

**ALABAMA TITLE IV-E
FOSTER CARE ELIGIBILITY REVIEW
April 1, 1999 - September 30, 1999**

I. INTRODUCTION

During August 7-10, 2000, Administration for Children and Families' (ACF) staff from the Regional and Central Offices and State of Alabama staff conducted an eligibility review of the State of Alabama's title IV-E foster care program.

The purpose of the title IV-E eligibility review was to validate the accuracy of Alabama's claims to assure that appropriate payments were made on behalf of eligible children, to eligible homes and institutions, at allowable rates.

II. SCOPE OF THE REVIEW

The Alabama title IV-E foster care review, which was conducted in Montgomery, encompassed all title IV-E foster care cases during the period from April 1, 1999, to September 30, 1999. A computerized statistical sample of 93 cases was drawn from the Adoption and Foster Care Analysis and Reporting System (AFCARS) data that were transmitted by the State agency to ACF. The sampling frame consisted of cases of individual children who received at least one title IV-E foster care maintenance payment during the six-month period noted above. For each case, the child's case file was reviewed for the determination of title IV-E eligibility and to ensure that the foster home in which the child was placed was licensed for the period of the review.

During this initial primary review, 80 cases were reviewed. Six (6) cases were determined ineligible for either part or all of the review period for reasons that are identified in the Case Record Summary section of this report. Since the number of ineligible cases was fewer than nine, Alabama is considered to be in substantial compliance.

III. CASE RECORD SUMMARY

The following information details the ineligible cases and reasons for ineligibility, ineligible Federal dollars, and appropriate citations:

Sample Size	93
Number of Cases Reviewed	80
Number of Eligible Cases	74

Number of Ineligible Cases	6
Number of Cases Ineligible for the Entire Review Period	5
Number of Cases Ineligible for a Portion of the Review Period	1
Total Amount of Federal Dollars Associated with the Ineligible Cases	\$23,501

Analysis of the Ineligible Cases

Sample Number	Record Number	Reasons for Ineligibility	Statutory Citation	Ineligible Federal Dollars
Case 2	18192	Payments after age 18	Section 406 (a)	\$ 40
Case 13	74627	Voluntary placement - no court order with appropriate language within 180 days of placement	Section 472 (e)	(All State Funds)
Case 21	168173	Voluntary placement - no court order with appropriate language within 180 days of placement	Section 472 (e)	3,160
Case 44	62852	Not removed from specified relative	Section 406 (a) (as in effect on July 16, 1996)	11,525
Case 61	73809	Voluntary placement - no court order with appropriate language within 180 days of placement	Section 472 (e)	5,780
Case 68	87749	Voluntary placement - no court order with appropriate language within 180 days of placement	Section 472 (e)	2,995
Total Disallowance				\$23,501

As shown above there were 4 cases ineligible due to a voluntary placement without a court order with the required language within 180 days of the placement. There was also one case ineligible due to not meeting the AFDC requirement of being removed from a specified relative and one case ineligible due to

a IV-E payment being made after the child reached the age of 18.

IV. AREAS IN NEED OF IMPROVEMENT AND RECOMMENDATIONS

Areas in need of improvement include the following:

In consideration of the above data, apparently voluntary placements are an area of eligibility that needs improvement. During the review State and Federal staff considered the recommendation of programming ACWIS to notify staff at a time sufficient to obtain the necessary court orders prior to the 180 day limit. We understand that the State has already taken action to begin this process, that is, developing a tickler system to notify county staff of the due date for the court order at four months after a voluntary placement agreement.

Another issue noted by reviewers was the inappropriate use of long-term foster care. We noted a 12-year-old and a 5-year-old child with that permanency goal. While not an eligibility issue, we remind the State that ASFA does not recognize long-term foster care as an appropriate permanency goal for children in foster care. We recommend that the State examine practice in this area.

We discovered during the review that some counties reference the State Statute on Contrary to the Welfare. This will not be accepted in future eligibility reviews when the review period will contain cases that must meet the requirements of the new final rule.

We noted that some counties need to strengthen case documentation, particularly at placement moves to better document what is happening in the child's case and why.

Finally, a number of counties had issues with court orders. For instance, some courts in the cases reviewed were completing a check-off type form with no acknowledgment of social workers' good practice in those cases. The Final Rule requires court orders to be explicit and case specific. We are aware of the current work being done collaboratively by DHR and the Court Improvement Program to improve orders and are optimistic that this effort will improve court orders in all counties.

We recommend that you train county staff on title IV-E eligibility requirements, particularly in regards to the new Final Rule, to ensure documentation is adequate to claim IV-E reimbursement and to help them understand the impact of their documentation.

V. STRENGTHS AND MODEL PRACTICES

Strengths or model practices discovered over the course of the review include:

The AFDC portion of eligibility was done well in most cases.

We found very few placement moves in most children's cases.

We found evidence of concurrent permanency planning.

We found that social workers do a good job of looking for relatives in and out of state.

Overall, we found that DHR staff track children very well, noting where they are at any given time.

There was a lot of good case narrative on children.

There was very good documentation of criminal records checks on providers.

Although we saw examples of good work in other counties, we make particular note of Mobile County that had very specific and detailed court orders. In addition, Culman and Morgan Counties had well-organized records.

We commend DHR for including staff in the review from a variety of areas including program, fiscal, systems and licensing. It seemed particularly advantageous to include System of Care staff as reviewers to enable them to take back to the counties the eligibility and practice information discovered during the review to aid in implementing corrective action. However, all the staff was most helpful in providing assistance to reviewers in their areas of expertise.

We certainly wish to recognize the exemplary work done by Margaret Livingston and her Eligibility staff in preparation for as well as in the conduct of the review. The organization and completeness of the eligibility case documentation and their technical assistance during the review enabled us to complete the review in the most efficient and orderly manner.

VI. DISALLOWANCE

Considering the results of the review, six (6) cases were not eligible for funding under title IV-E foster care, with the result of \$23,501 FFP being disallowed. See the accompanying disallowance letter.