

Vermont Title IV-E Program Improvement Plan

12/14/2017-12/14/2018

Goal 1: All in state and out of state foster homes in which children are placed will be fully licensed as required by §472(b) & (c) of the Act and 45 CFR 1356.71(d)(1)(iv). No maintenance payments will be made on behalf of children in unlicensed placements.			
Activities	Person(s) Responsible	Completion Date	Status/Update
1. Work with IT to ensure that both room and board costs and expenses are stopped when a child is ineligible.	Heather McLain, Revenue Enhancement Director; Brianne Renadette, Revenue Team Lead; Jim Forbes, Director of Residential Licensing and Special Investigations; Derrick LaMarche, IT	3/30/2018	
2. Work with IT to create a comprehensive payment history report to be available as needed by REU staff.	Heather McLain, Revenue Enhancement Director; Brianne Renadette, Revenue Team Lead; Derrick LaMarche, IT	4/30/2018	
3. Adopt internal control in the DCF Business Office in which a payment will not be made to a foster parent without a licensing screen in the database.	Carrie Marshia, DCF Business Office, Jim Forbes, Director of Residential Licensing and Special Investigations	1/1/2018	
4. Edit SSMIS Manual to instruct District IVE Managers on the proper data entry sequence when a child/youth is placed with an unlicensed foster parent.	Jim Forbes, Director of Residential Licensing and Special Investigations; Sally Hall, Quality Assurance Specialist	6/30/2018	
5. Train district IV-E Managers on Title IV-E program with details about proper data entry and importance of such.	Heather McLain, Revenue Enhancement Director; Brianne Renadette, Revenue Team Lead; Jim Forbes, Director of Residential Licensing and Special Investigations	6/30/2018	
Goal 2: The State will only claim IV-E payments while the state maintains placement and care responsibility for children in foster care.			
Activities	Person(s) Responsible	Completion Date	Status/Update
1. Work with IT to ensure that IV-E payments for both room & board and expenses are ceased when a child is ineligible.	Heather McLain, Revenue Enhancement Director; Brianne Renadette, Revenue Team Lead; Derrick LaMarche, IT	3/30/2018	
2. Work with IT to create a comprehensive payment history report to be available as needed by REU staff.	Heather McLain, Revenue Enhancement Director; Brianne Renadette, Revenue Team Lead; Derrick LaMarche, IT	4/30/2018	

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Goal 3: Anytime a child enters foster care, there will be a judicial determination to the effect that reasonable efforts were made, or not required to be made, to prevent or eliminate the need for removal. No Title IV-E payments will be made until the Reasonable Efforts finding has been made.

Activities	Person(s) Responsible	Completion Date	Status/Update
1. Work with IT to ensure that the appropriate controls are included in the system such that no IV-E payment is made until the date of the Initial Reasonable Efforts finding is entered into the appropriate field. The child must be considered ineligible for any type of IV-E payment until the IREA date is included in the system.	Heather McLain, Revenue Enhancement Director; Brianne Renadette, Revenue Team Lead; Derrick LaMarche, IT	5/31/2018	
2. Work with IT to create a comprehensive payment history report to be available as needed by REU staff.	Heather McLain, Revenue Enhancement Director; Brianne Renadette, Revenue Team Lead; Derrick LaMarche, IT	4/30/2018	
3. Train district IV-E Managers on Title IV-E program with details about proper data entry and importance of such.	Heather McLain, Revenue Enhancement Director; Brianne Renadette, Revenue Team Lead; Jim Forbes, Director of Residential Licensing and Special Investigations	6/30/2018	

Goal 4: Any child that is in foster care for more than 12 months will have a judicial determination that the state made reasonable efforts to finalize a permanency plan. This judicial finding will 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 was obtained. The State will not make any IV-E claims when there is not a valid judicial finding of reasonable efforts to finalize their permanency plan.

Activities	Person(s) Responsible	Completion Date	Status/Update
1. Work with IT to ensure the proper controls hold through system upgrades and outages that appropriately cease IV-E payments when there is not a date included in the Permanency Reasonable Efforts field in the system.	Heather McLain, Revenue Enhancement Director; Brianne Renadette, Revenue Team Lead; Derrick LaMarsh, IT	3/30/2018	
2. Work with IT to create a comprehensive payment history report to be available as needed by REU staff.	Heather McLain, Revenue Enhancement Director; Brianne Renadette, Revenue Team Lead; Derrick LaMarche, IT	4/30/2018	
3. Develop internal auditing system to spot check the internal controls after system upgrades and outages.	Heather McLain, Revenue Enhancement Director; Brianne Renadette, Revenue Team Lead	1/1/2018	

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Activities	Person(s) Responsible	Completion Date	Status/Update
4. Train district IV-E Managers on Title IV-E program with details about proper data entry and importance of such.	Heather McLain, Revenue Enhancement Director; Brianne Renadette, Revenue Team Lead; Jim Forbes, Director of Residential Licensing and Special Investigations	6/30/2018	
Goal 5: The State will only claim IV-E maintenance payments for eligible activities and will claim IV-E administrative costs for activities allowable in that category.			
Activities	Person(s) Responsible	Completion Date	Status/Update
1. Work with the DCF Business Office to correct the coding of activities that are allowable as administrative costs, but not allowable as maintenance costs.	Heather McLain, Revenue Enhancement Director; Ed Dwinnell, DCF Business Office CAP Group	12/31/2017	Completed
2. Work with IT to create a comprehensive payment history report to be available as needed by REU staff.	Heather McLain, Revenue Enhancement Director; Brianne Renadette, Revenue Team Lead; Derrick LaMarche, IT	4/30/2018	

Process of Evaluation:

1. The State of Vermont DCF will conduct monthly meetings to evaluate the progress on our program improvement plan. These meetings will include all relevant staff and leadership who are in positions to implement and monitor the action steps listed above.
2. As IT system fixes are implemented, DCF will conduct a review of cases involving children placed with unlicensed foster parents and cases where there were late PREAs to ensure that IV-E payments are not being made in error. This process will include checking for room & board payments and other expenses. If the review reveals any errors in IV-E claiming, DCF will review all relevant cases to determine the amount to be refunded and to apply any manual work-arounds until the IT system fix is effective.
3. Ongoing monitoring: The REU Quality Assurance Specialist will review approximately 10% of all cases in their entirety in which there has been a IV-E payment. This equals approximately 4 cases per week. In any error case found, DCF will back out any improper payments and discontinue until eligibility requirements are met.
4. Management monitoring: The Revenue Enhancement Director will review approximately 5% of all cases in their entirety in which there has been a IV-E payment. This equals approximately 2 cases per week. In any error case found, DCF will back out any improper payments and discontinue until eligibility requirements are met.
5. Quarterly, DCF will submit program improvement plan updates to the Children's Bureau, which will include information about when each action step is achieved.

Heather McLain, Revenue Enhancement Director will be the evaluation lead. She can be reached at (802)241-0897 or heather.mclain@vermont.gov