.B.3. - Develop training materials for all case-carrying social workers, supervisors, and Corporation Counsel staff regarding protocols and procedures in Permanency Planning hearings (including corrective action procedures in instances in which "Reasonable Efforts" language is not obtained timely).	II.B.3: 8/04	See Narrative Supplement: #11
II.C. Coordination with Family Court	II.C. - The Agency is reasonably comfortable with current performance related to reasonable efforts to finalize a child's permanency plan - problems experienced in the Eligibility Review were primarily of an historic nature. We plan, however, to work with the Court on a number of issues (primarily 3rd Party Placement) and will include Permanency Planning on the agenda.	II.C: 8/04	See Narrative Supplement: #11
III. Licensing			
III.A. Congregate Care Facilities	III.A. - Achieve 100% licensure and ongoing, timely re-licensure.	III.A: 7/03	See Narrative Supplement: #11
III.B. Independent Living	III.B. - Achieve 100% licensure and ongoing, timely re-licensure.	III.B: 7/03	See Narrative Supplement: #11
III.C. Traditional & Kinship in District	III.C.1. - Biweekly review at the level of the Agency Director and senior staff of data showing number of homes awaiting licensure and the percentage of homes licensed timely overall and by category, identification of problems encountered, and decision-making regarding resolution.	III.C.1: Ongoing	See Narrative Supplement: #11
	III.C.2. - Provide monthly reports showing all licenses coming due for renewal within the next 120 days to all contracted providers and in-house family resource staff.	III.C.2: Ongoing	See Narrative Supplement: #11
	III.C.3. - Achieve 95% licensure.	III.C.3: 9/04	See Narrative Supplement: #11
III.D. Traditional & Kinship in MD	III.D. - Because many Traditional and Kinship foster families live in Maryland where the District has no legal authority to license, CFSA has invested in contracts with licensed Child Placement Agencies in Maryland to license and re-license such homes. Contracts were recently expanded from four to seven and contracts were modified to provide clearer performance standards. The review and reporting standards discussed in III.C.1 (above) will also be applied to the Maryland homes. As a result of these efforts, 100% licensure is expected.	III.D: 12/04	See Narrative Supplement: #11
III.E. Records & Data Entry (See also, Narrative Supplement, #s 7 & 8)	III.E.1. - The Title IV-E Audit led to the identification of a number of licensing related issues involving records retention, timely notice of need for renewal, and a variety of administrative coordination issues. These issues were resolved at various points prior to the PIP submission date.	III.E.1: 1/04	See Narrative Supplement: #11

Corrective Action Objective	Corrective Action Steps	Completion	Evaluation & Reporting
	III.E.2. - The Audit experience also identified concerns related to the entry on licensing data into FACES (expressed particularly by licensed child placement agencies in the District and Maryland). Training and technical assistance resources will be developed to assist agency staff and contractors with the accurate, timely entry of licensing data. Any system constraints identified in the process will be documented and resolved. (See also, Narrative Supplement, #9)	III.E.2: 12/04	See Narrative Supplement: #11
III.F. Policy & Procedure for Special Cases - Historic, Never Fully Licensed	III.F. - Because the District, like many other jurisdictions, had historically maintained a separate, less rigorous "approval" standard for Kinship Care homes, a number of children find themselves in long-term, stable, nurturing placements in homes unable to obtain licensure. We have initiated intensive staffings (with ongoing management review and decision-making) for such homes to identify barriers to licensure and to develop interventions where appropriate and feasible.	III.F: 12/04	See Narrative Supplement: #11
III.G. Claiming Logic (See also, Narrative Supplement #10)	III.G. - Once action steps identified in III.D, III.E.2 and III.F (above) are completed, implement FACES logic that precludes claiming maintenance costs for children in unlicensed facilities.	III.G: 10/04 (for 1stQ, FY05 IV-E.1)	See Narrative Supplement: #11
IV. AFCARS Reporting	IV. - AFCARS case data reporting will be modified to capture foster care maintenance payments in the reporting period and to be reflective of the District's "penetration rate" as reported on the quarterly IV-E-1 (see Narrative Supplement: #1).	IV: 5/04	See Narrative Supplement: #11