

Issue #1: Judicial Determination of Contrary to the Welfare and Reasonable Efforts

Goal: Develop and implement a procedure to ensure a judicial determination is made when a child returns to a foster care placement from a disrupted trial home visit of more than six months or beyond the extension of the court.

Action Steps	Method of Measuring Improvement	Evidence of Completion	Due Date	Date of Completion
1. IV-E System Team conference call to discuss the need for monitoring and obtaining required information.	NA	Monthly Agendas and Minutes	08-31-13	08-31-13 (ongoing)
2. Administrative memorandum will be issued to inform agency staff of the requirements when a child returns to foster care from a trial home visit.	Quarterly reports to ACF. Quality Assurance summary to show if there is improvement in receiving court orders with the required language to qualify for IV-E funding.	Administrative memorandum	01-01-14	01-01-14
3. New worker training will cover this issue as part of their required curriculum. The Administrative memorandum in #2 will be used as part of this training to insure new workers have this information. This will be an ongoing part of new worker training. For ongoing workers, the supervisor will be required to review the memo with them individually. Any questions regarding the memo will be addressed at the IV-E system team meetings.	Quarterly reports to ACF. Quality Assurance summary to show if there is improvement in receiving court orders with the required language to qualify for IV-E funding.	This training added to New Worker Training Curriculum	02-01-14	01-16-14
4. Enhance the process with the Court Improvement Project to obtain required judicial determinations. To include continued education of the judiciary and other court officials. There are efforts to enhance this process and procedures are in the development stages. The Center on Children, Families, and the Law representative receives information monthly from our IV-E court review team noting any court orders that fail to meet IV-E requirements. This information is shared with the specified judge and lets them know what is needed to meet IV-E requirements. Court officials may also be contacted if it is thought they need to know about the issue.	Quarterly reports to ACF. Quality Assurance summary to show if there is improvement in receiving court orders with the required language to qualify for IV-E funding.	Written Procedures, quarterly reports to ACF, Quality Assurance summary, and minutes from the IV-E Court Review Team to show if there is improvement in receiving court orders with the required language to qualify for IV-E funding.	04-01-14	

Action Steps	Method of Measuring Improvement	Evidence of Completion	Due Date	Date of Completion
5. Agency staff will set an initial worker alert to review the Children and Family Service case after five months of when a child is placed with parent as a trial home placement.	Quarterly reports to ACF. Quality Assurance summary to show if there is improvement in receiving court orders with the required language to qualify for IV-E funding.	Procedure Memorandum, quarterly reports to ACF, and Quality Assurance summary.	01-01-14	01-01-14
6. If the child is still in the parental home after five months the worker will check with the Children and Family Services worker to see if the placement remains stable and notify them of a need for a new court order if a new removal occurs.	Quarterly reports to ACF. Quality Assurance summary to show if there is improvement in receiving court orders with the required language to qualify for IV-E funding.	Procedure Memorandum, Quarterly reports to ACF, and Quality Assurance summary.	01-01-1	01-01-14
7. Agency staff will set a second alert to review the Children and Family Service case after the sixth month the child is placed with parent on a trial home visit. If it is found that the six month threshold for a trial home visit is exceeded with no court ordered extension, field staff will change the IV-E eligibility status to non-IV-E. IV-E claiming stops the month the child loses IV-E eligibility.	Quarterly reports to ACF. Quality Assurance summary to show if there has been ineligible payments made.	Quarterly reports to ACF, and Quality Assurance summary.	03-01-14	

Progress Report Delays/Barriers/Comments

Issue #2: AFDC Eligibility Determinations

Goal: To improve accuracy of eligibility determinations

Action Steps	Method of Measuring Improvement	Evidence of Completion	Date Due	Date of Completion
1. Develop and implement a policy regarding the process of eligibility determination.	CQI Case review results with a quarterly report that shows accuracy of IV-E determinations.	Administrative Memo	NA	08-31-12
2. Generate N-FOCUS edit/enhancement to prevent erroneous payments. SCR updates were implemented to address: child must have lived with specified relative within 6 months of judicial or VPA removal, VPA cases must have a judicial determination within 180 days or change to NON-IV-E, allows for eligibility determination for NON-IV-E case when a child is SSI eligible so Administrative costs can be claimed, allows adjusted to claiming validation if there was a change in funding code, claims validation changed to allow IV-E eligible services to be claimed if child, placement, and service is eligible for IV-E even if the provider (i.e. clothing store) is not a IV-E provider, and NFOCUS will ignore other facility types in determining IV-E claim ability and only considers relevant placement facility type to determine claim ability.	CQI Case review results with a quarterly report that shows accuracy of IV-E determinations.	N-FOCUS Systems Change Request (SCR). Results of CQI case reviews will show if there have been any erroneous payments made.	NA	11-11-12
3. Use IV-E System Team conference call to provide technical assistance regarding IV-E eligibility determinations.	NA	Agendas and Meeting Minutes	03-01-14	
4. Conduct case reviews to determine accuracy of eligibility determinations. We will review 100 – 150 IV-E cases statewide each quarter. A percentage of all QA reviews completed by the primary reviewers will also be reviewed by a second level reviewer to ensure reliability and consistency.	CQI Case review results with a quarterly report that shows accuracy of IV-E determinations.	CQI Case review results with a quarterly report that shows accuracy of IV-E determinations.	04-01-14	
5. Incorporate the results of IV-E eligibility reviews into the Nebraska Continuous Quality Improvement system.	CQI Case review results with a quarterly report that shows accuracy of IV-E determinations.	CQI Case review results with a quarterly report that shows accuracy of IV-E determinations.	04-01-14	

Action Steps	Method of Measuring Improvement	Evidence of Completion	Date Due	Date of Completion
6. Supervisors will review accuracy of IV-E determination for 100 % of the new cases.	CQI Case review results with a quarterly report that shows accuracy of IV-E determinations.	CQI Case review results with a quarterly report that shows accuracy of IV-E determinations.	04-01-14	

Progress Report Delays/Barriers/Comments

Issue #3: Eligibility Issue Regarding Licensing Status of Foster Family Homes During Placement

Goal: Ensure that a Foster Family Home is fully licensed throughout the placement of a child in order for foster care maintenance payments to be claimable.

Action Steps	Method of Measuring Improvement	Evidence of Completion	Date Due	Date of Completion
1. Generate N-FOCUS edit/enhancement to prevent erroneous payments.	Quarterly reports to ACF. Quality Assurance summary to show if there has been ineligible payments made.	Quarterly reports to ACF, and Quality Assurance summary.	NA	11-11-12
2. Agency staff will set a self-alert to review the license prior to expiration and if licensing renewal information is not completed and submitted timely to ensure that the foster home is fully licensed, Agency staff will take action to have the IV-E indicator for the foster home changed to "NO" on the date the license expires.	Quarterly reports to ACF. Quality Assurance summary to show if there has been ineligible payments made.	Quarterly reports to ACF, and Quality Assurance summary.	05-01-14	
3. Use IV-E System Team meeting to provide updates regarding Federal requirements and State standards. These are monthly meetings with all service areas represented on a teleconference call. Information is to be passed on to all field staff who are affected by our discussion or information shared during the meeting.	Results of CQI case reviews will show if there have been any erroneous payments made.	Agendas and Meeting Minutes to be provided on a quarterly basis during the PIP period. Feedback from the field regarding IV-E information shared will be important for any policy changes made or planned.	04-01-14	
4. Incorporate the results of IV-E eligibility reviews into the Nebraska Continuous Quality Improvement system.	Results of CQI case reviews will show if there have been any erroneous payments made.	CQI review results.	04-01-14	
5. CQI process will develop a plan for what action steps may be required for improvement for IV-E eligibility based on case review reports.	CQI plan.	CQI Case review results with a copy of the action steps that are needed.	11-01-14	

Progress Report Delays/Barriers/Comments

Issue #4 Safety Requirements of the Childcare Institutions and foster family home.

Goal: To improve the process to review the State licensing or approval standards for childcare institutions and foster family homes.

Action Steps	Method of Measuring Improvement	Evidence of Completion	Date Due	Date of Completion
1. Review Nebraska policy regarding initial and ongoing licensing standards for Childcare Institutions. Consider if any changes are required to address: <ul style="list-style-type: none"> • Frequency and documentation of required safety checks of childcare institution employees. • The enforcement response of the State when an applicant or staff in a residential childcare facility is found to have committed prohibiting offenses. • Verification of safety checks of staff as part of the initial and renewal licensing process. • Contract monitoring of DHHS's Division of Children and Family Services to include a process to ensure that the required safety checks of employees are conducted at the required intervals. 	Policy Memorandum for any changes required.	Policy Memorandum for any changes required.	04-01-14	
2. Insure documentation of safety checks completed at initial hiring by the childcare institution is in file.	CQI case review results and quarterly report to ACF.	CQI case review results.	04-01-14	

Action Steps	Method of Measuring Improvement	Evidence of Completion	Date Due	Date of Completion
3. Review of case files to verify state licensing or approval standards are met for childcare institutions and foster family homes at specific time periods.	CQI case review results and quarterly report to ACF.	CQI case review results.	04-01-14	

Progress Report Delays/Barriers/Comments

Issue #5: Payment Process as Related to Underpayments and Other Improper Payments

Goal: To improve the payment process resulting in a decrease of ineligible payments and underpayments.

Action Steps	Method of Measuring Improvement	Evidence of Completion	Date Due	Date of Completion
<p>1. Identify systemic issues in N-FOCUS. SCR updates were implemented to address the following issues: (a) child must have lived with specified relative within 6 months of judicial or VPA removal; (b) VPA cases must have a judicial determination within 180 days or change to NON-IV-E; (c) allow for eligibility determination for NON-IV-E case when a child is SSI eligible so Administrative costs can be claimed; (d) allow adjustment to claiming validation if there was a change in funding code; (e) claims validation changed to allow IV-E eligible services to be claimed if child is eligible and placement , and service are allowable for IV-E even if the service vendor (i.e. clothing store) is not a IV-E service vendor, and (f) NFOCUS will identify when a facility type has been changed from non-IV-E (non-licensed) to IV-E (fully licensed) and properly determine whether claimable.</p>	<p>Results of CQI case reviews will show if there have been any erroneous payments made.</p>	<p>N-FOCUS Systems Change Request (SCR). Results of CQI case reviews will show if there have been any erroneous payments made.</p>	<p>NA</p>	<p>11-11-12</p>
<p>2. Use IV-E System Team meeting to discuss system changes regarding the claiming and un-claiming of reimbursement for IV-E funding. The IV-E System Team consists of one or two representatives from each service area across the state, one member from the private agency (NFC), one member from the Omaha Tribe, Santee Sioux Nation, and Winnebago Tribe, along with IV-E Policy Central Office Staff. Membership is open if there is a need to expand the roster to include others. We can invite others to attend if it is beneficial.</p>	<p>NA</p>	<p>Agendas and Meeting Minutes to be provided on a quarterly basis during the PIP period. Feedback from the field regarding IV-E information shared will be important for any policy changes made or planned.</p>	<p>04-01-14</p>	
<p>3. Attend the Children’s Bureau IV-E Roundtable.</p>	<p>NA</p>	<p>Names of Nebraska attendees.</p>	<p>06-13-13</p>	

Action Steps	Method of Measuring Improvement	Evidence of Completion	Date Due	Date of Completion
4. Request and receive TA from the Children's Bureau.	Results of CQI case reviews will show if there have been any erroneous payments made.	Copy of Specific TA request, date of request, and date when TA assistance is provided.	04-01-14	
5. Discuss payment issues identified during IV-E case reviews in IV-E System Team meeting. These are monthly meetings with all service areas represented on a teleconference call. Information is to be passed on to all field staff who are affected by our discussion or information shared during the meeting.	NA	Agendas and Meeting Minutes to be provided on a quarterly basis during the PIP period. Feedback from the field regarding IV-E information shared will be important for any policy changes made or planned.	04-01-14	

Progress Report Delays/Barriers/Comments

Evaluation Procedures:

Nebraska’s Continuous Quality Improvement (CQI) System

Nebraska’s continuous quality improvement (CQI) system is designed to assess child welfare practice, outcomes, and compliance, and to use data and results to guide and change policies and practices in order to ensure that children and families receive quality services. The CQI system was implemented to continually analyze data regarding quality, outcomes and expenses, in order to implement the changes necessary to improve performance. The newly developed CQI framework is used to monitor DCFS performance as well as the performance of the Pilot Project (NFC). Continuous Quality Improvement is about constant learning about practice and outcomes, not simply quality assurance or compliance. CQI also allows for DCFS to develop strategies to improve the outcomes for children and families. Nebraska will conduct case reviews through the CQI process and will generate a report regarding whether or not Nebraska State Ward cases meet Federal requirements and State standards for IV-E eligibility. The CQI process will help in the development of a plan for what action steps may be required for improvement for IV-E eligibility based on their case review reports.

System Teams

Nebraska has developed the use of System Teams for each of the major program areas; permanency, adult protective services, Title IV-E, Indian Child Welfare Act, foster care, intake and investigation, education, training and prevention. The teams consist of program staff from central office and representatives from each of the Service Areas. The purpose of the system teams is to ensure a feedback loop between the field and program staff. These teams ensure consistent practice and assist in developing policy, training and support. The Title IV-E team will meet on at least a monthly basis.

Title IV-E Eligibility QA Review

One of the CQI System’s Quality Assurance (QA) activities will be to conduct quarterly Title IV-E eligibility reviews. Approximately 100-150 cases statewide will be reviewed each quarter using the Federal Title IV-E Foster Care Eligibility On-Site Review Instrument and Instructions. A percentage of all QA reviews completed by the primary reviewers will also be reviewed by a second level reviewer to ensure reviewer reliability and consistency.

Sample Selection:

The Protection and Safety Data Specialist will provide the QA Lead with a list of current IV-E cases on a quarterly basis. A Random Sample of cases will be selected for review and cases that were reviewed within 1 year will be eliminated from the current case sample.

Review Schedule:

Quarter	Review Month
1 st Quarter : June – Aug 2013	August 2013
2 nd Quarter: Sept –Nov 2013	November 2013
3 rd Quarter: Dec 2013 – Feb 2014	February 2014
4 th Quarter: March – May 2014	May 2014

Review Details:

The review location will be determined based on the cases selected for review in each Service Area. The reviewers will rely on information in the hard copy IMFC and RD files and N-FOCUS for the review.

Review Results (Feedback IMFC Supervisors and Workers)

Completed review tools will be made available to IMFC Supervisors and Workers in the Service Area. Any error cases will be noted and addressed with the individual IMFC Supervisor and Worker. Guidance on possible resolution will be provided through the Central Office Title IV-E Administrator and/or Program Specialist. Cases that are not able to be corrected will need to be changed to Non-IV-E funding from the date of ineligibility, funds unclaimed, and reimbursement made to Federal funds.

Review Results (Quarterly)

The QA Review Lead will complete a quarterly report with information from the reviews. The QA Review Lead will work closely with the Central Office Title IV-E Administrator and Program Specialist to identify strengths and areas needing improvement and implement strategies to address areas needing improvement.

Progress reports for this program improvement plan will be submitted to the Children's Bureau Regional Office quarterly.