

Louisiana Department of Children and Family Services

Final Report

Primary Review Title IV-E Foster Care Eligibility Report of Findings for

April 1, 2023 – September 30, 2023

Introduction

The Children's Bureau (CB) of the Administration for Children and Families (ACF) conducted a primary review of the Louisiana Department of Children and Family Service's (DCFS) title IV-E foster care program during the week of February 4-9, 2024. The title IV-E foster care review was conducted in collaboration with Louisiana and was completed by a review team comprised of representatives from the state DCFS and Office of Juvenile Justice (OJJ), CB Central and Regional offices, and the ACF Regional Grants Management office.

Key purposes of the title IV-E Review are (1) to determine whether a state's title IV-E foster care program is in compliance with eligibility requirements as delineated in 45 CFR §1356.71 and §472 of the Social Security Act (the Act); and (2) to validate the basis of the state's financial claims to ensure appropriate payments are made on behalf of its eligible children.

Scope of the Review

The IV-E Review encompassed a sample of Louisiana's foster care cases in which a title IV-E maintenance payment was claimed for an activity that occurred in the 6-month period under review (PUR) of April 1, 2023, through September 30th, 2023. A computerized statistical sample of 80 cases (80 cases plus 20 oversample cases) was drawn from data the state submitted to the Adoption and Foster Care Analysis and Reporting System (AFCARS) for the above period. Eighty (80) cases were reviewed, which consisted of 77 cases from the original sample plus 3 oversample cases. Three cases (# 9, #42, and #58) were excluded from the original sample because no title IV-E foster care maintenance payment was made for a period of activity during the PUR. The state provided documentation to support excluding these cases from the review sample and replacing them with cases from the oversample.

In accordance with federal regulations at 45 CFR 1356.71, the state was reviewed against requirements of title IV-E of the Act and federal regulations regarding:

- Judicial determinations regarding reasonable efforts and contrary to the welfare as set forth in §472(a)(2)(A) of the Act and 45 CFR §§1356.21(b) and (c), respectively;

- Voluntary placement agreements as set forth in §§472(a)(2)(A)(i) and (d)-(g) of the Act and 45 CFR §1356.22;
- Responsibility for placement and care vested with the title IV-E agency as stipulated in §472(a)(2)(B) of the Act and 45 CFR § 1356.71(d)(iii);
- Eligibility for Aid to Families with Dependent Children (AFDC) under the state plan in effect July 16, 1996, as required by §472(a)(3) of the Act and 45 CFR § 1356.71(d)(1)(v);
- Placement in a foster family home, childcare institution, or residential family-based treatment facility for substance abuse as specified in §§472(b), (j) and (k) and §475A of the Act and 45 CFR § 1356.71(g);
- Placement setting is fully licensed in accordance with §§ 472(c) and (j) of the Act and 45 CFR § 1356.71(d)(1)(iv) and
- Safety requirements for the child’s foster care placement as required at §471(a)(20) of the Act and 45 CFR §§1356.30 and 1356.71(d)(1)(iv).

The case record of each child in the selected sample was reviewed to verify title IV-E eligibility. The foster care provider’s record was also looked at to ensure the foster care setting where the child resided during the PUR was fully licensed and met applicable safety requirements. Payments made on behalf of each child were reviewed to verify expenditures were properly claimed under title IV-E and to identify underpayments that were eligible for claiming.

A sample case was assigned an error rating when the child was not eligible on the date of activity in the PUR for which title IV-E maintenance was claimed. A sample case was cited as non-error with ineligible payment when the child met eligibility requirements for the PUR, but there were periods in a child’s foster care episode for which title IV-E maintenance payments were improperly claimed. In addition, underpayments were identified for a sample case when the state unintentionally failed to claim an allowable title IV-E maintenance payment for an eligible child within the 2-year filing period specified in 45 CFR §95.7, and the filing period had not expired.

The Children’s Bureau and Louisiana agreed the state would have 14 days following the onsite review to submit additional documentation for a case during the onsite review identified as in error, in “undetermined” status, or not in error but with ineligible payments.

Compliance Finding

The Children's Bureau has determined 69 of the 80 sample cases met all eligibility requirements (i.e., are deemed non-error cases) for the PUR. Eleven (11) cases are determined in error for not meeting eligibility requirements either for periods only during the PUR or for a child's entire foster care episode. Five (5) of these error cases also had periods of ineligible payments outside of the PUR. Two (2) non-error cases met eligibility requirements for the PUR but were found to have periods in the foster care episode for which title IV-E maintenance payments are improperly claimed.

CB has determined the DCFS's IV-E foster care program is not in substantial compliance with federal eligibility requirements for the PUR. Non-substantial compliance in a primary review means the total number of error cases determined as not meeting eligibility requirements for the PUR is more than four (4) cases. Additional findings for non-error cases with ineligible payments are not considered in determining the state's compliance level. Because the state is not in substantial compliance, a program improvement plan, and a secondary review of 150 sample cases are required.

In addition to the above cases established as having ineligible payments, one (1) non-error case has a period of eligibility for which the state has not claimed allowable title IV-E maintenance payments.

Case Record Summary

The following charts record the improper payment cases comprised of: error cases, non-error cases with ineligible payments, and underpayments; reasons for improper payments; improper payment amounts; and federal provisions for which the state does not meet compliance mandates. Calculation of improper payment amounts is based on the dates specified in the chart and the federal financial participation (FFP) rates of maintenance payments at the state's Federal Medical Assistance Percentages (FMAP) for the applicable periods for each sample case.

Error Cases:

Sample Number	Improper Payment Reason & Ineligibility Period April 1, 2023 – September 30, 2023	Improper Maint. Payments (FFP)	Improper Admin. Payments (FFP)
12	Title IV-E foster care maintenance payments were made after the child was discharged from foster care. [§472(a)(2)(B) and (C) of the Act; 45 CFR §1356.71(d)(1)(iii)] Reported Disallowance Period: 09/21/2023- 09/30/2023	\$135	\$0
30	Title IV-E foster care maintenance payments were made beyond the 14-day limitation for a childcare institution (CCI) that is not one of the specified placement settings. Reported disallowance period would be the entire time the child was placed there excluding the first 14 days. [§472(k)(1)(2) of the Act; 45 CFR§1356.71(d)(1)(iv)] Ineligible Period: 9/28/2022 - present Reported Disallowance Period: 09/28/2022- 01/31/24	\$33,096	\$16,187
34	Judicial determination of reasonable efforts to finalize permanency plan was not met timely. Prior to the PUR, the last judicial finding was made 03/21/21. The subsequent judicial finding was due 03/2022 but was not made until 1/23/24. [§472(a)(2)(A)(ii) and 471(a)(15) of the Act; 45 CFR §1356.21(b)(2)] Ineligible Period: 04/01/2022- 12/31/2023	\$41,762	\$20,885
35	Criminal records checks were not completed on the foster parents. [§471(a)(20)(A) of the Act and 45 CFR §1356.30] Ineligible Period: 08/01/2022- 09/30/2023	\$5,442	\$14,043

Sample Number	Improper Payment Reason & Ineligibility Period April 1, 2023 – September 30, 2023	Improper Maint. Payments (FFP)	Improper Admin. Payments (FFP)
38	Removal from and living with requirements not met by the same specified relative. The child lived with the adoptive grandmother who died before the child was removed, but was judicially removed from the biological mother whose rights had been terminated and did not meet the living with requirement. [§472(a)(3)(A)(ii) of the Act; 45 CFR §1356.21(k) & (l)] Ineligible Period: Entire Foster Care Episode Reported Disallowance Period: 08/01/2022- 12/31/2023	\$45,787	\$17,078
70	Judicial determination of reasonable efforts to finalize permanency plan not met timely for PUR. The judicial finding was due 04/2023 but was made until 09/23/23. [§472(a)(2)(A)(ii) of the Act; 45 CFR §1356.21(b)(2)]. Ineligible Period: 05/01/2023- 08/31/2023	\$1,554	\$4,047
78	Judicial determination of reasonable efforts to finalize permanency plan not met timely for PUR. The judicial finding was due in 01/2023 but was not made until 07/26/23. [§472(a)(2)(A)(ii) of the Act; 45 CFR §1356.21(b)(2)]. Ineligible Period: 02/01/2023- 06/30/2023	\$2,163	\$5,058
79	Title IV-E foster care maintenance payments were made for a period of time the child was placed in a relative foster home that was not fully certified. [§472(b) and (c) of the Act; 45 CFR §1356.71(d)(1)(iv)] Ineligible Period: 06/30/2023- 08/14/2023	\$67	\$0

Sample Number	Improper Payment Reason & Ineligibility Period April 1, 2023 – September 30, 2023	Improper Maint. Payments (FFP)	Improper Admin. Payments (FFP)
80	Title IV-E maintenance payments were made for a period of time the child was on a trial home visit. [§472((b) and (c) of the Act; 45 CFR §1356.71(d)(1)(iv)] Ineligible Period: 04/01/2023- 04/30/2023	\$95	\$0
OS-1	Title IV-E foster care maintenance payments were made for a period of time the child was placed in a relative foster home that was not fully certified. [§472(b) and (c) of the Act; 45 CFR §1356.71(d)(1)(iv)] Ineligible Period: 08/24/2023- 09/22/2023	\$266	\$0
OS-2	Title IV-E foster care maintenance payments were made for a period of time the child was on a trial home visit. [§472((b) and (c) of the Act; 45 CFR §1356.71(d)(1)(iv)] Ineligible Period: 05/01/2023- 05/30/2023 In addition, title IV-E foster care maintenance payments were made after the child was discharged from foster care. [§472(a)(2)(B) and (C) of the Act; 45 CFR §1356.71(d)(1)(iii)] Ineligible Period: 06/12/2023- 06/12/2023	\$804	\$1,012
-	Total Maintenance FFP and Total Administrative FFP	\$131,171	\$78,310

Overall Total FFP: \$209,481

Non-Error Cases with Ineligible Payments:

Sample Number	Improper Payment Reason & Ineligibility Period April 1, 2023 – September 30, 2023	Improper Maint. Payments (FFP)	Improper Admin. Payments (FFP)
24	Title IV-E foster care maintenance payments were made for a period of time the child was placed in a relative foster home that was not fully certified. [§472(b) and (c) of the Act; 45 CFR §1356.71(d)(1)(iv)] Ineligible period: 03/01/2023- 03/12/2023	\$162	\$1,012
27	Judicial determination of reasonable efforts to finalize permanency plan was not timely. The Judicial determination was due 9/2022 but was not made until 12/21/22. [§472(a)(2)(A)(ii) of the Act; 45 CFR §1356.21(b)(2)] Ineligible period: 10/01/22- 11/30/22	\$838	\$2,023
-	Total Maintenance FFP and Total Administrative FFP	\$1,000	\$3,035

Overall Total FFP: \$4,035**Underpayment Case:**

Sample Number	Improper Payment Reason & Underpayment Period April 1, 2023 – September 30, 2023	Improper Maint. Payments (FFP)
80	The child was eligible for foster care maintenance payments when placed in a certified foster care placement on 12/10/2021 but foster care maintenance payments were not made until 08/01/2022. [§472(a) of the Act; 45 CFR 45 CFR 1356.60(a)(1)(i)] Underpayment period: 12/01/2021- 08/31/2022 Claimable period: 06/01/2022- 08/31/2022	\$1,706

Overall Total FFP: \$1,706

Areas Needing Improvement

Findings of this IV-E Review indicate Louisiana needs to further develop and implement procedures to improve program performance in the following areas. For each issue, there is a discussion of the nature of the area needing improvement, the specific title IV-E requirement to which it relates and the corrective action the state should undertake.

Issue #1: *Timeliness of Judicial Determinations Regarding Reasonable Efforts to Finalize a Permanency Plan.* Three (3) error cases and one (1) non-error case have ineligible payments because the judicial requirement of “reasonable efforts to finalize a permanency plan” is not satisfactorily met for the specified period. Louisiana, like most states, incorporated the federal requirement for a judicial determination of “reasonable efforts to finalize a permanency plan” into its court proceeding for the 12-month permanency hearing. However, if the permanency hearing is delayed, the delay results in the state obtaining a judicial determination beyond the 12 months required by federal regulation.

The review found case reviews and permanency hearings were happening frequently and sometimes every three to six months, but the court templates did not contain language relating to the judicial determination of reasonable efforts to finalize the placement or permanency plan within 12 months as required per federal regulations. The review also found different court templates being used for Instanters, Case reviews, and Permanency Hearings which caused inconsistency across the state. The courts in parishes that used the court templates developed in the Round 3 (R3) CFPS PIP were found to be consistent and contained the judicial determination reasonable efforts to finalize the placement or permanency plan. Information from the review also indicated that judges from some of the parishes were reportedly not using the court templates because they found them to be too long and cumbersome. In some of the parishes it was learned that DCFS staff filled out the order instead of the courts.

Title IV-E Requirement: For a child who is judicially removed and remains in foster care for 12 months or more, federal provisions at §472(a)(2)(A) of the Act and 45 CFR §1356.21(b)(2) require the state to obtain a judicial determination of whether the state has made “reasonable efforts to finalize a permanency plan” for the child. The judicial finding must occur at regular 12-month intervals for the duration of the foster care episode and no later than 12 months from the month in which the prior determination is obtained. If the judicial determination of “reasonable efforts to finalize” is not made or is not timely, the child becomes ineligible from the beginning of the first month after it is due and remains ineligible until the judicial determination is made.

Recommended Corrective Action: The previous title IV-E review conducted in 2017 documented that the DCFS had built a viable partnership with the state Court Improvement Project (CIP) which had helped broaden the judiciary’s understanding of title IV-E requirements and furthered its continued assistance to the state in meeting federal requirements. As a result, the frequency of

permanency hearings supported consistency in having the required judicial findings related to reasonable efforts to achieve the permanency plan to occur in a timely manner. Furthermore, court hearings to review the reasonable efforts to finalize the placement or permanency plan for the child were often held more frequently than the 12-month regulatory requirement which led to timely findings.

As mentioned above, the DCFS and CIP collaborated for a successful R3 CFSR PIP. In one of the cross-cutting themes on Quality Legal Representation, court template documents were revised and distributed statewide. The heart of that effort was to provide guidance and tools to facilitate alternatives to foster care, and/or achieving timely safety and permanency, all when safely able to do so. Templates were used for Instant Safety Plans, Instant Orders with custody to a relative or other suitable individual, Protective Orders, Dispositional reports, case review reports, and permanency reports.

We encourage the DCFS to support the use of these templates created in R3 CFSR PIP statewide as it would address a part of the identified issues stated in this report. We also encourage that the DCFS and CIP continue additional efforts to broaden the judiciary's understanding of title IV-E requirements and further its continued assistance to the state in meeting federal requirements. Furthermore, we encourage the DCFS to continue to work closely with the CIP to train and support judges, attorneys, and other court staff to monitor timeliness of judicial findings and to ensure court orders are provided timely to document eligibility for the DCFS and OJJ cases; including a practice change of having the courts fill out these orders instead of DCFS staff as reported through the review.

Issue #2: *Unallowable Program Costs.* In six (6) error cases and one (1) non-error case it was determined title IV-E payments were claimed for items outside the definition of allowable program costs. It is important to note that some of these error cases had more than one reason that program costs were determined unallowable.

The current systems that DCFS developed were not followed to prevent title IV-E payments from being made when children move to placements unallowable under the title IV-E foster care maintenance payment program. For example, there were two (2) error cases, where IV-E foster care maintenance payments were made to a foster home, while the child moved to a trial home visit. There were two (2) error cases, where the state claimed for IV-E foster care maintenance payments after the child was discharged from foster care. Various reasons contributed to these errors. In some cases, individuals did not follow required procedures for notifying the IV-E analyst when a child changed placement. It was also determined that some cases needed payment adjustments in the Tracking Information and Payment System (TIPS) were not made or were not made timely. Additionally, there were three (3) error cases where IV-E maintenance were claimed for the previous foster home while the child was placed with a relative foster home that was not yet fully certified.

Lastly, there was one (1) error case where the state paid IV-E foster care maintenance payments beyond 14 days for a child placed in a childcare institution that was not a specified placement setting per section 472(k)(1)(2) of the Act.

Title IV-E Requirement: Consistent with federal provisions at 45 CFR 1356.60(a)(1)(i), claiming title IV-E foster care maintenance payments is limited to expenditures covered within the federal definition of foster care maintenance at §475(4) of the Act. The state must document foster care maintenance payments claimed for title IV-E reimbursement are for allowable expenditures in accordance with the statutory definition, are in amounts conforming to state established rates of payment for the type and level of care provided and reflect non-duplicative amounts of the costs of daily maintenance.

Additionally, Title IV-E agencies may claim up to 14 days of title IV-E foster care maintenance payments each time a child is placed in a childcare institution. The agency may continue to claim title IV-E foster care maintenance payments after the child's 14th day of placement in the childcare institution only if it is one of the specified placement settings described in § 472(k)(2) of the Act. The specified settings are: childcare institutions specializing in providing prenatal, post-partum or parenting supports for youth; childcare institutions specializing in providing services for children and youth at risk of becoming, or who are, sex trafficking victims; supervised independent living setting for youth age 18 years or older; and childcare institutions meeting the definition of a qualified residential treatment program.

Recommended Corrective Action: The Tracking Information and Payment System (TIPS) is the automated system which tracks payments to foster care providers. Per DCFS policy- Section L Data Management Systems, The IV-E Analyst is to routinely do clearances in the system at initial financial determination and redetermination on the child. Clearances for DCFS programs are obtained via a cross-program case search in the Common Front End Access system- CAFÉ.

As an effort to improve the Title IV-E Eligibility programs, the CAFÉ system was utilized to automate the IV-E eligibility process. However, through this review, we found instances of unallowable costs occurring as a result of placement changes or when the placement became certified and new determinations needed to be made in the system to avoid using the incorrect funding source. We encourage the agency to apply quality assurance to ensure these determinations are recorded timely and accurately. We also recommend that the IV-E agency make routine fiscal adjustments to avoid underpayments, ineligible payments, and unallowable costs.

Issue #3: Safety Requirements. In two (2) error cases it was determined title IV-E payments were claimed outside the definition of safety requirements for the child's foster care placement. There was one (1) error case in which criminal background checks expired and were not completed again timely on foster parents prior to re-certification by the DCFS and the period title IV-E foster care maintenance payments were made for the child placed in the foster home. The

minimum requirements for foster and adoptive homes per the DCFS Policy 9-210, “Qualifications of the Foster and Adoptive Parents (G)”, require that a fingerprint-based criminal record clearance on foster/adoptive parent applicants and all household members 18 years of age or older shall be conducted prior to certifying a family to foster or adopt. Foster/adoptive parents and all household members 18 years of age or older are required to have a subsequent criminal record clearance conducted every three years following the initial certification. However, review of the pertinent record showed that a criminal record clearance expired in 08/2022 but a subsequent criminal record check had not taken place. It is also important to note that the state re-certified this home on 10/17/2023 even though a subsequent criminal record check had not taken place. As a result, the foster parent had an expired criminal record check during the entire placement episode the child was placed in that foster home.

One error case had no acceptable documentation to verify certification of the foster home prior to and during the time the child was placed in the home and the period title IV-E foster care maintenance payments were made. Per DCFS Policy 9-615, the Home Development (HD) Worker and the applicant are engaged in a mutual assessment process to determine whether the applicant meets the agency’s minimum requirements and has the skills and abilities to become a successful foster/adoptive parent. The result of this decision-making process is summarized in a written evaluation of the home by the HD Worker. This evaluation shall include all documentation of the rationale for the HD Worker’s recommendation regarding certification. Because the agency is legally responsible for the homes that are certified, the final decision to certify a foster/adoptive home must rest with the agency. The HD Supervisor shall approve all certifications and closures. There was no documentation verifying the home had been certified. Opportunity was given to state staff to locate such document, but there was no evidence found elsewhere that the home was ever fully licensed or certified.

Additional Program Concerns

IV-E funds not claimed: Sample #80 was identified as having \$1,706 in underpayments. An underpayment is defined as an allowable title IV-E maintenance payment for an eligible child that the title IV-E agency unintentionally failed to claim within the 2-year filing limit as specified at 45 CFR § 95.7.

No financial penalties are assessed against the title IV-E agency for underpayments, nor are underpayments used to offset disallowances calculated for error cases and unallowable claims. The state may submit a claim for underpayments that are still within the two-year filing limit by filing an increasing adjustment on the Title IV-E Programs Quarterly Financial Report, Form CB-496, in the next quarter.

In addition to the one case meeting the definition of an underpayment, we identified 22 other cases (case #s 8, 13, 14, 15, 18, 24, 27, 28, 36, 41, 45, 47, 48, 50, 52, 54, 55, 66, 72, 77, 79, and OS-1) in which the agency did not claim for all allowable title IV-E foster care maintenance

payments prior to the expiration of the 2-year time filing limit. This resulted in the loss of an estimated \$14,150 FFP for these cases.

The majority of instances in which title IV-E funds were not claimed involved changes in placement, custody, or relative home certification status. Errors seemed to have occurred for various reasons such as information not determined timely or recorded correctly in the system to allow for routine fiscal adjustments. We also observed a consistent pattern of the state beginning to claim for eligible cases on the first day of the month after all eligibility requirements were met, rather than submitting claims starting with the first date of eligibility, which may occur mid-month. This issue was also identified in prior title IV-E reviews.

We encourage the agency to undertake additional quality assurance activities to ensure that determinations affecting eligibility are recorded timely, and to identify and address systemic issues preventing the agency from claiming all allowable costs.

Program Strengths & Promising Practices

The following positive practices and processes of the state's title IV-E foster care eligibility program were observed during the IV-E Review. These approaches seem to have led to improved program performance and successful program operations.

Specialized Eligibility Staff: As noted in Louisiana's previous IV-E review, the utilization of specialized eligibility staff to complete the title IV-E eligibility determination process continues to be an asset for DCFS. A program specialist and financial specialist support the regional staff from the agency's central office. The eligibility staff works with the foster care and investigation staff throughout the state to ensure that the case files and documentation are thorough and complete. With the exception of the specific issues noted above, we found that the eligibility staff continue to have a clear understanding of title IV-E foster care eligibility requirements regarding the AFDC-related requirements; judicial determinations regarding removal, placement authority and on-going permanency planning.

The dedication of specialized staff resources to the program helps reduce the possibility of ineligible or erroneous title IV-E foster care maintenance payments. Timely and thorough completion of the state's multiple Financial Assessment and Transaction Forms (FAST forms) by caseworkers and eligibility specialists has facilitated thorough and consistent documentation of the eligibility determination process. Reviewers were also able to understand key decision-making points in determining eligibility.

Specialized DCFS IV-E supervisors provide training to foster care, adoption, and OJJ staff in their regions. State Office staff provide guidance on changes to IV-E regulations and policy through monthly calls and WebEx sessions to equip IV-E field staff with information that they

can use to train other staff. Additionally, they provide IV-E training to new supervisors across all programs annually.

Efforts to Improve Documentation of Judicial Determinations: Although Louisiana's IV-E review found errors regarding judicial determinations, reviewers also noted some consistent strengths and positive practices we encourage the DCFS to build upon.

Affidavits: As noted in previous reviews, Affidavits continued to be detailed regarding case circumstances; often providing an extensive case history of the family including the actual date the child was removed from the home, efforts made by the agency to prevent removal or facts in support of why such efforts were not reasonable; and the facts to support a "contrary to the welfare" finding for the children in the home. The information in the affidavits were comprehensive and adequately established the foundation from which the court could make important judicial determinations that were specific to the child's circumstances. Affidavits also provided important information for the eligibility determinations.

Instanters: All (80) cases reviewed found Instanters contained required judicial determination language regarding reasonable efforts and contrary to welfare finding for children. As stated above, judges in parishes that used the court templates developed in the R3 CFSR PIP had consistent information to assist in finding placement and care information to determine eligibility.

Disallowance

A disallowance in the amount of \$131,171 in maintenance payments and \$78,310 in related administrative costs is disallowed for title IV-E foster care payments claimed for error cases. Additional amounts of \$1,000 in maintenance payments and \$3,035 in related administrative costs are disallowed for title IV-E foster care payments claimed improperly for non-error cases. The total disallowance as a result of this IV-E Review is \$213,516 in FFP.

Louisiana also must identify and repay any ineligible payments for error and non-error cases that occur for periods prior and subsequent to the PUR that are beyond those identified in this report for the improperly paid cases. No future claims can be submitted on these cases until it is determined all eligibility requirements are met.

Next Steps

Federal regulations at 45 CFR § 1356.71(i)(2) require the development of a Program Improvement Plan (PIP) when a state is found to be not in substantial compliance in a primary review of its title IV-E foster care program. The PIP must be developed by the state in consultation with Children's Bureau staff and must address, at a minimum, each area the IV-E Review identified as needing improvement. The state is expected to work closely with the

Children's Bureau's Regional Office for guidance and technical assistance throughout the PIP development and implementation processes.

Louisiana's PIP must be submitted to the Children's Bureau Region 6 office within 90 calendar days from the date the state receives the accompanying letter from the Children's Bureau advising the state that its title IV-E program is not operating in substantial compliance.

The PIP must include the following elements, as noted in federal regulations at 45 CFR § 1356.71(i):

- specific goals for improvement
- action steps needed to correct each identified weakness or deficiency
- time frames for completing each action step

The Children's Bureau does not require a state to use a particular format when preparing its PIP. The PIP, however, must provide sufficient detail and context to ensure the Children's Bureau Regional Office and state staff can work in partnership to monitor the state's progress in implementing and completing the PIP. To assist state staff with the PIP process, the Children's Bureau has developed a standard template that is recommended for state staff to use in preparing the PIP document for initial submission and for periodic reporting of progress to the Children's Bureau Regional Office. The template can be found on the Children's Bureau Website at: <https://www.acf.hhs.gov/cb/policy-guidance/title-iv-e-program-improvement-plan-instructions-and-template>

Louisiana is strongly encouraged to use the PIP process to examine program deficiencies and develop measurable, sustainable strategies that target the root cause of problems preventing the state from operating an accurate foster care eligibility program. The PIP planning and implementation process provides the state with an excellent opportunity to engage the judiciary, licensing agency, and other state partners to develop strategies for making short-term and long-term changes necessary to improve state performance and service delivery. The state also should use the PIP process to enhance its internal quality assurance procedures to inform and eventually evolve into a systematic mechanism for continuous program improvement that support systemic change and sustain successful performance achievements over time.

Furthermore, the PIP development and implementation of it may necessitate making changes to your automated information systems. We encourage the state to include its data analysis staff and information technology staff in discussions with program staff about modifications. If the state has an active information technology project that qualifies for title IV-E funding under federal regulations at 45 CFR §1355.52, the information technology changes made must be reported and approved through the process described in 45 CFR §1355.54.

A secondary IV-E Review of 150 sample cases will be conducted, in accordance with 45 CFR §1356.71(j)(2), following the expiration of Louisiana's approved PIP completion date.

The Children's Bureau Region 6 office staff will work with state staff to identify corrective action and obtain support available through the Children's Bureau's capacity building centers to help the state develop and implement program improvement strategies throughout its PIP process.