

**IOWA TITLE- E
FOSTER CARE ELIGIBILITY REVIEW**
October 1, 2000 – March 31, 2001
Des Moines, Iowa

I. INTRODUCTION

During the week beginning September 17, 2001, Administration for Children and Families (ACF) staff from the Regional Office and the State of Iowa staff conducted an eligibility review of the State of Iowa's Title IV-E foster care program.

The purpose of the Title IV-E review was to validate the accuracy of Iowa 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 Iowa Title IV-E Foster Care review, which was conducted in Des Moines, Iowa encompassed a sample of all Title VI-E cases during the most recent Adoption and Foster Care Analysis Reporting System (AFCARS) reporting period from October 1, 2000 to March 31, 2001. A computerized statistical sample of 88 cases was drawn from AFCARS data submitted by the State. The sampling of cases consisted of cases of individual children who received at least one 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 placement in which the child was placed was licensed for the period of review. The cases were also examined to determine if criminal background checks had been completed on all persons in those Foster Family or Group homes.

During the initial primary review, 80 valid cases were reviewed. Twenty-two cases were determined to be ineligible for either part or all of the episode of foster care for reasons that are detailed in the Case Record Summary section of this report. Since the number of

ineligible cases exceed eight, Iowa is considered to not be in substantial compliance. Pursuant to section 1356.71(I), Iowa is required to develop a Program Improvement Plan (PIP) designed to correct those areas determined not to be in substantial compliance. The PIP will be developed jointly by the State and Federal staff and must be submitted to my office within 90 days from your receipt of the letter notifying you of noncompliance. Once the PIP is successfully completed, a secondary review of a sample of 150 Title IV-E foster care cases will be conducted.

III. CASE RECORD SUMMARY

The following details the ineligible cases and the reasons for ineligibility. The total ineligible dollar amount is **\$156,945.41**. The following table shows that the errors were concentrated in 4 categories: **Contrary to Welfare** with 6 errors, **Reasonable Efforts** with 6 errors, **AFDC Related** with 14 errors and **Criminal Background** checks with 3 errors. This count includes multiple types errors found in some cases.

October 1, 2000 to March 31, 2001

CASE RECORD SUMMARY			
Case Number	Total Dollar Amount in Error	Federal Dollars in Error	Nature of Error/Dates of Ineligibility
	1023.19	612.24	Criminal Records Check (1/9/01 - 2/15/01)
	920.59	576.93	AFDC Eligibility (2/1/01 - 3/31/01)
	18932.82	11,881.48	Contrary to Welfare, Reasonable Efforts(1), AFDC Eligibility (3/26/99 - 3/31/01)
	1,177.82	718.36	Reasonable Efforts(1) (4/26/00 - 3/31/01)
	4,433.36	2,778.39	Contrary To Welfare (12/29/00 - 3/31/01)
	2,376.64	1,489.44	Contrary to Welfare, Reasonable Efforts(1) (1/12/01 - 3/31/01)
	37,640.03	23,625.39	AFDC Eligibility, Criminal Records Check (4/4/97 - 3/31/01)
	24,936.15	15,496.41	AFDC Eligibility (4/29/98/ - 3/31/01)

	3,136.25	1,965.49	Contrary to Welfare, Reasonable Efforts (1)(7/25/00 - 3/31/01)
	4,410.43	2,764.02	Contrary to Welfare, Reasonable Efforts (1)(2/5/01 - 3/31/01)
	11,350.88	7,123.01	Reasonable Efforts (1) AFDC Eligibility (9/22/98 - 3/31/01)
	3,417.83	2,141.95	AFDC Eligibility (12/25/00 - 3/31/01)
	4,484.01	2,810.13	AFDC Eligibility (12/8/00 - 3/31/01)
	1,997.00	1,255.00	Criminal Records Check (8/1/00 - 11/3/00)
	1,674.33	1,049.3	AFDC Eligibility (3/10/01 - 3/31/01)
	2,460.39	1,541.93	AFDC Eligibility (2/7/01 - 3/31/01)
	16,839.62	10,605.09	AFDC Eligibility (4/4/00 - 3/31/01)
	1,741.30	1,091.27	AFDC Eligibility (1/31/01 -3/31/01)
	72.22	45.26	AFDC Eligibility (2/15/01 - 2/16/01)
	8,044.94	5,084.64	AFDC Eligibility (11/18/98 - 3/31/01)
	9,280.21	5,845.74	Contrary to Welfare, AFDC Determination (3/2/00 - 3/31/01)
	1,203.00	753.92	AFDC Eligibility (2/21/01 - 3/31/01)
Total	161,553.01	101,255.41	Total Dollar and Federal share of maintenance disallowance
Admin.	88,854.00	55,690.00	Fifty-five percent of maintenance disallowance
Total	250,407.01	156,945.41	

IV. AREAS IN NEED OF IMPROVEMENT

A. The following information describes areas that were found deficient during the review and that need to be addressed in the Program Improvement Plan.

Reasonable Efforts, Contrary to Welfare Documentation

Documentation of reasonable effort to prevent removal or reunify the child with the family was missing in several cases. Some cases didn't contain either contrary to welfare or reasonable effort language.

AFDC

The review found the eligibility form to be confusing and hard to follow in determining the child's eligibility related to income resources, removal from home of a specified relative, and deprivation of parental support. Many had no dates or signatures of when and who determined eligibility.

Licensure/Criminal Background Checks

The review found that children were placed in foster care placements prior to the criminal record checks being completed. Documentation of these checks should be in the file.

B. The following areas noted don't affect the Title VI-E eligibility per se, but are also areas that should be given attention.

Court Orders

Court Orders that include sibling groups should have individual findings and determinations for each child.

Court Orders that were Permanency Review orders didn't contain permanency information.

Court Orders gave concurrent custody to DHS and relative.

AFDC Determinations

Time between redeterminations, 6 months or annually. Federal regulations only require annual reviews. Iowa's IV-A plan that was in effect July 16, 1996, require redeterminations every 6 months. DHS may want to review plan requirements and how they apply.

V. STRENGTHS AND MODEL PRACTICES

There were some very good court orders with clear language related to reasonable efforts and contrary to welfare in juvenile offender's

files. These orders were from the first, fifth and seventh District Courts.

The review was very well organized and showed that the state put a lot of time into the preparation.

The case files were well organized and easy to follow and find information. Payment histories were attached to all of the cases.

State reviewers were very knowledgeable and were able to read the cases objectively and clarify information for federal reviewers. They also were able to reconstruct eligibility on cases when possible resulting in fewer cases being ineligible.

State provided good access to data systems during the review.

Judges were available on-site during the review to help interpret court orders.

State and federal staff were able to begin making recommendations to improve errors found during the review.

VI. 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 maintenance payment during the six month AFCARS period of October 1, 2000 to March 31, 2001. Based upon the result of the review, 22 cases were not eligible for funding under Title IV-E foster care. The total amount of disallowance is **\$156,945.41** (FFP & Administrative)