# FY 17 RBWO Contract Deliverables, Minimum Standards and PBP Measures

# **Frequently Asked Questions**

# 6/30/16

#### **Contract Deliverables**

1. Should providers require use of the RBWO Match Screening Summary (RBWO MSS) form by other agencies such as DJJ?

Providers are encouraged to suggest other stakeholders and agencies such as DJJ to utilize the RBWO Match Screening Summary form but it is not currently a requirement for other agencies to do so.

2. What responsibility does the provider have in ensuring that the background check is completed on youth 18 years and older?

This is the responsibility of the DFCS Case Manager.

3. What is the requirement for DFCS case managers with regards to contact with clients placed in CCIs?

The Division of Family and Children Services (DFCS) shall conduct at least one (1) purposeful, face-to-face contact with every child under its care and/or custody every calendar month. **Exception**: Children placed outside of Georgia in accordance with the Interstate Compact on the Placement of Children (ICPC) purposeful visits will be conducted by a representative of the state in which the child is placed in accordance with an approved ICPC request. DFCS shall make at least one purposeful contact with the placement resource each month. DFCS shall ensure at least fifty percent (50%) of all purposeful contacts occur in the child's residence.

4. Is the Life Coach strictly for ILPs?

Yes

5. With regards to the adoption services incentive, will providers also receive an incentive for the six months supervision of eligible cases?

No, upon the approval of an Adoption Consideration Evaluation (ACE) and the child is placed on adoption status (Forms 33 or 37 are signed) the CPA will receive a \$2,500 payment per child. The CPA will continue to supervise and support the placement until finalization. Upon finalization of the adoption, the CPA will receive an additional payment of \$2,500 per child.

6. What is the role of the ILS?

Review DFCS Child Welfare Policy Manual Chapter 13 on Independent Living Program http://odis.dhs.ga.gov/ChooseCategory.aspx?cid=1029

7. What are the guidelines regarding what ILP youth can get funding for?

Review DFCS Child Welfare Policy Manual Chapter 13 on Independent Living Program http://odis.dhs.ga.gov/ChooseCategory.aspx?cid=1029

8. Will there be a check box on GA+SCORE to indicate acknowledgement of the RPPS training standard for all staff?

*OPM* is currently working in partnership with Care Solutions to further enhance the *GA+SCORE* database to make it more user friendly and efficient for all users. The addition of a RPPS training check box will be considered during upcoming future enhancements.

9. What is the time frame for discharge summaries of youth who discharge following a court hearing or change in custody? Please clarify the "time of notification" and no "later than 24 hours" provisions.

A Discharge Summary must be provided to the DFCS case manager at the time of notification of placement move/disruption but no later than 24 hours from the provider. When a provider receives initial notice of the plan for a youth to discharge from their facility, providers must notify the youth's DFCS case manager within 24 hours of that initial notification.

### **Feedback/Suggestions:**

- Ensure that RBWO Screening Summary (RBWO MSS) form is completed in its entirety prior to submission and ensuring to highlight any information pertaining to the child's developmental functioning if a psychological is not provided.
- Consideration for the development of a universal application to be used by all agencies.
- Consideration made surrounding the Minimum Standards concerning discharge protocol. The
  current standard does not take into consideration children who during crisis committed
  offenses that require legal action or harmed someone that would merit immediate disruption.

- The ability of providers to receive retroactive reimbursements back dated from the date of
  placement when children first enter care when a child's per diem rate increases due to
  identified needs.
- Concerns regarding WTLP not being updated accordingly by DFCS staff.
- Request for more information regarding the new monthly ILP meetings that are hosted by MAAC.
- Consideration of having DHS expectations for the age a facility serves to be more aligned with how programs are licensed.

#### **Minimum Standards**

- 1. CCI Staffing Standards: Is the role of the CSL required for ILP agencies only or are TLPs required to have this role as well? Can a CCW serve in this role? CSL role is required for ILP only. No, CCW cannot serve in this role.
- 2. RBWO Standard 6.2 f states that all children age one (1) and over shall receive a dental screening within 10 days of entry into foster care (unless the dental screening was completed within the last six months). What should providers do to fulfill this requirement when the provider is unable to locate a dentist within their area that will provide services to children under the age of 3 years old?

Please consult with Amerigroup for assistance.

3. What should a provider do if they are unable to have a child seen to complete a dental screening within 10 days of entry into foster care?

Please consult with Amerigroup for assistance.

4. Will Amerigroup cover for dental screens on an 1 year old?

Yes, Amerigroup will cover this expense.

5. RBWO Standard 6.26: Does an HSP or higher staff's attendance at an RPPS classroom or webinar training qualify them as a "train the trainer" or is there an additional process?

Participation in the training qualifies them as a "train the trainer".

6. RBWO Standard 1.7: Documenting visits in SHINES is not possible due to provider's inability of documenting child placements into a provider's home in SHINES.

If a provider is having difficulty entering in documentation for a visit with youth in SHINES due to the child's placement not being entered into SHINES, the provider can email the DFCS CM the documentation within 72 hours of the visit as verification of the visits being completed within the specified time restraints which will satisfy the documentation

requirement. Once the child's placement is entered into SHINES, the provider can then enter in the documentation into SHINES accordingly.

7. RBWO Standard 12.35: Can a Policy Violation Assessment be completed while a CPS investigation is ongoing?

When an allegation has been called into CPS intake and the case is progressed to the level of an investigation, CPS has to make immediate response time which is within 24 hours. Due to concerns of initiating the completion of the Policy Violation Assessment, a 7 days delay from the date of notification has been implemented by OPM with regards to requesting Policy Violation Assessments (PVA) for completion. This will allow CPS to complete their initial response time without any interference with regards to the completion of the Policy Violation Assessment. Providers have 15 days from the date of request to complete the PVA request. A training was offered on June 27, 2016 which will go over the CPS, Policy Violation Assessment process and the Child Abuse Registry in more detail.

8. RBWO Standard 12.35: The PVA system has resulted in an increase in allegations made by youth at our agency.

As a mandated reporter, any allegations of any form of abuse or neglect whether founded or unfounded has to be reported by law to CPS. As a means of concurrently investigating allegations of maltreatment in care, all CPS allegations warrant a PVA to be completed. If the allegations are found to be false or unfounded, the agency will not be penalized or scrutinized for false allegations made against the provider. A training was offered on June 27, 2016 which will go over the CPS, Policy Violation Assessment process and the Child Abuse Registry in more detail.

9. RBWO Standard 12.35: Are Policy Violation Assessments needed for completion regarding false allegations when CPS does not investigate? What are the legal ramifications of completing a Policy Violation Assessment with consideration to the Open Records Act?

Policy Violation Assessments are still required for completion when an allegation is screened out by CPS intake. When a case is screened out, CPS does not proceed with investigating the allegations. A Policy Violation Assessment would be needed when cases are screened out so that an assessment can be made of the allegations and to determine if any policy violations have occurred surrounding the incident. A training was offered on June 27, 2016 which will go over the CPS, Policy Violation Assessment process and the Child Abuse Registry in more detail.

10.RBWO Standard 12.35: Completing a PVA and a Corrective Action Plan (CAP) without allowing adequate diligence is prematurely suggesting that a policy violation has occurred when it has yet to be determined.

Corrective Action Plans (CAPs) are only requested when a Policy Violation Assessment has been completed and reviewed by OPM and determined that a policy violation has occurred based on the documentation and assessment submitted by the provider. A training was offered on June 27, 2016 which will go over the CPS, Policy Violation Assessment process and the Child Abuse Registry in more detail.

#### **Feedback/Suggestions**

- Concerns regarding ensuring that DFCS case managers enter in placements into SHINES within 24 hours of placement so that providers can enter in documentation as needed in a timely manner.
- Concerns regarding DFCS case managers ensuring that providers have pertinent information regarding a child's last dental appointment prior to placement, as well as documents from the dentist who provided care to ensure the continuity of care of youth.
- Concerns regarding ensuring the youth's medical insurance is active and that providers are provided with a copy of the youth's insurance care upon admission.

#### **PBP Measures**

1. The life skills stipulations are very hard to meet when youth attend school or work programs. It is very confusing why an ILP youth must have both an ISP and an ISP/ILP plan. They are both serving the same thing. This is in addition to a life plan. We should combine all three to make one useful plan.

The Service Plan and Skills Plan can be combined as long as it's a section within the plan that clearly identifies the Skills Plan goals.

2. Will a CAP be required for all sections of the quarterly PBP report scoring under 85%? If so, I believe setting at 80% is more appropriate, and consideration of bi-annual review should be based on 85% criteria.

The standard still remains that a PIP is only required for scores below 70.

3. The 0 points for substantiated case of maltreatment – how long does the 0 points last? Is this an annual or quarter score? We understand the Division has a zero tolerance but what are the national standards around maltreatment in care and is this possible given the society that we live in. We can train foster parents and staff and there will still be incidents of maltreatment given the population that is being served. This should really be looked at closely.

Yes, the federal standards were reviewed and the Division made the decision to take the stance of zero tolerance with maltreatment in care.

4. Anything that requires SHINES should also have latitude built in. The system gets more and more irrelevant as it requires use of a browser that was modern in 1997.

The Division is currently assessing the needs for updates to SHINES and SHINES portal.

5. Please clarify how long the score of "0" for any maltreatment cases will remain applicable. "0" for the duration of the current quarter, current quarter plus next, remainder of the fiscal year?

Maltreatment cases will be reviewed for entire fiscal year.

# **Feedback/Suggestions**

- Placement stability is concerning when agencies are penalized for "positive" moves to family
  or due to adoptions. There should be a way to separate the disruptive moves versus a positive
  move for a child.
- The life skills stipulations are difficult to meet when youth attend school or work programs. There is some concern regarding why an ILP youth must have both an ISP and an ISP/ILP plan as they are both serving the same thing in addition to a life plan. Consideration should be given regarding combining all three to make one useful plan.

## **Child Abuse Registry**

A training was offered on June 27, 2016 to discuss the Child Abuse Registry and the PowerPoint Presentation is posted on GA+SCORE. If there are any additional questions about the Registry, please contact Melloney Claiborne at Melloney Claiborne@dhs.ga.gov.

# **Feedback/Suggestions**

- Concerns regarding uploading information gathered on the Child Abuse Registry into a database for staff will impede confidentiality. Consideration should be given regarding whether providers can develop their own internal policies of how to manage this information to ensure confidentiality.
- Issues with DFCS case manager's timeliness with regards to closing out placements in SHINES resulting in no available slots for additional children to be entered accordingly. Consideration should be given regarding whether a placement unit or someone can be designated to be responsible for this task.