

DEPARTMENT OF HEALTH AND HUMAN SERVICES
DIVISION OF SOCIAL SERVICES
CHILD WELFARE SERVICES

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January 10, 2018

DEAR COUNTY DIRECTORS OF SOCIAL SERVICES

ATTENTION: DSS DIRECTORS, CHILD WELFARE PROGRAM ADMINISTRATORS, PROGRAM MANAGERS, SUPERVISORS AND SOCIAL WORKERS

SUBJECT: RESULTS OF 2017 TITLE IVE FOSTER CARE ELIGIBILITY REVIEW

FOR INFORMATION

The Children's Bureau (CB) of the Administration for Children and Families (ACF) conducted a primary review of the state's Title IV-E foster care program during the week of July 24, 2017. The review included a sample of 80 foster care cases in which a Title IV-E maintenance payment was claimed during the period under review (PUR). The purposes of this review are to determine whether the North Carolina Department of Social Services' Title IV-E foster care program is in compliance with eligibility requirements and to validate the basis of the state's financial claims to ensure appropriate payments are made on behalf of eligible children. The case record of each child in the selected sample is reviewed to verify Title IV-E eligibility specific to legal requirements, AFDC connectedness, placement in a licensed family foster home or child care institution, and safety requirements for the child's foster care placement.

A total of 79 of the 80 cases were determined to have met all eligibility requirements for the PUR. One (1) case was identified as an error because the removal from and living with requirements were not met by the same specified relative. There were also four non-error cases that met requirements during the PUR but were found to have a period in the child's foster care episode for which Title IV-E maintenance payments were claimed prior to the month in which a judicial finding of reasonable efforts to prevent removal was made. In addition to these cases, there were three (3) non-error cases with periods of eligibility for which the state had not claimed allowable Title IV-E maintenance payments. Continued training for county staff was identified as a recommended corrective action for each of these issues. The state will also need to implement system safeguards that will prevent counties from claiming Title IV-E funds before all requirements have

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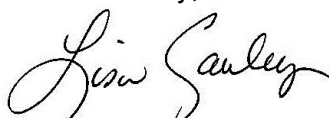
been met and to ensure that maintenance payments are claimed from the first day of the month in which all Title IV-E eligibility requirements are met. The design of NCFAST should provide the state with some of the safeguards needed and the state will continue to explore other ways to maximize the use of Title IV-E dollars for eligible children.

The review process found that North Carolina continues to make improvements to ensure protections for children. Judicial determinations of contrary to the welfare and reasonable efforts to prevent removal were timely and child specific. Judicial findings of reasonable efforts to finalize the permanency plan were obtained in a timely manner and were often obtained within six months of the child's entry into foster care and occurred more frequently than the federal requirements. Records were well organized and included necessary documents for verifying eligibility. Documents were easily retrieved from counties if they were not in the record. Reviewers also noted that safety checks were consistently being conducted on family foster homes and documentation of these checks was available. The eligibility determination form (DSS-5120) and redetermination form (DSS-5120A) provide counties with a standardized process for easily and accurately recording the information needed for verifying eligibility.

This review also found additional areas in need of improvement and identified corrective actions the state will need to take to improve program performance. There were several cases in which the placement log and payment histories conflicted. In each of these cases, the county had paid the correct provider, but had inaccurately reported the facility ID on the DSS-5094 for reimbursement. NCFAST will minimize the possibility of this occurring since the facility name is provided in conjunction with the facility ID but counties will also need to develop improved fiscal oversight and controls to ensure that placements and payment rates are accurately reflected. A comprehensive payment history should include ALL payments made to include payments made from all county funds and payments made using the child's resources and the Division will be exploring ways to best capture this in the future. North Carolina will also need to develop a system of quality assurance at the county and state level to periodically review and track payments to providers to verify accuracy and compliance with federal requirements and state standards.

The Division recognizes the hard work that you all do in meeting the needs of children and families and appreciates your assistance in making this a successful review. We are confident that we will all continue to work together and take advantage of this unique opportunity to gain insight into the functioning of our child welfare system and make the recommended changes to further enhance our practice. If you have specific questions regarding cases from your county, please consult with one of your CPRs.

Sincerely,



Lisa T. Cauley
Deputy Director

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