

FOSTER CARE ELIGIBILITY REVIEW (Primary)

September 24 - 27, 2007

Des Moines, Iowa

I. INTRODUCTION

During the week of September 24-27, 2007, staff from the Children's Bureau (CB), Administration for Children and Families (ACF), CB Regional Office staff and staff from the State of Iowa, and Peer Cross State Reviewers conducted a Primary Foster Care Eligibility Review of the State of Iowa's title IV-E foster care program.

The purpose of the primary title IV-E review was (1) to determine if Iowa was in compliance with the child and provider eligibility requirements as outlined in 45 CFR subsections 1356.71 and 472 of the Social Security Act, and (2) to validate the basis of Iowa's financial claims, to ensure that appropriate payments were made on behalf of eligible children and to approved or licensed homes and institutions.

II. SCOPE OF THE REVIEW

The Iowa title IV-E Foster Care Eligibility Review, which was conducted in Des Moines, Iowa, encompassed a sample of title IV-E cases from the Adoption and Foster Care Analysis Reporting System (AFCARS) reporting period from October 1, 2006 thru March 31, 2007. A computerized statistical sample of 80 cases (and a 10% over sample) was drawn from AFCARS data submitted by the State. The sample consisted of cases of individual children who received at least one title IV-E foster care maintenance payment during the six-month review period noted above. For each case, the child's case file was reviewed for the determination of title IV-E eligibility and the provider's file was reviewed to ensure that the foster home or childcare institution in which the child was placed was licensed or approved for the period of review. The cases were also examined to determine if criminal background checks had been completed in conformance with the requirements set forth at 45 CFR 1356.30.

During the primary review, 80 cases were reviewed and none were determined to be error cases. Two cases contained payments that were improperly claimed. Although these cases are not considered "error cases" for determining substantial compliance, the ineligible maintenance payments and the associated administrative costs are assessed for these ineligible payments. A disallowance in the amount of \$652.14 in maintenance payments and \$743.00 in administrative costs are assessed for these ineligible payments

III. AREAS FOR FOLLOW-UP

Court Orders

- Older court orders in several jurisdictions had long multiple-choice statements with "or" connecting opposing decision statements, which made the intent of the language unclear and confusing.

- Several court orders referenced attachments in support of the determinations, i.e., case plans that were not attached to the order. Since these documents are the basis for the judicial finding and a component of the ruling, they should be included with the written court order. This is not an eligibility issue but a technical improvement suggestion for furthering good practice.

AFDC Determinations

- Several forms were not fully completed; however, the eligibility decision was documented. To improve case management and support eligibility decisions, case forms should be thoroughly documented and each question should be answered as required.

Licensing

- Criminal background checks for some employees in a few group homes did not contain explanation of follow-up when there was a “hit” on an employee. Further case exploration determined the group homes met the safety requirements.

In general, eligibility files should be thoroughly documented to provide a complete and accurate picture of the child’s eligibility for title IV-E.

IV. STRENGTHS AND MODEL PRACTICES

Court Orders

- The findings of Contrary to Welfare, Reasonable Efforts to Prevent Removal and Reasonable Efforts to Achieve Permanency were clearly stated and the basis for the determinations was extensively documented.

AFDC Determinations

- “Initial and Change” eligibility forms were accurate and complete with supporting documentation regarding income, resources and deprivation. Many had accompanying narratives which clearly explained the determination of IV-E eligibility.
- Court orders were attached to IV-E “Change” forms.
- Staff has a clear understanding of the AFDC determination requirements and its affect on IV-E eligibility.

Licensing and Safety

- Licensing files were well organized with appropriate criminal background checks and clearances for the length of the child’s stay in the placement.

Overall Observations

- Excellent progress has been made by the State in program improvement since the last review. This is reflected with the State going from five error cases in the last Review to none in the current review. The establishment of the IV-E Eligibility Unit appears to be effective in ensuring that eligibility requirements are met and continuously monitored.
- The review was well organized and reflected excellent preparation by State staff.
- State reviewers were very knowledgeable about eligibility requirements, committed to the review process, and able to read cases objectively.
- Federal and State staff believed a true partnership existed throughout the review. Everyone learned from each other.
- The case files were accessible and well organized. Complete payment histories and case summaries were attached to all of the cases. This was very helpful to the reviewers.

In addition to the eligibility findings, these observed child welfare practices in the sample cases are notable:

- Relative placements were consistently sought out and utilized. Several of the court orders encouraged use of relative placements in lieu of foster care.
- Children were being moved quickly toward permanency with permanency hearings occurring frequently prior to the 12-month requirement.
- Termination of Parental Rights (TPR) was filed within a year of removal, when TPR was necessary. The orders were clear, detailed and acknowledged efforts of parents.
- Compelling reasons for not filing a TPR were clearly stated in orders when TPR was not appropriate.
- Court Orders were clear in instructing parents on the consequences of not following through on services for reunification.
- Many of the children in out of home care did not experience multiple placements.
- Many of the children were placed in pre-adoptive foster homes, which resulted in adoption finalization.

V. DISALLOWANCE

The review included a sample of 80 cases. The sample was drawn from a universe of cases that received at least one title IV-E foster care maintenance payment during the six-month AFCARS period of October 1, 2006 to March 31, 2007. Based on the results of the review, the State of

Iowa has been determined to be in substantial compliance. There were no cases found to be in error. There were two cases identified that contained payments that were claimed improperly outside the period under review. Although these cases are not considered “error cases” for determining substantial compliance, the ineligible maintenance payments and the associated administrative costs are assessed to these ineligible payments. A disallowance in the amount of \$652.14 in maintenance payments and \$743 in administrative costs are assessed for these ineligible payments. The summary of these cases is listed below.

CASE RECORD SUMMARY				
Sample Number	Federal Matching Amount	Federal Administrative Costs	Nature of Ineligible Payment	Dates of Ineligibility
IA23	\$267.67	\$408.00	Reasonable efforts to achieve permanency determination was not timely	4/1/2007- 4/20/2007
IA49	\$384.47	\$335.00	Reasonable efforts to achieve permanency determination was not timely	5/1/2007 – 5/31/2007