



Tom C. Rawlings
Director



RBWO Provider
Monthly
Meeting

- Title IV-E Audit
- Kenny A
- CPS Investigation



Title IV-E Audit Review Findings

*Dr. Shaun E. Johnson, OPM Director & Tammy Reed,
Placement & Permanency Director*



Title IV-E Audit

- The Children's Bureau (CB) of the Administration for Children and Families (ACF) conducted a secondary review of Georgia's title IV-E foster care program.
 - The title IV-E Foster Care Eligibility Review (IV-E Review) was conducted during the week of July 15, 2019.
 - The review team comprised of representatives from the Georgia Department of Family and Children Services (DFCS) Revenue Maximization Unit (Rev Max); the DFCS Office of Residential Child Care Licensing (RCCL); state court improvement project; CB Central and Regional offices; ACF Regional Grants Management office; and cross-state peer reviewers.
 - The Period under Review (PUR) was **April 1, 2018 - September 30, 2018.**

Title IV-E Audit Results

- The review team has determined that **139 of the 150** sample cases have met all eligibility requirements (i.e., are deemed non-error cases) for the PUR.
 - Eleven cases are determined as in error for not meeting eligibility requirements either for periods only during the PUR or for a child's entire foster care episode.
 - Six non-error cases meet eligibility requirements for the PUR, but are found to have periods in a child's foster care episode for which title IV-E maintenance payments are improperly claimed.
- The Children's Bureau has determined that Georgia's title IV-E foster care program is in **substantial compliance** with federal eligibility requirements for the PUR. Substantial compliance in a secondary review is achieved when either the case error rate is not more than 10 per cent (i.e., 15 or fewer cases) or the dollar error rate is not more than 10 per cent for the review sample.

Recommendations

- RBWO Providers must continue to follow the RBWO Minimum Standards and Child Welfare policies surrounding completing safety screening timely (i.e. OIG/Background, Pardons & Parole, Sex Offender, Department of Corrections and CPS Screening letter)
- Providers must continue with completing the initial and re-evaluation letters timely for foster homes which reflect the dates of approval.
- OPM must continue completing and monitoring Safety Desk Checks on providers.
- OPM must continue to review documentation being submitted for foster homes to ensure compliance with DFCS CW Policies and RBWO Minimum Standards.



Kenny A

Kenny A: Third Infrastructure Brief Summary

- This brief is organized in three parts: an introduction; recommendations; detailed analysis of specific Infrastructure Standards; and appendices. The methodology for analysis and reporting included using the State's administrative data to generate information on child and family outcomes, case file reviews, interviews, focus groups with staff and stakeholders and observations.

Opportunities

- RWBO Standards 3.10, 6.3, 8.5 and 11.19 all deal with the child's continued relationship with family and the contract agency and caregiver working with the child's family, they could benefit from strengthening to detail further the caregiver's ability and willingness to support the child's relationship with the family, as discussed in Infrastructure Standard IV.A.2 *"DFCS shall include in caregiver screening and ongoing support the caregiver's ability to support the child's relationship with his/her birth family, including extended family. This includes the degree of support for contacts between the child and his/her siblings and other birth family and the caregivers' feelings, willingness, and ability to work with birth families toward reunification, including methods used to support this plan."*
- Standard 11.26 describes the policy violation report needing to be completed within 15 days and the Corrective Action Plan (CAP) developed within three days. However, the standard does not state that CAPs must be completed within six months, nor does it detail the requirement that the first face-to-face contact needs to be made within 24 hours of receiving notification. While this information is noted in DFCS policy, which they are also bound by, it might be helpful to have all the pertinent information in the same location.
- MTAT did not see any language evident in the RBWO Minimum Standards Manual regarding assistance to relative caregivers with paperwork to get licensed.
- Reviewers also observed significant inconsistencies in practice between CPA agencies.

Opportunities

- As contract agencies, it is pretty daunting to move into specialization for children and youth with challenging behaviors due to liability issues and they are therefore wary of moving into the “high needs” space.
- **Twenty-nine** CPA foster homes were unapproved in Period 27 compared to **sixty-four** in Period 28
- Contract agencies may have three consecutive quarters of a grade falling below the 70 percent threshold before they are “placed on notice.” However, if the possible 10 incentive points are consistently needed to put the contract agency over the 70 percent threshold, this is concerning.
 - For FY 2021, contract agencies will no longer be able to receive incentive points if their score is below the 70 percent threshold.

Third Infrastructure Brief x + v

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Quality

To gain a better understanding of the quality of the safety review process and the information obtained and assessed, MTAT conducted a case review of safety reviews conducted between July 1, 2019 and December 31, 2019 of providers that had a Kenny A. placement during the same time period. Of a population of 250 safety reviews across 147 providers, MTAT conducted a random sample and reviewed 25 safety reviews on CPA homes and 25 safety reviews on CCI facilities. Of the 250 safety reviews, 31 received a quality of care concern designation of “significant.” In order to ensure a better understanding of the concerns, MTAT reviewed an additional sample among the 50 total safety reviews (11). The results of the review are as below.

Table 6. Findings: Case Review of Safety Reviews July to December 2019

	CPA	CCI
Overall Score		
Range	0-100	20-100
Average	74.6%	73.4%
Safety Finding		
Safe	16, 64.0%	16, 64.0%
Risk Identified	9, 36.0%	9, 36.0%
Quality of Care		
Significant	5, 20.0%	6, 24.0%*
Moderate	4, 16.0%	5, 20.0%
Minor	5, 20.0%	10, 40.0%*
None	11, 44.0%	4, 16.0%
Required Number of Children Interviewed?	21, 84.0%	9, 36.0%
Existing Corrective Action Plan?	17, 68.0%	15, 60.0%
Completed	6, 35.3%	5, 33.3%
In Progress	7, 41.2%	2, 13.3%
Incomplete	4, 23.5%	8, 53.3%
New Corrective Action Plan	14, 56.0%	20, 80.0%

*In one instance, the spreadsheet provided indicated that the quality of care concern was minor, but when MTAT opened the review in GA Score, it was labeled “significant.”

Opportunities

- Concerns emerged over monitoring of safety reviews, when looking further at the number new CAPs requested on homes that had existing CAPs. For CPA providers, nine of the 14 (64.3%) new CAPs had existing CAPs, and of those nine, six (66.7%) CAPs were in progress or incomplete. For CCI's, 14 of the 20 (70.0%) new CAPs had existing CAPS, and of those 14, 10 (71.4%) were in progress or incomplete. For the 11 safety reviews labeled "significant" for quality of care concerns.

Conversation surrounding CPS Investigation

LaResa Price, Safety Director