



Andrew M. Cuomo
Governor

NEW YORK STATE
OFFICE OF CHILDREN & FAMILY SERVICES
52 WASHINGTON STREET
RENSSELAER, NY 12144

Gladys Carrión, Esq.
Commissioner

Local Commissioners Memorandum

Transmittal:	13-OCFS-LCM-02
To:	Local District Commissioners
Issuing Division/Office:	Administration
Date:	January 18, 2013
Subject:	Federal Administration for Children and Families Final Report on the 2012 Title IV-E Primary Foster Care Eligibility Review
Contact Person(s):	Please contact your Regional Office with any questions: BRO - Dana Whitcomb, (716) 847-3145 Dana.Whitcomb@ocfs.state.ny.us RRO - Karen Buck, (585) 238-8549 Karen.Buck@ocfs.state.ny.us SRO - Daniel Comins, (315) 423-1200 Daniel.Comins@ocfs.state.ny.us ARO - Kerri Barber, (518) 486-7078 Kerri.Barber@ocfs.state.ny.us NYCRO - Markette Harris, (212) 383-1808 Markette.Harris@ocfs.state.ny.us SVRO - Ray Toomer, (845) 708-2498 Raymond.Toomer@ocfs.state.ny.us Native American Services - Kim Thomas (716) 847-3123; Kim.Thomas@ocfs.state.ny.us
Attachments:	Yes: ACF Final Report '2012' Title IV-E Foster Care Eligibility Report
Attachments Available Online:	Yes: This and previous Title IV-E Foster Care Eligibility Reviews, click on "Previous FCER Findings", on the menu at the left, at: http://www.ocfs.state.ny.us/main/fostercare/titleiv-e

I. Purpose

The purpose of this Local Commissioners Memorandum (LCM) is to inform Local Departments of Social Services (local districts) that New York State was recently found to be in substantial compliance with federal Title IV-E child and provider eligibility requirements by the federal Administration for Children and Families (ACF). This determination was based on the Primary Title IV-E Foster Care Eligibility Review (FCER), completed at the Office of Children and Family Services (OCFS) in Rensselaer during the week of June 25 – June 29, 2012. New York State passed this Primary Review with zero error cases. This LCM transmits the attached ACF Final Report on the Foster Care Eligibility Review (FCER) issued by ACF on September 6, 2012.

In the report, ACF commends New York State for its significant efforts and clear achievements in continuing to improve compliance with Title IV-E eligibility requirements. OCFS thanks everyone who participated in the activities undertaken to prepare for the Primary Review. These achievements could not have occurred without the hard work and diligence of the local districts, New York State Family Courts, voluntary authorized agencies, and other local and state partners over the last three years.

ACF also noted in the report that there were several cases in the sample that had improper payments and some cases had underpayments.

If New York State had been found not to be in substantial compliance for this Primary Review, a new Performance Improvement Plan (PIP) would have been required, followed by a Secondary Review in 2015. The Secondary Review would have entailed a more extensive review of 150 cases with an error threshold of 10% (case error rate and dollar error rate cannot exceed 10%). If New York State failed the Secondary Review, the error rate would have been extrapolated across the entire Title IV-E claim. Due to the successful completion of the 2012 Primary Review, a PIP and a Secondary Review are not required.

II. Background

The 2012 FCER was performed on 80 Title IV-E eligible cases with a Title IV-E claim that ACF randomly selected from the Adoption Foster Care Analysis and Reporting System (AFCARS) for the April 1, 2011, to September 30, 2011 Period Under Review (PUR). The outcome of the 2012 FCER reflects the ongoing statewide commitment to improve on previous ACF review findings over a ten-year period. For a complete summary of past FCER results, visit the OCFS Title IV-E website at:

<http://www.ocfs.state.ny.us/main/fostercare/titleiv-e>

III. Program Implications

Local districts are reminded that the Federal Title IV-E FCER occurs on a three-year cycle with the next Primary Review to be held in 2015. That Primary Review will continue the 95% compliance requirement (that is, no more than four sample cases can be in error during the selected PUR. Accordingly, OCFS, in partnership with local districts, New York State Family Courts, voluntary authorized agencies, and others must continue to work together and focus efforts to improve eligibility determination procedures, and improve procedures to gather and store Title IV-E compliance documentation. The attached report provides ACF's findings of our strengths and areas in need of improvement. OCFS will be in contact with local districts to discuss ACF and OCFS issues identified in the Report.

As a start, local districts are encouraged to review and update their Title IV-E eligibility determination procedures and to continue necessary activities to maintain and improve Title IV-E compliance. The local district review should specifically address the areas noted in the ACF Final Report as needing improvement.

Additionally, OCFS will continue to work closely with local districts, New York State Family Courts, voluntary authorized agencies, and other local and state partners to support additional activities and communications that are essential to New York State's success in future federal Title IV-E Foster Care Eligibility Reviews. OCFS will be updating the Title IV-E Eligibility Manual and checklist, as well as initiating additional training for local district staff. Information will be made available on the OCFS Title IV-E website.

Please contact your OCFS Regional Office if you have any recommendations, questions, or concerns.

Mikki Ward-Harper

Issued By:

Name: Mikki Ward-Harper

Title: Acting Deputy Commissioner

Division/Office: Administration



DEPARTMENT OF HEALTH & HUMAN SERVICES

SEP - 6 2012

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

Gladys Carrion, Esq.
Commissioner
New York State Office of Children and Family Services
Capital View Office Park
52 Washington Street
Rensselaer, New York 12144-2796

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DIRECTOR

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BUREAU OF FINANCIAL OPERATIONS

Dear Ms. Carrion:

The Children's Bureau (CB), Administration for Children and Families (ACF), conducted a primary review of New York State's Office of Children and Family Services (NYS OCFS) title IV-E foster care program during the week of June 25, 2012. The review protocol was implemented in accordance with the Federal provisions at part 45, section 1356.71 of the Code of Federal Regulations (45 CFR 1356.71). This letter transmits our report of final findings for this primary review and provides a summary of the findings.

The purposes of the primary title IV-E foster care review were (1) to determine whether NYS OCFS was in compliance with the eligibility requirements as outlined in statute and regulations at section 472 of the Social Security Act and 45 CFR §1356.71; and (2) to validate the basis of NYS OCFS' financial claims to ensure that appropriate payments were made on behalf of eligible children. A computerized statistical sample of 80 cases was reviewed by a team comprised of Federal and State staff to determine the State's level of compliance in meeting the Federal eligibility requirements for the six-month period under review (PUR) of April 1, 2011 through September 30, 2011.

The review team determined that all of the 80 cases met eligibility requirements (i.e., deemed non-error cases) for the PUR. Eight non-error cases were found to be ineligible for Federal funding for a period for which payments were claimed. Accordingly, Federal funds claimed for title IV-E foster care maintenance payments, including related administrative costs associated with the non-error cases with ineligible payments, are being disallowed. Three (3) cases were underpaid and may be eligible for Federal funding in the amount of \$21,861.60 in maintenance payments and \$9,464.00 in related administrative costs. In accordance with Federal regulations at 45 CFR §95.7, NYS OCFS may claim the eligible payments by filing an increasing adjustment on its Quarterly Report of Expenditures of the title IV-E programs (Form CB-496) in the next quarter, if the claim for expenditure falls within 2 years after the calendar quarter in which the expenditure is made.

Based on the review of the case samples, CB has determined that NYS OCFS' title IV-E foster care program is in substantial compliance with Federal eligibility requirements for the PUR. The additional findings for non-error cases with ineligible payments were not considered in determining the State's substantial compliance with the Federal requirements. Since NYS OCFS is in substantial compliance, a secondary review is not required. The next primary review will be held within three years.

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NYS OCFS is commended for its continuous efforts that have resulted in successful review performance from its past review findings of non-substantial conformity in 2003 (31 errors cases; initial primary review), 2006 (13 errors cases; secondary review), to substantial compliance findings in 2009 (2 errors cases; primary review), and in this current primary review with 0 error cases. The enclosed report of findings identifies additional program strengths and provides recommendations for further program enhancements.

This letter also constitutes our formal notice of disallowance of \$40,750.93 in foster care maintenance payments and \$17,608.00 in related administrative costs for title IV-E funds claimed improperly for the non-error cases with ineligible payments. The total disallowance as a result of this review is \$58,358.93. OCFS must identify and repay any ineligible payments that occurred for non-error cases subsequent to the PUR. No future claims should be submitted on these cases until it is determined that all eligibility requirements are met.

Since the amount of disallowed funds was previously included in Federal payments made to the State, you must repay these funds by including a prior period decreasing adjustment on the appropriate lines of Part I and 2 of the Quarterly Report of Expenditures (Form CB-496). Form CB-496 must be submitted within 30 days of the date of this letter in order to avoid the assessment of interest. The State must cease claiming title IV-E payments associated with the improperly paid cases until eligibility is substantiated for them.

This is CB's final decision. If you disagree with the decision about the review findings, Federal regulations at 45 CFR Part 16 permit you to appeal this decision directly to the Departmental Appeals Board (the Board). Your written request to appeal must be sent within 30 calendar days of receiving this notice of finding and payment disallowance. The use of registered or certified mail, return receipt requested, is recommended to establish the mailing date of all correspondence. The letter to appeal this decision should be sent to:

Department of Health and Human Services
Departmental Appeals Board, MS 6127
Appellate Division
330 Independence Ave., SW
Cohen Building, Room G-644
Washington, DC 20201

You must attach a copy of this decision to your appeal notice and the notice must state the amount in dispute and the reason you think this decision is wrong. A copy of your appeal also should be sent to Junius Scott, Child Welfare Regional Program Manager in Region II. The Board will notify you of further procedures.

If you appeal, you may elect to repay the amount at issue pending a decision by the Board, or you may retain the funds pending that decision. An adjustment to return the disallowed funds for the purposes of avoiding interest assessment must be made through the use of the Form CB-496, as described above. If you retain the funds and the Board sustains all or part of the

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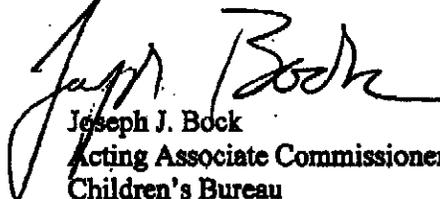
disallowance, interest will be charged starting from the date of this letter on the funds the Board decides were properly disallowed. Regulations at 45 CFR Part 30 detail how interest will be computed.

In the event you choose to take no action to return the funds, it will be assumed you have elected to retain the funds either to appeal or to delay recoupment of the funds until the next issued grant award. Interest will continue to accrue on the Federal funds retained by the State during this period.

If there are any questions or concerns, please feel free to contact Junius Scott, Child Welfare Regional Program Manager in Region II, at (212) 264-2890, ext 145, or by e-mail at junius.scott@acf.hhs.gov. You also may contact Shari Brown, Children and Families Program Specialist, at (212) 264-2890, ext.125, or by e-mail shari.brown@acf.hhs.gov. Questions concerning the disallowance should be directed to Jing Lin, Financial Management Specialist, at jing.lin@acf.hhs.gov or (212) 264-2890, ext 138.

We look forward to working with OCFS to continue to improve State implementation of the Federal requirements. Thank you for your continuous efforts to improve the quality of lives for children, youth and families in the State of New York.

Sincerely,


Joseph J. Bock
Acting Associate Commissioner
Children's Bureau

Enclosure

cc: Junius Scott, Child Welfare Regional Program Manager; CB, Region II; New York, NY
Laura Velez, Deputy Commissioner; NY, OCFS, Division of Child Welfare and
Community Services; Rensselaer, NY
Susan Costello, Director; NY OCFS, Financial Management; Rensselaer, NY
Shari Brown, Children and Families Program Specialist; CB, Region II; New York, NY
Jing Lin, Financial Management Specialist; ACF, OA, OGM, Region II; New York, NY
Jennifer Butler-Hembree, Child Welfare Program Specialist, CB, Central Office;
Washington, DC
Clinton, McGrane, Grant Officer, ACF, OA, OFM, Region II; New York, NY
Gail Collins, Director; CB, Division of Program Implementation; Washington, DC

**State of New York
Primary Review
Title IV-E Foster Care Eligibility
Report of Findings for
April 1, 2011- September 30, 2011**

Introduction

During the week of June 25, 2012, the Children's Bureau (CB) of the Administration for Children and Families (ACF) conducted a primary review of the New York's title IV-E foster care program. The review was conducted in collaboration with the New York State (NYS) Office of Children and Family Services (OCFS) and was completed by a review team comprised of representatives from NYS OCFS, NYS local social service districts, NYS Office of Court Administration – Court Improvement Program staff, the CB Central and Regional Offices, ACF Regional Grants Management, peer reviewers from Texas and Utah and two observers from the St. Regis Mohawk Tribe.

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

Scope of the Review

The primary review encompassed a sample of the State's foster care cases that received a title IV-E maintenance payment during the six-month period under review (PUR) of April 1, 2011 through September 30, 2011. A computerized statistical sample of 110 cases (80 cases plus 30 oversample cases) was drawn from State data submitted to the Adoption and Foster Care Analysis and Reporting System (AFCARS) for the above period. Eighty (80) cases were reviewed, which consisted of 73 cases from the original sample plus seven (7) oversample cases. Five cases, samples #4, #26, #32, #40 and #77, were excluded from the original sample because the youth were over 18 years of age. CB's policy is to exclude cases of youth over ages 18 and over if the State has an approved option in its titles IV-E and IV-A (AFDC) plans to serve these youth. Two cases, samples #53 and #65, also were excluded from the original sample because there were no title IV-E foster care maintenance payments made for a period during the PUR. The State provided documentation to support excluding these cases from the review sample and replacing them with cases from the oversample.

In accordance with Federal provisions at 45 CFR 1356.71, the State was reviewed against the requirements of title IV-E of the Act and Federal regulations regarding:

- Judicial determinations regarding reasonable efforts and contrary to the welfare as set forth in §472(a)(2)(A) of the Act and 45 CFR §§1356.21(b)(1) and (2), and (c), respectively;

- Voluntary placement agreements as set forth in §§472(a)(2)(A) and (d)-(g) of the Act and 45 CFR §1356.22;
- Responsibility for placement and care vested with State agency as stipulated in §472(a)(2)(B) of the Act and 45 CFR §1356.71(d)(1)(iii);
- Eligibility for Aid to Families with Dependent Children (AFDC) under the State plan in effect July 16, 1996 as required by §472(a)(3) of the Act and 45 CFR §1356.71(d)(1)(v).
- Placement in a licensed foster family home or child care institution as defined in §§472 (b) and (c) of the Act and 45 CFR §1355.20(a); and
- Safety requirements for the child's foster care placement as required at 45 CFR §1356.30.

A case folder of each child in the selected sample was reviewed to verify title IV-E eligibility. Foster care provider's documents were also examined to ensure the foster family home or child care institution where the child was placed during the PUR was licensed or approved and that safety requirements were appropriately documented. Payments made on behalf of each child also were reviewed to verify the expenditures were allowable under title IV-E and to identify underpayments that were eligible for claiming. A sample case was assigned an error rating when the child was not eligible on the date of activity in the PUR for which title IV-E maintenance was paid. A sample case was cited as non-error with ineligible payment when the child was not eligible on the activity date outside the PUR or the child was eligible in the PUR on the service date of an unallowable activity and title IV-E maintenance was paid for the unallowable activity.

Compliance Finding

The review team determined that all of the 80 cases met eligibility requirements (i.e., were deemed non-error cases) for the PUR. Because the number of cases in error is fewer than four (4), New York State OCFS is found to be in substantial compliance for the PUR. The state is commended for its continuous efforts that have resulted in successful review performance from its past review findings of non substantial compliance in 2003 (31 errors cases; initial primary review), 2006 (13 errors cases; secondary review) to substantial compliance findings in 2009 (2 errors cases; primary review) and in this current primary review with 0 error cases.

The review team also determined that eight (8) non-error cases were ineligible for Federal funding for a period of claiming. Accordingly, Federal funds claimed for title IV-E foster care maintenance payments, including related administrative costs associated with the non-error cases with ineligible payments, are being disallowed. Three non-error cases were underpaid and are eligible for Federal funding.

Case Summary

The following charts record the non-error cases with ineligible payments; underpayments; reasons for the improper payments; improper payment amounts; and Federal provisions for which the State did not meet the compliance mandates.

Non-error Cases with Ineligible Payments

Sample Number	Improper Payment Reason & Ineligibility Period	Improper Payments (FFP)
#2	No safety check for foster family home provider. [§§472(b) and (c); 45 CFR §§1356.71(d)(1)(iv) & 1355.20] Ineligible: 08/18/2008-9/30/2008	\$2,541.80 Maint \$1,094.00 Admin
#8	Foster family home not licensed. [§§472(b) and (c); 45 CFR §§1356.71(d)(1)(iv) & 1355.20] Ineligible: 03/28/2007-9/28/2007	\$15,418.67 Maint \$7,604.00 Admin
	No safety check for foster family home provider. [§§472(b) and (c); 45 CFR §§1356.71(d)(1)(iv) & 1355.20] Ineligible: 09/28/2007-07/31/2008	
#12	No safety check for foster family home provider. [§§472(b) and (c); 45 CFR §§1356.71(d)(1)(iv) & 1355.20] Ineligible: 05/19/2009-10/31/2009	\$10,597.84 Maint \$3,958.00 Admin
#16	No safety check for foster family home provider [§§472(b) and (c); 45 CFR §§1356.71(d)(1)(iv) & 1355.20] Ineligible: 12/12/2007-12/31/2007	\$1,728.86 Maint \$ 486.00 Admin
#23	Foster family home not licensed. [§472(b) and (c). 45 CFR §§1356.71(d)(1)(iv). 1355.20] Ineligible: 08/01/2009-09/30/2009	\$1,636.80 Maint \$765.00 Admin
	No safety check for foster family home provider [§§472(b) and (c); 45 CFR §§1356.71(d)(1)(iv) & 1355.20] Ineligible: 08/01/2009-08/30/2009	
#41	Foster family home not licensed. [§472(b) and (c). 45 CFR §§1356.71(d)(1)(iv). 1355.20] Ineligible: 03/06/2009-05/31/2009	\$4,432.65 Maint \$2,171.00 Admin
#48	Judicial determination of reasonable efforts to finalize permanency plan not timely. [§472(a)(2)(A)(ii); 45 CFR §1356.21(b)(2)] Ineligible: 01/01/2008-01/31/2008; 09/01/2008-09/30/2008	\$4,094.31 Maint \$1,507.00 Admin
#72	Foster family home not licensed. [§472(b) and (c). 45 CFR §§1356.71(d)(1)(iv). 1355.20] Ineligible: 09/16/2006-09/16/2006	\$300.00 Maint \$23.00 Admin
	Total:	\$40,750.93 Maint \$17,608.00 Admin

Non-error Underpayments

Sample Number	Underpayments Reasons	Improper Payments (FFP)
#6	Foster home licensed. [§§472(b) and (c); 45 CFR §§1356.71(d)(1)(iv) & 1355.20] Eligible: 04/26/2011-05/04/2011; 05/05/2011-05/12/2011; 05/13/2011-6/30/2011	\$1,961.74 Maint \$1,716.00 Admin
#11	Foster home licensed. [§§472(b) and (c); 45 CFR §§1356.71(d)(1)(iv) & 1355.20] Eligible: 02/17/2010-02/28/2010	\$772.60 Maint \$333.80 Admin
#72	Foster home licensed. [§§472(b) and (c); 45 CFR §§1356.71(d)(1)(iv) & 1355.20] Eligible: 07/01/2007- 04/30/2008	\$19,127.26 Maint \$7,415.00 Admin
	Total:	\$21,861.00 Maint \$9,464.00 Admin

Areas in Need of Improvement

The findings of this review indicate the State needs to further develop and implement practices and procedures to improve the title IV-E program performance in the following areas. For each issue, there is a discussion of the nature of the area needing improvement, the specific title IV-E requirement to which it relates, and the corrective action the State should undertake.

Issue #1: Placement in a Licensed Facility. In non-error case samples #8, #23, #41, and #72, ineligible title IV-E payments were made prior to the foster care homes obtaining full licensure or approval.

Title IV-E Requirement. For the child to be eligible, the child must be placed in a facility that is licensed and meets all of the State agency standards of full licensure or approval. The documentation of full licensure can be satisfied by the certificate of licensure/approval or a letter of approval. Effective September 28, 2000, full licensure must be met by all providers, including those licensed or approved by a child-placing agency. The license must show that the foster family home or childcare institution is licensed for the duration of the child's placement. The State may not claim title IV-E maintenance payments on behalf of a child prior to the full licensure of the foster care placement for the child. [§ 472(b) and (c); 45 CFR §§ 1356.71(d)(1)(iv).1355.20].

Recommended Corrective Action. OCFS should continue to ensure that staff are fully trained and understand that all State licensing criteria must be met prior to claiming title IV-E maintenance payments on behalf of a child placed in the foster care setting.

Issue #2: Safety Requirements of Provider. In non-error case samples #2, #8, #12, #16, and #23, ineligible payments were made prior to completion of safety checks.

Title IV-E Requirement. To ensure that a child is not placed in a foster care setting where the potential caregiver has caused or is likely to cause harm to a child, the State is required to examine the potential safety risk posed to the child by a foster care provider. The State agency must document for title IV-E requirements that the foster care provider meets the established safety standards before the period that the title IV-E foster care maintenance payment are claimed for the child placed with the foster care provider. [§472(b) and (c). 45 CFR §§1356.71(d)(1)(iv). 1355.20].

Recommended Corrective Action: OCFS should continue with their statewide improvement efforts to ensure that all staff statewide are trained and understand the Federal requirements.

Issue #3: Underpayments. There were three (3) cases that in each case it was documented that the child had met all criteria for eligibility under title IV-E. However, the State did not claim maintenance payments for the maximum amount of time that it could have claimed for each child.

Title IV-E Requirement: Federal regulation at 45 CFR §1356.60 provide that title IV-E foster care maintenance payments may be claimed for allowable cost of expenditures that are covered by the Federal definition of foster care maintenance found at §475(4) of the Act. Under §472 of the Act, title IV-E maintenance payments generally may be claimed from the first day of the foster care placement in the month in which all title IV-E eligibility criteria are met. The payment may be claimed for the entire month when an eligible child has resided in the foster care placement for the entire month. However, if the eligible child is placed on a date in the month other than the first of the month, title IV-E funds may be claimed for the period beginning with the actual date of foster care placement.

Recommended Corrective Action: NYS OCFS should identify the systemic factors underlying the occurrence of improper payments and develop an action plan to correct them. This process would help determine whether adequate financial controls and edits are in place and properly functioning to prevent payment for ineligible children or unallowable program costs. Also, it would help to reduce or eliminate underpayments and increase the State's ability to maximize reimbursements for allowable costs of care for eligible children by using funding available under title IV-E.

Strengths and Promising Practices

The following positive practices and process of the title IV-E foster care eligibility program were observed during the review. These approaches may have led to improved program performance.

Court Orders: CB recognized the collaborative efforts between OCFS and the State Office of Court Administration to standardize and enhance the quality and timeliness of court orders issued on foster care cases. Most of the orders contained detailed, child-specific information and clear enunciation of judicial expectations for actions to achieve the desired permanency outcome. Some permanency hearing reports contained case-specific services provided to children and their

parents. We also noted some court orders addressed Indian Child Welfare Act requirements for children's affiliation to Native American or tribal groups. NYS OCFS and the Office of Court Administration have participated in cross systems training to provide an understanding to its State and court personnel on identifying children of Native American heritage who are placed in foster care, as well as the importance and the process of contacting Native American tribes and Nation to inform them when children come into foster care. The continued focus of encouraging all jurisdictions to utilize the standardized court orders statewide, as a guide for court personnel, is minimizing the omission of pertinent information

Permanency Hearings. The New York State Permanency legislation continues to have an impact on the improved timeliness of judicial determinations of reasonable efforts to finalize the permanency plan. The New York State law requires permanency hearings every six months, which has increased the timeliness of judicial determinations to finalize permanency. It is our hope that these efforts will strengthen the State's ability to achieve better permanency outcomes for children in foster care.

Relative Caregivers. NYS OCFS' policy and practice is to place children who cannot remain in their home with relative caregivers. We are seeing the use of relative caregivers and children placed in lower levels of care, such as family foster homes, instead of more restrictive congregate care. The exploration of guardianship with relatives can assist many children in the achievement of permanency goals and stable placements with family members. OCFS should continue the statewide efforts to promote use the Federal title IV-E Guardianship Assistance Program (GAP) for relatives who are reluctant to adopt family members.

Areas of Concern

Case Documentation. OCFS provided the full case records which allowed the review process to be completed onsite and provided for a comprehensive review and onsite technical assistance. In some cases, the documentation in the Family Assessment and Service Plans (FASP) were case-specific and detailed. However, in one case, documentation was missing from the case record. In some instances, there also was "cutting and pasting" of case documentation in FASPs and the licensing re-certification noting change only in the dates. The "cutting and pasting" led to non-descriptive, outdated information in a format that was repeated throughout the periods of case recordings.

Timely and current documentation is the "lifeline" and one essential product in a child's case. Documenting case activity is one of the many important tasks and responsibilities performed by child welfare staff. Case documentation is vital, should be accurate, and available in order to support all decisions such as the safety checks, licensing and reasonable efforts that affect outcomes for children.

Case documentation tells the story of every child and his or her family. Every child experiences milestones during the life of his or her case, such as celebrating another year of life (a birthday), another inch of growth, or challenges from being in out-of-home care. Although "cutting and pasting" is viewed as an efficient and effective case management tool, good casework practice should provide an accurate picture of the child at the point in time the documentation is submitted. Caution is needed to minimize the rote use of the tool in order to ensure that case

notes reflect the quality efforts made by casework staff as they work diligently on behalf of each child and his or her family.

Disallowances

A disallowance in the amount of \$40,750.93 in maintenance payments and \$17,608.00 in related administrative costs of Federal Financial Participation (FFP) is assessed for title IV-E foster care payments claimed for the non error cases. The State also must identify and repay any ineligible payments that occurred for the non-error cases subsequent to the PUR. No future claims should be submitted on these cases until it is determined that all eligibility requirements are met.

Next Steps

As part of your efforts to improve the Foster Care Eligibility Program, CB recommends that OCFS continue its efforts to strengthen the program statewide through the ongoing collaboration and training efforts with staff and external stakeholder that are crucial to an efficient and effective State child welfare program. The Regional Office staff will be available to work with you and your staff.
