

_____ County
Title IV-E Implementation Plan
FY 2012

I) Administrative Claiming Methodology

- The Department will be using the “direct” claiming methodology for administrative costs (skip to IV.).
- The Department will be using the “enhanced” claiming methodology for administrative costs.

II) Eligibility Rate

This department will use an eligibility rate based on the number of Title IV-E Certified children divided by the number of children in foster care. The definition of foster care is attached. The eligibility rate will be determined monthly and averaged for the quarter.

- The department is not sharing an eligibility rate with any other departments.
- The department is sharing an eligibility rate and will sign and submit to the Juvenile Justice Department a Memorandum of Understanding.

III) Reasonable Candidates

Case Plans

The “reasonable candidate” population for juvenile probation will consist only of those children who have been court-ordered to formal probation in their home and who have a defined case plan that documents that the child has been determined to be at imminent risk of removal from the home and placement into foster care, absent preventative pre-placement intervention services. The case plan contains clearly defined goals that must be met for the child to reside safely in the home and offers services for the child and family. If the services described in the case plan are ineffective, the plan for child will be removal from the home and placement into foster care. *A copy of the current case plan that will be used is attached.*

Juvenile probation officers will document on the case plan the supporting documentation that was used to establish candidacy. The Foster Care Risk Assessment will be completed prior to completing each case plan. The risk assessment must be one tool used to establish candidacy, but may not be the only tool used. Social history reports, psychological reports, or other case file documentation will be used in addition to the risk assessment as supporting documentation of imminent risk of removal from the home and placement into foster care. The case plan will include a description of current risk factors which place the child at imminent risk of removal from the home and placement into foster care.

Children on probation are required to have a defined case plane developed with the input of the child, the family and the juvenile probation officer within 30 days of disposition. The department will not claim administrative costs for reasonable candidates until the case plan is completed. The date of completion is documented by the date of the JPO’s signature on the case plan. If any party is unable to sign, or refuses to sign the case plan, an explanation will be provided.

Case Plan Reviews

The case plan will be reviewed six months from the date of disposition and every six months thereafter, and when circumstances in the home change. During the review, the case plan is updated and candidacy is reviewed. The Review of Child/Family Case Plan (attached) will document a child's candidacy for foster care or continued candidacy for foster care. This case plan review will be used for all children placed on probation in their home.

A new risk assessment will be completed prior to completing the Review of Child/Family Case Plan, however, it will not be the sole source of documentation of candidacy. Social history reports, psychological reports, or other case file documentation will be used in addition to the risk assessment as supporting documentation of imminent risk of removal from the home and placement into foster care. The date of the determination is the date the Review of Child/Family Case Plan is completed. The date of completion is documented by the date of the JPO's signature on the case plan review. If any party is unable to sign, or refuses to sign the case plan review, an explanation will be provided.

IV) Foster Care

Allowable Title IV-E administrative costs for Title IV-E certified children will be determined by using a time study methodology that will allocate allowable costs for children in foster care and further allocated by applying the eligibility rate. Children in foster care are those children who have been removed from their normal place of residence (i.e. the home of their parent, legal guardian, managing conservator, custodian, or relative) by a court order and placed in a foster care setting, and for whom the county has placement and care responsibility. A child is in foster care in accordance with this definition regardless of whether the foster care facility is licensed and payments are made for the child's care or whether federal matching of any payments is made. A list of foster care settings is included in the attached definition of foster care.

V) Time Study

The two methods used to document time spent by probation staff on allowable Title IV-E activities are the Random Moment Sampling (RMS) time study and the Continuous Time Reporting System. Only direct service staff are time studies using either method. Supervisors and administrative staff are excluded from the time study, however, their expenditures are captured in the claim and driven by the time study results.

This department will use the following time studying methodology for this fiscal year:

Random Moment Sampling

- (1) The administrator of our program is (consultant's name here). Our time study includes the following components:
- (2) Only direct service staff who are time studied. Direct supervisors and administrative staff are not time studied, however, their costs are driven by the sample results.
- (3) Random moments are selected prior to the quarter in which the study occurs. Every person has an equal chance of being selected for every moment.
- (4) The time study results will not be deemed valid unless the greater of a) a minimum of 2000 valid responses are obtained or b) a statistically valid sample to the 95% confidence level +/- 2% is achieved.
- (5) The study may contain a standard 10% over sample. Any additional over sample will be justified by historical data.

- (6) The study will capture the case number that the participant is working on and a description of the activity that justifies the code selected.
- (7) Responses will be made within 48 hours or the moment is invalid.
- (8) A subset of 10% of all responses will be validated by a supervisor or, in the instance the chief is participating in the study and is chosen in the subset, the moment will be validated by a person of equal or higher position.
- (9) There will be a quality assurance process and security measures in place, i.e., ID numbers for staff and passwords.

Continuous Time Reporting System

Only direct service staff will participate in the continuous time reporting system and keep a time sheet. Using this document, staff will record their time in ¼ hour intervals and document case numbers and description of activities for each increment of time. Staff would complete a time sheet for every day they work. The daily excel time sheets are linked to a summary sheet that will compile the data for the entire month. The summary sheet is printed out and signed by the employee and supervisor each month. All time sheets are retained by the department for a minimum of five years. Time sheets will be submitted to the Juvenile Justice Department when requested for review during desk audits, on-site audits, during claims processing, or at any time clarification is required.

VI) Time Codes

This department will use the following set of time codes for this fiscal year:

- The following time codes will be used to allocate time using the “enhanced” methodology:
 - (1) Facilitating Eligibility Determination
 - (2) Case Management
 - (3) Court-Related Activities
 - (4) Training
 - (5) Counseling and Social Services
 - (6) Other Activities
 - (7) General Administration
 - (8) Leave and Breaks

A copy of the time code descriptions and examples of allowable activities for each is attached. Below is the basis for claiming these activities and the percentages that will be requested for reimbursement.

- (1) *Facilitating Eligibility Determination.* The determination and redetermination of Title IV-E eligibility are necessary and allowable administrative activities in the Title IV-E foster care program. Administrative costs allocated to this time code are reimbursable at 50%.
- (2) *Case Management.* Case management activities such as referral to services, placement of the child, development of the case plan, and case reviews are allowable Title IV-E activities when performed for children that are reasonable candidates for Title IV-E foster care and Title IV-E certified children. Administrative costs for allowable case management activities for reasonable candidates and children in foster care are reimbursable at 50% with an eligibility rate applied. Case management activities for any other children are non-reimbursable.
- (3) *Court-Related.* Preparation for and participation in judicial determinations is an allowable Title IV-E activity when performed for children that are reasonable candidates for Title IV-E foster care and Title IV-E certified children placed in foster care. Administrative costs for allowable court related activities for reasonable candidates and

children in foster care are reimbursable at 50% with an eligibility rate applied. Court related activities for any other children are non-reimbursable.

- (4) *Training*. Training related to claiming administrative costs for reasonable candidates and children in foster care is an allowable Title IV-E activity. Administrative costs allocated to this time code are reimbursable at 75% with an eligibility rate applied. Training that is directly related to Title IV-E foster care maintenance (i.e., training staff on the requirement to claim Title IV-E foster care maintenance) is an allowable Title IV-E activity. Administrative costs allocated to this time code are reimbursable at 75%. Training that is not specifically related to Title IV-E, general training, is reallocated and does not affect the claim.
- (5) *Counseling & Social Services*. Social services provided to the child, the child's family or foster family which provide counseling or treatment to ameliorate or remedy personal problems, behaviors or home conditions are not allowable under Title IV-E. Administrative costs allocated to this time code are non-reimbursable.
- (6) *Other Activities*. Any activity that is not specifically addressed in the other codes is unallowable. Administrative costs allocated to this time code are non-reimbursable.
- (7) *General Administration*. Administrative duties that benefit Title IV-E and other programs. General Administrative activities are reallocated.
- (8) *Leave & Breaks*. Time included under this time code is reallocated.

The following time codes will be used to allocate time using the "direct" methodology:

- (1) Facilitating Eligibility Determination
- (2) Training
- (3) Case Management
- (4) General Administration
- (5) Other Activities

A copy of the time code descriptions and examples of allowable activities for each is attached. Below is the basis for claiming these activities and the percentages that will be requested for reimbursement.

- (1) *Facilitating Eligibility Determination*. The determination and redetermination of Title IV-E eligibility are necessary and allowable administrative activities in the Title IV-E foster care program. Administrative costs allocated to this time code are reimbursable at 50%.
- (2) *Training*. Training that is directly related to Title IV-E foster care maintenance (i.e., training staff on the requirements to claim Title IV-E foster care maintenance) is an allowable Title IV-E activity. Administrative costs allocated to this time code are reimbursable at 75%. Training that is not specifically related to Title IV-E, general training, is reallocated.
- (3) *Case Management*. Case management activities such as referral to services, placement of the child, development of the case plan, and case reviews are allowable Title IV-E activities when performed for Title IV-E certified children only. This code also includes court-related activities such as preparation and participation in judicial determinations for Title IV-E certified children only. Administrative costs for allowable case management activities for Title IV-E certified children are reimbursable at 50%. Case management activities for any other children are non-reimbursable.
- (4) *General Administration*. Administrative duties that benefit Title IV-E and other programs. Leave and breaks. Time included under this time code is reallocated.
- (5) *Other Activities*. Any activity that is not specifically addressed in the other codes is unallowable. Administrative costs allocated to this time coded are non-reimbursable.

VII) Title IV-E Administrative Claim

This department will use the attached claim form (with instructions) to bill for allowable Title IV-E administrative costs for this fiscal year.

VIII) Department Organization

An organizational chart for the department as well as descriptions of each unit of the probation department is attached.