

Virginia's Title IV-E Corrective Action Plan

Overview and Plan Matrix

March 8, 2011

The attached table is a matrix layout of the issues, federal recommendations and suggestions from Virginia's Department of Social Services to improve the deficiencies identified during the August 2-6, 2010 Title IV-E Review.

This plan was developed by the Title IV-E Corrective Action Plan Advisory Team members, that include Therese Wolf-VDSS Permanency Program Manager, Pat Lewis-VDSS Title IV-E Supervisor, Dorothy Hollahan-VDSS Quality Manager, Janet Gaskins-VDSS Title IV-E Regional Consultant, John Leybold- VDSS Senior Financial Compliance Analyst, Nadine Blackwell-LDSS Newport News –IV-E EW, Wanda Ambrose-LDSS Essex-Administrative Office Manager, Carolyn Smith-LDSS Prince William-Human Services Worker III, Vickie Haralson-LDSS Chesapeake-Chief Social Work Supervisor, Meade Adams-LDSS Richmond-Social Work Supervisor, Shelia Wilkerson-Spears-LDSS Richmond-Benefits Program Specialist, Bob Lingo-LDSS Orange-Director, Hugh Fields-LDSS Henrico County Controller, Rachel White-LDSS New Kent- Administrative Office Manager.

The issues identified by the Federal review were unallowable program cost, placement and care responsibilities, invalid removals, AFDC eligibility, timeliness of judicial determinations, safety requirements and foster care rates. Deficiencies can be assigned to several general areas that need improvement including training, improved written guidance and communication, monitoring and documentation, improved documentation and verification of meeting safety requirements by licensing and accountability and financial accuracy. The attached table addresses each issue with specific goals and outcome, action steps, target date for implementation and completion of the steps, and evaluation measures. Virginia will provided status updates on a quarterly basis to apprise the ACF Regional Office of our progress.

Virginia recognized, beginning in 2009, that deficiencies existed while conducting on-sight agency reviews. The Title IV-E staff and Division of Family Services (DFS) program managers had initiated plans to make changes in training, monitoring, and written guidance prior to the review. The existing plans in conjunction with the other actions identified in the matrix should be completed within the year because much of the preliminary work is complete and waiting for initiation. More explanation of the work in progress follows.

TRAINING

The past training method, used since 2007, was an intensive 4 day, lecture based format. It was conducted annually, once in each region of the state and targeted new IV-E eligibility workers. There was no tracking for attendees or testing to determine the effectiveness of the class or understanding of the curriculum. As we began on-site case reviews in March 2009, we found recurring errors and misunderstanding of the requirements. This was due in part to the outdated IV-E guidance manual, but also reflected that existing training was not effective for long term knowledge. We also found that many of the agencies had tight

budgets and limited staff, which made it difficult to send staff for training. There was no training offered to service workers or finance staff on the intricacies of IV-E compliance.

In early 2009, IV-E staff developed an additional training curriculum, targeted towards Service Workers. The training focused on the IV-E requirement and Reasonable Candidates. The training sessions were conducted between April and December 2009 in each of the regions. The second training was for Finance workers and focused on Payment Accuracy Guidelines including allowable IV-E Costs. These were mini-sessions, presented at each of the Regional Local Office Managers Meetings between October 2009 and March 2010.

In coordination with larger State training plans to develop more online training, the rapid e-learning software (Articulate) was provided to the unit. The software and online access through the Knowledge Center, offered the opportunity to provide training in topical segments. The program also allows testing and tracking of participants. The original 4 day IV-E training has been broken out into sections that include Entering Foster Care, Initial IV-E Eligibility, and Placement training. The remaining curriculum segments to be developed are Court Orders and Judicial Language and Ongoing Requirements. Title IV-E Policy Training for Service Workers and Payment Accuracy for Finance Workers will also be added to the Knowledge Center online course options. Although the training component of the plan is large, it is expected that the remaining curriculum can be developed and all classes accessible online within the year.

MONITORING

Virginia did not have an ongoing schedule to ensure that all IV-E cases were reviewed for correctness between 2007 and January 2009. As the Federal Review approached, it became a priority to conduct reviews. Between March 2009 and May 2010, 115 of the 120 local agencies had a review. There were 5 localities that did not report any IV-E. The review process, which included using the Federal IV-E Review Instrument, verified the initial determination, reviewed court hearings, placement requirements and correct payments. Each agency was provided a detailed report that identified successful and problematic procedures. These reviews established our baseline for future reviews to begin during the second quarter of the PIP. The monitoring requirements will continue through the implementation phase of the PIP. The longer term goal will be to develop a quality assurance plan as follow-up to the errors found. The resources needed to continue on-site reviews are discussed in more detail later in the plan.

GUIDANCE

The existing Title IV-E Manual has not had a comprehensive revision since 2006. This has been an ongoing challenge for the several years but is now, almost complete. The revision process has been ongoing for all of 2010 but never quite completed. The new guidance has been developed through a cross-functional advisory team comprised of IV-E workers and supervisors representing 10 local departments and the IV-E Consultants. The new revised draft has been reformatted to follow the IV-E process from entry into foster care through close-out and incorporates the changes in the Fostering Connections Act, new State guidance for foster home approval, enhanced maintenance payments (VEMAT), elimination of annual redeterminations and a new section on allowable IV-E costs and payment

accuracy. The prior year's work on the new guidance will enhance our ability to complete the actions for the PIP quickly.

TECHNICAL SUPPORT AND SUPERVISION

This is one of the areas in which Virginia has consistently provided excellent support to the local workers. IV-E Consultants are easily accessible and respond quickly to a request. Each of the IV-E Consultants is available each day through email and telephone and has an extensive knowledge of IV-E policy. The Title IV-E Supervisor also assists with clarification on policy and is accessible for support. In addition to the daily availability for support, Consultants send out FAQs and "Did You Know" updates to share new information. In addition, the IV-E consultants or supervisor, attend the Benefit Program Organization meetings and regularly offer training and information updates on IV-E policies.

RECOMMENDATION FOR RESOURCES AND ACTIONS

The Advisory team and IV-E Staff have determined that additional staff is needed in order to meet IV-E needs. It is recommended that 3 new part time IV-E Consultants be hired to ensure completion of the Program Improvement Plan. Currently there are 2 part-time staff and one program supervisor to provide administration and program support to 120 Local Departments of Social Services. The priorities of needs are often conflicting with the demand to revise written guidance, perform agency case reviews, provide training, develop new online curriculum, respond with technical support for Title IV-E workers and provide remedial support to troubled agencies. The Team believes that having a regional consultant for each area will free the program supervisor to focus on the policy and compliance issues including updating and revising IV-E guidance, developing training guidelines and curriculum, evaluating compliance reviews to identify problem agencies and assisting in the development of quality assurance plans. The additional regional consultants will be utilized to conduct more frequent training, provide regular compliance reviews in a timely manner and to provide prompt technical assistance.

In addition to the additional staff request, the team recommends that barriers to shared information be removed. The child welfare reporting system currently does not generally allow access by Eligibility Workers. By granting access to the official foster care reporting system, the eligibility worker can better monitor the classification of the cases, verify court and placements requirements are met and improve the accuracy of IV-E payments. As a best practice, cross unit collaboration will be modeled by the State. Licensing Division, the Regional Offices and Courts will engage in open communication to quickly resolve issues such as payment accuracy, safety needs and timeliness of court orders. Each locality will be encouraged to find ways to work across the divisions of eligibility, service and finance to ensure that cases are correctly evaluated, managed and paid correctly.

Finally the State has begun to develop a rate structuring process for children residential facilities. The Team supports continued development of the process which will allow for standardized payments, improved payment accuracy and equitable provision of services to all children in residential foster care.

The attached Matrix addresses a comprehensive approach to resolving the issues presented through our internal review and the recent Federal findings. The action steps are ambitious but achievable due to the ongoing work already started including curriculum development, guidance revisions and resumption of agency reviews.

Respectfully submitted

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Pat Lewis, Title IV-E Supervisor

TRAINING

Actions topics	Action Steps to Achieve	Key Contact	Evidence of Completion	Estimated Date to Complete
Issue 1	Revise Allowable Cost Matrix and provide directive to all LDSS staff	IV-E Supervisor	Send to ACF revised Matrix and copy of Broadcast	Q1
	Develop online independent training on Payment Accuracy in the Knowledge Center for local finance staff to identify allowable IV-E costs	IV-E Supervisor	Send to ACF training curriculum.	Q2
			Because the Knowledge Center is an online, self-paced independent study format there is no set agenda to provide. We can obtain statistical, summary information for who has completed the course with a passing score of 80%.	Q4
	Provide annual refresher training on Allowable Costs at each of the 5 Regional Business Office Managers meetings in each region	Regional IV-E Consultants	Send to ACF copy of the curriculum and training documents; dated agendas for completed training	Q3
Issue 2	Develop online independent training in the Knowledge Center for case workers and fiscal staff to be able to identify date errors and how to correctly close cases when children are no longer receiving	IV-E Supervisor	Send to ACF training curriculum.	Q2
			Because the Knowledge Center is an online, self-paced independent study format there is no set agenda to provide. We can obtain statistical, summary information for who has completed the course with a passing score of 80%.	Q4

	foster care maintenance			
Issues 3 & 5	Develop online independent training in the Knowledge Center for case workers which include appropriate removal and compliance requirements and timeframes for court orders	IV-E Supervisor	Send to ACF training curriculum.	Q2
			Because the Knowledge Center is an online, self-paced independent study format there is no set agenda to provide. We can obtain statistical, summary information for who has completed the course with a passing score of 80%.	Q4
	Provide classroom training for LDSS service and eligibility workers which include appropriate removal and compliance requirements and timeframes for court orders	Regional IV-E Consultants	Send to ACF training curriculum; dated agenda for completed training	Q4 -On going with final report at end of CAP
	Provide refresher training to LDSS attorneys to update their knowledge base on IV-E removal and court order requirements as written in Foster Care Policy	Permanency Program Manager	Send to ACF dated agenda for completed training	Q3
Issue 4	Update and provide current IV-E	IV-E Supervisor	Send to ACF updated training curriculum	Q2

	training curriculum to expand the explanation and requirements to accurately determine the family assistance unit; calculate financial need and; deeming income			
GUIDANCE				
Actions topics	Action Steps to Achieve	Key Contact	Evidence of Completion	Estimated Date to Complete
Issue 1	Provide revised IV-E Manual to LDSS which include new payment accuracy section that defines and identifies what may be appropriately claimed under title IV-E.	Permanency Program Manager and Title IV-E Supervisor	Send to ACF the revised draft for approval; copy of Broadcast with directive to begin use of new guidance	Q1
	Add resource tool library (worksheets, flowcharts, matrix) to the existing agency intranet to assist local workers with quick reference for IV-E guidance.	IV-E Supervisor	Send to ACF copies of the resource tools including the payment matrix, 60 and 180 days charts for Foster Care, Deeming Step-parent income, Relative of 5 th degree, AFDC 100% and 185% of Need Worksheets.	Q1

Issue 3	Issue a Broadcast and ensure that Foster Care Policy clearly indicates that if a court orders a child's removal from the home, the child must be physically removed in order to be eligible for title IV-E foster care payment.	Permanency Program Manager	Send to ACF Broadcast with policy directive	Q1
			Send to ACF revised version of guidance	Q1
Issue 4	Revise IV-E eligibility manual to ensure that correct information from the State's AFDC State Plan and Foster Care policy manual is included for Assistance Unit, Deeming and Financial determination	IV-E Supervisor	Sent to ACF revised version of guidance	Q1

MONITORING

Actions topics	Action Steps to Achieve	Key Contact	Evidence of Completion	Estimated Date to Complete
Issues 2,3,4 & 5	Conduct agency case reviews based on proficiency of IV-E compliance and number of errors found in prior visit with	IV-E Supervisor	Send to ACF the dates review are completed and names of agency visited	Q4- Ongoing quarterly summary report-final report at end of CAP

	a minimum of 40 review per year			
	Develop quality assurance process to identify root causes of errors	Continuous Quality Improvement Unit	Send to ACF copy of the process to be used	Q4
OASIS				
Actions topics	Action Steps to Achieve	Key Contact	Evidence of Completion	Estimated Date to Complete
Issue 2	Issue Broadcast to notify LDSS to grant eligibility workers access to OASIS for quality review of IV-E eligibility case information	Permanency Program Manager	Send ACF copy of the Broadcast.	Q1
LICENSING				
Actions topics	Action Steps to Achieve	Key Contact	Evidence of Completion	Estimated Date to Complete
Issue 6	Implement process to gather, store and make info available to VDSS that ineligible employee candidates are not hired by CRF. Plan is to notify provider that applicant did not meet requirements and require confirmation on no-hire status. IV-E will track and	IV-E Supervisor	File maintained at VDSS IV-E office for inspection by the ACF at Review	Q3- data collection will be ongoing

	file responses; agency reviewer will verify personnel files on site and notify IV-E unit of any errors.			
	Send directive memo to State Children Residential Facilities monitors instructing them verify through onsite standards reviews to notify VDSS if any applicant who received a non employable report (104 and 106 form letters) are found to be employed	IV-E Supervisor	Send to ACF copy of the directive from the Division of Licensing	Q3-reviews will be ongoing

RATE STRUCTURING

Actions topics	Action Steps to Achieve	Key Contact	Evidence of Completion	Estimated Date to Complete
Issue 7	Develop a rate structuring workgroup	Permanency Program Manager	Provide ACF with list of members	Q1
	Develop a work plan for rate structure	Permanency Program Manager	Provide ACF with copy of the plan and target dates	Q2