

Tennessee Department of Children's Services
Title IV-E Eligibility
Program Improvement Plan
June 30, 2004

The purpose of this document is to identify action undertaken by the Tennessee Department of Children's Services (DCS) to develop and implement a Program Improvement Plan (PIP) to bring the department in full compliance with Department of Health and Human Services (HHS) regulations concerning Title IV-E. Areas in need of improvement as identified in the Tennessee Title IV-E Foster Care Eligibility Review for the period October 1, 2002 to March 31, 2003 follow:

- Placement in fully approved foster family home or child care institution, and
- Connection between the payment and eligibility system and the reporting system.

A specific discussion of the goals, action steps, timelines, and progress measures for each area follows.

I. Placement in fully approved foster family home or child care institution:

The department will place foster children only in fully approved foster homes or child care institutions that comply with all applicable federal and state laws, policies and regulations. To achieve this goal, DCS has outlined four action steps.

DCS Policy 16.4, *Foster Home Study, Evaluation and Training Process*, requires a criminal background check, including fingerprinting and sex offender registry check, prior to the approval of the foster home. During two recent audits and the Title IV-E Eligibility Review by HHS, reviewers determined that DCS had a number of foster homes not in compliance with this policy. The Department has taken the following corrective actions:

1 – Action Item: Evaluate Policy 16.4 to determine if all provisions comply with state and federal regulations as well as DCS's state plan and modify the policy as necessary.

Responsible Person: Elizabeth Black, Executive Director of the Office of Child Permanency

Start Date: January 16, 2004

Completion Date: July 15, 2004

Status: In process

Policy 16.4 has been reviewed and modifications will be complete by July 15, 2004. These modifications will require all homes to be in full compliance with all of the provisions in policy 16.4 for DCS foster home approval, including criminal background checks and PATH training prior to approval as a foster home.

2 – Action item: Develop and implement a plan to bring all foster homes into full compliance and maintain compliance with DCS policies and procedures on training and approval, including criminal background checks/fingerprinting. Use pro-active measures to expedite homes through the foster home certification process. This includes all foster homes that contract directly with DCS as well as foster homes provided through contracts with private agencies.

- a. Identify all existing foster homes (both DCS and through private agencies) that are not in compliance with Policy 16.4 as revised and require information concerning non-compliant foster homes to be submitted to Central Office.

Responsible Person: Judy Cole, Executive Director of the Office of Regional Support

Start Date: January 16, 2004

Completion Date: February 17, 2004

Status: Completed

On 2-17-04, 1168 DCS foster homes were identified as out of compliance with DCS policy regarding the foster home training and approval process. Most, but not all, of these were kinship foster homes. Regions were given a deadline of April 1, 2004 to bring these foster homes into compliance or the foster homes would be at risk of losing their foster care board payments.

- b. Develop pro-active measures to bring all non-compliant foster homes into compliance with Policy 16.4 as revised. Established a deadline of April 1, 2004 for DCS and July 31, 2004 for foster homes through private agencies to have all children in approved placements.

Responsible Person: Judy Cole, Executive Director of the Office of Regional Support

Start Date: February 20, 2004

Completion Date: July 31, 2004

Status: In Process

By April 1, the regional reports showed 368 foster homes still out of compliance. Although maintenance payments were made to the unapproved homes, all were either made from state appropriations or adjusted at a later date to state appropriations. The breakdown of these homes follows:

No. of Homes	Level of Non-Compliance	Reason for Non-Compliance	Action Taken
185	Minimal	Awaiting fingerprint results	No loss of board payment on April 1, 2004
98	Moderate	Awaiting submission of needed documentation (e.g. certificates for divorce, marriage, birth)	Child and family team meetings were convened. Foster parents were required to submit needed documentation by 4/12/04 or lose board payment.
85	Substantial	Failure to meet most	Child and family team meetings were convened.

		requirements for approval.	Foster parents were given option of taking custody or meeting all approval requirements within 60 days. After 4/1/04, if homes were still out of compliance, no foster care board payments were made, and none will be made until full compliance is achieved.
--	--	----------------------------	--

As of 4-27-04, there were 161 reported out of compliance; of those, 83 were awaiting fingerprint results. For the remaining 78 homes, 44 were substantially out of compliance in that they lacked PATH training, criminal background checks/fingerprinting, and most other elements of the training and approval process. The remaining 34 cases involved the lack of certain forms, references, or other documentation. The Regional Administrators reviewed these 78 homes on a case-by-case basis. Child and Family Team meetings were convened, and appropriate plans made for the children placed in the unapproved homes. If the Child and Family Team decision was for the child to remain in the placement, federal IV-E funds will not be utilized for those placements until they have been fully approved.

- c. Develop proactive measures to facilitate the timely completion of fingerprinting and the communication of the results of the fingerprint search for documentation in foster home files.

Responsible Person: Elizabeth Black, Executive Director of the Office of Child Permanency
Start Date: January 16, 2004
Completion Date: April 30, 2004
Status: Completed

During the months of February and March 2004, DCS negotiated with various state agencies and federal agencies as well as with fingerprinting contractors to facilitate timely fingerprinting and reporting of fingerprinting results. Significant improvements were achieved. Automation of the foster parent certification or approval process in FHACP will provide data to monitor timeliness of the process on an ongoing basis.

- d. Expedite completion of PATH training for non-compliant foster homes by increasing the number of training sessions and providing in-home training where needed and appropriate.

Responsible Person: Elizabeth Black, Executive Director of the Office of Child Permanency
Start Date: January 16, 2004
Completion Date: April 1, 2004
Status: Completed

Regional staff scheduled additional Path training classes convenient in location and time for prospective foster parents.

- e. Facilitate communication between regional field staff, Central Office, and executive management concerning status of non-compliant foster homes and action to be taken regarding foster homes not in compliance after deadlines.

Responsible Person: Elizabeth Black, Executive Director of the Office of Child Permanency

Start Date: April 5, 2004

Completion Date: April 30, 2004

Status : Completed

Communication of directive regarding non-compliant foster homes and action to be completed was completed through a series of memos and telephone conferences with regional staff.

- f. Modify TNKIDS (Tennessee's SACWIS) to track all homes (both DCS and through private agencies) for the initial foster home certification process and annual re-certification process to facilitate timely reporting and monitoring.

Responsible Person: Michael Price, Executive Director of Office of Information Technology

Start Date: January 14, 2004

Completion Date: May 2005

Status: In Process

The review of current systems identified that TNKIDS is the most logical system to track foster home certification. However, until the tracking of foster home certification is integrated into TNKIDS, DCS will track foster home certification in Foster Home Application and Child Placement (FHACP) application. This web based application contains foster home information.

- g. Pending TNKIDS modification to up grade the application , an automated web-based application, Foster Home Approval and Child Placements (FHACP) will be used to track all homes (both DCS and through private agencies) through the initial foster home certification process and annual re-certification process to facilitate timely reporting and monitoring. The FHACP required modification to facilitate the accurate tracking of foster home certification and re-certification.
 - 1. Develop Additional business rules for the functionality and data elements required.

Responsible Person: Elizabeth Black, Executive Director of the Office of Child Permanency

Start Date: January 14, 2004

Completion Date: April 2004
Status: Complete

2. Development, test, and implement modifications to the FHACP

Responsible Person: Michael Price, Executive Director of the Office of Information Technology

Start Date: January 14, 2004

Completion Date: June 25, 2004

Status: In Process

Programs were developed and tested by the deadline, however, during implementation subsequent to June 14, 2004, issues were identified with the population of the history file. A solution has been identified and corrections are in process to be complete by June 25, 2004

- h. Development of a training plan to train regional staff on the use of the new functionality and data elements is in progress but is incomplete. Training will be completed by Computer Based Training (CBT), The CBT will available to users on June 28, 2004. CBT training of staff is expected to be completed by July 02, 2004. Regional field staff will have FHACP databases updated by July 21, 2004.

Responsible Person: Elizabeth Black, Executive Director of the Office of Child Permanency

Start Date: May 2004

Completion Date: July 21, 2004

Status: In Process

The training plan has been development using CBT format. The CBT became available to case managers and providers on June 28, 2004. Completion of the CBT training for FHACP is required prior to update of the FHACP databases.

- i. Update FHACP databases with all foster home certification information by July 21, 2004.

Responsible Person: Judy Cole, Executive Director of the Office of Regional Support

Start Date: June 21, 2004

Completion Date: July 21, 2004

Status: In Process

The FHACP databases were available and the training by CBT became available on June 28, 2004. Training is expected to be complete and update of databases in process by July 2, 2004. Update of date bases are scheduled to be completed by regional staff by July 21, 2004.

- j. Refund of Title IV-E funds are being completed retroactively from the date of certification for non-compliant foster homes that come into compliance. Prior quarter adjustments will be reported on the quarterly IV-E-1 report to reflect the refund of Title IV-E funds. Revenues associated with cost charged to IV-E in error will be moved to Deferred Revenue and refunded subsequent to July 1, 2004. Federal Schedules of Federal Financial Assistance will be adjusted to reflect the prior quarter adjustments on the Title IV-E-1 report.

Responsible Person: Ken Sanders, Executive Director of the Office of Finance and Program Support

Start Date: July 17, 2004

Completion Date: August 15, 2004

Status: Awaiting completion of Action Steps I.2.i and I.2.j

Accounting records will be adjusted subsequent to July 21, 2004 when FHACP data on approved foster homes is complete. This project must be completed by August 1, 2004 to facilitate adjustment of funding and accounts receivable for yearend closing.

- k. Contracts with private agencies who provide for foster home services for DCS are being modified to allow DCS to assess a penalty for unapproved placement of a custody child in a home that does not meet minimum standards per DCS Policy 16.4.

Responsible Person: Ken Sanders, Executive Director of the Office of Finance and Program Support

Start Date: June 1, 2004

Completion Date: October 15, 2004

Status: In Process

Proposed changes to the contracts have been made and review by the Department of Finance and Administration is underway.

3 – Action Item: A statistically significant sample of foster homes (DCS and contract agency homes) will be selected for a targeted review on an ongoing basis utilizing a tool that reflects changes in and measures conformance with DCS Policy 16.4. The review will include the following:

- a. A statistically significant sample of homes that are indicated to be approved foster homes in FHACP (subsequently in TNKIDS) will be sampled and tested for compliance with DCS Policy 16.4.
- b. A statistically significant sample of homes whose applications are in process in FHACP (subsequently in TNKIDS) but have not been approved will be selected to determine if significant delays are being experienced at any stage in the approval process to identify potential systemic barriers to successful completion.

- c. A statistically significant sample of claims for maintenance payments for children that were charged to Title IV-E per Revenue Maximization funding records to determine if children were placed in approved foster homes or childcare institutions.
- d. A statistically significant sample of claims for maintenance payments that were charged to state funds per Revenue Maximization funding records to determine if children were placed in approved foster homes or childcare institutions.
- e. Results of testing will be reported to regional, central office, and upper management at DCS for corrective action if required and will also be submitted to ACF Region IV.

Staff Responsible: Paul Montebello, Executive Director of the Office of Performance Enhancement

Begin Date: June 1, 2004

Completion Date: September 1, 2004

Status: In process

Program staff and CQI staff have met to define the parameters of the targeted review program and a review instrument to measure conformance with DCS Policy 16.4. Program and QA/CQI staff will develop a training plan to be completed in July 2004 and will pilot the instrument in August 2004. Following the initial pilot, results will be reviewed and revisions, if needed, to the instrument will be made and a plan for ongoing reviews established. Reviews will be implemented statewide. Evaluations will be scheduled on a semi-annual basis.

4 – Action Item: Based on links between TNKIDS, CHIPFINS, Standard Claims Invoice and Funding programs, identify children who have been placed in unapproved homes and preclude or retroactively adjust non-compliant transactions from funding with federal grant funds. Action steps follow:

- a. Develop business rules necessary to implement required exchange of data between systems and modifications to existing systems.

Responsible Person: Ken Sanders, Executive Director of the Office of Finance and Program Support

Start Date: June 7, 2004

Completion Date:

Status: In Process

Business rules are under development.

- b. Develop, test and implement any necessary modifications to systems

Staff Responsible: Michael Price, Executive Director of the Office of Information Technology

Begin Date: July 1, 2004
Completion Date: [REDACTED]
Status: In Process

Business rules are being discussed and resources are being assigned as available. Adjustments to funding will be required retroactive to July 1, 2004.

- c. Monitor on going operations to ensure continued integrity of the functionality of the programs.

Staff Responsible: Paul Montebello, Executive Director of the Office of Performance Enhancement
Begin Date: July 1, 2004
Completion Date: [REDACTED]
Status: Pending completion of Action Step I.3.b above.

II. Link between Payment, Eligibility, and Reporting Systems

The ultimate goal of DCS is to integrate the payment, eligibility, and the reporting systems into a seamless network of databases within TNKIDS. Pending completion of action items to achieve this goal, DCS's goal is to develop interfaces between the systems to provide reliable updates to TNKIDS from the payment funding system to ensure accurate AFCARS reporting to HHS concerning claims paid for eligible foster children. The following actions steps will be completed to achieve our interim and long-range goals for accurate AFCARS reporting.

1-Action Item: Observations during the IV-E Eligibility Review fieldwork seem to conflict with DCS's understanding of AFCARS reporting requirements. To resolve these issues DCS will:

- a. Contact ACF Region IV to request technical assistance to clarify or confirm for DCS the conditions that will result in compliant reporting of claims paid during the report period.

Staff Responsible: Ken Sanders, Executive Director of Finance and Program Support
Begin Date: 05/14/04
Completion Date: [REDACTED]
Status: IN Process

DCS has contacted ACF Region IV to gain clarification of the issue on what condition should determine when the AFCARS reporting indicator for a IV-E claim has been paid. ACF has indicated that a conference call is in order. DCS has contacted the ACF Region IV to schedule this call. DCS is waiting for a response from ACF Region IV to identify the participants from HHS.

- b. Based on HHS' direction develop business rules to be used to facilitate compliant AFCARS reporting.

Staff Responsible: Paul Montebello, Executive Director of the Office of Performance Enhancement

Begin Date: July 1, 2004

Completion Date: [REDACTED]

Status: IN Process

Business rules will be finalized subsequent to telephone conference with HHS concerning compliant reporting format for the IV-E claim paid indicator.

- c. Request an Engineering Change Proposal (ECP) to develop, test and implement modifications to TNKIDS and other systems to facilitate accurate reporting of claims paid by IV-E in AFCARS reporting.

Staff Responsible: Paul Montebello, Executive Director of the Office of Performance Enhancement

Begin Date: June 1, 2004

Completion Date: [REDACTED]

Status: IN Process

- d. Develop, test and implement modifications to TNKIDS and other systems to facilitate accurate reporting of claims paid by IV-E in AFCARS reporting.

Responsible Person: Michael Price, Executive Director of the Office of Information Technology

Start Date: July 1, 2004

Completion Date: [REDACTED] *

Status: In Process

- e. Select a statistically significantly sample of data from AFCARS reporting prior to submission to HHS to determine the propriety of information concerning claims paid and charged to Title IV-E during the reporting period.

Staff Responsible: Paul Montebello, Executive Director of the Office of Performance Enhancement

Begin Date: May 16, 2005

Completion Date: [REDACTED]

Status: Sequential Item

* Development, testing and implementation of engineering changes to TNKIDS require the prioritization of recourses among numerous important projects. The earliest possible implementation date for this engineering change does not allow time to apply quality assurance measures to the data for the period ending March 31, 2005 prior to the reporting of the AFCARS data to HHS.

Sampling will begin when data is extracted from TNKIDS.

- f. Report results of testing to DCS staff at regional level, central office level and upper management.

Staff Responsible: Paul Montebello, Executive Director of the Office of Performance Enhancement

Begin Date: June 1, 2005

Completion Date: [REDACTED]

Status: Sequential Item

Sample selection and testing must be completed prior to reporting. Work is in progress to determine the baseline for reporting.

- g. Report results of testing to ACF Region IV.

Staff Responsible: Paul Montebello, Executive Director of the Office of Performance Enhancement

Begin Date: June 16, 2005

Completion Date: [REDACTED]

Status: Sequential Item

Sample selection and testing must be completed prior to reporting.

2-Action Item: Integrate the payment, eligibility, and reporting systems into a seamless interface of databases within the TNKIDS network. Please refer to DCS's current IAIPD for TNKIDS (Tennessee's SACWIS) for a detailed description of action steps and timeline for completion of this step. (a copy will be provided on request)

Staff Responsible: Michael Price, Executive Director of the Office of Information Technology

Begin Date: June 23, 2004

Completion Date: May 10, 2005

Status Update: In Process See Current IAIPD

III. A Continuous Quality Improvement

DCS is establishing measures for Continuous Quality Improvement (CQI) to ensure compliance with all applicable federal and state laws, regulations and policies as well as the accurate and timely of update of electronic and hard copy files. The respective Deputy Commissioner or their designee(s) must approve the CQI plan for each region or unit in the central office, to ensure the appropriate integration of measures to address audit issues into the departmental CQI plan.

- a. Regional administrators will integrate proactive measures to address the cause of audit findings into the regional Continuous Quality Improvement plan for submission to the Executive Director of the Office of Regional Support.

Responsible Person: Judy Cole, Executive Director of the Office of Regional Support

Start Date: August 1, 2004

Completion Date: August 31, 2004

Status:

- b. The Offices of Child Safety, Child Permanency, Family and Child Well Being must integrate into the CQI plans for each office, proactive measures to identify, address or prevent the cause of audit findings centrally and at the regional level.

Responsible Person: Bonnie Hommrich, Deputy Commissioner of Protection and Permanency

Start Date: July 1, 2004

Completion Date: July 31, 2004

Status:

- c. Administrative and fiscal staff must integrate measures in the CQI plan in central office to develop a CQI plan to provide technical assistance and training for regional staff to identify, address or prevent the cause of audit findings centrally and at the regional level.

Responsible Person: Tom Riche, Deputy Commissioner of Administration and Training

Start Date: July 1, 2004

Completion Date: July 31, 2004

Status:

- d. The Office of Performance Enhancement and Continuous Quality Improvement and Quality Assurance will be responsible for the aggregation of data from the department's CQI activities to facilitate the monitoring and reporting CQI results to upper management of DCS.

Responsible Person: Paul Montebello, Executive Director of the Office of Performance Enhancement

**Daryl Chansuthus, Director of Continuous Quality
Improvement and Quality Assurance**

Start Date: August 1, 2004

Completion Date: September 30, 2004

Status: