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May 21, 2010

To: Regional Managers
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From: James W. Payne, Director
Angela Green, Deputy Director of Practice Support
Dave Judkins, Deputy Director of Field Operations
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Subject: Eligibility Files
DCS-09-26

In preparation for upcoming Title IV-E federal reviews, the Indiana Department of Child Services (DCS) continues to pursue the goals outlined in our Program Improvement Plan (PIP). During the January 2009 review, a number of cases in the Indiana Child Welfare Information System (ICWIS) were determined to be eligible but did not have the appropriate documents in the case file to support the determination. DCS is committed to improving the accuracy of eligibility information in ICWIS and in our case files.

This administrative letter outlines tools that can be used to build a stand-alone eligibility file or to create a section in the child's case file to maintain all supporting eligibility documentation. Regardless of whether a separate file or a separate section in the child's case file is used, all information should be kept in a single location so that it is easily accessible if a case is selected for an audit. This letter also describes a quality assurance process that will occur in which each Supervisor or designee will verify information in ICWIS to assure that information is entered correctly into ICWIS with supporting documentation in the eligibility file.



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Maintenance of Eligibility Information

Eligibility information should be maintained as follows:

- New foster care cases: A complete eligibility file should be created within 30 days of the child's removal from the home.
- Existing eligible Title IV-E foster care cases: If an eligibility file has not already been prepared, the file should be created when the next Reasonable Efforts to Finalize the Permanency Plan (REPP) determination is received (every six [6] months - at the same time as the case plan review). An eligible case is one for which ICWIS reflects an eligibility status of 'open,' 'claim admin,' or 'no admin.' The eligibility file for an existing case can be built beginning with the current REPP determination made at the time of the periodic case plan review. It is not necessary to retroactively create the file for prior time periods. The remainder of the eligibility information can be assembled if the case is ever selected for an audit.
- Title IV-E ineligible cases: An eligibility file does *not* need to be developed on existing ineligible cases which have an ICWIS eligibility status of 'denied,' since these cases will not be pulled in a Title IV-E audit.

If your DCS local office has not already established standardized procedures for creating an eligibility file, the attached 'IV-E Eligibility File' document can be used for guidance. The eligibility file consists of four sections with a divider page that identifies the section and lists the types of documents included in that section (templates for divider pages are also attached). Although this format is not required, it is recommended. Existing eligibility file formats currently used by DCS local offices are acceptable; however, all documents necessary to support the child's eligibility must be included in the file.

Quality Assurance Process

Quality Assurance Tool: The 'Standard IV-E Eligibility File Requirements and Quality Assurance' attachment (referred to herein as "quality assurance tool") is a tool that the Family Case Manager (FCM) should use as a checklist to build the eligibility file. The FCM will use the quality assurance tool to document that the information necessary to support the eligibility criteria is included both in the file and in ICWIS. The items listed in the quality assurance tool should be maintained in the eligibility file for each foster care episode.

Within 15 days of the eligibility file being constructed, the FCM Supervisor, or his or her designee, should complete the following tasks:

- Verify the consistency between the documentation in the eligibility file and information in ICWIS using the quality assurance tool;



- Work with the FCM to resolve data errors in ICWIS and incorporate additional documentation in the eligibility file as necessary to meet the criteria on the quality assurance tool before final supervisory sign-off; and
- Maintain the signed and completed quality assurance tool in the eligibility file.

This is a recurring process. The Supervisor, or his or her designee, should conduct these tasks on an ongoing basis each time there is an update to the eligibility file and/or ICWIS, for example, court activities, changes in placement, and periodic review.

Since the accuracy of ICWIS data and eligibility file documentation is critical to DCS' future success, the use of the quality assurance tool by both the FCM and FCM Supervisor is required.

Desk Guide: To assist with the accuracy of ICWIS data entry and eligibility file documentation, a 'Title IV-E Foster Care and Title IV-A EA Eligibility Desk Guide' (herein referred to as the "Desk Guide") will be released. The purpose of the Desk Guide is to provide detailed guidance on federal and State Title IV-E criteria, eligibility file documentation, and ICWIS data entry. The use of the Desk Guide and the quality assurance tool should improve the identification and correction of eligibility errors.

DCS Quality Assurance Review (QAR) Process: Compliance with the use of the quality assurance tool will be reviewed and documented during the DCS QAR process through the following two questions:

1. A IV-E Eligibility File was created for children in out-of-home care with an eligibility status of open, claim admin or no admin.
2. The supervisor has reviewed and signed the completed 'Standard IV-E Eligibility File Requirements and Quality Assurance' form.

Sample File Review: A sample review of 25 cases statewide will be performed monthly beginning July 2010 by the Central Eligibility Unit (CEU) to validate that the documentation in the file supports the information entered in ICWIS. CEU will request a copy of the documents that support each eligibility requirement in addition to the completed quality assurance tool.

Thank you for your support and cooperation. Successful implementation of these tools and processes will assist in the preparation of IV-E cases for future audits. If you have any questions related to the contents of this letter please address them to the CEU at Centralized.Eligibility@dcs.in.gov.

Sincerely,

James W. Payne, Director
Indiana Department of Child Services



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