

Oklahoma Title IV-E Foster Care Eligibility Review

Period Under Review: October 1, 2002-March 31, 2003

Introduction

During September 22-26, 2003, Administration for Children and Families (ACF) staff from the Dallas Regional and Central Offices staff and State of Oklahoma staff conducted an eligibility review of Oklahoma's title IV-E foster care program in Oklahoma City, Oklahoma.

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

Scope of the Review

The Oklahoma title IV-E foster care initial primary review encompassed a sample of all of the title IV-E foster care cases that received a foster care maintenance payment during the period of 10-1-02/3-31-03. A computerized statistical sample of 80 plus 20 over sample cases was drawn from the Adoption and Foster Care Analysis and Reporting System (AFCARS) data which was transmitted by the State agency to the ACF for the period under review. 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 the review.

Case Record Summary and Areas of Improvement

Although no Program Improvement Plan is required since there were no *error* cases, the following represents some of the review team recommendations for improvement:

- Continue to strengthen case record documentation of source of families' support for cases showing "zero income" related to initial eligibility determinations.
- Improve eligibility documentation of financial need and deprivation. Include narrative in FACS supporting the eligibility determination, particularly regarding whether or not the father is in the home.
- Ensure that IV-E eligibility determination forms are consistently signed and dated.
- Modify KIDS so that AFDC eligibility determinations document the specific dates the determination covers, which allow for retrospective claims, if needed.
- Improve court order determinations so they are more child-specific, and include case-specific narrative of findings to eliminate *or* supplement the currently used "checkbox findings."
- Standardize court order language so that it more closely reflects Federal language regarding "contrary to the welfare" and "reasonable efforts" determinations.
- Revise eligibility procedures to clarify that TANF income has no link to IV-E eligibility determination.
- Revise eligibility procedures to clarify that SSI income does not automatically cause the child to be ineligible for IV-E.
- Revise State policy/procedures regarding the definition of "specified relative" for the purpose of IV-E eligibility determination as defined at 45 CFR 233.90 (c)(1)(v). Initiate retrospective claiming (up to two years) for IV-E reimbursements for those cases that

were originally determined to be non-IV-E eligible because the child did not live with the biological parent.

- Enhance KIDS to clearly document the approval dates of kinship homes and identify whether the placement is specifically foster care, relative or kinship when the same provider qualifies as a foster care home resource and/or a relative/kinship placement.
- Revise provider home assessment documentation to include official approval dates.
- Revise provider background checks documentation to include official receipt dates.
- Revise policy regarding the date the child is considered to have entered foster care to reflect the actual date of removal.
- Ensure Termination of Parental Rights orders address reasonable efforts to finalize a permanency plan.

Strengths and Model Practices

- Collaborative state/federal teamwork preparing for and during the title IV-E foster care eligibility review provided positive experiences for the reviewers.
- Reviews and court orders are timely and more frequent than required.
- Stability of placements during the period of review was excellent. The State seeks relative and kinship care placement resources to preserve connections.
- No IV-E payments were made prior to approvals of resource homes or determination of IV-E eligibility. Excellent edits and internal controls in KIDS.
- No children were placed in resource homes without safety checks having been completed.
- Permanency hearings and adjudications were completed timely.
- Excellent case work by the Tribes with stability of placements during the period of review. Reviews and court orders were completed timely. Provider approval documentation was exceptional.

Other factors contributing to success of the review and the lack of errors include:

- The KIDS SACWIS system, upgraded with enhanced title IV-E eligibility determination functionality.
- Expertise and dedication to excellence on the part of the OKDHS staff.
- Well-trained, tenured county title IV-E custody specialists.