



DEPARTMENT OF HEALTH & HUMAN SERVICES

ADMINISTRATION FOR CHILDREN AND FAMILIES
Administration on Children, Youth and Families
1250 Maryland Avenue, S.W.
Washington, D.C. 20024

MAY 15 2007

Karleen Jackson
Commissioner
Department of Health and Social Services
Post Office Box 110601
Juneau, Alaska 99811-0601

Dear Ms. Jackson:

This is to provide notification that the Children's Bureau (CB) has approved Alaska's title IV-E foster care Program Improvement Plan (PIP). Enclosed is a copy of the approved PIP. This PIP was developed by Alaska's Office of Children's Service (OCS) in collaboration with CB's Regional and Central Offices in response to the results of a title IV-E foster care eligibility review that was completed during the week of September 11 - 15, 2006, in Juneau, Alaska.

In correspondence dated December 13, 2006, Alaska was advised that the results of the September review were that the State of Alaska's title IV-E foster care maintenance program was not in substantial compliance with Federal child and provider eligibility requirements for the period October 1, 2005 - March 31, 2006. Pursuant to 45 CFR 1356.71(i), Alaska was, therefore, required to develop a PIP to address those areas identified in the review as requiring corrective action.

The draft PIP was received timely on March 26, 2007. The plan was reviewed by both Regional and Central Office CB staff, and additional revisions were submitted. We have completed a review of the most recent submission of the PIP and we have determined that it addresses the issues required. CB Regional Office staff will continue to work with OCS in the implementation of this PIP. Quarterly reports must include a description of the progression of the plan and the results of the required evaluations. The first quarterly report is due 90 days from the date of this letter and should be sent to the Regional office.

We look forward to our continued work with you and your staff to improve services to children and families in Alaska and to improve State implementation of Federal Requirements. Please contact Program Specialist Lois Ward at 206-615-2603, if you have any questions regarding this PIP process.

Sincerely,



Susan Orr, Ph.D.
Associate Commissioner
Children's Bureau

Enclosure

cc:

Tammy Sandoval, Deputy Commissioner; Office of Children's Services; Juneau, AK
Paul Kirisitz; CB, DPI; Washington, DC
Jennifer Butler-Hembree; CB, DPI; Washington, DC
JBS International; 8630 Fenton Street; Suite 1200; Sliver Springs, MD 20910
John Henderson, Program Manager; CB Region 10; Seattle, WA

STATE OF ALASKA
Office of Children's Services (OCS)
TITLE IV-E PROGRAM IMPROVEMENT PLAN [PIP]

ACF Contact: Lois Ward
ACF Regional Office: Region X
Date of Title IV-E Review: September 2006 [Primary Review]
Date of Title IV-E PIP Submission: March 20, 2007

Area Needing Improvement	Goals	Action Steps	Method of Measuring Improvement	Estimated Date of Achievement	Actual Date of Achievement	Staff/Unit Responsible	Quarterly Progress Report /Comments (Delays/ Barriers/Comments) Percentage Complete
<p>I. "Reasonable efforts to prevent placement" and "reasonable efforts to finalize the permanency determinations" were not as meaningful and case specific as they should be.</p>	<p>A. Increase the number of reasonable efforts findings that are "meaningful" and "case specific".</p>	<p>1) The Department of Law (DOL) has revised model court orders which will be completed, signed and distributed at the hearing. The court orders include:</p> <ul style="list-style-type: none"> • Order for Continuance and for Temporary Custody (<i>Attachment A</i>) • Temporary Custody Order (<i>Attachment B</i>) • Findings and Order Following Permanency Order (<i>Attachment C</i>) <p>These court orders are being piloted in the Anchorage Region. Following an approximate two-month pilot period, these forms may be revised and will be distributed for statewide implementation.</p>	<p>In June 2007, approximately 50% of the orders in Anchorage will be completed on the revised form. In October there will be an increase in use of the forms in Anchorage and verification that the forms are being used in other regions. The Department of Law will monitor to ensure that Assistant Attorney General's (AAG) are using the revised orders. OCS will contact the Department of Law on a quarterly basis to determine the approximate use of the forms.</p>	<p>January 2008</p>		<p>Carla Raymond Eligibility Staff / Kristie Swanson</p>	<p>Comment: The Court Improvement Project (CIP) held a meeting on March 2, 2007 with CIP Judges to introduce and review the revised forms.</p> <p>Comment: Based upon a meeting with Region X on March 12, 2007, DOL will revise the court orders and redistribute to the Anchorage Region for a pilot period of less than 2-months.</p>

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		<p>2) The Judicial Education Coordinator with the Court Improvement Project will provide information to the Courts on the court order formats.</p> <p>3) OCS will revise the "Report for Permanency Hearing" template in ORCA to include a prompt for SW's information on which reasonable efforts were made to finalize the permanency plan. <i>Attachment E.</i></p>	<p>not the order is on the revised form 2) if order was signed on the date of hearing and 3) the period of time it takes ET's to receive the court order. Northern, Southcentral, and Southeastern Regions will implement tracking 45 days after statewide implementation of the revised court orders. Court Order Tracking Log is labeled <i>Attachment D.</i></p> <p>Copy of informational memo.</p> <p>ORCA completion date.</p>	<p>August 2007</p> <p>November 2007 (2.5 Release)</p>		<p>Suzanne DiPietro</p> <p>ORCA Manager / Kristie Swanson</p>	

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		4) OCS will send a Program Instruction to SWs regarding completion of Section II on the Report for Permanency Hearing to include information specific to efforts to finalize the permanency plan. This PI shall remain in effect until item 3 above is complete.	The Department of Law will monitor to ensure that AAG's are receiving the revised permanency report format. OCS will contact the Department of Law on a quarterly basis to determine the approximate use of the form.	July 2007		Gudrun Bergvall / Tammy Sandoval	
II. "Reasonable efforts to finalize the permanent plan" findings were not consistently made in a timely manner. In addition to the two cases determined in error, additional cases were incorrectly removed from title IV-E for periods of time in which this requirement was met.	A. Decrease percentage of cases where findings are not entered within the statutorily mandated time frames.	1) Department of Law will notify AAG's statewide to schedule permanency hearings within 11 months to better ensure compliance with the 12 month requirement. 2) The Judicial Education Coordinator with the Court Improvement Project will add to the agenda for an upcoming CIP meeting, the following: 2a) A recommendation requesting letters be send out to the judges addressing the need to schedule permanency hearings within 11 months.	The Department of Law will monitor to ensure that AAG's are scheduling permanency hearings within 11 months. OCS will contact the Department of Law on a quarterly basis to determine if scheduling is occurring. Copy of agenda. Copies of letters.	January 2008 September 2007 November 2007		Carla Raymond / Kristie Swanson / Gudrun Bergvall Suzanne DiPietro Suzanne DiPietro	

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	<p>B. OCS will change the Title IV-E eligibility status whenever reasonable efforts to finalize the permanency plan is not met within a statutorily mandated time frame.</p>	<p>3) Create ORCA functionality to notify OCS Social Workers within 30 days prior to the hearing in order to ensure that the permanency reports are submitted 10 days prior to the court date.</p> <p>4) ET staff will conduct a redetermination within 60 days after reasonable efforts to finalize the permanency plan are not met according to the statutorily mandated time frame and adjusted the claim back to the date of ineligibility.</p> <p>4a) OCS will develop business rules and request an ORCA design session for development of an automated message notifying ET's and SW's of annual reasonable expiration. (2.5 Release)</p> <p>4b) Implement ORCA Report 123 (Annual Reasonable Efforts Overdue) that was previously designed to track expired annual reasonable efforts.</p>	<p>Documentation of incident and progress reports from ORCA Programming Staff.</p> <p>Quality assurance review will occur based on a random sample from the ORCA Report 123 (Annual Reasonable Efforts).</p> <p>Completion of the ORCA notification.</p> <p>Completion of the ORCA report.</p>	<p>November 2007 (2.5 release)</p> <p>April 2008</p> <p>November 2007 (2.5 Release)</p>		<p>ORCA Manager / Kristie Swanson</p> <p>Lisa McClure / Rick Hamby</p> <p>ORCA Manager / Kristie Swanson</p> <p>ORCA Manager / Kristie Swanson</p>	

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	C. ET staff will use one system (ORCA) to document Title IV-E Eligibility Determinations.	<p>5) OCS will provide the Department of Law (Diane Oisen) a list of clients that Annual Reasonable efforts have expired.</p> <p>6) Required modifications to ORCA are:</p> <ul style="list-style-type: none"> Increasing the comment space on determination and redetermination screens to allow an unlimited amount of text and allow a full print of the text. To allow the eligibility questions on the determination and redeterminations to be printed simultaneously. 	<p>Documentation that quarterly report was sent.</p> <p>Completion of ORCA modifications and full implementation of the eligibility staff.</p> <p>Implementation will be measured by random sampling of determination and redeterminations 45 days after ORCA modifications are in place to ensure that all aspects of initial determinations and redeterminations are conducted in ORCA.</p>	<p>May 2008</p> <p>November 2007 (2.5 Release)</p> <p>May 2008</p>		<p>Kristie Swanson</p> <p>ORCA Manager / Kristie Swanson</p> <p>Lisa McClure Rick Hamby</p>	
<p>III. AFDC-relatedness was not consistently determined using the correct eligibility month and the correct home. The Rosales Court Decision was incorrectly applied to children who entered care prior to the state plan Rosales effective date</p>	<p>A. To cease using Rosales in Title IV-E eligibility determinations for State of Alaska custody children.</p>	<p>1) OCS implemented a policy change, effective March 1, 2006, after the DRA was signed into law. The policy instructed Eligibility Technicians to review all cases where eligibility was based on the Rosales Court Decision and determine if the</p>	<p>OCS will conduct quality assurance reviews for 100% of all Rosales cases beginning March 16, 2007 as the redeterminations are completed to ensure that the Title IV-E Eligibility was determined correctly and all ineligible periods</p>	<p>July 2007</p>		<p>Rick Hamby/ Lisa McClure/ Kristie Swanson / Gudrun Bervall</p>	

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(7/1/03). The Rosales decision was also incorrectly applied to children who did not meet the AFDC criteria in the month court action was initiated.		child would be eligible without using the Rosales Decision. If the child would not be eligible without using the Rosales Decision, the child's eligibility status was changed to ineligible.	were removed. This will be documented on QA tracking sheet and provided to Region X. <i>Attachment F.</i>				
IV. Some cases are being determined Title IV-E eligible when children are placed with providers who do not meet the full licensing requirements and/or criminal check requirements.	A. Eliminate Title IV-E claiming for children who are placed in not fully licensed homes.	<p>1) Implement use of Reference Guide for Licensing Terminology to ensure licenses consistently reflect the correct status and ET staff can document the correct eligibility status. <i>Attachment G.</i></p> <p>2) Provide training to licensing staff and to ensure consistent statewide use of licensing related fields in ORCA.</p> <p>3) Develop a licensing quality assurance review instrument that includes criminal background checks.</p> <p>3a) Develop guidelines for licensing quality assurance reviews.</p>	<p>Completion of Reference Guide</p> <p>Training agendas and training attendance rosters.</p> <p>Completion of review instrument.</p> <p>Completion of guidelines.</p>	<p>March 2007</p> <p>July 2007</p> <p>June 2007</p>	<p>March 30, 2007</p>	<p>Gudrun Bergvall</p> <p>Licensing Supervisors</p> <p>Sue Frisby Deb Downs</p> <p>Gudrun Bergvall</p>	

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		<p>3b) Conduct licensing quality assurance reviews.</p> <p>3c) If a review found that finds a home not fully licensed (including criminal background checks) Central Office will be notified in order to verify that Title IV-E funds are not being claimed.</p> <p>4) ET staff will conduct a timely (no more than 45 days) redetermination upon ORCA notification of a placement change or upon notification of a license status change that results in a change in eligibility status.</p> <p>4a) ORCA's automated messages regarding license status changes will be modified to include Person ID and Case Number in order to assist ET's to redetermine eligibility in a timely manner.</p> <p>5) Implement ORCA Reports 115 (ET Caseload) and 116 (Aging Redeterminations) to assist ET's to manage their</p>	<p>Quarterly monitoring that reviews have been completed.</p> <p>Verification that Central Office was notified of the QA review and that an appropriate redetermination was conducted.</p> <p>QA review will occur on a monthly basis per Region based on a random sample of Title IV-E eligible cases to determine accuracy and timeliness of redeterminations related to licensing and/or placement changes.</p> <p>Completion of ORCA modification.</p> <p>Complete of ORCA report.</p>	<p>May 2008</p> <p>May 2008</p> <p>May 2008</p> <p>November 2007 (2.5 Release)</p>		<p>Licensing Supervisors / Steve Krall</p> <p>Rick Hamby/ Gudrun Bergvall / Kristie Swanson</p> <p>Rick Hamby/ Lisa McClure</p> <p>ORCA Manager / Kristie Swanson</p> <p>ORCA Manager / Kristie Swanson</p>	

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<p>V. State makes extensive and lengthy use of emergency licenses instead of moving quickly to have providers meet requirements for full licensure.</p>	<p>A. Shorten the period of time it takes providers to move from emergency licensure to fully licensed.</p>	<p>workload to meet federal claiming requirements.</p> <p>1) Conduct an initial analysis of homes that are not fully licensed to determine reasons why the process is lengthy. Based on the results of the analysis, recommendations will be developed to address reasons why homes are not fully licensed.</p> <p>1a) Implement recommendations. This will be clarified upon completion of the analysis.</p> <p>2) Conduct a biannual analysis of homes that are not fully licensed and determine reasons for delay and monitor progress towards being licensed.</p> <p>2a) Develop ORCA report on all aspects of licensing status.</p>	<p>Develop a list of not fully licenses homes by geographical location and track when application was submitted, what is missing and how long it takes.</p> <p>ORCA Reports</p> <p>Maintain a list of not fully licenses homes by geographical location and track when application was submitted, what is missing and how long it takes.</p> <p>Completion of ORCA reports.</p>	<p>May 2007</p> <p>November 2007</p> <p>November 2007 (2.5 Release)</p>		<p>Steve Krall / David Strouth</p> <p>Steve Krall / David Strouth</p> <p>Licensing Staff</p> <p>ORCA Manager / Kristie Swanson</p>	<p>This analysis will be contingent upon the functionality in ORCA.</p>

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<p>VI. The monitoring of facilities which include the employee criminal records lacks consistent procedures, documentation and follow up to ensure safety requirements are met for staff.</p>	<p>A. To ensure there are statewide procedures in place to monitor that all employees of residential facilities meet federal and state safety requirements.</p>	<p>1) OCS and Division of Public Health (DPH) shall co-develop a tracking tool for facilities to document that employee fingerprints meet licensing requirements including tracking timeliness per the new licensing regulations effective 2/9/07. <i>Attachment H.</i></p> <p>1a) OCS will implement the above tracking document by adding the requirement to the FY08 Continuation Grant Application.</p> <p>1b) OCS will conduct a random review of personnel files during the Residential Facility annual site review to verify that employee criminal background checks are documented. If the criminal background checks documentation cannot be verified, OCS will notify DPH who will take appropriate action.</p> <p>2) DPH will review all employee criminal</p>	<p>Completion of form.</p> <p>OCS will review the tracking sheet for compliance during the Residential Facility Annual Site Reviews.</p> <p>OCS will submit quarterly updates to Region X regarding reviews.</p>	<p>March 2007</p> <p>May 2008</p> <p>May 2008</p>	<p>March 31, 2007</p>	<p>OCS / DPH</p> <p>OCS Program Coordinator</p> <p>OCS Program Coordinator</p> <p>DPH Review Team</p>	<p>Comment: The residential care licensing responsibilities were moved from OCS to the Division of Public Health (DPH) on March 16, 2006.</p> <p>Effective February 9, 2007, the Background Check Unit (BCU), began to review barrier crimes and conditions to individuals working, residing or volunteering at a facility and verify that the criminal histories meet the standards. This new unit provides consistent review of histories and provides 'real-time' monitoring of individuals associated with facilities.</p>

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		<p>background checks or provisional or final background check authorizations issued by the Background Check Unit as part of their facility annual site reviews. If a facility does not meet standards, the licensing worker may a) develop a corrective action plan as situation warrants; and/or b) enter the violation into ORCA and c) notify OCS Program Officer if appropriate. The Program Officer will notify ET staff to change eligibility status of all children placed in the facility if needed.</p> <p>3) OCS and DPH will co-develop and implement the use of a Reference Guide for Facility Licensing Terminology to be utilized by DPH licensing and OCS ET staff to document the correct eligibility status for children in placed in residential facilities.</p>	<p>Worksheet during the annual site reviews.</p> <p>Completion of Guide</p>	<p>June 2007</p>		<p>Gudrun Bergvall / Jeri VanSandt</p>	