

## **STATE OF IOWA TITLE IV-E PROGRAM IMPROVEMENT PLAN**

### **Introduction**

During the week of September 17 to 21, 2001, the Administration for Children and Families' (ACF) staff from the Kansas City Regional Office and State of Iowa staff conducted an eligibility review of Iowa's Title IV-E Foster Care program in Des Moines, Iowa. The review consisted of an 80 case sample of children with IV-E claims for service rendered during the period October 2000 to March 2001.

The purpose of the review was to determine compliance with the child and provider eligibility requirements outlined in 45 CFR 1356.71 and Section 472 of the ACT, and to validate the basis for Iowa's financial claims. The review resulted in a report dated October 22, 2001, which found Iowa's Title IV-E Foster Care maintenance program "not in substantial compliance" with federal requirements.

It is important to note that this review evaluated the documentation requirements related to federal IV-E eligibility, not the ability of the foster care program to address child safety. DHS is committed to safety and permanency for the children we serve. DHS also recognizes that Federal IV-E funds are an important source of revenue that helps us protect children and secure permanent homes for children. DHS takes the stewardship of federal and state funding seriously, and is committed to working with our partners to improve the accuracy of our IV-E claiming.

The review report complimented the state for a very well organized review. The review also recognized that files were well organized and easy to follow, and that payment histories were available and attached to each case file. The review noted that the state review team members were very knowledgeable, and that the availability of judges to interpret legal issues was an asset to the review.

### **Areas Found To Be In Need Of Improvement During The Eligibility Review**

The following sections of this Program Improvement Plan (PIP) will address the areas identified as needing improvement in the federal report which are repeated below. Each step of the Action Plan will identify specific action steps which will relate to one or more of the areas of deficiency and/or attention. Each step will include the date of completion and a plan for monitoring and reporting progress toward completion to ACF.

#### **Areas of deficiency:**

1. Documentation of contrary to the welfare and reasonable efforts to prevent removal or reunify the child with the family.
2. Documentation of child eligibility related to income and resources, removal from the home of a specified relative, and deprivation of parental support.
3. Documentation of criminal record checks.

#### **Areas in need of attention:**

4. Documentation of individual findings in court orders.
5. Documentation of reasonable efforts to finalize the permanency plan in court orders.
6. Documentation of concurrent custody in court orders.
7. Frequency of AFDC review.

## **Action Plan**

### **Step #1: Assessment**

Evaluate the strengths and weaknesses of the current eligibility determination process. Review of identified weaknesses and strengths, then compile the information to provide a picture of the process to identify areas of the process that need change and areas that do not need change

#### **Area(s) needing improvement**

1. Documentation of contrary to the welfare and reasonable efforts to prevent removal or reunify the child with the family.
2. Documentation of child eligibility related to income and resources, removal from the home of a specified relative, and deprivation of parental support.
3. Documentation of criminal record checks.
4. Documentation of individual findings in court orders.
5. Documentation of reasonable efforts to finalize the permanency plan in court orders.
6. Documentation of concurrent custody in court orders.
7. Frequency of AFDC review.

#### **Completion Date**

A small group representing Income Maintenance staff, DHS Service staff, JCS staff, Court staff, and Policy staff will conduct this evaluation which will result in a final report of recommendations to clarify and improve the state eligibility determination process by February 15, 2002

#### **Monitoring Plan**

Workgroups will submit meeting notes and intermediate work products to the Deputy Director of Field Operations

#### **Reporting Plan**

The final report will be shared with ACF upon completion, and will serve to guide other specific steps in the PIP.

### **Step #2: Plan Development**

Develop a plan to modify the current IV-E eligibility determination process to improve accuracy and consistency of the documentation for IV-E eligibility determinations. Plan will identify number and type of staff, duties, form changes and any additional supports needed.

#### **Area(s) needing improvement**

1. Documentation of contrary to the welfare and reasonable efforts to prevent removal or reunify the child with the family.
2. Documentation of child eligibility related to income and resources, removal from the home of a specified relative, and deprivation of parental support.
3. Documentation of criminal record checks.
4. Documentation of individual findings in court orders.
5. Documentation of reasonable efforts to finalize the permanency plan in court orders.
6. Documentation of concurrent custody in court orders.
7. Frequency of AFDC review.

#### **Completion Date**

April 15, 2002

#### **Monitoring Plan**

Workgroups will submit meeting notes and intermediate work products to the Deputy Director of Field Operations.

#### **Reporting Plan**

Draft Plan will be shared with ACF by 3/15/02 for review and comment.

**Step #3: Implementation**

Implement changes needed to improve the current eligibility determination process based on evaluation process in Step #1 and action plan from Step #2.

**Area(s) needing improvement**

1. Documentation of contrary to the welfare and reasonable efforts to prevent removal or reunify the child with the family.
2. Documentation of child eligibility related to income and resources, removal from the home of a specified relative, and deprivation of parental support.
3. Documentation of criminal record checks.
5. Documentation of reasonable efforts to finalize the permanency plan in court orders.
7. Frequency of AFDC review.

**Completion Date**

Team will review reports developed in Step 1 and Step 2 to develop specific recommendations for implementation of changes by July 30, 2002

**Monitoring Plan**

Workgroups will submit meeting notes and intermediate work products to the Deputy Director of Field Operations.

**Reporting Plan**

Report addressing each recommendation identified in Step 1 will be submitted to ACF.

**Step #4: Record Checks**

Improve accuracy and compliance of required documentation of record checks for foster care providers.

**Area(s) needing improvement**

3. Documentation of criminal record checks.

**Completion Date**

March 1, 2002

**Monitoring Plan**

- a. Complete assessment of factors leading to non-compliance by 2/1/02 and report outcomes to the Deputy director of Field Operations..
- b. Develop revised procedure by 3/1/02 which assures record checks are completed and documentation in DHS file for foster homes and foster care facilities
- c. Develop any necessary training to support the revised procedures by 3/1/02. The training materials and schedule will be provided to the Deputy director of Field Operations.

**Reporting Plan**

Revised procedure and training plan will be shared with ACF by 3/1/02.

**Step #5: Policy Base**

Update IV-E Policy manual to reflect needed policy clarifications identified in Step 1 and desk aides to reflect revised IV-E eligibility determination process changes.

**Area(s) needing improvement**

1. Documentation of contrary to the welfare and reasonable efforts to prevent removal or reunify the child with the family.
2. Documentation of child eligibility related to income and resources, removal from the home of a specified relative, and deprivation of parental support.
3. Documentation of criminal record checks.
4. Documentation of individual findings in court orders.
5. Documentation of reasonable efforts to finalize the permanency plan in court orders.
6. Documentation of concurrent custody in court orders.
7. Frequency of AFDC review.

**Completion Date**

June 1, 2002

**Monitoring Plan**

State will develop recommendations (per Step #1 and 2) for ACF approval by 3/15/02. Policy changes will be drafted by 5/15/02, which support the recommendations in Step #1, and policy changes will be published and necessary training provided for implementation by 6/1/02.

**Reporting Plan**

State will notify ACF of the implementation of the revised policy by 6/1/02.

**Step #6: Juvenile Court Services**

Improve accuracy and compliance of Juvenile Court Services information and communication for determination of IV-E eligibility documentation.

**Area(s) needing improvement**

1. Documentation of contrary to the welfare and reasonable efforts to prevent removal or reunify the child with the family.
2. Documentation of child eligibility related to income and resources, removal from the home of a specified relative, and deprivation of parental support.
4. Documentation of individual findings in court orders.
5. Documentation of reasonable efforts to finalize the permanency plan in court orders.

**Completion Date**

- a. With assistance from ABA, to develop training and eligibility forms to communicate IV-E eligibility information by 3/15/02.
- b. With assistance from ABA, develop training information on how to address Contrary to the Welfare, permanency, and TPR for delinquent youth by 3/1/02.
- c. State IV-E desk aids will be up-dated to reflect procedural and form changes specific to JCS staff by June 1, 2002.
- d. DHS will make consultation available to JCS staff in support of their role to capture and accurately communicate information needed by DHS to accurately determine IV-E eligibility.
- e. Training information developed will be delivered for use by JCS staff and shared with ACF by June 1, 2002.

**Monitoring Plan**

DHS will contact ABA by 1/15/02. DHS will work with ABA, JCS staff, and Court Improvement Project (CIP) to develop forms and procedures, which simply and accurately communicate IV-E eligibility information. DHS will modify procedures related to JCS role in capturing and reporting information necessary to make IV-E determinations. JCS and CIP will coordinate training and CIP will help to address any per diem related expenses to the training.

**Reporting Plan**

State will inform ACF when the training has been delivered to JCS.

**Step #7: Court Orders**

Improve compliance of Juvenile Court orders with IV-E eligibility documentation requirements.

**Area(s) needing improvement**

1. Documentation of contrary to the welfare and reasonable efforts to prevent removal or reunify the child with the family.
4. Documentation of individual findings in court orders.
5. Documentation of reasonable efforts to finalize the permanency plan in court orders.
6. Documentation of concurrent custody in court orders.

**Completion Date**

- a. Submit all Model Orders, Findings, and forms developed for review by ACF staff for compliance with federal requirements by 1/25/02.
- b. Complete training for all judges on Juvenile Court procedures including state and federal requirements for IV-E compliance by 2/1/02.
- c. CIP and DHS will review 100 random IV-E cases (stratified to cover each judicial district) for compliance of court orders with IV-E requirements and provide feedback to individual judges, along with a summary report of findings to Chief District Court Judges, the Supreme Court and State Court Administrator. by May 1, 2002, including a summary report of findings.
- d. DHS, JCS and CIP will develop a cover letter to be used by DHS/JCS as part of reports to the court identifying key IV-E issues for the judge to consider.
- e. CIP, in consultation with DHS, Court Administration and the Juvenile Court Committee leadership, will develop a template incorporated into each court order identifying key IV-E issues to be addressed with each applicable order of the court.

**Monitoring Plan**

DHS will maintain monthly contact with CIP of progress of each component of Action Step #7.

**Reporting Plan**

DHS will report to ACF when judges' training is completed to verify completion. DHS will provide the CIP summary report on the completion of the review and findings.

**Step #8: Court Orders**

Compliance with court related IV-E eligibility requirements will be improved by providing information and training on IV-E requirements to attorney's practicing in Child Welfare.

**Area(s) needing improvement**

1. Documentation of reasonable efforts to prevent removal or reunify the child with the family.
4. Documentation of individual findings in court orders.
5. Documentation of reasonable efforts to finalize the permanency plan in court orders.
6. Documentation of concurrent custody in court orders.

**Completion Date**

- a. DHS and CIP will seek technical assistance from ABA to develop training, including IV-E requirements by January 15, 2002.
- b. DHS and CIP will seek commitment to participate in training on IV-E and AFSA from the Attorney General's Office, the Prosecuting Attorneys Council, the County Attorney Association, and the Public Defender's Office by February 15, 2002.
- c. Training information and schedules will be made to each party listed in "b" above by April 15, 2002.

**Monitoring Plan**

DHS and CIP will maintain monthly contact to monitor progress toward each component of Action Step #8.

**Reporting Plan**

DHS will report to ACF when attorney training is completed to verify completion. Progress will be communicated to ACF as part of the Quarterly progress reports.

**Step #9: Quality Improvement**

Develop a quality improvement process to improve the accuracy and level of IV-E claiming. The QI process will be designed to provide continuous monitoring and feedback for the ongoing refinement of the policies and processes that impact accurate and timely IV-E eligibility determinations.

**Area(s) needing improvement**

1. Documentation of contrary to the welfare and reasonable efforts to prevent removal or reunify the child with the family.
2. Documentation of child eligibility related to income and resources, removal from the home of a specified relative, and deprivation of parental support.
3. Documentation of criminal record checks.
4. Documentation of individual findings in court orders.
5. Documentation of reasonable efforts to finalize the permanency plan in court orders.
6. Documentation of concurrent custody in court orders.

**Completion Date**

- a. Develop protocols for routine IV-E case file reviews to assure accuracy of IV-E determinations by April 15, 2002. Case file reviews will examine IV-E requirements for accuracy and compliance for DHS, JCS, DIA, attorneys, service providers, and Courts respective role in the IV-E eligibility determination process. A draft of proposed protocols will be submitted to ACF for review.
- b. Develop procedures for routine analysis of secondary data to review IV-E eligibility and claiming patterns to provide feedback to field and policy staff, and to identify any deviations from expected norms and historical patterns that may warrant additional review.
- c. Develop model QI reports which will address both case file review information and secondary data analysis to provide feedback to field staff, policy staff, and administrators regarding IV-E determinations and to inform policy and practice changes on a quarterly basis.
- d. Once in place QI reports will be provided to the Deputy Director of Field Operations, The Deputy Director of Policy, Administrator for the Division of Behavioral, Developmental, and Protective Services for Families, Adults, and Children, and the Court Administration for the development of changes/improvements as needed.

**Monitoring Plan**

Workgroups will submit meeting notes and intermediate work products to the Deputy Director of Field Operations.

**Reporting Plan**

DHS will submit the draft protocols to ACF for approval by 4/15/02 and will verify ACF of the implementation of the QI process by 6/1/02. DHS will submit quarterly QI reports to ACF until completion of the subsequent IV-E eligibility review finding Iowa in Substantial Compliance.

**Step #10: Full Implementation**

Begin utilization of the new eligibility determination process to review cases and determine eligibility for new entries into foster care. Monitor and evaluate the quality improvement process and complete any needed enhancements to the process.

**Area(s) needing improvement**

1. Documentation of contrary to the welfare and reasonable efforts to prevent removal or reunify the child with the family.
2. Documentation of child eligibility related to income and resources, removal from the home of a specified relative, and deprivation of parental support.
3. Documentation of criminal record checks.
4. Documentation of individual findings in court orders.
5. Documentation of reasonable efforts to finalize the permanency plan in court orders.
6. Documentation of concurrent custody in court orders.
7. Frequency of AFDC review.

**Completion Date**

- a. Review and evaluation of IV-E eligibility for Foster Care cases as annual reviews are due on cases. All Foster Care case reviews completed by January 30, 2003. This process will be accelerated so that all foster care cases are reviewed between July 2002 and January 2003. IV-E claiming will be stopped where appropriate.
- b. Evaluation of Quality Improvement recommendations: the first quarterly QI report will be completed by October 1, 2002.
- c. Implement any additional refinements to the Eligibility determination process by January 31, 2003.
- d. Provide continuing feed back to all departments involved in IV-E eligibility determinations starting in October of 2002.

**Monitoring Plan**

DHS will monitor and track completion of the case reviews through the Quality Improvement process

**Reporting Plan**

- DHS will provide a final report of progress made and the status of IV-E eligibility to ACF staff by January 30, 2003.
- DHS will provide quarterly summary reports on findings of the eligibility review per a.
- DHS will provide quarterly QI reports per b. and c.

## Timeline for Iowa's Title IV-E Program Improvement Plan

**Flow of Action steps:**

1-2-3-5 follow on each other - revision of overall DHS IV-E eligibility determination process.

6-7-8 all relate to changes involved the **Juvenile Court Services**

4 relates to criminal records checks for **foster care providers (licensing)**

9-10 relate to **quality control and implementation** of the system developed in 1 thru 8.

Action Step	What	Due	Who	<--deficiency-->							
				1	2	3	4	5	6	7	
8a	DHS & CIP will seek TA from ABA to develop <b>IV-E training for attorneys</b> practicing child welfare	1/15/02	DHS, CIP	x			x	x	x		
7a	Submit all Model Orders, Findings, and forms developed for review by ACF staff for compliance with federal requirements by 1/25/02.	1/25/02	DHS, CIP	x			x	x	x		
4a	Complete assessment of factors leading to non-compliance in documentation of <b>criminal records checks</b> .	2/1/02	DHS			x					
7b	<b>Complete training for all judges</b> on Juvenile Court procedures including state & federal requirements for IV-E compliance. Inform ACF.	<b>2/1/02</b>	DHS, CIP	x			x	x	x		
1	Conduct evaluation resulting in report of specific recommendations of actions to clarify/improve <b>IV-E eligibility determination process</b> . (submit to ACF)	2/15/02	small work group (IM, DHS service, JCS, court staff, policy staff)	x	x	x	x	x	x	x	x
8b	Commitments to participate in the <b>attorney training</b> will be sought from the Attorney General's Office, Prosecuting Attorneys Council, County Attorney Ass., and Public Defenders Office	2/15/02	DHS, CIP	x			x	x	x		
4b	Develop revised procedure and necessary training which assures <b>criminal records checks</b> are complete. Share with ACF.	<b>3/1/02</b>	DHS			x					

Action	Step	What	Due	Who	<--deficiency-->							
					1	2	3	4	5	6	7	
	6b	With assistance of ABA develop training information on how <b>Juvenile Court services</b> should address Contrary to Welfare, permanency, and TPR for delinquent youth.	3/1/02	DHS, ABA, JCS staff, CIP staff	x	x		x		x		
	7d	Develop <b>cover letter to accompany DHS reports to the court</b> , identifying key IV-E issues for the judges to consider. (no due date in draft PIP - 3/1/02 made up)	3/1/02	DHS, CIP	x			x	x	x		
	7e	CIP, in consultation with DHS, Court Administration and the Juvenile Court Committee leadership, will develop a template incorporated into each court order identifying key IV-E issues to be addressed with each applicable order of the court.	3/1/02	DHS, CIP, Court Administration, Juvenile Court leadership.	x			x	x	x		
	6a	With assistance from ABA, to develop training and eligibility forms to communicate IV-E eligibility information by 3/15/02.	3/15/02	DHS	x	x		x		x		
	2a	Develop & submit to ACF for review & comment draft plan to modify <b>IV-E eligibility determination process</b> , identifying number & type of staff, duties, form changes and any additional supports needed.	3/15/02	workgroups to the Dept. Director of field operations	x	x	x	x	x	x	x	x
	2b	Finalize plan to modify <b>IV-E eligibility determination process</b> , identifying number & type of staff, duties, form changes and any additional supports needed.	4/15/02	workgroups to the Dept. Director of field operations	x	x	x	x	x	x	x	x
	8c	Attorney training information and schedules will be mailed to each of the groups participating in <b>attorney training</b> .	4/15/02	DHS, CIP	x			x	x	x		
	9a	Develop protocols for a <b>routine IV-E case file reviews</b> to assure accuracy of IV-E determinations, involving DHS, JCS, DIA, attorneys, service providers, and courts. Forward to ACF for review	4/15/02	workgroups to the Dept. Director of field operations		x	x	x	x	x		
		First Quarterly Progress Report provided to ACF	4/1/01	DHS	x	x	x	x	x	x	x	x
	6c	With assistance of ABA, develop eligibility forms (and training) to communicate IV-E eligibility information with <b>Juvenile Court Services</b> .	5/1/02	DHS, ABA, JCS staff, CIP staff	x	x		x		x		

7c	<b>Review 100 random IV-E cases for compliance of court orders</b> with IV-E requirements, and provide feedback to judges and Court Administrators' Office. Provide summary report to ACF.	5/1/02	DHS, CIP	x			x	x	x	
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Action Step	What	Due	Who	<--deficiency-->							
				1	2	3	4	5	6	7	
5a	DRAFT <b>update to IV-E Policy Manual and desk aides</b> will be completed, supporting recommendations submitted to ACF on 3/15/02.	5/15/02	DHS	x	x	x	x	x	x	x	x
5b	<b>Update to IV-E Policy Manual and desk aides</b> will be published and necessary training provided for implementation. ACF will be notified of implementation	6/1/02	DHS	x	x	x	x	x	x	x	x
6d	Update IV-E desk aides to reflect procedural and form changes specific to <b>Juvenile Court Services</b> staff.	6/1/02	DHS, ABA, JCS staff, CIP staff	x	x		x		x		
9b	Develop procedures for <b>routine analysis of secondary data</b> to determine IV-E eligibility and claiming patterns, identify deviations, and provide feedback to field and policy staff.	6/1/02	workgroups to the Dept. Director of field operations	x	x	x	x	x	x		
9c	Develop <b>model QI reports</b> which will be used in providing feedback to field and policy staff on both case file review and eligibility and claiming patterns	6/1/02	workgroups to the Dept. Director of field operations	x	x	x	x	x	x		
9d	<b>Implementation of the QI (review &amp; assurance) process</b> will begin, and ACF notified The first quarterly QI report will be shared with ACF on 10/1/02	<b>6/1/02</b>	Director of field operations	x	x	x	x	x	x		
3	Implement plan to modify <b>IV-E eligibility determination process</b> .	<b>7/30/02</b>	Director of field operations	x	x	x		x		x	
8d	DHS will report to ACF when <b>attorney training</b> is completed (no date given - 7/30 made up)	<b>7/30/02</b>	DHS	x			x	x	x		
	Second Quarterly Progress Report provided to ACF	8/1/01	DHS	x	x	x	x	x	x	x	x
9e	1st <b>quarterly QI report submitted to ACF</b> (no date given - estimated date)	10/1/02	Director of field operations	x	x	x	x	x	x		
	Third Quarterly Progress Report provided to ACF	12/1/01	DHS	x	x	x	x	x	x	x	x
9f	2nd <b>quarterly QI report submitted to ACF</b> (no date given - estimated date)	1/1/03	Director of field operations	x	x	x	x	x	x		
10b	Any refinements to the revised <b>Eligibility determination process</b> completed.	<b>1/31/03</b>	DHS	x	x	x	x	x	x	x	x
10a	All <b>foster care case reviews</b> completed	<b>1/30/03</b>	DHS	x	x	x	x	x	x	x	x
10c	<b>Final report</b> of progress made and status of IV-E eligibility sent to ACF	<b>1/30/03</b>	DHS	x	x	x	x	x	x	x	x
	<b>Completion of PIP</b>	2/1/03									