

Maryland Department of Human 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 Maryland's title IV-E foster care program during the week of March 18, 2024. The title IV-E foster care review (IV-E Review) was conducted in collaboration with Maryland and was completed by a review team comprised of representatives from the Maryland Department of Human Services (DHS), the Maryland Department of Juvenile Services (DJS), the Maryland Court Improvement Program (CIP), CB Central and Regional offices, ACF Grants Management office and a contracted reviewer.

Key purposes of the 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 Maryland's foster care cases in which a title IV-E maintenance payment was claimed for an activity that occurred in the six-month period under review (PUR) of April 1, 2023 – September 30, 2023. A computerized statistical sample of 100 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 74 cases from the original sample plus six (6) oversample cases. Two (2) cases were identified for elimination prior to the onsite review because there were no title IV-E foster care maintenance payments made for a period of activity during the PUR. While onsite, four (4) additional cases were identified to be excluded from the sample for a previously unidentified payment code allocated to state funds but reflected as title IV-E foster care maintenance under the coding for AFCARS at the time the sample was selected.

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 also 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 two-year filing period specified in 45 CFR §95.7, and the filing period had not expired.

The Children's Bureau and Maryland agreed the state would have two weeks following the onsite review to submit additional documentation for a case identified during the onsite review as in error, in "undetermined" status, or not in error but with ineligible payments. Supplemental documentation submitted by the state for sample cases 11, 12, 13, 22, 41, 48, 49, 54, 68, 69, 76 and OS5 supported changing the improper payment findings to properly claimed, non-error cases.

Compliance Finding

The Children's Bureau has determined 75 of the 80 sample cases met all eligibility requirements (i.e., are deemed non-error cases) for the PUR. Five (5) 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) non-error cases meet eligibility requirements for the PUR but are found to have periods in the foster care episode for which title IV-E maintenance payments are improperly claimed.

The Children's Bureau has determined that Maryland's title 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 11 improper payment cases comprised of error cases and non-error cases with ineligible payments and/or 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 year(s) 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)
4	<p>Safety requirements for the child’s foster care placement were not met [§471(a)(20) of the Act and 45 CFR §§1356.30 and 1356.71(d)(1)(iv)].</p> <p>Ineligible Period: 04/3/2020 – present</p> <p>Reported Disallowance Period: 04/03/2020–01/31/2024</p>	\$105,201	\$68,243
5	<p>Financial need was not established for eligibility for Aid to Families with Dependent Children (AFDC) under the state plan in effect July 16, 1996 [§472(a)(3) of the Act and 45 CFR § 1356.71(d)(1)(v)].</p> <p>Ineligible Period: 11/16/2022 – present (entire foster care episode)</p> <p>Reported Disallowance Period: 11/16/2022-01/31/2024</p>	\$6,958	\$23,361
40	<p>Judicial determination of reasonable efforts to finalize permanency plan not met timely for PUR. The judicial finding was due by 11/30/2022 and was made on 06/12/2023 [§472(a)(2)(A)(ii) of the Act; 45 CFR §1356.21(b)(2)].</p> <p>Ineligible Period: 12/1/2022 - 05/31/2023</p>	\$11,573	\$10,012
75	<p>Title IV-E foster care maintenance payments were made when the agency did not have placement and care responsibility [§472(a)(2)(B) of the Act; 45 CFR §1356.71(d)(1)(iii)].</p> <p>Ineligible Period: 05/05/2023 - 05/31/2023</p>	\$452	\$1,669

Sample Number	Improper Payment Reason & Ineligibility Period April 1, 2023 – September 30, 2023	Improper Maint. Payments (FFP)	Improper Admin. Payments (FFP)
OS-2	<p>Judicial determination of reasonable efforts to finalize permanency plan not met timely for PUR. The judicial finding was due by 04/30/2023 and was made 07/14/2023 [§472(a)(2)(A)(ii) of the Act; 45 CFR §1356.21(b)(2)].</p> <p>Ineligible Period: 05/01/2023 - 06/30/2023</p> <p>Foster care maintenance payment was made for the month prior to the judicial findings of contrary to the welfare of the child and reasonable efforts to prevent removal of the child [45 CFR §1356.21(b)(c)].</p> <p>Ineligible Period: 02/28/2018</p>	<p>\$7,177</p> <p>\$96</p>	\$3,337
-	Total Maintenance FFP and Total Administrative FFP	\$131,457	\$106,622

Overall Total FFP: \$238,079

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)
8	<p>Foster care maintenance payment was made for the month prior to the judicial findings of contrary to the welfare of the child and reasonable efforts to prevent removal of the child [45 CFR §1356.21(c)].</p> <p>Ineligible Period: 11/30/2021</p>	\$16	\$0
16	<p>Foster care maintenance payment was made for the month prior to the judicial finding of reasonable efforts to prevent removal of the child [45 CFR §1356.21(a)].</p> <p>Ineligible Period: 04/01/2022 - 04/30/2022</p>	\$492	\$1,669

Sample Number	Improper Payment Reason & Ineligibility Period April 1, 2023 – September 30, 2023	Improper Maint. Payments (FFP)	Improper Admin. Payments (FFP)
44	Foster care maintenance payment was made for the month prior to the judicial findings of contrary to the welfare of the child and reasonable efforts to prevent removal of the child [45 CFR §1356.21(b)(c)]. Ineligible Period: 11/30/2018	\$53	\$0
60	Foster care maintenance payment was made for the month prior to the judicial findings of contrary to the welfare of the child and reasonable efforts to prevent removal of the child [45 CFR §1356.21(b)(c)]. Ineligible Period: 07/28/2021 - 7/31/2021	\$64	\$0
80	Foster care maintenance payment was made for the month prior to the judicial findings of contrary to the welfare of the child and reasonable efforts to prevent removal of the child [45 CFR §1356.21(b)(c)]. Ineligible Period: 03/31/2022	\$16	\$0
-	Total Maintenance FFP and Total Administrative FFP	\$641	\$1,669

Overall Total FFP: \$2,310

Underpayment Case:

Sample Number	Improper Payment Reason & Underpayment Period April 1, 2023 – September 30, 2023	Improper Maint. Payments (FFP)
12	Reasonable efforts to finalize the permanency plan were due 08/31/2023 and were made on 05/04/2023. The state adjusted payments to state funds for a period in which a determination of reasonable efforts was not yet due and child met all IV-E eligibility requirements. [45 CFR §§1356.21(a)(b)]. Underpayment Period: 08/01/2023 - 09/30/2023	\$565

Areas Needing Improvement

Findings of this IV-E Review indicate Maryland needs to further develop and implement procedures to improve program performance in the following areas:

Issue #1: *Safety Considerations for Foster Family Homes*

The review team found one (1) case in error because a child placement agency (CPA) provider submitted claims to the state for title IV-E on behalf of a child placed with foster parents whose criminal background checks revealed prohibited criminal charges. The child placing agency did not verify whether the criminal charge was for a prohibited felony pursuant to the Social Security Act section 471(a)(20) prior to the period for which title IV-E payments were made.

Title IV-E Requirement: As specified in section 471(a)(20) of the Act and 45 CFR §1356.30(f), the licensing file of a state or its contracted child placing agency must contain documentation which verifies that criminal records checks are conducted with respect to the foster family home in order for a child placed in the home to be eligible for title IV-E funding. The documentation must verify the foster parent has not been convicted of any of the prohibited felonies listed under § 471(a)(20)(A)(i) and (ii) of the Act. For homes newly licensed on or after October 1, 2008, the state must ensure that the criminal records check completed on these providers includes a fingerprint-based check of the National Crime Information Database (NCID). The state must provide for the IV-E review documentation validating that these safety considerations are satisfied for the duration of the child's placement for which title IV-E foster care maintenance payments are claimed.

Recommended Corrective Action: Maryland should review its child placing agency licensing and monitoring processes to determine whether there are sufficient controls in place to prevent children from being placed in potentially unsafe foster family homes and to ensure claims for reimbursement are submitted only on behalf of eligible children. It is also recommended that the state update its licensing policies and regulations to directly address prohibited crimes of violence as defined in Maryland Criminal Law §14-101: Crimes of Violence.

Issue #2: *AFDC Eligibility*

During the onsite review, the review team evaluated sample cases to determine compliance with the requirements for the Aid to Families with Dependent Children (AFDC) program as it was in effect on July 16, 1996. One (1) case was identified as an error due to the child's financial need not having been established; the state improperly identified deprivation from a parent in the household which resulted in the state reconstructing the eligibility determination and determining that the case did not meet AFDC eligibility requirements.

Title IV-E Requirement: In accordance with §472(a)(1)(B) of the Act and 45 CFR §1356.21(l)(1), financial need must be established based on the circumstances that existed in the

home of the family unit during the month the court proceedings leading to the child's removal were initiated or the voluntary placement agreement was signed. It must be determined a child would have been AFDC eligible in either the month the court proceeding leading to the requisite judicial determination is initiated through a removal petition or removal court order, or the month the voluntary placement agreement is signed, using the state's AFDC plan as in effect on July 16, 1996.

Recommended Corrective Action: The DHS should consider providing additional training and guidance for eligibility workers on making AFDC determinations in accordance with the state's 1996 AFDC plan. Particular attention should be made to ensuring that there is appropriate documentation to support allowable deprivation factors. The state should also enhance the training around determination of financial need, ensuring that the income of applicable parents is included, and that appropriate documentation is used as a reference for verifying eligibility (e.g., case notes, court orders, investigation reports, court petitions, income verification systems, etc.).

It was noted during the review that the "Income and Resources/Assets Calculation Worksheet" in CJAMS/MD THINK, Maryland's comprehensive child welfare information system, lists an "Eligibility Month" at the top of the page. Since this is not clearly identified as the AFDC eligibility month for which the income calculations should be determined, or the title IV-E eligibility month, it could result in workers conducting the financial need on the wrong month or a system payment error. Additionally, the "Title IV-E Eligibility Determination Worksheet, Section II: Aid to Families with Dependent Children (AFDC), A. Defining the Eligibility Month" does not include the date the agency filed a petition initiating the child's removal which is a relevant date in defining the AFDC eligibility month. It is recommended that the date of the petition be added to this section to ensure proper determinations of financial need. For added support, the month for which the AFDC determination of financial need is assessed could be included under Section F. of the "Title IV-E Eligibility Determination Worksheet."

Issue #3: *Judicial Determinations Regarding Reasonable Efforts to Finalize a Permanency Plan.* Two (2) cases are in error for not satisfactorily meeting the judicial requirement of "reasonable efforts to finalize a permanency plan" for the specified period.

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 month in which the judicial determination is made.

Recommended Corrective Action: The requisite judicial determination need not be tied to a permanency or other court hearing. The judicial determination may be rendered by the court at any point during the 12-month period. The state should continue to develop and implement procedures to ensure timely judicial determinations of “reasonable efforts to finalize the permanency plan” regardless of the timing of the permanency hearing.

The accuracy and reliability of eligibility determinations generally are increased through training of the judiciary and other court officials to correct delays in judicial findings as well as to secure court orders that reflect title IV-E criteria on legal authority, best interests, and reasonable efforts. Therefore, the state may wish to coordinate with the State Court Improvement Program to determine whether any additional training is needed. In addition, training of state agency staff will help to ensure timely and accurate data entry, assist agency workers to make eligibility decisions based on the correct elements needed for compliance, and to eliminate the authorization of payments prior to establishing compliance with requirements.

The state should also review the process for system checks in CJAMS/MD THINK, Maryland’s comprehensive child welfare information system, to assure that IV-E claiming is suspended when the reasonable efforts to finalize the permanency plan requirement is not met.

Issue #4: *Placement and Care Responsibility*

Placement and care responsibility may be granted in the removal court order or in a subsequent court ruling for a judicial removal. The review found one (1) case with an error in which foster care maintenance payments were made when the state did not maintain responsibility for the placement and care of the child. Title IV-E funds were claimed for the period after the child had been adopted. Although the court terminated the agency’s responsibility for care and custody of the child, and the state discontinued payment to the child placement agency, foster care maintenance payments continued to be made to the foster care provider.

Title IV-E Requirement: Federal provisions at §472(a)(2)(B) of the Act and 45 CFR 1356.71(d)(1)(iii) require that the responsibility for placement and care of a child be with the state agency administering the title IV-E plan approved under §471 of the Act, or any other public agency with whom the state agency has a written agreement in effect. The state agency must present documentation that it has responsibility for placement and care of the child for the entire period under review. This responsibility must be for the entire period for which a title IV-E maintenance payment is claimed and must be clearly indicated in a court order or voluntary placement agreement. The term placement and care means that the state agency is legally accountable for the day-to-day care and protection of the child who has come into foster care either through a court order or a voluntary placement agreement. Placement and care responsibility allows the state agency to make placement decisions about the child, such as where the child is placed and the type of placement most appropriate for the child. It also ensures that the state provides the child with the mandated statutory and regulatory protections,

including case plans, administrative reviews, permanency hearings, and updated health and education records.

Recommended Corrective Action: Maryland must ensure that appropriate fiscal controls are in place to ensure that title IV-E foster care maintenance payments are no longer claimed for children who have achieved permanency. The state should pay particular attention to finalized adoptions. The state is encouraged to conduct systemic monitoring of its programmatic and financial operations to determine that the required actions and supporting documentation are completed timely and that the title IV-E claims are submitted only for those cases meeting all applicable requirements. The state should consider additional training for staff on how to properly document when a foster care episode ends, particularly in cases where the agency no longer has placement and care responsibility.

Issue #5: *Title IV-E Foster Care Payments Prior to All Requirements Being Met*

Ineligible foster care maintenance payments were found to have been made for six (6) cases as a result of payments made for the month prior to the judicial findings of contrary to the welfare of the child and reasonable efforts to prevent removal of the child. Title IV-E foster care maintenance payments for a period prior to the month the eligibility requirements are met are not allowable. If the ineligible period is in the period under review, the child's sample case is in error with ineligible payments that are disallowed. If the ineligible period is outside the period under review, the same case is a non-error case with ineligible payments that are disallowed.

Title IV-E Requirement: Federal provisions at §472 of the Act and 45 CFR §1356.21(a) require that to be eligible to receive federal financial participation (FFP) for foster care maintenance payments, a title IV-E agency must meet the program implementation requirements. Furthermore, the Children's Bureau Child Welfare Policy Manual, Section 8.3A.15, Question #1 indicates that title IV-E agency may claim federal financial participation from the first day of the child's placement in the month in which all title IV-E requirements have been met.

Recommended Corrective Action: The state should evaluate its payment systems to determine whether adequate financial controls and edits are in place and properly functioning to prevent payments for ineligible children. The state should consider an automated quality assurance (QA) module to periodically exam and track payments for accuracy and compliance with federal requirements and state standards. The state should address corrections to the title IV-E eligibility module and ensure that there are system checks and adequate financial controls in place to prevent payments for ineligible periods.

Underpayments

Underpayments in accordance with §475(4) of the Act and 45 CFR 1356.60(a)(1)(i) were identified in one (1) case reviewed. The underpayment was the result of the state having made an adjustment from federal to state funds for a service period during which a timely judicial

determination of “reasonable efforts to finalize the permanency plan” had been made. The state submitted an updated payment history on April 3, 2024, reflecting that this payment had been correctly adjusted back to federal funding. This was identified as a system correction based on the completion of title IV-E eligibility re-determination completed in January 2024 and processed in the payment system at the end of February 2024. As with the cases determined to be errors, the underpayment appears to have resulted from a system functionality being linked to eligibility redetermination rather than an automatic system function linked to timely judicial determinations.

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:

Cross-collaboration: The Maryland DHS collaborates with many partners to better serve children and families in the title IV-E foster care program. Representatives from the Department of Juvenile Services and Maryland Foster Care Court Improvement Program participated in the review. This participation as reviewers helped to broaden their understanding of title IV-E requirements and to further their continued assistance to the state in meeting federal requirements.

Judicial Findings: Judicial determinations of contrary to the welfare, reasonable efforts to prevent removal, and reasonable efforts to finalize the permanency plan were clearly documented and child specific. Compared to findings from previous IV-E Reviews, reviewers noted marked improvement in court orders identifying the individual who was the subject of the contrary to the welfare finding, whom the child was living with the time of removal, and from whom the child was removed. Court orders often detailed the reasonable efforts to prevent removal, or specified they were not needed and provided details of the emergent situation necessitating removal. Court orders also described the efforts made by the agency to finalize the permanency plan. In some instances, there was detailed documentation of when the agency had not made reasonable efforts to prevent removal or finalize a permanency plan. The improved language included in the court orders resulted in greater accuracy for the determinations of AFDC eligibility and ongoing eligibility.

Safety: Although there was one (1) error due to a safety non-compliance issue, in general there were thorough and comprehensive safety checks being conducted on resource parents. Many records contained explanations regarding criminal charges that did not meet the prohibited felony status as defined at 470(a)(20) of the Act. This demonstrated that the licensing agency was thoroughly reviewing the criminal record checks and ensuring that the foster parents met the requirements. We would encourage the state to enhance this practice to include a summary

review of the safety checks for any report where there is a criminal charge. Although not applicable to title IV-E eligibility, records frequently contained Child Protective Services clearances, court records, driving records, and other various types of clearances, as well as clearances for other adults in the home.

Disallowance

A disallowance in the amount of \$131,457 in maintenance payments and \$106,622 in related administrative costs is disallowed for title IV-E foster care payments claimed for error cases. Additional amounts of \$641 in maintenance payments and \$1,669 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 \$240,389 in FFP.

Maryland 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.

Maryland's PIP must be submitted to the Children's Bureau Region 3 office within 90 calendar days from the date the state receives the enclosed 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>

Maryland 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 your 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 Maryland's approved PIP completion date.

The Children's Bureau Region 3 office staff will work with state staff to identify corrective actions 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.