

Washington State Title IV-E Foster Care Eligibility Review August 27 - 30, 2007 Final Report

Introduction

The Children's Bureau (CB), Administration for Children and Families (ACF), Central and Region X offices, conducted a primary review of the State of Washington's title IV-E program, in Olympia, Washington, from August 27 to 30, 2007. A team of five CB Region X staff, one Federal contract staff from Region X, one member of CB's Central Office staff, one CB Region IX staff, two cross-state peer reviewers and five Washington State Children's Administration staff completed the onsite review.

The purpose of the title IV-E foster care eligibility review was, (1) to determine if Washington 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 Washington's financial claims to ensure that appropriate payments were made on behalf of eligible children.

Scope of the Review

The Washington 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 October 1, 2006 to March 31, 2007. A computerized statistical sample of 100 cases (80 cases plus 20 oversample 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. The State requested the sample June 22, 2007. A review of the expenditure history of these cases by State and Federal staff determined 1 of the original sample of 80 cases and 1 of the oversample cases did not qualify for the sample because they had no IV-E payments during the period under review.

Of the 80 cases reviewed, 76 cases were determined eligible for title IV-E and 4 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, we have determined Washington to be in substantial compliance for this primary review.

Case Record Summary

The State may not claim title IV-E foster care maintenance payments for a child who is not in a licensed/approved foster family home as required in section 472(b)(1) and (c) of the Social Security Act, or who is not in a placement that meets the definition of foster care under 45 CFR 1355.20(a). Three cases were determined to be in error because title IV-E funds were claimed while the child was in an unlicensed placement. One case was determined to be in error because

title IV-E funds were claimed after the child left foster care and returned home. These 4 cases were found in error because payments were made during the period under review while the child was ineligible under the title IV-E foster care program.

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

- Sample number 12 was determined to be in error because title IV-E maintenance payments were claimed during the period under review while the child was placed in an unlicensed relative placement. Title IV-E funds were claimed for one day for the previous foster home while the child was in the unlicensed placement. This is an error as the child was ineligible for title IV-E (sections 472(b) and (c) of the Social Security Act; 45 CFR 1356.71(d)(1)(iv), 1355.20). Although the State backed out the IV-E claim for this one day, the case remains an error as the IV-E claim was changed after the sample was provided to the State. For the on-site review, payments for a case that are rescinded by the State after the sample is provided to the State for the onsite review will not be considered during the review. This is based on long standing Federal policy to ensure that the determination of substantial compliance is not affected by the removal of known ineligible payments from the review sample after it is identified in the review sample. In drawing its sample, CB must do so in accordance with 45 CFR 1356.71(c)(1), and established policy. Payment adjustments to cases after the sample is drawn invalidate the underlying statistical validity of the sampling process.
- Sample number 29 was determined to be in error because title IV-E maintenance payments were claimed during the period under review while the child was placed in an unlicensed relative placement. IV-E funds were claimed for the previous foster home for the same two days the child was in the unlicensed placement. This is an error as the child was ineligible for title IV-E for these two days (472(b) and (c) of the Social Security Act; 45 CFR 1356.71(d)(1)(iv), 1355.20). The State made a payment adjustment after the sample was provided to the State, which could not be considered for the review.
- Sample number 35 was determined to be in error because title IV-E maintenance payments were claimed for child care during the period under review after the child returned home. Title IV-E maintenance may not be claimed when the child is no longer in a foster care placement (472(b) and (c) of the Social Security Act; and 45 CFR 1356.71(d)(1)(iv), 1355.20).
- Sample number 43 was determined to be in error because title IV-E maintenance payments were claimed during the period under review while the child was placed in an unlicensed relative placement. Title IV-E funds were claimed for child care (472(b) and (c) of the Social Security Act; 45 CFR 1356.71(d)(1)(iv), 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 judicial finding in the first removal order in all cases in the sample.
- “Reasonable efforts to prevent removal” was addressed as a finding in the first removal order. This results in timely findings, meeting the Federal requirements for a judicial determination within 60 days.
- Washington has made significant progress in the quality of court orders since the last review. More recent court order forms provide a place to record case-specific findings concerning reasonable efforts to prevent placement and reasonable efforts to finalize the permanency plan. Reviewers noted orders from Regions III and VI were particularly good.
- We had many cases in the sample with voluntary placement agreements. We found these were signed by both the parent/legal guardian and the State agency.
- Voluntary placement agreements were followed by court orders with best interest findings well before 180 days, usually within the first month.
- Washington has conscientious eligibility specialists who carefully apply the title IV-E requirements to each case. Eligibility determinations were well documented and well organized with thorough narratives.
- Re-determinations of eligibility were consistently completed in a timely manner (every six months).
- Licensing staff are conscientious about timely licensing and thorough criminal background checks.
- Foster family homes are regularly licensed and renewed with no gaps in licenses. Reviewers noted several licensed relative homes, and many new homes.
- Washington utilizes a specialized criminal records check unit to ensure completion of all criminal check requirements. Reviewers noted quick turnaround time for requested background checks.
- Reviewers noted excellent documentation in many cases regarding criminal background checks and clear investigation in the case of any findings. Complaints against a home or facility were fully addressed and well-documented, and licenses terminated where appropriate.
- Licenses were amended as appropriate to accommodate children placed in a home outside of specified age range or number of children in the home.

Concerns

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

- Many court orders that addressed permanency planning referred to the Individual Service and Safety Plan (ISSP) for specific details on the permanency plan. Good practice dictates that the order include child specific findings or plans. If it does not, Washington needs to ensure the ISSP adequately addresses the permanency plan.
- Eligibility workers consistently back-out claimed payments when they discover periods of child ineligibility. However, Washington might consider strengthening systems that are in place to prevent claims immediately when a child becomes ineligible for any reason. For example, if a child goes to an unlicensed placement, all title IV-E maintenance payments should cease at that time. Many States have mechanisms within their State Automated Child Welfare Information Systems (SACWIS) that immediately stop IV-E claims when the child becomes ineligible. Technical assistance is available as you require.
- Washington should re-consider the use of eligible and reimbursable/not-reimbursable language, as this may be causing some confusion related to claims. For example, eligible and not-reimbursable is a misnomer since it is only when all title IV-E eligibility factors are met that a child is actually eligible for title IV-E. The child's eligibility includes his/her placement in a licensed foster home or child care institution.
- Reviewers noted different forms being used for voluntary placement agreement, with inconsistent language as to when the child may be returned to the parents (for example, "as soon as possible," "within 72 hours," or "upon written request"). While this would not affect a child's eligibility, Washington might want to review these forms for consistency.

Payment Issues

Miscellaneous Ineligible Payments

The review identified miscellaneous ineligible payments totaling \$446, Federal Financial Participation (FFP), as identified on Attachment C and as follows:

- Five cases (Samples # 9, 23, 59, 61 and 79) included charges that do not meet the IV-E 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:
 - Samples # 23, 61 and 79 - Transportation for medical reasons and to respite care
 - Sample #09 - Transportation to courthouse for probation officer visit
 - Sample #23 - Transportation to new foster care placement

- Sample # 59 - Transportation of biological mother for child visitation

Transportation costs are discussed further, below, under the Other Payment Issues section.

- One case (Sample #10) was found to have a duplicate payment as two providers were paid for the same care days.
- One case (Sample #11), before the period under review, was found to include payments prior to the first of the month in which all eligibility factors were met.
- Four cases (Samples # 38, 42, 78 and 79) were found to include erroneous correction of payments (COP) which are discussed below under the Summary of Payment Issues section.
- One case (Sample #51) was found to include charges in excess of the established rates.
- One case (Sample #59) included payments, after the period under review, that were COP (for no permanency plan) after the sample was identified.

Underpayments

The review identified potential underpayments totaling \$1,403, FFP, which are identified on Attachment D. Upon further research to determine if corrections have already been made, the State may submit a prior period increasing adjustment on its expenditure report to claim the following.

- Erroneous COP to State funds for incorrect care days, calculation errors, and for permanency plan dates not required.
- Transportation for allowable activities, such as foster parent transportation to child care.

Summary/Other Payment Issues

Transportation Costs: Transportation as a separate item of expense for title IV-E maintenance payments is not allowable except for the costs of transporting the child for visitation to his family or other caretakers. However, based on recent policy interpretations and rulings by the Departmental Appeals Board, we are exploring whether some of the disallowed transportation costs claimed as maintenance payments might have been eligible for reimbursement as title IV-E administrative costs. The Regional Office will be in contact with the State to provide further information on this point after we have given the matter additional consideration.

Correction of Payment (COP) Procedures: Numerous errors were found in the COP process, specifically, incorrect calculations of the number of days to be adjusted where the calculation was one day off. The State should be reminded that the State pays for the first day of care but

not for the last day of care, and that the service end date should be the date one day prior to the end date.

Additionally, numerous incorrect calculations of the amount to be corrected were made. The calculation of the amount to be adjusted might be the result of staff not knowing that the daily rate is calculated based on a 30.42 days/month. If this is the case, additional instructions should be given.

Responsible Living Skills Program (RLSP): Sample #77 reflected payments for this program for the full contracted monthly rate. However, our review of the contract indicates that payment includes reimbursement for various unallowable costs such as social services, medical services, and independent living skills, in addition to allowable maintenance costs. Consequently, the State must cease claiming the full monthly rate as title IV-E maintenance payments effective immediately, but no later than January 1, 2008, and develop a means to properly allocate the costs to the above referenced cost categories.

The allocation methodology should be submitted to the Regional Office within 90 days of receipt of this report.

Payment System: We found that your payment system allowed incorrect and/or old rates to be paid; some of those payments have been included in the ineligible payments section above. State staff indicated that a new system is being developed and that these cost issues should not occur in the new system.

Disallowances

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

The disallowed amounts 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					
					Attachment
Sample #	FFY 06	FFY 07	Total		Ref
<i>Maintenance Payments</i>					
<u>Error Cases:</u>					A
12		12.18	12.18		
29		41.30	41.30		
35		2,177.13	2,177.13		
43		996.80	996.80		
Subtotal		3,173.93	3,173.93		
<u>Other Payments:</u>	75.71	817.70	893.41		C
Total	75.71	3,991.63	4,067.34		
FMAP	50.00%	50.12%			
FFP	37.86	2,000.61	2,038.46		
<i>Administrative Costs</i>					
<u>Error Cases:</u>					B
35		4,856	4,856		
43		1,943	1,943		
Subtotal	0	6,799	6,799		
<u>Other Payments:</u>					
42		971	971		
59		2,914	2,914		
78		971	971		
Subtotal	0	4,856	4,856		
Total FFP	0	11,655	11,655		
FFP Grand Total	37.86	13,655.68	13,693.54		

WA IVE Review					Attachment A
Sample #	12				
Reason Ineligible:	Unlicensed Relative Home (#29)				
Period Ineligible:	01-26-07 thru 01/26/07				
<u>Service Period</u>		SSPS	Prov		
From	Thru	Code	ID	Amount	Comments
01-26-07	01-26-07	3211	6499551	12.18	COP after Sample Identified

WA IVE Review					Attachment A
Sample #	29				
Reason Ineligible:	Child moved to Unlicensed Relative Home (#29)				
Period Ineligible:	10/09 - 10/10/06				
<u>Service Period</u>		SSPS	Prov		
From	Thru	Code	ID	Amount	Comments
10-09-06	10-10-06	3210	492229	29.62	COP after Sample Identified
10-09-06	10-10-06	3212	492229	11.68	COP after Sample Identified
Total				41.30	

WA IVE Review					Attachment A
Sample #	35				
Reason Ineligible:	Returned Home 01-08-07, Child care continued to be claimed				
Period Ineligible:	01-09-07 thru 05-31-07				
<u>Service Period</u>		SSPS	Prov		
From	Thru	Code	ID	Amount	Comments
01-09-07	01-31-07	2833	195258	346.19	Child Care
02-01-07	02-28-07	2833	195258	468.38	Child Care
03-07-07	03-31-07	2833	195258	468.38	Child Care
04-01-07	04-30-07	2833	195258	468.38	Child Care
05-01-07	05-31-07	2833	195258	425.80	Child Care
Total				2,177.13	

WA IVE Review				Attachment A	
Sample #	43				
Reason Ineligible:	Unlicensed Relative Home (#29)				
Period Ineligible:	02-07-07 to 03-31-07				
<u>Service Period</u>		SSPS	Prov		
From	Thru	Code	ID	Amount	Comments
02-07-07	02-28-07	2805	808272	473.48	Child care charged
03-01-07	03-31-07	2805	808272	523.32	Child care charged
Total				996.80	

**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:	WA	REVIEW PERIOD:	FROM 10-01-06	TO 03-31-07	TYPE OF REVIEW:
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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:	04-01-06	TO	06-30-06
Qtr 2 Pre-RP:	07-01-06	TO	09-30-06
Qtr 3 RP:	10-01-06	TO	12-31-06
Qtr 4 RP:	01-01-07	TO	03-31-07

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.	\$ 8,039,401	\$ 8,561,018	\$ 8,110,659	\$ 8,512,711		
CY LINE 5e.	\$ 2,895,184	\$ 2,414,379	\$ 3,194,866	\$ 2,715,773		
TOTAL	\$ 10,934,585	\$ 10,975,397	\$ 11,305,525	\$ 11,228,484	\$ 44,443,991	\$ 3,703,665.92

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

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.	UPDATE					
TOTAL	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
TOTAL AVERAGE MONTHLY ADMINISTRATIVE COSTS (= 2 (a) plus 2 (b))						\$ 3,703,665.92

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	4117	4066	3715	3892	15790	3947.50

4. AVERAGE MONTHLY ADMINISTRATIVE COST DISALLOWANCE PER CHILD:

Monthly Administrative Costs divided by Monthly Number of Children (= Step 2 divided by Step 3) **\$ 938.2308**

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:

Sample Case Number	Case Record #	Ineligibility Start Date	Ineligibility End Date
35		1/9/07	5/31/07

Error Reason Numbers (OPTIONAL)

Child returned 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
5	5	0

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

FEDERAL FISCAL YEAR (FFY)	OMB* DEFULATOR 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	5	\$ 4,856	\$ 4,856
10/1/05 - 9/30/06	1.2379	1.0000		\$ -	\$ 4,856
10/1/04 - 9/30/05	1.1823	0.9551		\$ -	\$ 4,856
10/1/03 - 9/30/04	1.1269	0.9103		\$ -	\$ 4,856
10/1/02 - 9/30/03	1.0903	0.8808		\$ -	\$ 4,856
10/1/01 - 9/30/02	1.0538	0.8513		\$ -	\$ 4,856
10/1/00 - 9/30/01	1.0304	0.8324		\$ -	\$ 4,856
10/1/99 - 9/30/00	1.0000	0.8078		\$ -	\$ 4,856
10/1/98 - 9/30/99	0.9650	0.7795		\$ -	\$ 4,856
10/1/97 - 9/30/98	0.9449	0.7633		\$ -	\$ 4,856
10/1/96 - 9/30/97	0.9318	0.7527		\$ -	\$ 4,856
10/1/95 - 9/30/96	0.9151	0.7392		\$ -	\$ 4,856
10/1/94 - 9/30/95	0.8922	0.7207		\$ -	\$ 4,856
10/1/93 - 9/30/94	0.8644	0.6983		\$ -	\$ 4,856
10/1/92 - 9/30/93	0.8418	0.6800		\$ -	\$ 4,856
10/1/91 - 9/30/92	0.8181	0.6609		\$ -	\$ 4,856
10/1/90 - 9/30/91	0.7994	0.6458		\$ -	\$ 4,856
10/1/89 - 9/30/90	0.7693	0.6215		\$ -	\$ 4,856
			5	\$ 4,856	

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>
	43		02-07-07	03-31-07
	<u>Error Reason Numbers (OPTIONAL)</u>			
	Unlicensed Relative Home (#29)			

- (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 & Admin Costs</u>
2	2	0

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

FEDERAL FISCAL YEAR (FFY)	OMB* DEFULATOR 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	2	\$ 1,943	\$ 1,943
10/1/05 - 9/30/06	1.2379	1.0000		\$ -	\$ 1,943
10/1/04 - 9/30/05	1.1823	0.9551		\$ -	\$ 1,943
10/1/03 - 9/30/04	1.1269	0.9103		\$ -	\$ 1,943
10/1/02 - 9/30/03	1.0903	0.8808		\$ -	\$ 1,943
10/1/01 - 9/30/02	1.0538	0.8513		\$ -	\$ 1,943
10/1/00 - 9/30/01	1.0304	0.8324		\$ -	\$ 1,943
10/1/99 - 9/30/00	1.0000	0.8078		\$ -	\$ 1,943
10/1/98 - 9/30/99	0.9650	0.7795		\$ -	\$ 1,943
10/1/97 - 9/30/98	0.9449	0.7633		\$ -	\$ 1,943
10/1/96 - 9/30/97	0.9318	0.7527		\$ -	\$ 1,943
10/1/95 - 9/30/96	0.9151	0.7392		\$ -	\$ 1,943
10/1/94 - 9/30/95	0.8922	0.7207		\$ -	\$ 1,943
10/1/93 - 9/30/94	0.8644	0.6983		\$ -	\$ 1,943
10/1/92 - 9/30/93	0.8418	0.6800		\$ -	\$ 1,943
10/1/91 - 9/30/92	0.8181	0.6609		\$ -	\$ 1,943
10/1/90 - 9/30/91	0.7994	0.6458		\$ -	\$ 1,943
10/1/89 - 9/30/90	0.7693	0.6215		\$ -	\$ 1,943
			2	\$ 1,943	

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 r Attachment B 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>
	42		05-01-07	05-31-07
	<u>Error Reason Numbers (OPTIONAL)</u>			
	Child Adopted, COP after Sample identified			

- (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 & Admin Costs</u>
1	1	0

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	1	\$ 971	\$ 971
10/1/05 - 9/30/06	1.2379	1.0000		\$ -	\$ 971
10/1/04 - 9/30/05	1.1823	0.9551		\$ -	\$ 971
10/1/03 - 9/30/04	1.1269	0.9103		\$ -	\$ 971
10/1/02 - 9/30/03	1.0903	0.8808		\$ -	\$ 971
10/1/01 - 9/30/02	1.0538	0.8513		\$ -	\$ 971
10/1/00 - 9/30/01	1.0304	0.8324		\$ -	\$ 971
10/1/99 - 9/30/00	1.0000	0.8078		\$ -	\$ 971
10/1/98 - 9/30/99	0.9650	0.7795		\$ -	\$ 971
10/1/97 - 9/30/98	0.9449	0.7633		\$ -	\$ 971
10/1/96 - 9/30/97	0.9318	0.7527		\$ -	\$ 971
10/1/95 - 9/30/96	0.9151	0.7392		\$ -	\$ 971
10/1/94 - 9/30/95	0.8922	0.7207		\$ -	\$ 971
10/1/93 - 9/30/94	0.8644	0.6983		\$ -	\$ 971
10/1/92 - 9/30/93	0.8418	0.6800		\$ -	\$ 971
10/1/91 - 9/30/92	0.8181	0.6609		\$ -	\$ 971
10/1/90 - 9/30/91	0.7994	0.6458		\$ -	\$ 971
10/1/89 - 9/30/90	0.7693	0.6215		\$ -	\$ 971
			1	\$ 971	

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 r Attachment B 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:	Sample Case Number	Case Record #	Ineligibility Start Date	Ineligibility End Date
	59		04-01-07	06-30-07

Error Reason Numbers (OPTIONAL)

COP after Sample identified for no Permanency Plan
--

- (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
3	3	0

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

FEDERAL FISCAL YEAR (FFY)	OMB* DEFULATOR 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	3	\$ 2,914	\$ 2,914	
10/1/05 - 9/30/06	1.2379	1.0000		\$ -	\$ 2,914	
10/1/04 - 9/30/05	1.1823	0.9551		\$ -	\$ 2,914	
10/1/03 - 9/30/04	1.1269	0.9103		\$ -	\$ 2,914	
10/1/02 - 9/30/03	1.0903	0.8808		\$ -	\$ 2,914	
10/1/01 - 9/30/02	1.0538	0.8513		\$ -	\$ 2,914	
10/1/00 - 9/30/01	1.0304	0.8324		\$ -	\$ 2,914	
10/1/99 - 9/30/00	1.0000	0.8078		\$ -	\$ 2,914	
10/1/98 - 9/30/99	0.9650	0.7795		\$ -	\$ 2,914	
10/1/97 - 9/30/98	0.9449	0.7633		\$ -	\$ 2,914	
10/1/96 - 9/30/97	0.9318	0.7527		\$ -	\$ 2,914	
10/1/95 - 9/30/96	0.9151	0.7392		\$ -	\$ 2,914	
10/1/94 - 9/30/95	0.8922	0.7207		\$ -	\$ 2,914	
10/1/93 - 9/30/94	0.8644	0.6983		\$ -	\$ 2,914	
10/1/92 - 9/30/93	0.8418	0.6800		\$ -	\$ 2,914	
10/1/91 - 9/30/92	0.8181	0.6609		\$ -	\$ 2,914	
10/1/90 - 9/30/91	0.7994	0.6458		\$ -	\$ 2,914	
10/1/89 - 9/30/90	0.7693	0.6215		\$ -	\$ 2,914	
				3	\$ 2,914	

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 r Attachment B 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:	Sample Case Number	Case Record #	Ineligibility Start Date	Ineligibility End Date
	78		07-01-07	07-31-07

Error Reason Numbers (OPTIONAL)

Child Adpted, COP/No COP after Sample identified

- (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
1	1	0

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

FEDERAL FISCAL YEAR (FFY)	OMB* DEFULATOR 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	1	\$ 971	\$ 971
10/1/05 - 9/30/06	1.2379	1.0000		\$ -	\$ 971
10/1/04 - 9/30/05	1.1823	0.9551		\$ -	\$ 971
10/1/03 - 9/30/04	1.1269	0.9103		\$ -	\$ 971
10/1/02 - 9/30/03	1.0903	0.8808		\$ -	\$ 971
10/1/01 - 9/30/02	1.0538	0.8513		\$ -	\$ 971
10/1/00 - 9/30/01	1.0304	0.8324		\$ -	\$ 971
10/1/99 - 9/30/00	1.0000	0.8078		\$ -	\$ 971
10/1/98 - 9/30/99	0.9650	0.7795		\$ -	\$ 971
10/1/97 - 9/30/98	0.9449	0.7633		\$ -	\$ 971
10/1/96 - 9/30/97	0.9318	0.7527		\$ -	\$ 971
10/1/95 - 9/30/96	0.9151	0.7392		\$ -	\$ 971
10/1/94 - 9/30/95	0.8922	0.7207		\$ -	\$ 971
10/1/93 - 9/30/94	0.8644	0.6983		\$ -	\$ 971
10/1/92 - 9/30/93	0.8418	0.6800		\$ -	\$ 971
10/1/91 - 9/30/92	0.8181	0.6609		\$ -	\$ 971
10/1/90 - 9/30/91	0.7994	0.6458		\$ -	\$ 971
10/1/89 - 9/30/90	0.7693	0.6215		\$ -	\$ 971
			1	\$ 971	

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)

Summary of Miscellaneous Ineligible Payments											Attachment C
Sample #	Service Period		SSPS Code	Prov ID	Amount	FFY 06	FFY 07	Comments			
	From	Thru									
09		11-30-06	3233	595481	8.90		8.90	Transportation to Courthouse - P.O. Visit			
10	12-28-05	12-31-05	3210	5851915	48.64	48.64		Duplicate Payment to old provider			
11	12-30-05	12-31-05	3211	5957888	24.32	24.32		IVE prior to CTW			
23	10-27-06	11-01-06	3233	455592	66.75		66.75	FC transportation for medical			
23	11-14-06	11-14-06	3233	455592	22.25		22.25	FC transportation for new placement, allowable as Admin			
38	10-01-06	10-12-06	3456	87627	391.15		168.86	FC child left FH, paid more than 12 days & COP calculated incorrectly			
42	05-01-07	05-31-07	3211	348648	450.69		-	Child Adopted, COP after Sample Identified			
51	07-16-06	07-31-06	3212	6223046	0.96	0.96		Payment in excess of established rates			
51	08-01-06	08-31-06	3212	6223046	1.79	1.79		Payment in excess of established rates			
51	09-01-06	09-30-06	3212	6223046	1.79		1.79	Payment in excess of established rates			
51	10-01-06	10-31-06	3212	6223046	1.79		1.79	Payment in excess of established rates			
59	01-01-07	01-31-07	3233	6777398	31.00		31.00	FC trans for bio mom for visitation.			
59	04-01-07	06-30-07	3210	6777398	1,121.04		-	COP after sample identified for no Permanency Plan			
59	04-01-07	06-30-07	3212	6777398	1,570.53		-	COP after sample identified for no Permanency Plan			
61	12-06-06	12-13/06	3233	299221	74.76		74.76	Transportation to respite care			
78	07-01-07	07-31-07	3211	111719	398.68		-	Child Adopted, COP after Sample Identified			
78	07-01-07	07-31-07	3213	111719	414.16		414.16	Child Adopted, No COP			
79	11-01-06	11-02-06	3210	496559	1.00		1.00	COP calculation error			
79	01-27-06	01-27-06	3233	496559	5.34		5.34	Transportation for medical			
79	02-28-06	02-28-06	3233	496559	20.92		20.92	Transportation for medical			
79	03-31-06	03-31-06	3233	496559	0.18		0.18	Transportation calculation error			
Total Maintenance					4,656.64	75.71	817.70				
FMAP						50.00%	50.12%				
FFP						37.86	409.83				

WA IVE Review - Underpayments										Attachment D		
Sample #	Service Period		SSPS Code	Amount	FFY 06	FFY 07	Comments					
	From	Thru										
21	12-01-06	12-11-06	3210	8.42		8.42	Adopt. Final 12-12-06, COP paid FC for 10 days instead of 11					
22	03-01-07	03-08-07	3210	118.48		118.48	COP to SO, returned home on '03-09-07.					
59	12-08-06	02-08-07	3233	409.95		409.95	FP transportation					
59	02-01-07	02-28-07	3210	373.68		373.68	COP to SO in error for no Permanency Plan					
59	02-01-07	02-28-07	3212	523.51		523.51	COP to SO in error for no Permanency Plan					
59	03-01-07	03-31-07	3210	373.68		373.68	COP to SO in error for no Permanency Plan					
59	03-01-07	03-31-07	3212	523.51		523.51	COP to SO in error for no Permanency Plan					
68	01-01-07	01-31-07	3233	158.55		158.55	Transportation to Child Care					
68	02-01-07	02-28-07	3233	137.84		137.84	Transportation to Child Care					
68	03-01-07	03-31-07	3233	151.62		151.62	Transportation to Child Care					
82	10-01-06	10-07-06	3201	21.00		21.00	COP to SO in error					
Total				2,800.23		2,800.23						
FMAP						50.12%						
FFP						1,403.48						

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