



NC DEPARTMENT OF
**HEALTH AND
HUMAN SERVICES**

ROY COOPER • Governor

MANDY COHEN, MD, MPH • Secretary

SUSAN OSBORNE • Assistant Secretary for County Operations for
Human Services

JUNE 10, 2019

DEAR COUNTY DIRECTOR OF SOCIAL SERVICES

**ATTENTION: COUNTY DSS ATTORNEYS, CHILD WELFARE PROGRAM
MANAGERS AND SUPERVISORS, AND CHILD WELFARE PROGRAM
ADMINISTRATORS**

SUBJECT: PREPARATION FOR FEDERAL IV-E ELIGIBILITY REVIEW

REQUIRED ACTION: TIME SENSITIVE

The purpose of this letter is to provide counties with details in preparation for the next Federal Title IV-E Eligibility Review which is expected to take place in July 2020. With this review, the Federal government will assess the State's adherence to Title IV-E eligibility criteria. Cases subject to this review will be drawn from cases identified as receiving one or more Title IV-E foster care maintenance payments in the period under review which has been identified as October 1, 2019 to March 31, 2020. Out of a sample of 80 cases, the error threshold for this review is 4 cases. Any case found in error will be subject to disallowance of Federal Financial Participation (FFP) for both maintenance costs and for associated Title IV-E Administrative costs. If the error rate exceeds the threshold of 4 cases, North Carolina may be subject to additional financial sanctions and will be required to implement a program improvement plan.

The Title IV-E Eligibility Review will measure compliance with all requirements related to the child's eligibility including, but not limited to:

- Judicial determinations within valid, enforceable orders that include findings and conclusions of contrary to the welfare (or best interest) and reasonable efforts language;
- Judicial determinations, within 180 days of the placement, that it is in the best interests the child to continue in care, for any voluntary placement agreement (VPA);
- A judicial determination in every court order that the county DSS has responsibility for placement and care;
- Proper need and deprivation determinations based on the AFDC "Look Back Date";
- Verification that the child was continuously placed in a licensed home or facility for every month that IV-E reimbursement was claimed; and
- Compliance with all licensing requirements for every placement provider with whom the child was placed during the period under review.

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

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AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION EMPLOYER

In preparation for the Federal Title IV-E Eligibility Review, counties must review every case for which a Title IV-E foster care payment is made during the period under review, using the attached Title IV-E Foster Care Eligibility On-Site Review Instrument. A 100% review of all open Title IV-E cases must be completed no later than August 31, 2019.

To assist county staff with understanding and using the Federal Review Tool, the Division of Social Services (DSS) is scheduling webinars focused on the use of the tool on a sample case. Staff need to only register for one webinar, but the webinars will be offered multiple times over a one-week period to allow for more opportunities for county participation.

The webinar schedule is as follows:

June 17: 9-12 and 1:30-4:30
June 18: 9-12 and 1:30-4:30
June 19: 9-12 and 1:30-4:30
June 20: 9:00-12 and 1:30-4:30
June 21: 9:00-12

In order to register for a webinar, click on the following link (or copy it into a browser):
<https://attendee.gototraining.com/rt/3374487346497561089>

At the registration site, staff can pick the date of the webinar in which they want to participate. As previously noted, it is only necessary to attend one webinar; the content will be duplicated each time.

DSS will be issuing an additional Dear County Director Letter that outlines procedures counties should follow as they are involved with the review process. In addition, DSS will hold regional meetings toward the end of July 2020 where county staff will be able to bring difficult cases to discuss with the Title IV-E team and receive assistance. More information will be forthcoming.

If you have any questions about this correspondence or the Title IV-E Eligibility Review, please contact Evan Friedel at 336-922-0370 or evan.friedel@dhhs.nc.gov.

Sincerely,



Kristin O'Connor, Section Chief
Child Welfare Policy and Programs

Attachment: Title IV-E Foster Care Eligibility On-Site Review Instrument

Cc: Susan Osborne, Assistant Secretary for County Operations for Human Services
Lisa Cauley, Deputy Director for Child Welfare Services
Teresa Strom, Section Chief for County Operations
Evan Friedel, Title IV-E Coordinator

CWS-21-19