

## **IDAHO TITLE IV-E FOSTER CARE ELIGIBILITY REVIEW**

### **October 1, 1999 – March 31, 2000**

#### Introduction

Region X Administration for Children and Families (ACF) conducted an initial primary review of the State of Idaho Title IVE program to determine if title IVE payments were made on behalf of eligible children to eligible foster homes and institutions. The period reviewed was from October 1, 1999 through March 31, 2000. The on-site review was held in Boise from July 10 through July 14, 2000 and was completed by a team of five federal staff and three Department of Health and Welfare state staff.

#### Scope of the Review

The review team conducted a review of a sample of 80 cases pulled from a universe of title IVE payments for this period. The team determined that, for the review period, 77 cases were eligible for title IVE and three cases were ineligible for title IVE. For a state to be determined in substantial conformity on an initial primary review, no more than 8 cases may be found in error. Consequently, the State of Idaho has been determined in substantial conformity on the initial primary review. No secondary review will be required and the only financial penalty to be taken will be for the ineligible payments on these three cases amounting to \$60,245 Federal Financial Participation (FFP).

#### Case Record Summary

Below is a summary of the findings for each of the three cases determined to be ineligible.

- Sample number 52: Initial eligibility including AFDC-relatedness and court requirements could not be substantiated for a child who came into state foster care from a disrupted private agency adoptive placement. 42 USC 672(a) (1) and (4).
- Sample number 60: Child whose adoption was dissolved did not meet the requirement for AFDC-relatedness in the adoptive home from which the child was removed. 42 USC 672 (a)(4). Documentation of removal pursuant to voluntary placement agreement was missing. 42 USC 672(a)(1).
- Sample number 80: Voluntarily placed child did not have a judicial determination within 180 days of placement. 42 USC 672(e).

## Strengths

Since the previous title IVE review Idaho has made significant improvements its title IVE eligibility processes. This can be credited to 1) the establishment of a centralized eligibility unit with trained specialists, 2) work with the courts resulting in improved contrary to the welfare and reasonable efforts court order language required for title IVE eligibility, and 3) timely foster care licensing and renewal.

## Recommendations for Improvement

Because the period reviewed was largely prior to the issuance of the new title IVE regulations, this review did not measure state compliance with provisions in the new regulations such as the new court order and new licensing requirements. The next primary review will measure the state against these stricter standards and will allow only four, rather than eight cases to be determined ineligible. Consequently, we encourage the state to continue its efforts to obtain appropriate meaningful language in court orders, to meet the full licensure standards, and to ensure that safety is documented for foster care providers.

The State may wish to consider other efforts to further improve its eligibility process as well as its practice. We noted the following areas where policy/procedural clarification may be helpful.

- Procedures for the proper execution of voluntary placement agreements.
- Statutory/court rules changes to provide a consistent way of obtaining a judicial determination for voluntary placements which will continue 180 days or more from placement
- Statutory change to allow the agency to maintain custody of children age 18 and older who are in care and expected to finish school by age 19.
- Work with and training of partners including tribes and private agencies to ensure that appropriate initial judicial determinations are made, files are retained and required initial eligibility information is provided to DHW when a case is later transferred.
- Improved documentation in case records of the date child last lived with a parent, particularly when child had been informally placed prior to DHW involvement.
- Clarification of eligibility policy and practice for determination of deprivation due to absence, death, disability and unemployment.
- Improved eligibility forms providing clarity in eligibility month, deprivation, home from which removed, effective date, and new eligibility requirements.
- Procedures to improve the quality of information provided to eligibility specialists and the timeliness of eligibility determinations.

Disallowance

Ineligible payments associated with the cases reflect all periods of ineligibility through the service period ended March 31, 2000 as follows. A disallowance letter for \$60, 245 FFP is enclosed with this report. Additionally, all service periods after March 31, 2000 must be removed from the IVE claims.

<b>Sample #</b>	<b>52</b>	<b>60</b>	<b>80</b>	<b>Total</b>	<b>FMAP</b>	<b>FFP</b>
FFY 94	0	0	1,635.71	1,635.71	70.92%	1,160.05
FFY 95	0	0	3,224.95	3,224.95	70.14%	2,261.98
FFY 96	2,378.88	0	3,067.01	5,445.89	68.78%	3,745.68
FFY 97	5,450.00	0	3,975.73	9,425.73	67.97%	6,406.67
FFY 98	5,324.00	0	4,326.36	9,650.36	69.59%	6,715.69
FFY 99	2,868.00	32,915.29	3,557.87	39,341.16	69.85%	27,479.80
FFY 00	3,182.67	11,336.69	3,263.55	17,782.91	70.15%	12,474.71
<b>Total</b>	<b>19,203.55</b>	<b>44,251.98</b>	<b>23,051.18</b>	<b>86,506.71</b>	<b>0</b>	<b>60,244.58</b>