



St Johns County Board of County Commissioners-
Family Integrity Program

FEDERAL FUNDING ELIGIBILITY MONITORING PLAN

October 2024-September 2025



Introduction

The State of Florida relies heavily on federal dollars to help fund our child welfare system. Eligibility for these funds, especially the Title IV-E and TANF, is linked to our ability to provide quality services to children and families as well as to achieving compliance with federal and state criteria. This Monitoring Plan describes the review approach and schedule for use in reviewing cases for eligibility with Title IV-E and TANF. This plan supports the overall effort to improve the quality of services for children and families.

The Federal Funding Monitoring Plan considers the fact that a successful monitoring plan focuses on making improvements in weak areas on an on-going basis, while also being dynamic enough to address the various crises and environmental changes that we experience.

Statutory Authority and References

The statutory references that are relevant for Title IV-E and TANF are:

Federal requirements:

- Child and Family Services Review – S. 1123A, Social Security Act; 45 CFR 1355.32(d), and 45 CFR 1355.33
- Title IV-E – §. 422(b)(12), 471(a)(7), (10), (20), (23), 472(a)(1)-(4), (b), (c) (e), (f), (g), (j), (k) and 474(d), 475A of the Act
- Code of Federal Regulations – Requirements Applicable to Title IV-E:
 - Eligibility of the children on whose behalf foster care maintenance payments are made 45 CFR parts 1355, 1356, and 1357 to include:
 - Judicial determinations regarding “reasonable efforts” and “contrary to the welfare” in accordance with 45 CFR §1356.21(b) and (c);
 - Voluntary placement agreements in accordance with 45 CFR §1356.22;
 - Responsibility for placement and care vested with the title IV-E agency in accordance with 45 CFR §1356.71(d)(iii);
 - Eligibility for AFDC under the state plan that was in effect on July 16, 1996, in accordance with 45 CFR §1356.71(d)(1)(v) ;
 - Child’s placement in a foster family home, childcare institution, or residential family-based treatment facility for substance abuse, in accordance with 45 CFR § 1356.71(g);
 - Child’s placement setting is fully licensed, in accordance with 45 CFR § 1356.71(d)(1)(iv);
 - Safety requirements are met by the foster parent of the foster family home or staff of the childcare institution where the child is placed, in accordance with 45 CFR §§1356.30 and 1356.71(d)(1)(iv); and
 - Allowable payments made to foster care providers that comply with 45 CFR §1356.30.
- State statutes that generally cover child welfare services, including some eligibility requirements:
 - Chapters 39, 409, and 414, Florida Statutes



Federal Funding Eligibility Monitoring Plan

Purpose

This Federal Funding Eligibility Monitoring Plan is intended to support the child welfare program in receiving federal funds correctly, in order to obtain necessary resources that sustain services for children and their families. Because federal dollars are fundamental to our ability to provide services, conformity with specific federal and state requirements is necessary and critical. Payments made to ineligible children or for ineligible purposes may subject the lead agency and state to penalties, starting with the reimbursement of erroneous payments.

This Monitoring Plan addresses the process and frequency for eligibility reviews. Title IV-E and TANF eligibility reviews conducted under this Monitoring Plan will assist in the validation of the accuracy of the State's claim for reimbursement of payments. Eligibility reviews for Title IV-E Foster Care including Extended Foster Care (EFC), Title IV-E Adoption Subsidy, and Temporary Assistance for Needy Families (TANF) Adoption Subsidy on a regular and recurring basis must occur. The reviews concentrate on eligibility criteria and documentation.

The reviews will be educational and corrective in nature with a focus on Title IV-E Foster Care and Adoption Subsidy, and TANF MAS requirements.

Review Activities – Annual File Review

The federal funding review consists of:

- all assigned activities associated with review of case files, including completion of the review instruments;
- management debrief following the review; and
- a report (See Appendix A for Report Template) summarizing the findings and recommendations at the end of the review.

1. Determine the dates for the review. The Family Integrity Program will complete its IV-E foster care including EFC, IV-E adoption subsidy, and TANF adoption subsidy eligibility reviews between the 2nd and 3rd quarters of the 2024-2025 federal fiscal year. Foster Care cases will be reviewed in March 2025 and Adoption TANF and IV-E cases will be reviewed in May 2025.

2. Calculating Sample Size. The Family Integrity Program's sample of IV-E Foster Care including EFC, Adoption Assistance, and TANF Adoption Subsidy payments will be drawn from Florida Safe Families Network (FSFN) utilizing FSFN Payment Download and includes all children coded as eligible for each funding source.

- The sample for Adoption will be drawn in October 2024 with a 12-month minimum Payment Service Date Range of 10/01/2023- 09/30/24. Given the agency's small size, the sample will primarily consist of the most recent adoption files. However, older files may also be included as needed to ensure the sample meets the required size criteria.
- The sample for Foster will be drawn in **January 2025** with a specific Payment Service Date Range of **10/1/2024 – 12/31/2024**. All foster care reviews and corrections will be completed by 5/31/2025.



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- o The Foster Care reviews will be completed no later than March 2025, therefore the “Federal Monitoring – Region Licensing Compliance Template” will be submitted to the contract manager approximately 60 days prior to the review. This template will be submitted with each CCA provider and the time period under review for each child selected for the review to the contract manager no later than 01/31/2025.

(OCAs: Foster Care - LCFHE, LCLVE, SE5SE, LCSSE, LCNSE, EFRBE / MAS - WR001 / Adoption TANF - 39MAS)

An amount that equals a 90% confidence level and a margin of error of 10% with a response distribution of 50% for IV-E Foster Care including EFC, IV-E Adoption Assistance, and Adoption TANF separately will be reviewed. The Sample Size Calculator that will be utilized is found at the following link: [Sample Size Calculator by Raosoft, Inc.](#)

3. **Select Case Samples.** A random sample selection will occur to identify children for the review. If any case that is selected has been discharged or terminated at the time of the review, that case will be discarded and another case will be randomly selected.

4. **Review of Files.** The role of the reviewer is to verify elements of eligibility utilizing the review tools in Qualtrics, as developed by OCFW. The reviewer will be able to make well-informed assessments about conformity, identify areas where corrective action is required, and where technical assistance is needed, through review of the information and evidence from the case file reviews.

With the scheduled Title IV-E Audit by the Children’s Bureau, any corrections for the foster care reviews must be completed by 5/31/2025. The completed Regional Licensing Compliance Template must be utilized for the foster reviews and results entered into Qualtrics.

NOTE: The monitoring review must be conducted by a revenue maximization supervisor or specialist or other party familiar with eligibility. The person completing the eligibility determination will not review his or her own cases. Due to the agency only having one revenue maximization specialist, the agency’s Quality Services staff will review all eligibility files.

5. **Findings.** Following the review, the Quality Services Supervisor will review the findings and provide a preliminary report to the agency’s Contract and Finance Officer; error cases and payments will be identified, and corrections made for any case having a finding, such as a payment made with an unmet eligibility criterion, a duplicate payment, an overpayment, or any other unallowable expenditure. The final finding result will be documented, in Qualtrics and in the Report, after corrections or attempts to correct are taken. **If action has not been taken by the time of entry in Qualtrics, reviewer will identify in Qualtrics what action will be taken to address error.**

6. **Complete Final Report.** A written report of the review will be prepared within 30 business days of completion of each review but no later than 9/30/25. A written annual report (collapse findings from the eligibility reviews) will be sent, *per the Contract*, to the Department’s Contract Manager outlining areas where correction was needed with a summary of the findings for each case reviewed and actions taken to address error. Additionally, a quality improvement plan may be developed to address weaknesses and ensure compliance. Appendix A is a sample of the report template. The final submission will include the written report and the Regional Licensing Compliance Template.



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Signatures

Kelly Smith

Quality Services Supervisor

10/23/24

Date

[Signature]

Contract and Finance Manager

10/24/2024

Date

S. A. Novak

Chief Executive Officer

10/24/2024

Date



Appendix A

Federal Funding Monitoring Annual Report

Purpose of Review

The Title IV-E Foster Care (FC), IV-E Adoption Subsidy and TANF MAS eligibility review is part of the Federal Funding Eligibility Monitoring Plan. The purpose of this review is two-fold, first to ensure accurate eligibility decisions. Secondly, it is to ensure continued receipt of federal and state funding necessary to support our child welfare system.

Summary

<This summary should provide an overview of the key findings, brief analysis and describe what you learned, etc.>

Methodology

<Describe the sampling methodology and period under review.>

For example: The sample was pulled on date from the name report from location. The population size for Title IV-E Foster Care Eligible children is ####. The 90/10 sample size is ##. The population size for Title IV-E Adoption Eligible children is ###. The 90/10 sample size is ##. The population size for Adoption TANF Eligible children is ###. The 90/10 sample size is ##.

Case Results

- Non-Error Case = Accurate eligibility determination.
- Error Case = Inaccurate eligibility determination or IV-E was claimed and should not have been during the Period Under Review.
- Procedural Error Case = Information was not properly recorded, or documentation was not uploaded in CWIS, but the outcome of the eligibility determination was not impacted.

Improper Payments

- Underpayments = A payment should have been funded by IV-E and was unintentionally not claimed.
- Ineligible Payments = A payment should not have been funded by IV-E and was claimed.
NOTE: An underpayment or ineligible payment may occur in a Non-Error Case if the payment was outside of the Period Under Review.

<Describe the findings for the separate eligibility populations.> For example:

IV-E Foster Care (FC)

- Of the ## cases reviewed as eligible for IV-E Foster Care, ## cases (##%) are Non-Error cases.
 - ## IV-E FC cases with **No** Improper/Ineligible Payments
 - ## IV-E FC cases with Improper/Ineligible Payments
 - In ## IV-E FC cases, a payment was claimed to IV-E that does not meet the definition of a foster care maintenance payment. The payment was Voided and re-entered using the appropriate Service Type.



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- Of the ## cases reviewed as eligible for IV-E Foster Care, ## cases (##%) are Error cases.
 - In ## IV-E FC cases, the child had not lived with a specified relative within 6 months of removal. The eligibility in FSN was voided and determined correctly.
 - In ## IV-E FC cases, children were found to be ineligible for an interim period of time due to a lack of judicial finding of reasonable efforts to finalize the permanency plan (REFPP) within 12 months of the removal. This was corrected by documenting the REFPP on the Redetermination tab in the FSN Title IV-E Foster Care Eligibility module.
- Of the ## cases reviewed as eligible for IV-E Foster Care, ## cases (##%) are Procedural Error only cases.
 - In ## IV-E FC cases, the Shelter Order was not uploaded in CWIS. The eligibility in CWIS was determined correctly and the missing documentation has been uploaded to CWIS.

IV-E Adoption Subsidy

- Of the ## cases reviewed as eligible for IV-E Adoption Subsidy, ## (##%) are Non-Error cases and eligible under Title IV-E Adoption Subsidy.
- Of the ## cases reviewed as eligible for IV-E Adoption Subsidy, ## cases (##%) are Error cases and found to be IV-E Ineligible.
 - In ## IV-E adoption subsidy case, the Eligibility Path selected was that the child was an SSI Recipient. This is not accurate. No Eligibility Path was met. This case was submitted to OCW for review and override Eligibility to IV-E Ineligible.
- Of the ## cases reviewed as eligible for IV-E Adoption Subsidy, ## cases (##%) are Procedural Error only cases.
 - In ## IV-E adoption subsidy case, the Finalization Order was not uploaded in CWIS. The eligibility in CWIS was determined correctly and the missing documentation has been uploaded to CWIS.

TANF MAS

- Of the ## cases reviewed as eligible for TANF MAS, ## (##%) are Non-Error cases and eligible under TANF Adoption Subsidy.
- Of the ## cases reviewed as eligible for TANF MAS, ## cases (##%) are Error cases.
 - In ## TANF MAS case, the child should have been determined IV-E Eligible. Initially, case was determined IV-E Ineligible due to no deprivation. However, documentation in the file reflects that one parent was receiving supplemental security income in the AFDC eligibility month. This case was submitted to OCW for review and override Eligibility to IV-E eligible.
- Of the ## cases reviewed as eligible for TANF MAS, ## cases (##%) are Procedural Error only cases.
 - In ## TANF MAS cases, the Finalization Order was not uploaded in CWIS. The eligibility in CWIS was determined correctly and the missing documentation has been uploaded to CWIS.



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Initiatives to Improve

1. *<Describe what outcomes were realized due to initiatives identified in prior year report?>*
2. *<Describe any activities underway to improve eligibility and practice. What training initiatives are underway? Describe actions that will occur to prevent future occurrences of the Error-Cases findings. How do type of errors compare to prior year errors?>*

Additional Comments

Signatures

Lead Reviewer

Date

Chief Operating Officer

Date

Chief Financial Officer

Date

Chief Executive Officer

Date