

**RHODE ISLAND DEPARTMENT OF HUMAN SERVICES
TITLE IV-E FOSTER CARE ELIGIBILITY REVIEW
SEPTEMBER 10, 2001 TO SEPTEMBER 13, 2001**

I. INTRODUCTION

During the week of September 10 – September 13, 2001, staff from the Regional and Central Offices of the Administration for Children and Families (ACF) and State of Rhode Island conducted an eligibility review of the State of Rhode Island's Title IV-E Foster Care program.

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

II. SCOPE OF THE REVIEW

The Rhode Island Title IV-E Foster Care review was conducted in Providence at the administrative office of Department of Children Youth and Families. It encompassed a sample of all title IV-E foster care cases open during the period from October 1, 2000 through March 31, 2001. A computerized statistical sample of 88 cases was drawn from the Adoption and Foster Care Analysis and Reporting System (AFCARS) data that was 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 payment during the six month period noted above. For each case, the child's case file was reviewed for a determination of Title IV-E eligibility and to ensure that the foster home in which the child was placed was licensed for the period under the review.

During this first primary review, 80 cases were reviewed. Of those, seven were determined to be ineligible for either part or all of the review period for reasons identified in the Case Record Summary of this report. Since the number of ineligible cases was less than eight, Rhode Island is considered **to be in substantial compliance**. Therefore, the State will not be required to participate in a subsequent primary review until FFY 2004.

III. STRENGTHS

The Department has made great strides in automating the Title IV-E eligibility determination process in its RICHEST system. This appears to have increased the accuracy of this comprehensive and complex determination process. It also facilitates more accurate billing and claiming for only IV-E eligible foster children.

Reviewers found that all 80 cases met the requirements for the child to be determined needy and dependent based on AFDC guidelines that were in effect on 7/16/1996 (on which IV-E eligibility is based.) In addition, all but one case was found to have the court determinations of Contrary to Welfare and Reasonable Efforts to Prevent Placement required in order for the child to be determined initially eligible for IV-E.

IV. AREAS IN NEED OF IMPROVEMENT

Reviewers found that five of the seven cases failed due to foster home licensing issues. It is our understanding that except for a limited number of cases, the Department's policy is that all homes will be fully licensed. Full licensure is required (as of 9/27/00) of all foster care placements for which the Department intends to claim Title IV-E FFP.

We are aware that the Department had installed an edit in its RICHEST system and that these cases were claimed in error because the edit failed to work properly. Your staff has informed us that efforts have already been made to correct this problem in order to ensure that only fully licensed foster care homes/facilities will be included in future IV-E claims.

In addition, two of the seven cases failed because the court did not document its determination that the Department had made Reasonable Efforts to Finalize the Permanency Plan in the Court Order - as required by ACF regulations that took effect on 3/27/01 (after a one year transition period.) Since a court transcript is the only other acceptable method of documentation of these Reasonable Efforts, your staff spent much time and effort obtaining transcripts for our review otherwise more cases would have failed.

We have been informed that the Department is in the process of reviewing the court order form and will be installing an edit in RICHIST to alert staff if any otherwise IV-E eligible foster child is missing these required court determinations.

V. CASE RECORD SUMMARY

The following details the ineligible cases, reasons for ineligibility, and the ineligible claims. The disallowance for each failed case encompasses the entire period of ineligibility for which IV-E FFP was claimed.

Sample No. 4

The child was determined to be ineligible from 03/08/01 – 6/30/01 because of a lapse in the foster home license from 3/8/01 - 4/18/01 and from 3/27/01 - 6/30/01 because of a failure to obtain reasonable efforts to finalize the permanency plan within the required timeframe resulting in a total disallowance of \$1,713 IV-E (\$921 FFP).

Sample No. 7

The child was determined ineligible from 09/27/00 – 11/22/00 because the foster family home lacked full licensure during this period resulting in a disallowance of \$625 IV-E (\$336 FFP).

Sample No. 16

The child was determined to be ineligible for the period 10/20/00 – 03/21/01 because the foster family home lacked full licensure during this period resulting in a disallowance of \$1,523 IV-E (\$819 FFP).

Sample No. 35

The child was determined to be ineligible from 03/27/01- 06/30/01 because of a failure to obtain reasonable efforts to finalize the permanency plan within the required timeframe resulting in a total disallowance of \$1,430 IV-E (\$769 FFP).

Sample No. 45

The child was determined to be ineligible from 09/27/00 - 03/30/01 because the family foster home lacked full licensure during this period resulting in a disallowance of \$254 IV-E (\$137 FFP).

Sample No. 56

The child was determined to be ineligible for the entire period of placement starting 02/16/96 – 06/30/01 due to failure to obtain the determination of contrary to welfare to remain in the home upon the removal of the child resulting in a disallowance of \$60,089 IV-E (\$32,367 FFP).

Sample No. 68

The child was determined to be ineligible from 09/27/00-11/19/00 because the family foster home lacked full licensure during this period resulting in a disallowance of \$497 IV-E (\$267 FFP).

Total Funds Questioned \$66,131 IV-E (Gross) \$35,616 FFP

VI. DISALLOWANCE

The dollar amount to be refunded to the Administration for Children and Families is \$35,616, the Federal share of the foster care payments for the ineligible cases for the period(s) of ineligibility.

