

ARKANSAS PROGRAM IMPROVEMENT PLAN TRACKING MATRIX – 09/13/2010

STRATEGY I – ENSURE PAYMENT HISTORY IS RELIABLE AND ACCURATE

Goal: The State must be able to provide a consistent, reliable and accurate payment history that is able to track all foster care maintenance and administrative payments made on behalf of each child in its care. The action steps required to implement this strategy are depicted in the following table.

Action(s) Required	Lead Person(s)	Target Completion Date	Actual Completion Date	Date Sent to ACF
1. Modify the PIE (Provider Invoice Entry) system so that it accurately charges the various funding sources in each contract based on the individual client's eligibility.	Greg Crawford\ Lawrence Rosser	07/31/2010		
2. The CFM (Contract Financial Management) system will reflect the actual allocation of contract dollars by child and funding source.	Greg Crawford\ Lawrence Rosser	07/31/2010		
3. Import AASIS (Arkansas' statewide financial system) warrant number, date, and paid amount into CFM.	Greg Crawford\ Lawrence Rosser	07/31/2010		
4. Title IV-E retro claim process to incorporate all contracts that have a Title IV-E funding component.	Greg Crawford\ Lawrence Rosser	10/31/2010		

STRATEGY II – IMPROVE COURT ORDERS

Goal: The State will ensure that the court orders are child-specific and explicit. For example, through the Court Improvement Project the State can educate the judiciary and other court officials about drafting court orders that adequately reflect State and Title IV-E criteria of legal sufficiency and findings to “contrary to welfare” and “reasonable efforts” by including the name of the individual against whom the finding is made, or by specifying the individual’s relationship to the child who is the subject of the court hearing; and by documenting that the hearing dates are routinely within the court orders. The action steps required to implement this strategy are depicted in the following table.

Action(s) Required	Lead Person(s)	Target Completion Date	Actual Completion Date	Date Update Sent to ACF
1. Educated the Office of Chief Counsel Attorneys about drafting court orders that adequately reflect the State and Title IV-E criteria of legal sufficiency and findings of “contrary to the welfare” and “reasonable efforts”. Review oral feedback from the IV-E foster care review exit conference with all County Legal Operations (CLO) attorneys and handout and review federal law.	Lisa McGee	10/31/2009	10/14/2009 at Fall CLO Attorney Conference	
2. Share and discuss with all CLO attorneys the section on “Issue #2 Court Orders” from the findings in the March 23, 2010, IV-E foster care review letter from the Department of Health and Human Services and handout Job Performance Expectations for CLO Attorneys with citations to state law, federal law and regulations, the IV-E review, and the State Adoption Audit. Refer to Attachment A for a copy of the handouts.	Lisa McGee Misty Bowen-Eubanks Kay Forrest Chuck Thompson	Spring 2010	May 5, 2010 at Children In The Courts Conference	
3. Review state and federal law and regulations on IV-E requirements for foster care.	Lisa McGee Misty Bowen-Eubanks Kay Forrest Chuck Thompson	October 2010 at Fall CLO Attorney Conference		

<p>4. Random review of court orders to ensure that needed language is contained in each order and that the orders or affidavits specify the individual's relationship to the subject of the court hearing and by documenting that the hearing dates are routinely included in the court orders</p>	<p>Lisa McGee Misty Bowen-Eubanks Kay Forrest</p>	<p>Through March 2011 at the time of each employee's annual performance evaluation and continually thereafter</p>		
<p>5. Random review of court orders as the orders come to the attention of Legal Operations through the normal course of business to ensure needed language is contained in the orders.</p>	<p>Lisa McGee Misty Bowen-Eubanks Kay Forrest Chuck Thompson</p>	<p>Through March 2011 at the time of each employee's annual performance evaluation and continually thereafter</p>		

STRATEGY III-A – ELIGIBILITY DOCUMENTATION FORM

Goal: The State concurs with ACF recommendation regarding replacement of the current Medicaid eligibility form (CFS-488) with a form specifically designed for the Title IV-E Program targeting initial eligibility determinations. The State will implement an eligibility worksheet that contains the month for which the eligibility is determined, the date this determination was made, eligibility decision, period of eligibility, basis of decision, and an indication of the State agency’s sanction of the eligibility decision. The action steps required to implement this strategy are depicted in the following table.

Action(s) Required	Lead Person(s)	Target Completion Date	Actual Completion Date	Date Update Sent to ACF
1. Develop a revised eligibility worksheet (CFS-488) that addresses the information on the federal Title IV-E eligibility review instrument to ensure that the State eligibility decisions are clearly documented.	Steve Sorrows	Completed		
2. Submit the revised eligibility worksheet to the ACF Regional Office for review and comment.	Steve Sorrows	Completed		
3. ACF Regional Office review of proposed eligibility worksheet and provide comments to State.	Kendall Darling	Completed		
4. Incorporate ACF recommendations into the eligibility worksheet.	Steve Sorrows	09/01/2010		
5. Train State eligibility staff to use new worksheet.	Julie Mullins	09/17/2010		
6. Publish revised eligibility worksheet in DCFS policy.	Christin Harper	10/01/2010		
7. Begin use of the eligibility worksheet.	Julie Mullins	10/01/2010		
8. Develop a revised eligibility redetermination worksheet that addresses the information on the federal Title IV-E eligibility review instrument to ensure that the State eligibility decisions are clearly documented.	Julie Mullins	12/31/2010		
9. Submit redetermination worksheet to the ACF Regional Office for review and comments.	Steve Sorrows	01/15/2011		
10. ACF Regional Office review of proposed eligibility redetermination worksheet and provide comments to State.	Patsy Buida	01/31/2011		

11. Incorporate ACF recommendations into the eligibility redetermination worksheet.	Steve Sorrows	02/15/2011		
12. Train State eligibility staff to use new redetermination worksheet.	Julie Mullins	02/28/2011		
13. Publish revised eligibility worksheet in DCFS policy.	Christin Harper	03/01/2011		
14. Begin use of the eligibility redetermination worksheet.	Julie Mullins	03/01/2011		

STRATEGY III-B – QUALITY ASSURANCE SYSTEM FOR ELIGIBILITY DETERMINATIONS

Goal: The State already has a quality assurance system in place for initial Title IV-E eligibility determinations. When new Eligibility Analysts are hired the DCFS Eligibility Unit Manager reviews 100% of the staff’s work for up to six months depending on the results of the quality assurance reviews. Following this period, the Eligibility Unit Manager reviews at least 10% of the Title IV-E determinations each month. The results of the reviews are documented and used to assess the employee’s job performance. Implementation of the CFS-488 eligibility worksheet discussed in the previous strategy will strengthen the determination process in that each factor on the federal review instrument will also be documented in the State’s eligibility case file.

The only case in the review for which the State failed to make the appropriate eligibility determination was sample AR11. In this instance the State’s Eligibility Analyst did not appropriately interpret the “Contrary to Welfare” language in the initial court order. AR11 was an older IV-E determination with the child re-entering foster care on April 1, 2004. The Eligibility Unit revised its procedures regarding review of court orders beginning in 2007 as a result of findings from the 2006 Title IV-E review. The State believes the best strategy for addressing initial eligibility decisions based on issues such as the one in sample AR11 is to review all initial eligibility determinations that were made for IV-E children who entered foster care during calendar year 2006 and prior. These cases will be reviewed beginning with the approval of this Program Improvement Plan. The strategy is that all cases will be reviewed as soon as possible but no later than the month prior to the beginning of the AFCARS period, which will serve as the universe of cases for the next Title IV-E review. That AFCARS period begins October 1, 2011. Therefore, all cases subject to the second party review of the initial IV-E determination in this strategy will be completed no later than August 31, 2011. This time frame permits the State not only to identify any cases which may be in error but also to correct the cases prior to commencement of the AFCARS period. The action steps required to implement this strategy are depicted in the following table.

Action(s) Required	Lead Person(s)	Target Completion Date	Actual Completion Date	Date Update Sent to ACF
1. Identify Title IV-E eligible children who entered foster care prior to calendar year 2007.	Steve Sorrows	Completed		
2. Review the initial eligibility decision for each case & address any erroneous findings by updating the case file & State system as well as repaying ACF for erroneous claims. Repayment will occur on a quarterly basis.	Julie Mullins Steve Sorrows	Update throughout PIP period. Complete cases by 08/31/2011		
3. Develop query of CHRIS system to show disposal of applications for children entering foster care as of 10/01/2008 and later.	Steve Sorrows Darcy Dinning	12/31/2010		

STRATEGY IV – QUALITY ASSURANCE FOR SAFETY REQUIREMENTS

Goal: The State will implement a quality assurance system to ensure that documentation of compliance with safety requirements is met and to support the State’s claim for Title IV-E foster care maintenance payments. The action steps required to implement this strategy are depicted in the following table.

Action(s) Required	Lead Person(s)	Target Completion Date	Actual Completion Date	Date Update Sent to ACF
1. DCFS will pull CHRIS report listing all family members 18 and older with the dates of the members’ criminal record check results and date keyed. DCFS will compare the results with the data report pulled from the Criminal Records Check Unit for the period under review (10/01/2008 – current). Any discrepancies will be followed up in steps 2 and 3.	Chris Price	30 days after ACF approval of PIP		
2. DCFS Resource Workers will review the hard copy record to locate hard copy results missing in step 1, ensuring each member (18 years +) of approved foster homes has a current CRC in the case file matching the CHRIS system entry.	Cherylon Reid/ DCFS Area Directors	60 days after step 1		
3. Any Criminal Record Check that is missing/incomplete will be processed within 30 days from the identified discrepancy.	DCFS Area Directors	30 days after step 2		
4. Area Directors will submit verification in writing of all record reviews and current criminal record checks are current and match CHRIS entry based on the comparison chart.	Cherylon Reid/ DCFS Area Directors	30 days after step 3		
5. The tracking log in step 1 will be submitted to the DCFS Chief Fiscal Officer for necessary review and any needed financial adjustments.	Greg Crawford	180 days after PIP approval		
6. Criminal record checks and all other safety checks will be reviewed during annual re-evaluation and licensing reviews to assist with keeping checks current and in compliance.	DCFS Area Directors	Ongoing		
7. Central Office staff will ensure that a hard copy of all criminal records checks processed for foster parents is maintained in central filing until scanned results process is established.	Olivia Bates	Ongoing		

STRATEGY V – CONTRACT RATES (BLENDED RATES)

Goal: The State will review its payment systems to determine whether adequate financial controls and edits are in place and properly functioning to prevent payments for ineligible children or unallowable program costs. The action steps required to implement this strategy are depicted in the following table.

Action(s) Required	Lead Person(s)	Target Completion Date	Actual Completion Date	Date Update Sent to ACF
1. PIE will accurately charge the various funding sources in each contract based on the individual client’s and provider’s eligibility.	Greg Crawford/ Lawrence Rosser	07/31/2010		
2. Title IV-E retro claim process will incorporate all contract that have a Title IV-E funding component.	Greg Crawford/ Lawrence Rosser	10/31/2010		
3. Review and confirm pay history is accurate.	Greg Crawford/ Lawrence Rosser/ Audrey Martin	10/31/2010 and at least quarterly during the life of the PIP		