



**Virginia Pryor**  
Interim Director

# Office of Provider Management

## IV-E Audit Updates

Presenters:

Tiffany Cutliff, Monitoring Manager (Green Team)

LaShaunda Daniel, Provider Relations Manager

# Agenda

- Review the Scope of the Title IV-E Review
- Review Staff Safety Check Requirements
- How We Are Looking
- Foster Home Requirements
- Q & A /Feedback



# Title IV-E Foster Care Eligibility

The Children's Bureau (CB) of the Administration for Children and Families (ACF) conducted a primary review of the Georgia Title IV-E foster care program in November 2015.



# Purpose of the Review

1. Determine whether the Georgia Title IV-E foster care program was in **compliance** with the **eligibility** requirements outlined in 45 CFR §1356.71 and §472 of the Social Security Act;
2. Validate the basis of the State's financial claims to ensure **appropriate payments** were made on behalf of **eligible** children.

# Scope of the Review

- A random sample of **80** cases were drawn from data that the State submitted to the Adoption and Foster Care Analysis and Reporting System (AFCARS) for the period of 10/01/14 – 03/31/15.
- **69** out of **80** cases met all eligibility requirements.
- In the **11** cases that did not meet eligibility, **\$398,733** is due to be repaid.
- Due to provider non-compliance, **\$359,989 (90.2%)** is our responsibility.

# Reasons for Disallowance

- The safety requirements were **not completed** satisfactorily for staff.
- Several OIG renewals were **overdue** and not completed at the 5 year mark as required by state agency policy.
- Several safety requirements were not completed **prior to the hire** date as required by state policy.

# Safety Check Requirements

- OIG Fitness Determination Letter (Background check)
- Department of Corrections (DOC)
- Sex Offender Registry (SOR)
- Pardons and Parole (P&P)
- CPS Screening (Child Abuse Registry – CAR)



# Applicable Minimum Standards



## FY 18 RBWO Minimum Standard

- 1.3 Providers must ensure that employees in positions or classes of positions have direct care, treatment, custodial care, access to confidential information of clients or any combination thereof (to include administrative support staff, janitorial/housekeeping staff, maintenance/grounds keeping staff and security guards) shall undergo a criminal history investigation prior to being hired and every five years thereafter (based upon hire date anniversary). This requirement became effective July 1, 2014. Staff hired prior to July 1, 2009 but before July 1, 2014 must have their 5-year criminal records check completed by their anniversary date as they reach their fifth (5th) year of service. The criminal history investigation shall include fingerprint record check pursuant to the provisions of Section 49-2-14 of the Official Code of Georgia, Annotated (O.C.G.A). Providers shall maintain and upon request, provide DHS with evidence of a satisfactory criminal record check of any members of its staff or a subcontractor's staff assigned to or proposed to be assigned to any aspect of the performance of this contract. Providers must utilize the Georgia Applicant Processing Services (GAPS) at [www.ga.cogentid.com](http://www.ga.cogentid.com) to comply with this requirement.
  - a. Only RBWO Staff (Director, Case Support Supervisor, Case Support Worker, Human Service Professional, Life Coach and Child Care Worker) criminal records checks are required to be uploaded into GA+ SCORE. These checks must be uploaded by the date of hire and by the 5 year anniversary of the agency hire date.

# FY 18 RBWO Minimum Standard

- 1.15 Providers must conduct and document the results of a Child Protective Services history check through the Georgia Child Abuse Registry for all staff before hiring and annually within 30 days of the staff's anniversary date. Each provider must have a policy on checking the registry and how, if the results of the registry reveal a substantiated case, the provider's procedure for assessing the information and determining whether or not the individual should be hired or continue their employment. For staff with substantiated history, the assessment must be reviewed by OPM for concurrence prior to the staff person beginning work and for veteran staff, the assessment must be submitted to OPM for concurrence within five (5) days of completion of the assessment.

# FY 18 RBWO Minimum Standard

- 1.16 Providers must conduct and document, a Sex Offenders Registry, Pardons and Paroles and Department of Corrections check on all staff prior to hiring and annually within thirty days of the staff anniversary date. Each provider must have a policy on how your agency will regularly monitor compliance for initial hires and annually. These checks are required to be uploaded into GA + SCORE at hire and before the annual expiration date. The links for the registries are as follows:

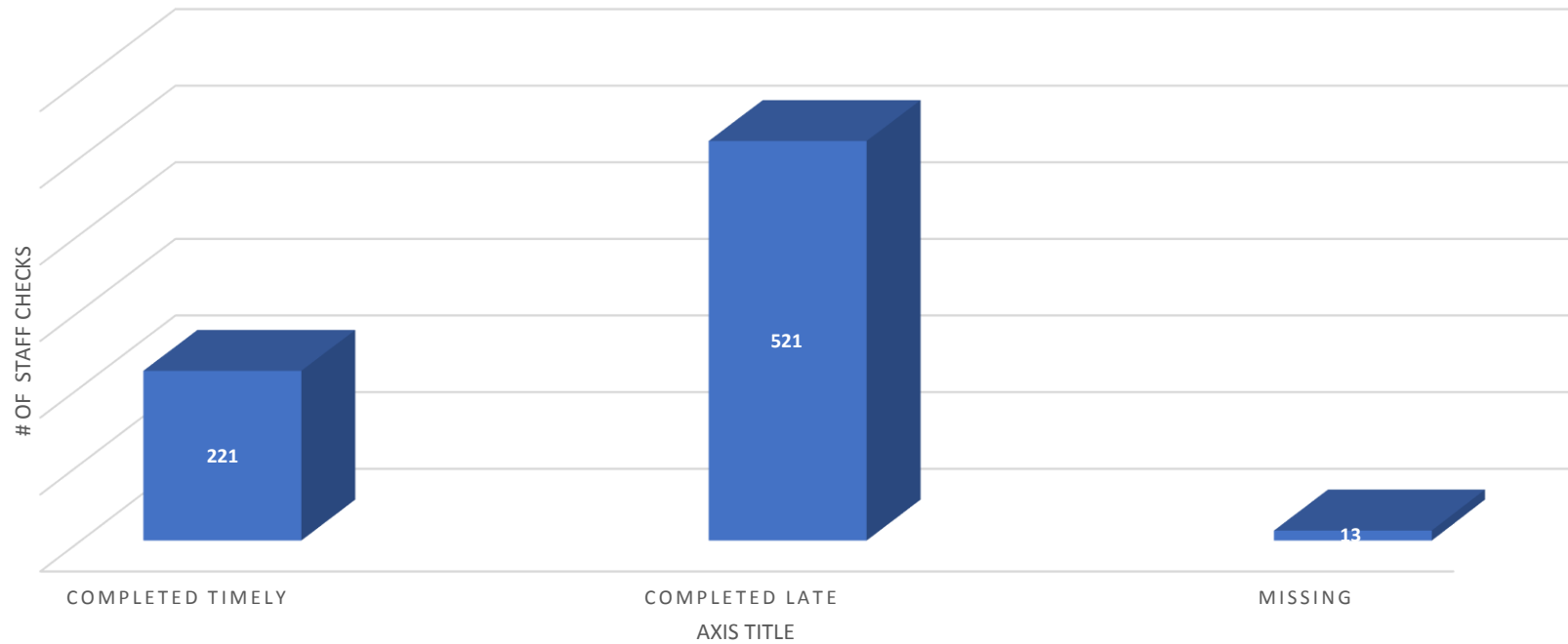
[http://gbi.georgia.gov/georgia-sex-offender-registry;](http://gbi.georgia.gov/georgia-sex-offender-registry)

[https://papapps.pap.state.ga.us/paroleesearch/search/searchPage;](https://papapps.pap.state.ga.us/paroleesearch/search/searchPage)and

<http://www.dcor.state.ga.us/GDC/Offender/Query>

# FY 17 (July 1, 2016 – June 30, 2017)

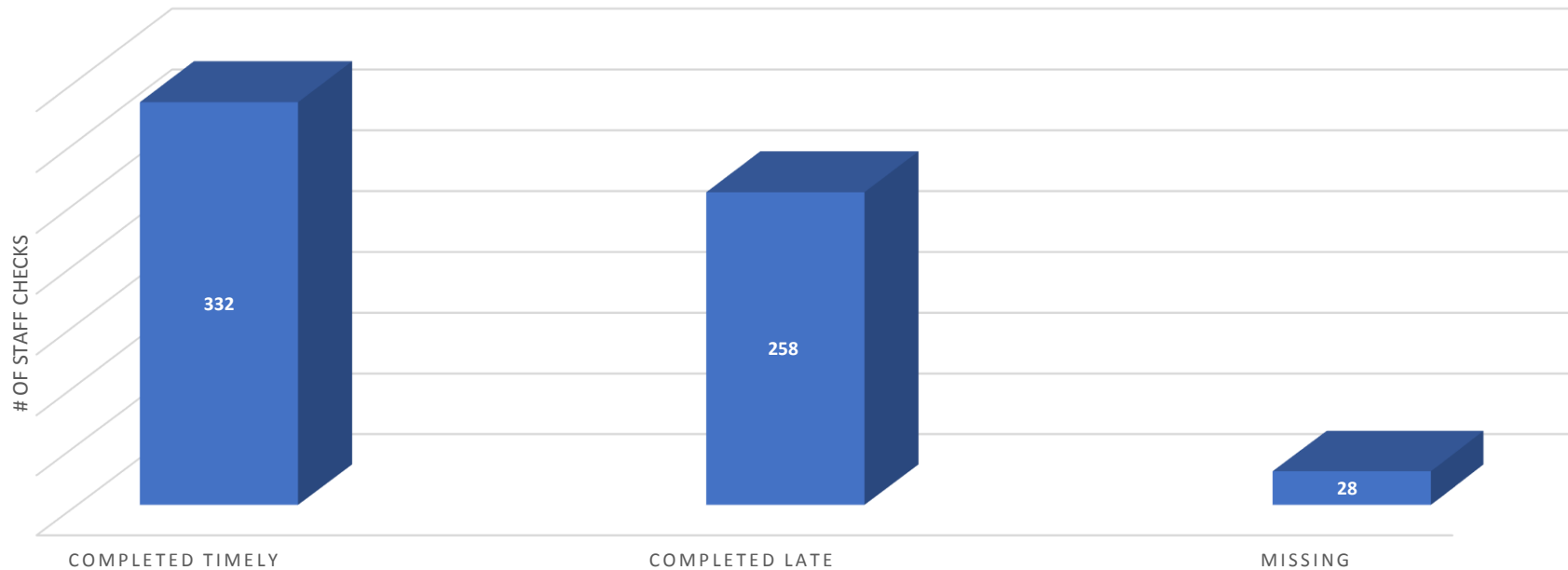
FY 17 STAFF SAFETY CHECKS



Out of 755 Staff, 29.27% were completed timely; 69.01% were completed late; 1.72% were missing

# FY 18 (July 1, 2017 – December 10, 2017)

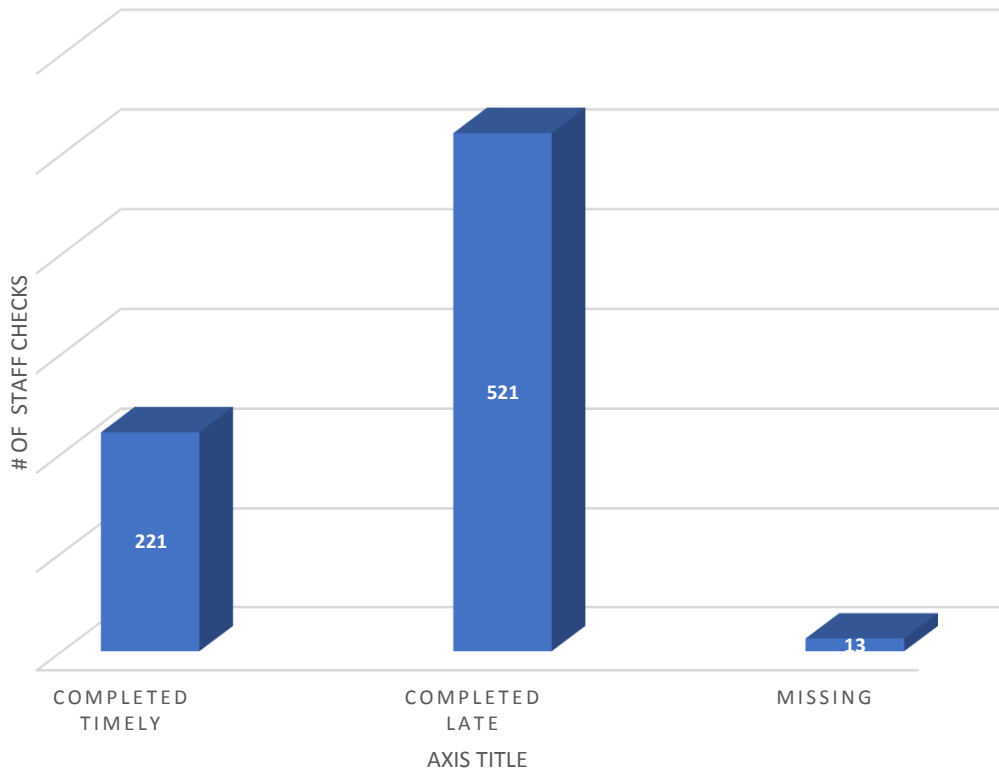
## FY 18 STAFF SAFETY CHECKS



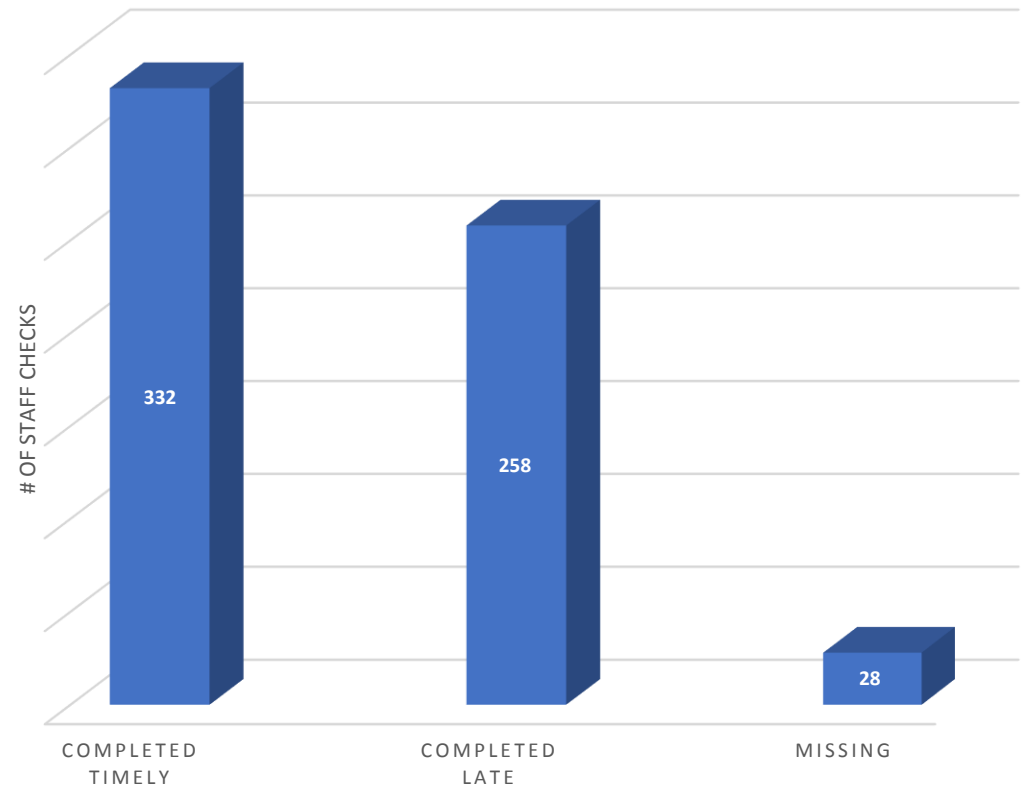
Out of 618 Staff, 53.72% were completed timely; 41.75% were completed late; 4.53% were missing

# FY 17 vs FY 18

## FY 17 STAFF SAFETY CHECKS



## FY 18 STAFF SAFETY CHECKS



# Going Forward





## IV-E Reminders

- Screenings for youth turning 18 years old
- Foster Parent Training Hours
- Training Needs/Support
- Questions & Answers



## Child Welfare Policy 14.14

Complete a written addendum to the Family Evaluation within 30 calendar days of significant changes within a family, including an explanation of how the change impacts the family.

A household member reaches 18 years of age. A criminal records check, safety screening and a medical evaluation must be completed on new adult household members and existing household members reaching 18 years of age.

# Foster Parent Continuing Development Training

- CPA's are now required to enter the specific training titles in GA+SCORE for foster parents.
- Continued Parent Development (CPD) may be provided by licensed, certified, credentialed, or otherwise qualified professionals. Providers must consistently monitor each family's participation in CPD throughout the year to avoid situations where families do not have adequate time to meet the minimum **15 hour** requirement by the end of the calendar year. CPA's are responsible for making ongoing training activities available for its foster families.
- CPA's will have to complete policy violations assessment for Foster Parents who fail to obtain the required training hours.
- This low risk policy violation should be assessed during the foster parents' re-evaluation.



# Foster Parenting Training Hours

Approval Date	Start of Training (60 days from Approval Date)	Hours Due by December 31st
January	March	15 hours
February	April	15 hours
March	May	15 hours
April	June	9 hours
May	July	9 hours
June	August	9 hours
July	September	6 hours
August	October	6 hours
September	November	3 hours
October	December	3 hours
November *	January	15 hours
December *	February	15 hours

Any Questions?

