

# **Idaho Title IV-E Foster Care Eligibility Review**

## **April 1, 2006 through September 30, 2006**

### **Final Report**

#### **Introduction**

The Children's Bureau (CB), Administration for Children and Families (ACF), Central and Region 10 offices conducted a primary review of the State of Idaho's title IV-E program, in Boise, Idaho, from March 26 through March 29, 2007. A team of five CB Regional staff, one member of CB's Central Office staff, one ACF Regional Office Intergovernmental Personnel Act staff, three Federal contractors and four Idaho Office of Children's Services staff completed the onsite review.

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

#### **Scope of the Review**

The Idaho title IV-E foster care 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 April 1, 2006 through September 30, 2006. A computerized statistical sample of 80 cases was selected from the Adoption and Foster Care Analysis and Reporting System (AFCARS) data, which was transmitted by the State agency to CB for the period under review. A review of the expenditure history of these cases by State and Federal staff determined 22 of the original sample of 80 cases did not qualify for the sample because they had no IV-E payments during the period under review. An additional computerized statistical sample of 50 cases was drawn from AFCARS to ensure a complete sample of 80 cases.

Of the 80 cases reviewed, 77 cases were determined eligible for title IV-E and 3 cases were determined to be in error for either part or all of the review period. Since the number of error cases was no more than four (4), CB has determined Idaho to be in substantial compliance for this primary review.

#### **Case Record Summary**

Below is the summary of the findings for the cases determined to be in error:

- Sample number 68 was determined to be in error because title IV-E was claimed when the initial contrary to the welfare determination was not made in the first removal order. (472(a)(1) and 471(a)(15)(B)(i)).

- Sample number 95 was determined to be in error because removal was pursuant to an invalid voluntary placement agreement that was not signed by the custodial parent. (472(d)(e) and (f) and 45 CFR 1356.22).
- Sample number 98 was determined to be in error because Title IV-E was claimed for a child who was placed in a foster home that was not fully licensed during the period under review. The license was “closed” at the foster family’s request, and then the family and foster child moved out of state and remained unlicensed in the new state of residence. (472 (b), and (c) and 45 CFR 1356.71(d)(1)(iv), and 1355.20).

## **Strengths**

In the title IV-E cases reviewed, the following strengths were noted:

- “Contrary to the welfare to remain in the home” was addressed as a finding in the first removal order in all but one case in the sample.
- “Reasonable efforts to prevent removal” was addressed as a finding in the first removal order. This results in timely findings, as Federal requirements specify within 60 days.
- Idaho has made significant progress in the quality of court orders since the last review. Many court orders included judicial determinations with meaningful case-specific findings concerning reasonable efforts to prevent placement and reasonable efforts to achieve permanency.
- Re-determinations of eligibility were consistently completed in a timely manner.
- Idaho has conscientious eligibility specialists who carefully apply the IV-E requirements to each case.
- Foster family homes are regularly licensed and renewed with no gaps in licenses.
- Idaho utilizes a specialized criminal records check unit to ensure completion of all criminal check requirements. There is good documentation regarding criminal background checks on the FOCUS system and eligibility files.
- Idaho has clearly made tremendous progress in licensing and monitoring safety in facilities since the last review.

## **Concerns**

In the title IV-E cases reviewed, the following concerns were noted:

- A few courts use “contrary to the welfare” language which should be improved to make more individualized judicial determinations based on the circumstances in the child’s home.

- Shelter care hearings must also address “contrary to the welfare”.
- Court order language could be improved around reasonable efforts for children removed in emergency situations.
- It is difficult to determine the actual date of the hearing on some court orders. These dates are critical in determining eligibility, as determinations must be made within specific timeframes.
- Initial eligibility needs to be determined for the month the petition is filed. During the review, State staff needed to complete a corrected determination of initial eligibility for several cases in the sample because the month the petition was filed had not been used as the eligibility month.
- State eligibility forms contained incomplete and incorrect wording concerning “Deprivation”.
- Idaho needs to ensure all licensing requirements and safety concerns are met prior to the issuance of a license. In some cases, the State was still actively gathering information and completing State background checks after the date of the license.
- Eligibility specialists need to be notified if a foster home is closed or not re-licensed.
- Eligibility specialists use the actual date of placement instead of the Federal definition. This resulted in potential underpayments in 4 cases in the sample (12, 29, 73 and 84), as the judicial determinations of reasonable efforts to finalize the permanency plans were timely according to the Federal definition.

## **Payment Issues**

### **Miscellaneous Ineligible Payments**

The review identified miscellaneous ineligible payments totaling \$1,923 Federal Financial Participation (FFP) as follows:

- Three cases (Sample #s 3, 29 and 90) were found to have duplicate payments as two providers were paid for the same care days. We understand that the Overpayment Alerts in the Family Oriented Community User System (FOCUS) do not require any positive action on the part of workers. The State plans to develop systems enhancement to require action on the alerts. This needs to be given priority.
- Two cases (Sample #s 8 and 86) outside the PUR claimed IVE prior to the safety requirements being met.
- Two cases (Sample #s 38 and 64) before the PUR were found to include payments prior to the Contrary to the Welfare (CTW) determination. While the Contrary to the Welfare

findings were in the first removal orders as required, payments occurred prior to the date of the finding.

- One case (Sample #96) was found to include a payment before the PUR that was prior to the "reasonable efforts to finalize the permanent plan" judicial determination. No ineligible payment has been calculated as the State adjusted the IVE claim prior to the onsite review but after the sample had been identified.
- Two cases included charges that do not meet the IVE maintenance payment definition at 45 CFR 1355.20, which is defined as “the cost of (and the cost of providing) food, clothing, shelter, daily supervision, school supplies, a child’s personal incidentals, liability insurance with respect to a child, and reasonable travel for a child’s visitation with family, or other caretakers,” as follows:
  - Sample #10 - Medical cost reimbursement to Pre-adoptive parents. These costs might be allowable as Adoption Assistance Non-recurring costs subject to the \$2,000 limitation.
  - Sample #73 - Claimed State worker travel costs. This cost item would be allowable as FC Administration.

**The following chart summarizes the ineligible payments:**

Summary of Miscellaneous Ineligible Payments							CTW = Contrary to the Welfare					
							RE = Reasonable Efforts					
Sample#	MOS	Code	Amount	FFY	FMAP	FFP	Comments					
03	March 07-31/06	210428	520.00	2006	69.91%	364	Duplicate Payment - Paid 2 providers for same care dates					
08	Dec 05	201798	135.35	2006	69.91%	95	Safety Requirements not met.					
10	Dec 05	205638	785.72	2006	69.91%	549	Medical cost reimbursement to Pre-Adopt Parent					
29	Aug 06	234576	77.42	2006	69.91%	54	Duplicate Payment - Paid 2 providers for same care dates					
38	Feb 05	162507	78.46	2005	70.62%	55	IVE prior to CTW & RE					
38	Feb 05	162605	80.00	2005	70.62%	56	IVE prior to CTW & RE					
64	Feb 04	119048	40.00	2004	70.46%	28	IVE prior to CTW & RE					
64	Feb 04	119010	100.00	2004	70.46%	70	IVE prior to CTW & RE					
73	Sept 06	238016	70.00	2007	70.36%	49	SW Travel costs = IVE Admin					
86	March 06	213067	340.00	2006	69.91%	238	Safety Requirements not met.					
90	March 07-31/06	210429	520.00	2006	69.91%	364	Duplicate Payment - Paid 2 providers for same care dates					
96	Oct 05	150561	273.49	2006	69.91%	-	IVE Prior to RE Permanency - Already adjusted out					
	Total					1,923						

## **Underpayments**

The review identified potential underpayments totaling \$10,506 FFP, which are identified on Attachment C. Upon further research to determine if payments were made on behalf of eligible children, and if corrections have not already been made, then the State may submit a prior period increasing adjustment on its expenditure report to claim the following.

- Payments where no IVE claim had been made for an otherwise eligible child or provider. Many of these instances appear to be related to: 1) the eligibility worker being unable to obtain some needed documentation such as court orders, and 2) eligibility determination errors.
- Plane ticket for child's placement at a pre-adoptive home would be an allowable IVE administrative cost claim.

## **Other Payment Issues**

Our review of the dropped sample cases found that numerous corrections (adjustments) had been made to the IVE claim. These corrections were reported as current quarter costs on the IVE expenditure report; however, many of these corrections were for prior periods. Adjustments to the IVE claims must be reported as corrections to the original time period claimed because of the difference in the FFP rates.

Our review found payments that could have been claimed under IVE but were charged to other funding sources as a result of a management decision. These included:

- Supplemental payments such as clothing were not claimed even though the basic maintenance payment was charged to IVE. Some of the other funding sources used were programs with allotment ceilings such as Temporary Assistance to Needy Families (TANF) and Chafee Foster Care Independence Program (CFCIP).
- Allowable maintenance payments such as day care for employed foster parents were charged to other funding sources as a result of a management funding decision.

## **Disallowances**

Based on the results of the review, the State of Idaho has been determined to be in substantial compliance as only three cases were determined ineligible for funding under title IV-E foster care.

The disallowed payments associated with the error cases and the ineligible payments were calculated as indicated on the following chart. Ineligible payments associated with the cases reflect all periods of ineligibility.

Summary of Ineligible Payments - Idaho FY 07 IVE Review									
	FY 04	FY 05	FY 06	FY 07	Total		Attachment Ref.		
<b>Maintenance Payments</b>									
Sample # 68			2,185		2,185		A-1		
Sample # 95			725		725		A-2		
Sample #98			-		-		A-3		
Total FFP			2,909		2,909				
Other Ineligibles:	99	112	1,663	49	1,923				
Total Maintenance FFP	99	112	4,572	49	4,832				
<b>Administrative Costs</b>									
Sample # 68			2,384		2,384		B-1		
Sample # 95			596		596		B-2		
Sample #98			-		-		B-3		
Total Admin FFP	0	-	2,980	-	2,980				
<b>Grand Total FFP</b>	<b>99</b>	<b>112</b>	<b>7,552</b>	<b>49</b>	<b>7,812</b>				

Calculation of Ineligible Payments - Sample #68										ATTACHMENT A-1
Reason Ineligible: #11 - No CTW										
Ineligible Period: 10-12-05 to 06-13-06 (Left care)										
Amount Paid										
Service			Prior to							
Begin	End	Months	Code	PUR	PUR	After PUR	FFY	FMAP	FFP	Comment
10-12-05	10-22-05	0.3548	192022	220.00			2006	69.91%	153.80	L2 SC
10-12-05			192030	100.00				69.91%	69.91	Clothing
10-13-05			192034	143.91				69.91%	100.61	Food
10-23-05	10-31-05	0.2903	193785	180.00				69.91%	125.84	L2 FC
11-01-05	11-30-05	1.0000	193785	400.00				69.91%	279.64	L2 FC
12-01-05	12-31-05	1.0000	193785	300.00				69.91%	209.73	L2 FC
12-12-05	12-12-05		193785	30.00				69.91%	20.97	L2 FC
01-01-06	01-31-06	1.0000	193785	300.00				69.91%	209.73	L2 FC
02-01-06	02-28-06	1.0000	193785	300.00				69.91%	209.73	L2 FC
02-12-06	02-28-06		210127	18.21				69.91%	12.73	Clothing
03-01-06	03-31-06	1.0000	193785	300.00				69.91%	209.73	L2 FC
03-01-06	03-31-06		210127	30.00				69.91%	20.97	Clothing
04-01-06	04-30-06	1.0000	193785		300.00			69.91%	209.73	L2 FC
04-01-06	04-30-06		210127		30.00			69.91%	20.97	Clothing
05-01-06	05-31-06	1.0000	193785		300.00			69.91%	209.73	L2 FC
05-01-06	05-31-06		210127		30.00			69.91%	20.97	Clothing
06-01-06	06-13-06	0.4333	193785		130.00			69.91%	90.88	L2 FC
06-01-06	06-13-06		210127		13.00			69.91%	9.09	Clothing
		8.0785		2,322.12	803.00	-			2,184.77	

Calculation of Ineligible Payments - Sample				#95		ATTACHMENT A-2					
Reason Ineligible:		#14 - VPA									
Ineligible Period:		11-22-05 to 05-22-06									
				Amount Paid							
Service			Prior to								
Begin	End	Months	Code	PUR	PUR	After PUR	FFY	FMAP	FFP	Comment	
11-22-05	03-31-06	0								Not Claimed	
04-01-06	04-30-06	1.0000	197732		274.00		2006	69.91%	191.55		
04-01-06	04-30-06		197734		240.00			69.91%	167.78		
04-01-06	04-30-06		212127		90.00			69.91%	62.92		
05-01-06	05-22-06	0.7097	197732		208.97			69.91%	146.09		
05-01-06	05-22-06		197734		162.58			69.91%	113.66		
05-01-06	05-22-06		212127		60.97			69.91%	42.62		
		1.7097		-	1,036.52	-			724.63		

Calculation of Ineligible Payments - Sample				#98		ATTACHMENT A-3					
Reason Ineligible:		#29 - Unlicensed Home									
Ineligible Period:		02-01-06 to 10-16-06									
				Amount Paid							
Service			Prior to								
Begin	End	Months	Code	PUR	PUR	After PUR	FFY	FMAP	FFP	Comment	
02-01-06	02-28-06	1.0000	133685		-			69.91%	-	Adjusted IVE 10-24-06	
02-01-06	02-28-06		141060		-			69.91%	-	Adjusted IVE 10-24-06	
03-01-06	03-31-06	1.0000	133685		-			69.91%	-	Adjusted IVE 10-24-06	
03-01-06	03-31-06		141060		-			69.91%	-	Adjusted IVE 10-24-06	
04-01-06	04-30-06	1.0000	133685		-			69.91%	-	Adjusted IVE 10-24-06	
04-01-06	04-30-06		141060		-			69.91%	-	Adjusted IVE 10-24-06	
05-01-06	05-31-06	1.0000	133685		-			69.91%	-	Adjusted IVE 10-24-06	
05-01-06	05-31-06		141060		-			69.91%	-	Adjusted IVE 10-24-06	
06-01-06	06-30-06	1.0000	133685		-			69.91%	-	Adjusted IVE 10-24-06	
06-01-06	06-30-06		141060		-			69.91%	-	Adjusted IVE 10-24-06	
07-01-06	07-31-06	1.0000	133685		-			69.91%	-	Adjusted IVE 10-24-06	
07-01-06	07-31-06		141060		-			69.91%	-	Adjusted IVE 10-24-06	
08-01-06	10-16-06									Not Claimed	

**SPREADSHEET FOR CALCULATING ADMINISTRATIVE COST DISALLOWANCES  
ON AN INDIVIDUAL CASE BASIS FOR TITLE IV-E FOSTER CARE ELIGIBILITY REVIEWS**

**FOR PERIODS UNDER REVIEW IN FEDERAL FISCAL YEAR 2007**

**FILE NAME FOR FFY 2007: ATTACHMENT B 2007**

Attachment B is used for computing administrative cost disallowances resulting from compliant Initial Primary, Primary and Secondary reviews, non-compliant Initial Primary and Primary reviews, and prior to and after the period under review portions of non-compliant Secondary reviews.

Refer to Attachment A for instructions on completing this calculation spreadsheet.

STATE: **Idaho** REVIEW PERIOD: FROM **04-01-06** TO **09-30-06** TYPE OF REVIEW:

**1. DEFINITION OF THE CURRENT YEAR (CY): THE 12 MONTH PERIOD FOR DISALLOWANCE:**

The 6 months review period (RP) and the 6 months immediately preceding it (Pre-RP) comprise the 12 months of the Current Year (CY).

Qtr 1 Pre-RP:	10-01-05	TO	12-31-05
Qtr 2 Pre-RP:	01-01-06	TO	03-31-06
Qtr 3 RP:	04-01-06	TO	06-30-06
Qtr 4 RP:	07-01-06	TO	09-30-06

**2. AVERAGE MONTHLY ADMINISTRATIVE COSTS FOR THE CURRENT YEAR:**

(a) COLUMN (b) CURRENT QUARTER Federal Share, LINE 5a. Case Planning & Management, LINE 5e. Other Administration

YEAR (See Step 1)	COLUMN (b) Qtr 1 Pre-RP	COLUMN (b) Qtr 2 Pre-RP	COLUMN (b) Qtr 3 RP	COLUMN (b) Qtr 4 RP	TOTAL ADMIN COSTS	AVERAGE MONTHLY = TOTAL ADMIN COSTS DIVIDED BY 12
CY LINE 5a.	\$ 561,553	\$ 517,205	\$ 628,749	\$ 492,142		
CY LINE 5e.	\$ 353,471	\$ 279,254	\$ 431,297	\$ 316,491		
<b>TOTAL</b>	<b>\$ 915,024</b>	<b>\$ 796,459</b>	<b>\$ 1,060,046</b>	<b>\$ 808,633</b>	<b>\$ 3,580,162</b>	<b>\$ 298,346.83</b>

(b) COLUMN (d) PRIOR QUARTER Adjustments Federal Share, LINE 5a. Case Planning & Management, LINE 5e. Other Administration

YEAR (See Step 1)	COLUMN (d) Qtr 1 Pre-RP	COLUMN (d) Qtr 2 Pre-RP	COLUMN (d) Qtr 3 RP	COLUMN (d) Qtr 4 RP	TOTAL ADMIN ADJUSTMENTS	AVERAGE MONTHLY = TOTAL ADMIN ADJUSTMENTS DIVIDED BY 12
CY LINE 5a.	\$ -	\$ -	\$ -	\$ -		
CY LINE 5e.	\$ -	\$ -	\$ -	\$ -		
<b>TOTAL</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>

**TOTAL AVERAGE MONTHLY ADMINISTRATIVE COSTS (= 2 (a) plus 2 (b))** \$ 298,346.83

**3. AVERAGE MONTHLY NUMBER OF CHILDREN FOR THE CURRENT YEAR:**

COLUMN (b) Federal Share, LINE 4 Average Monthly Number of Children. (Because of the formulas in cells, a one has been entered below to avoid showing an error.)

YEARS (See Step 1)	COLUMN (b) Qtr 1 Pre-RP	COLUMN (b) Qtr 2 Pre-RP	COLUMN (b) Qtr 3 RP	COLUMN (b) Qtr 4 RP	TOTAL # OF CHILDREN	AVERAGE MONTHLY = TOTAL # OF CHILDREN DIVIDED BY 4
CY LINE 4	1026	993	1006	980	4005	<u>1001.25</u>

**4. AVERAGE MONTHLY ADMINISTRATIVE COST DISALLOWANCE PER CHILD:**

Monthly Administrative Costs divided by Monthly Number of Children (= Step 2 divided by Step 3) \$ 297.9744



5. Determine the number of months of ineligible maintenance payments made for each error case identified in the title IV-E eligibility case review, beginning with the first month of ineligibility and continuing through the earlier date of the end of the on-site review or when the ineligibility ceases.

An administrative cost disallowance must be taken for this same duration of time for each case, unless it meets the exceptions noted in ACYF-CB-PI-06-06. Complete Steps 5, 6, and 7 for each error case.

(a) Enter:	<u>Sample Case Number</u>	<u>Case Record #</u>	<u>Ineligibility Start Date</u>	<u>Ineligibility End Date</u>
	#68		10-12-05	06-13-06
	<u>Error Reason Numbers (OPTIONAL)</u>			
	#11 - CTW			

(b) Enter the number of Months of Ineligible Administrative Costs in **Step 6** in Column # OF ERROR MONTHS PER YEAR for each error case.

<u># Months of Ineligible Maintenance Payments</u>	<u># Months of Ineligible Administrative Costs</u>	<u>Reasons For Any Difference In # Of Months Between Main Payments &amp; Admin Costs</u>
8,0785	8	0.0785
<b>Rounding required of Administrative Costs</b>		

6. Determine Total Adjusted Administrative Cost Disallowance per Error Case: (Refer to Attachment A for completing this section.)

FEDERAL FISCAL YEAR (FFY)	OMB* DEFLATOR CHART %	ADMIN COSTS DISALLOW DEFLATION %	# OF ERROR MONTHS PER YEAR	# MONTHS X (STEP 4 X % DEFLATION) =	TOTAL CUMULATIVE DISALLOW
10/1/06 - 9/30/07	1.2815	1.0352	0	\$ -	\$ -
10/1/05 - 9/30/06	1.2379	1.0000	8	\$ 2,384	\$ 2,384
10/1/04 - 9/30/05	1.1823	0.9551		\$ -	\$ 2,384
10/1/03 - 9/30/04	1.1269	0.9103		\$ -	\$ 2,384
10/1/02 - 9/30/03	1.0903	0.8808		\$ -	\$ 2,384
10/1/01 - 9/30/02	1.0538	0.8513		\$ -	\$ 2,384
10/1/00 - 9/30/01	1.0304	0.8324		\$ -	\$ 2,384
10/1/99 - 9/30/00	1.0000	0.8078		\$ -	\$ 2,384
10/1/98 - 9/30/99	0.9650	0.7795		\$ -	\$ 2,384
10/1/97 - 9/30/98	0.9449	0.7633		\$ -	\$ 2,384
10/1/96 - 9/30/97	0.9318	0.7527		\$ -	\$ 2,384
10/1/95 - 9/30/96	0.9151	0.7392		\$ -	\$ 2,384
10/1/94 - 9/30/95	0.8922	0.7207		\$ -	\$ 2,384
10/1/93 - 9/30/94	0.8644	0.6983		\$ -	\$ 2,384
10/1/92 - 9/30/93	0.8418	0.6800		\$ -	\$ 2,384
10/1/91 - 9/30/92	0.8181	0.6609		\$ -	\$ 2,384
10/1/90 - 9/30/91	0.7994	0.6458		\$ -	\$ 2,384
10/1/89 - 9/30/90	0.7693	0.6215		\$ -	\$ 2,384
			<b>8</b>	<b>\$ 2,384</b>	

TOTAL FEDERAL SHARE ADJUSTED ADMINISTRATIVE COST DISALLOWANCE FOR THIS ERROR CASE IS THE LAST NUMERIC FIGURE IN THE TOTAL CUMULATIVE DISALLOWANCE COLUMN.

\* OFFICE OF MANAGEMENT & BUDGET (OMB)

5. Determine the number of months of ineligible maintenance payments made for each error case identified in the title IV-E eligibility case review, beginning with the first month of ineligibility and continuing through the earlier date of the end of the on-site review or when the ineligibility ceases.

An administrative cost disallowance must be taken for this same duration of time for each case, unless it meets the exceptions noted in ACYF-CB-PI-06-06. Complete Steps 5, 6, and 7 for each error case.

(a) Enter:	<u>Sample Case Number</u>	<u>Case Record #</u>	<u>Ineligibility Start Date</u>	<u>Ineligibility End Date</u>
	#95		04-01-06	05-22-06
	<u>Error Reason Numbers (OPTIONAL)</u>			
	#14 - VPA			

(b) Enter the number of Months of Ineligible Administrative Costs in **Step 6** in Column # OF ERROR MONTHS PER YEAR for each error case.

# Months of Ineligible <u>Maintenance Payments</u>	# Months of Ineligible <u>Administrative Costs</u>	Reasons For Any Difference In # Of Months <u>Between Main Payments &amp; Admin Costs</u>
1.7097	2.0000	-0.2903
		<b>Rounding required of Administrative Costs</b>

6. Determine Total Adjusted Administrative Cost Disallowance per Error Case: (Refer to Attachment A for completing this section.)

FEDERAL FISCAL YEAR (FFY)	OMB* DEFLATOR	ADMIN COSTS DISALLOW	# OF ERROR MONTHS PER YEAR	# MONTHS X (STEP 4 X % DEFLATION) =	TOTAL CUMULATIVE DISALLOW
10/1/06 - 9/30/07	1.2815	1.0352	0	\$ -	\$ -
10/1/05 - 9/30/06	1.2379	1.0000	2	\$ 596	\$ 596
10/1/04 - 9/30/05	1.1823	0.9551		\$ -	\$ 596
10/1/03 - 9/30/04	1.1269	0.9103		\$ -	\$ 596
10/1/02 - 9/30/03	1.0903	0.8808		\$ -	\$ 596
10/1/01 - 9/30/02	1.0538	0.8513		\$ -	\$ 596
10/1/00 - 9/30/01	1.0304	0.8324		\$ -	\$ 596
10/1/99 - 9/30/00	1.0000	0.8078		\$ -	\$ 596
10/1/98 - 9/30/99	0.9650	0.7795		\$ -	\$ 596
10/1/97 - 9/30/98	0.9449	0.7633		\$ -	\$ 596
10/1/96 - 9/30/97	0.9318	0.7527		\$ -	\$ 596
10/1/95 - 9/30/96	0.9151	0.7392		\$ -	\$ 596
10/1/94 - 9/30/95	0.8922	0.7207		\$ -	\$ 596
10/1/93 - 9/30/94	0.8644	0.6983		\$ -	\$ 596
10/1/92 - 9/30/93	0.8418	0.6800		\$ -	\$ 596
10/1/91 - 9/30/92	0.8181	0.6609		\$ -	\$ 596
10/1/90 - 9/30/91	0.7994	0.6458		\$ -	\$ 596
10/1/89 - 9/30/90	0.7693	0.6215		\$ -	\$ 596
			2	\$ 596	

TOTAL FEDERAL SHARE ADJUSTED ADMINISTRATIVE COST DISALLOWANCE FOR THIS ERROR CASE IS THE LAST NUMERIC FIGURE IN THE TOTAL CUMULATIVE DISALLOWANCE COLUMN.

\* OFFICE OF MANAGEMENT & BUDGET (OMB)

5. Determine the number of months of ineligible maintenance payments made for each error case identified in the title IV-E eligibility case review, beginning with the first month of ineligibility and continuing through the earlier date of the end of the on-site review or when the ineligibility ceases.

An administrative cost disallowance must be taken for this same duration of time for each case, unless it meets the exceptions noted in ACYF-CB-PI-06-06. Complete Steps 5, 6, and 7 for each error case.

(a) Enter:	<u>Sample Case Number</u>	<u>Case Record #</u>	<u>Ineligibility Start Date</u>	<u>Ineligibility End Date</u>
	#98		01-26-06	07-31-06
	<u>Error Reason Numbers (OPTIONAL)</u>			
	#29 - Unlicensed Home			

(b) Enter the number of Months of Ineligible Administrative Costs in **Step 6** in Column # OF ERROR MONTHS PER YEAR for each error case.

# Months of Ineligible Maintenance Payments	# Months of Ineligible Administrative Costs	Reasons For Any Difference In # Of Months Between Main Payments & Admin Costs
6.0000	0.0000	6
		Unlicensed Home

6. Determine Total Adjusted Administrative Cost Disallowance per Error Case: (Refer to Attachment A for completing this section.)

FEDERAL FISCAL YEAR (FFY)	OMB* DEFLATOR	ADMIN COSTS DISALLOW DEFLECTION %	# OF ERROR MONTHS PER YEAR	# MONTHS X (STEP 4 X % DEFLECTION) =	TOTAL CUMULATIVE DISALLOW
10/1/06 - 9/30/07	1.2815	1.0352	0	\$ -	\$ -
10/1/05 - 9/30/06	1.2379	1.0000	0	\$ -	\$ -
10/1/04 - 9/30/05	1.1823	0.9551		\$ -	\$ -
10/1/03 - 9/30/04	1.1269	0.9103		\$ -	\$ -
10/1/02 - 9/30/03	1.0903	0.8808		\$ -	\$ -
10/1/01 - 9/30/02	1.0538	0.8513		\$ -	\$ -
10/1/00 - 9/30/01	1.0304	0.8324		\$ -	\$ -
10/1/99 - 9/30/00	1.0000	0.8078		\$ -	\$ -
10/1/98 - 9/30/99	0.9650	0.7795		\$ -	\$ -
10/1/97 - 9/30/98	0.9449	0.7633		\$ -	\$ -
10/1/96 - 9/30/97	0.9318	0.7527		\$ -	\$ -
10/1/95 - 9/30/96	0.9151	0.7392		\$ -	\$ -
10/1/94 - 9/30/95	0.8922	0.7207		\$ -	\$ -
10/1/93 - 9/30/94	0.8644	0.6983		\$ -	\$ -
10/1/92 - 9/30/93	0.8418	0.6800		\$ -	\$ -
10/1/91 - 9/30/92	0.8181	0.6609		\$ -	\$ -
10/1/90 - 9/30/91	0.7994	0.6458		\$ -	\$ -
10/1/89 - 9/30/90	0.7693	0.6215		\$ -	\$ -
			0	\$ -	\$ -

TOTAL FEDERAL SHARE ADJUSTED ADMINISTRATIVE COST DISALLOWANCE FOR THIS ERROR CASE IS THE LAST NUMERIC FIGURE IN THE TOTAL CUMULATIVE DISALLOWANCE COLUMN.

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Summary of Potential Underpayments								ATTACHMENT C			
Service Month											
Sample#	Begin	End	Amount	FFY	FMAP	FFP	Comments				
05	Apr 06	July 06	488.83	2006	69.91%	342	Not claimed				
09	06-02-06	06-07-06	100.00	2006	69.91%	70	Shelter care for eligible provider not claimed				
11	May 06		300.00	2006	69.91%	210	Adjusted IVE to CVS				
12	July 05		461.00	2005	70.62%	326	Timely Permanency - not claimed				
12	Aug 05		461.00	2005	70.62%	326	Timely Permanency - not claimed				
12	Oct 05		461.00	2006	69.91%	322	Timely Permanency - not claimed				
12	Nov 05		461.00	2006	69.91%	322	Timely Permanency - not claimed				
12	Dec 05		30.00	2006	69.91%	21	Timely Permanency - not claimed				
29	Aug 05		540.00	2005	70.62%	381	Timely Permanency - not claimed				
29	Aug 05		172.99	2005	70.62%	122	Timely Permanency - not claimed				
34	Apr 06		712.76	2006	69.91%	498	1st month not charged				
38	May 06		150.30	2006	69.91%	105	Transportation to preadpt. placement not charged as IVE Adrin				
59	Sept 06		540.00	2007	70.36%	380	Timely Permanency - not claimed				
73	Nov 06	Dec 06	459.21	2007	70.36%	323	Permanency held timely but not claimed for maint & clothing				
84	Apr 06	June 1, 06	610.00	2006	69.91%	426	Timely Permanency - not claimed				
88	March 06		609.68	2006	69.91%	426	Elig Provider not claimed				
88	May 06	Aug 06	1,135.92	2006	69.91%	794	Elig Provider backed out of claim				
92	Aug 06		300.00	2006	69.91%	210	1st month not charged				
96	April 06	Oct 06	1,555.51	2006 & 07	69.91 & 70.36	1,091	Adjusted IVE to CVS				
100	July 06	Sept 06	5,437.50	2006 & 07	69.91 & 70.36	3,811	Adjusted IVE due to no CTW - found by review				
	Total		14,986.70			10,506					

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