



## DEPARTMENT OF HEALTH & HUMAN SERVICES

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ADMINISTRATION FOR CHILDREN AND FAMILIES  
Administration on Children, Youth and Families  
1250 Maryland Avenue, S.W.  
Washington, D.C. 20024

Ms. B.J. Walker, Commissioner  
Georgia Department of Human Resources  
Two Peachtree Street, NW Suite 29.250  
Atlanta, Georgia 30303-3142

Dear Ms. Walker:

This letter is in regard to Georgia's Child and Family Services Review (CFSR) Program Improvement Plan (PIP) and my decision to disallow **\$4,264,784** as a result of Georgia's failure to successfully complete all the requirements of its approved PIP.

The Administration for Children and Families (ACF), in collaboration with the Division of Family and Children Services (DFCS), conducted a CFSR of the State's child and family services programs during the week of July 16, 2001 to evaluate the seven outcomes and seven systemic factors enumerated in 45 CFR 1355.34. The review demonstrated that the State's child welfare program was not operating in substantial conformity with applicable Federal requirements in all seven outcome areas and three of the seven systemic factors. On October 10, 2001, ACF issued a final report of these findings to DFCS.

Pursuant to 45 CFR 1355.35, the State was required to develop a Program Improvement Plan addressing the items within each outcome measure and systemic factor that were determined not to be in substantial conformity during the review. DFCS developed its PIP and submitted it to ACF on January 30, 2002. After negotiations with Regional Office staff on several issues, the plan was resubmitted on June 26, 2002 and July 31, 2002. The final version was submitted on September 12, 2002. The PIP, with some revisions, was approved by ACF on October 1, 2002. For each item included in the Plan, several action steps were developed by DFCS, which, if successfully completed, would assist the State in achieving the applicable outcome or systemic factor. In addition, for each action step included in the PIP, Georgia set a benchmark by which progress could be measured and a date by which the benchmark would be reached.

The State had two years, until September 30, 2004, to implement the improvements it outlined in the Program Improvement Plan, and an additional year, until September 30, 2005, to demonstrate to ACF that it had successfully achieved all the goals included in its Plan. To complete its PIP, DFCS had to achieve the percentage goals it had set for improvements in the outcomes and items and accomplish the benchmarks it had set for each action step it included in the Plan.

During the PIP period, the State submitted quarterly progress reports to ACF along with documentation to support its claims that it had completed specific action steps and benchmarks. ACF provided detailed comments to DFCS on the quarterly reports and documentation clarifying what had been achieved by the State during the quarter, expectations for the next quarter's reports, suggestions and recommendations on documentation sources, status reports on the PIP, and other remarks to inform DFCS of what it needed to do to complete its PIP. At several points during the two-year implementation period, ACF agreed to renegotiate numerous aspects of the PIP in an effort to assist the State in addressing unforeseen barriers and to support successful completion of all PIP required activities. For example, ACF approved extension of timeframes, reduced percentages, changed strategies, and assisted the State with the development of different methods of measuring benchmarks. ACF also coordinated a variety of onsite technical assistance supports from the Regional Office and recommended technical assistance from the National Resource Centers throughout the program improvement period to assist the State. During the third year, ACF worked diligently to evaluate DFCS documentation to determine whether the State achieved the goals and objectives of its PIP.

As you were informed when the final CFSR report was issued on October 10, 2001, ACF suspended the withholding of funds associated with the seven outcomes and three systemic factors found not to be in substantial conformity for the period of time the State implemented its PIP. ACF has determined that the State has demonstrated successful completion of all PIP required activities by September 30, 2005, the close of the two year PIP implementation period, for the following: (1) Safety Outcome 1, (2) Safety Outcome 2, (3) Permanency Outcome 2, (4) Well-Being Outcome 2, (5) the Statewide Information System Systemic Factor, (6) the Service Array Systemic Factor, and (7) the Foster and Adoptive Home Licensing, Approval, and Recruitment Systemic Factor. Therefore, ACF is rescinding the penalty for these outcomes and systemic factors.

ACF has determined that DFCS was not able to complete 12 PIP required action steps resulting in the remaining outcomes: Permanency 1, Well-Being 1, and Well-Being 3, continuing to be out of substantial conformity. The enclosed matrix provides a summary of ACF's findings relevant to the penalty determinations for the three outstanding outcome areas.

ACF is required to assess a penalty, pursuant to 45 CFR 1355.36, if a State is unable to successfully complete its Program Improvement Plan. This letter constitutes the formal notice of disallowance of **\$4,264,784** in Federal Financial Participation (FFP) for title IV-B and title IV-E foster care administrative costs for the outcomes found to not have been completed. The penalty pool includes the State allotment of title IV-B funds for each of the years to which the withholding applies and an amount equivalent to ten percent of the State's Federal claims for title IV-E foster care administrative costs for each year funds are to be withheld as required by 45 CFR 1355.36(b)(4). The enclosed chart shows how

the amount of the disallowance was calculated. The penalty amount shown is an estimate through end of FY 06. It will be adjusted each year to reflect the most accurate amount based on State claims and adjustments to prior years. Please note that pursuant to 45 CFR 1355.36(e)(3), additional disallowances will be issued each year until Georgia is either found to be in substantial conformity at its next review, or successfully completes a PIP as a result of the succeeding review. The penalty amount will continue to be adjusted for two years after the State is found to be in substantial conformity or completes a subsequent PIP in order to capture the Title IV E claims adjustments. The State has two years to make adjustments to its claims and we expect to capture these in order to assess an accurate penalty.

Pursuant to 1355.36(e)(3), if ACF determines the State is in conformity on an outcome as a result of a second CFSR, the withholding of the one percent penalty will be terminated as of the end of the quarter in which such a determination is made. If, however, ACF determines as a result of a second CFSR that the nonconformity continues on an outcome, the one percent penalty will continue and the State will be required to enter into a second PIP. ACF will assess but suspend actual withholding of a penalty at the higher two percent level for the affected outcome that remains in nonconformity while the State implements its second PIP as required by 45 CFR 1355.36(b)(3) and (b)(7). The one percent penalty will continue to be withheld during the State's implementation of its second PIP according to 45 CFR 1355.36(b) (1).

Since the amount of disallowed funds was previously included in Federal payments made to the State, DFCS must repay these funds by check with Georgia funds that are not claimed for Federal reimbursement or used to satisfy any matching, cost sharing, and/or maintenance of effort requirement for any Federal program. DFCS must remit the total amount of the penalty to ACF by check payable to the U.S. Department of Health and Human Services within 30 days of the date of this correspondence in order to avoid the assessment of interest. I am also requesting that you forward the refund to the attention of James Colvin, State Grants Officer in the Regional Office. The Regional Office will assure that the amount of the penalty is processed properly on behalf of DFCS. Please enclose a copy of this letter and a brief transmittal that explains the purpose of the payment, DFCS Federal EIN (tax identification number), and the amount of the penalty when remitting the payment.

This is the final decision of the Administration for Children and Families. Under regulations at 45 CFR Part 16, you have the opportunity to appeal this decision to the Departmental Appeals Board (Board). This decision shall be the final decision of the ACF unless, within 60 days of the date of this letter, you deliver or mail (using registered or certified mail to establish the date) a written notice of appeal to:

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Department of Health and Human Services  
Departmental Appeals Board, MS 6127  
Appellate Division  
330 Independence Avenue, S.W.  
Cohen Building, Room G-644  
Washington, D.C. 20201

You must attach to the notice a copy of this decision, note that you intend to appeal, state the amount in dispute, and briefly state why you think this decision is wrong. A copy of your appeal should also be sent to my attention in the Regional Office. The Board will notify you of further procedures.

If you appeal, you may elect to repay the amount at issue pending a decision by the Departmental Appeals Board, or you may retain the funds pending that decision. If you retain the funds and the Board sustains all or part of the disallowance, interest will be charged, starting from the date of this letter, on the funds the Board decides were properly disallowed. Regulations at 45 CFR Part 30 explain how interest will be computed. The current interest rate is 12 5/8%.

In the event you choose to take no action to return the funds, it will be assumed you have elected to retain the funds either to appeal or to delay recoupment of the funds until the next issued grant award. Interest will continue to accrue on Federal funds retained by the State during this period.

Please contact Kunle Baoku, Children and Families Program Specialist at 404-562-2949 for questions regarding the Program Improvement Plan. Questions concerning the disallowance should be directed to Cindy Price-Hull, Financial Management Specialist, at 404-562-2902.

Sincerely,



Susan Orr, Ph.D.  
Associate Commissioner  
Children's Bureau

Enclosure

cc: Joan Ohl, Commissioner, Administration for Children, Youth and Families  
Diann Dawson, Director, Office of Regional Operations  
Joe Bock, Deputy Associate Commissioner, Children's Bureau  
Brent Orrell, Acting Director, Office of Public Affairs

COMPUTATION OF CFSSR PENALTY FOR GEORGIA FOR PERIOD OF OCTOBER 1, 2000 THROUGH SEPTEMBER 30, 2006

QUARTER ENDING/ FISCAL YEAR ENDING	IV-E FOSTER CARE EXPENDITURES						IV-B ALLOCATIONS			TOTAL FUNDS IN PENALTY POOL	PENALTY = 1% OF TOT POOL FOR EACH OF 3 FACTORS OF SUBSTANTIAL NON- CONFORMANCE
	CURRENT QTR ADMINISTRATIVE EXPENDITURES EXCLUDING SACWIS OPERATIONAL	PRIOR QUARTER ADJUSTMENTS BY QUARTER TO WHICH APPLICABLE		NET TOTAL IV-E FOSTER CARE EXPENDITURES BY QUARTER TO WHICH APPLICABLE	IV-E FOSTER CARE EXPENDITURES SUBJECT TO PENALTY POOL @ 10% OF TOTAL	IV-B PART 1 ANNUAL ALLOCATION	IV-B PART 2 ANNUAL ALLOCATION	25% of Annual Alloc to Each Qtr			
		INCREASING ADJUSTMENTS	DECREASING ADJUSTMENTS								
12/31/00	\$ 4,515,013	\$ 604,704		\$ 5,119,717	\$ 511,972	\$ 2,185,072	\$ 2,230,322	\$ 4,927,365	\$ 147,821		
03/31/01	\$ 5,545,636	\$ 1,053,863	\$ 104,937	\$ 6,494,562	\$ 649,456	\$ 2,185,072	\$ 2,230,322	\$ 5,064,850	\$ 151,945		
06/30/01	\$ 8,151,791	\$ 586,270	\$ 437,401	\$ 8,300,660	\$ 830,066	\$ 2,185,072	\$ 2,230,322	\$ 5,245,460	\$ 157,364		
09/30/01	\$ 6,822,811	\$ 1,248,931	\$ 689,526	\$ 7,382,216	\$ 738,222	\$ 2,185,072	\$ 2,230,322	\$ 5,153,615	\$ 154,608		
FY 01 TOTAL	\$ 25,035,251	\$ 3,493,768	\$ 1,231,864	\$ 27,297,155	\$ 2,729,716	\$ 8,740,287	\$ 8,921,288	\$ 20,391,291	\$ 611,739		
12/31/01	\$ 6,060,434	\$ 1,105,942	\$ 630,696	\$ 6,535,680	\$ 653,568	\$ 2,222,995	\$ 3,088,119	\$ 5,964,681	\$ 178,940		
03/31/02	\$ 5,264,805	\$ 675,731	\$ 675,731	\$ 4,589,074	\$ 458,907	\$ 2,222,995	\$ 3,088,119	\$ 5,770,020	\$ 173,101		
06/30/02	\$ 7,343,990	\$ 1,215,006	\$ 1,215,006	\$ 6,128,984	\$ 612,898	\$ 2,222,995	\$ 3,088,119	\$ 5,924,011	\$ 177,720		
09/30/02	\$ 6,196,302	\$ 1,051,150	\$ 855,949	\$ 6,391,503	\$ 639,150	\$ 2,222,995	\$ 3,088,119	\$ 5,950,263	\$ 178,508		
FY 02 TOTAL	\$ 24,865,531	\$ 2,157,092	\$ 3,377,382	\$ 23,645,241	\$ 2,364,524	\$ 8,891,978	\$ 12,352,474	\$ 23,608,976	\$ 708,269		
12/31/02	\$ 3,765,132		\$ 117,604	\$ 3,647,510	\$ 364,751	\$ 2,208,464	\$ 3,153,316	\$ 5,726,531	\$ 171,796		
03/31/03	\$ 5,070,178		\$ 5,197	\$ 5,064,981	\$ 506,498	\$ 2,208,464	\$ 3,153,316	\$ 5,868,278	\$ 176,048		
06/30/03	\$ 5,579,357			\$ 5,579,357	\$ 557,936	\$ 2,208,464	\$ 3,153,316	\$ 5,919,715	\$ 177,591		
09/30/03	\$ 4,143,836		\$ 24,738	\$ 4,119,098	\$ 411,910	\$ 2,208,464	\$ 3,153,316	\$ 5,773,689	\$ 173,211		
FY 03 TOTAL	\$ 18,558,485	\$ -	\$ 147,539	\$ 18,410,946	\$ 1,841,095	\$ 8,833,865	\$ 12,613,263	\$ 23,288,213	\$ 698,646		
12/31/03	\$ 4,803,035	\$ 469,835		\$ 5,272,870	\$ 527,287	\$ 2,283,643	\$ 3,068,053	\$ 5,878,983	\$ 176,369		
03/31/04	\$ 6,490,590	\$ 30,951	\$ 30,951	\$ 6,459,629	\$ 645,963	\$ 2,283,643	\$ 3,068,053	\$ 5,997,659	\$ 179,930		
06/30/04	\$ 8,316,709	\$ 1,269,149	\$ 1,269,149	\$ 7,047,560	\$ 704,756	\$ 2,283,643	\$ 3,068,053	\$ 6,056,452	\$ 181,694		
09/30/04	\$ 6,685,382	\$ 857,222	\$ 857,222	\$ 5,828,160	\$ 582,816	\$ 2,283,643	\$ 3,068,053	\$ 5,934,512	\$ 178,035		
FY 04 TOTAL	\$ 26,295,706	\$ 469,835	\$ 2,157,322	\$ 24,608,219	\$ 2,460,822	\$ 9,134,575	\$ 12,272,212	\$ 23,867,607	\$ 716,028		
12/31/04	\$ 5,286,289	\$ 324,408	\$ 1,715,051	\$ 3,895,626	\$ 389,563	\$ 2,305,199	\$ 3,136,915	\$ 5,831,677	\$ 174,950		
03/31/05	\$ 7,614,931	\$ 363,798	\$ 1,324,128	\$ 6,654,601	\$ 665,460	\$ 2,305,199	\$ 3,136,915	\$ 6,107,574	\$ 183,227		
06/30/05	\$ 7,474,511	\$ 421,296	\$ 15,358	\$ 7,880,449	\$ 788,045	\$ 2,305,199	\$ 3,136,915	\$ 6,230,159	\$ 186,905		
09/30/05	\$ 7,674,093	\$ 305,049	\$ 26,149	\$ 7,952,993	\$ 795,299	\$ 2,305,199	\$ 3,136,915	\$ 6,237,413	\$ 187,122		
FY 05 TOTAL	\$ 28,049,804	\$ 1,414,551	\$ 3,080,686	\$ 26,383,669	\$ 2,638,367	\$ 9,220,796	\$ 12,547,660	\$ 24,406,823	\$ 732,205		
12/31/05	\$ 9,419,630			\$ 7,419,540	\$ 741,954	\$ 2,342,903	\$ 3,518,163	\$ 6,603,021	\$ 198,091		
03/31/06	\$ 9,445,270			\$ 9,445,270	\$ 944,527	\$ 2,342,903	\$ 3,518,163	\$ 6,805,594	\$ 204,168		
06/30/06	\$ 8,353,690			\$ 8,353,690	\$ 835,369	\$ 2,342,903	\$ 3,518,163	\$ 6,696,436	\$ 200,893		
09/30/2006	\$ 6,304,485			\$ 6,304,485	\$ 630,448	\$ 2,342,903	\$ 3,518,163	\$ 6,491,515	\$ 194,745		
FY 06 TOTAL	\$ 31,522,985	\$ -	\$ -	\$ 31,522,985	\$ 3,152,298	\$ 9,371,613	\$ 14,072,652	\$ 26,596,564	\$ 797,897		

PENALTY FY'S 01 thru 06/04; to date 6/06	\$ 154,327,762	\$ 7,535,246	\$ 9,994,793	\$ 151,868,215	\$ 15,186,821	\$ 54,193,102	\$ 72,779,550	\$ 142,159,473	\$ 4,264,784

DATA SOURCE: GATES

\* Actual Expenditures not yet claimed; figures based on average of FY '01 - '06 expenditures reported on IV-E-1.

**GEORGIA PIP 2002-2004 FINAL STATUS REPORT  
PENALIZED OUTCOME AREAS**

**Permanency 1: Children will have permanency and stability in their living situations**

- (C18) Item 6: Stability of foster care placement
- (D2 and D6) Item 7: Permanency goal for child
- (E25) Item 9: Adoption

**Well-Being 1: Families have enhanced capacity to provide for their children's needs**

- (I7) Item 17: Needs and services of child, parents, and foster parents
- (J5 and J6) Item 18: Child and family involvement in case planning

**Well-Being 3: Children receive adequate services to meet their physical and mental health needs**

- (N2, N5, and N6) Item 22: Physical health of the child
- (O4 and O9) Item 23: Mental health of the child

OUTCOME AREA	PIP ITEM C18	MEASURABLE BENCHMARK
Permanency 1	<p>If the stability as measured by the data systems and file reviews has not improved significantly within 2 quarters, then the following additional actions will be taken:</p> <ul style="list-style-type: none"> <li>• Recommend additional training and policy changes</li> <li>• Identify additional factors that may contribute to the stability of children in foster care</li> </ul>	Complete a report to the team.

**ACF DETERMINATION:**

The State developed a multi-step process to assess issues related to poor performance in placement stability for children. Due to the foundational nature of the strategy, completion of C18 was contingent upon timely completion of subsequent steps. Due to continued delays and moving out benchmark dates for the earlier steps, insufficient time remained for the work of C18 to be completed in accordance with the timeframes of the PIP.

OUTCOME AREA	PIP ITEM D2	MEASURABLE BENCHMARKS
Permanency 1	Maintain accurate documentation of every placement of a child in foster care	Have developed staff performance standards with DCFS county staff, Field Directors, and social service staff to assure that case files are accurately documented to reflect every placement of a child in foster care. Evaluation: Spot check of files will be performed by the E&R group to make sure this documentation is occurring. Evaluation: All needed information about placements will be available for next Federal Review.

**ACF DETERMINATION:**

The PIP goal is "Maintain accurate documentation of every placement of a child in foster care". The State's 7<sup>th</sup> Quarter Report indicates "Electronic and desk review systems have been implemented to monitor the accuracy of child placements. The Division acknowledges via Action Step 5C that different systems reflect different information on placement moves." In addition, the County Trend Report notes an "issue of concern" that in "31% applicable cases reviews, the latest IDS Form 590 did not correctly list the child's current placement date in Item 35". The results provided to ACF by the State are conflicting. On June 25, 2006, the State submitted additional information for consideration. ACF carefully reviewed the information and found that the original determination that the required PIP work was not completed.

OUTCOME AREA	PIP ITEM D6	MEASURABLE BENCHMARKS
Permanency 1	Conduct annual training for judges, case managers, SAAGs, GALs, parent attorneys,	Permanency hearings will take place in juvenile court for every child in state care no later than 12

	CASAs, and Citizen Review Panel volunteers on the Permanency Hearing requirements.	<p>months after a child has entered foster care and periodically no later than 12 months thereafter if the child remains in care.</p> <p>Evaluation: Georgia's Court Improvement Project (CIP) will evaluate a sample of court case files annually to see if permanency hearings are occurring for every child.</p>
<p><b>ACF DETERMINATION:</b>  The State maintains that it has achieved the Action Step which is to conduct judicial trainings, but according to documentation the Measurable Benchmark regarding timely permanency hearings has not been met. The 8<sup>th</sup> Quarter Report indicates that "based on quantitative desk reviews of counties for the period of October 2003 through September 2004, 76.58% of case files had timely permanency hearings." In previous quarterly reports, the State contended that Permanency Hearings were not labeled as such, but were considered part of the Extension of Custody proceedings; however, the State's Trend Analysis Report highlights a number of "areas of concern" including "in 201 of the 795 (25%) applicable cases reviewed, the hearing for extension of custody was not held timely." On June 25, 2006, the State submitted additional information for consideration. ACF carefully reviewed the information and found that the original determination that the required PIP work was not completed.</p>		
<p><b>OUTCOME AREA</b>  Permanency 1</p>	<p><b>PIP ITEM E25</b>  Monitor new pilot project taking place in Fulton County where Superior Court Judges have delegated adoption jurisdiction to Juvenile Court Judges for adoption cases where the deprivation petition originated in the juvenile court.</p>	<p><b>MEASURABLE BENCHMARKS</b>  A qualitative report will assess the impact of the pilot to determine if the delegation is beneficial for adoptions and any other impact on the child welfare system. Recommendation for statewide implementation will follow if appropriate.</p>
<p><b>ACF DETERMINATION:</b>  Following submission of the 8<sup>th</sup> Quarter Report, the State agreed with ACF that the explanations provided in PIP quarterly</p>		

reports did not adequately address completion of the action step. The State was unable to provide anything further, acknowledging that the pilot did not progress as anticipated, nor was a qualitative report developed.

OUTCOME AREA	PIP ITEM I7	MEASURABLE BENCHMARK
Well Being 1	Complete a quarterly county by county report as it relates to the initial assessment component of the Comprehensive Child and Family Assessment (First Placement/Best Placement) and the identified types of placements needed and availability and permanency plans for the child.	Complete a report as to finding.

**ACF DETERMINATION:**

In the 8<sup>th</sup> Quarterly Report the State indicates that the status of this step was not fully achieved by the close of the PIP implementation period; therefore, the step was not achieved. On June 25, 2006, the State submitted additional information for consideration. ACF carefully reviewed the information and found that the original determination that the required PIP work was not completed.

OUTCOME AREA	PIP ITEM J5	MEASURABLE BENCHMARK
Well Being 1	Family group conferencing must be done at the 30-day case plan with multi-disciplinary staffing to ensure parental involvement in case planning.  Evaluation: Sample spot checks with counties will occur to see if counties are in compliance.	Family group conferencing will take place with all foster care cases.

**ACF DETERMINATION:**

The State submitted a request to substitute "MDT" for family group conferencing, but following review ACF determined that the MDT is not an acceptable substitution for family group conferencing; therefore, the State did not meet the PIP requirements for this step. On June 25, 2006, the State submitted additional information for consideration. ACF carefully

reviewed the information and found that the original determination that the required PIP work was not completed.

OUTCOME AREA	PIP ITEM J6	MEASURABLE BENCHMARK
Well Being 1	<p>Family Group Conferencing and First Placement/Best Placement projects will get sufficient support, leadership and project management to ensure successful implementation and maintenance.</p> <p>Evaluation: Feedback will be sought quarterly from the project managers on progress and needs for continued successful implementation.</p>	<p>A project manager will be assigned to both programs with full support for implementation.</p>
<p><b>ACF DETERMINATION:</b>            The State submitted a request to substitute "MDT" for family group conferencing, but following review ACF determined that the MDT is not an acceptable substitution for family group conferencing; therefore, the State did not meet the PIP requirements for this step. On June 25, 2006, the State submitted additional information for consideration. ACF carefully reviewed the information and found that the original determination that the required PIP work was not completed.</p>		
OUTCOME AREA	PIP ITEM N2	MEASURABLE BENCHMARKS
Well Being 3	<p>Georgia will continue to require all providers to complete a Multi Disciplinary Team Meeting for each Comprehensive Child and Family Assessment to determine the appropriate health needs and services of all children entering foster care program within the first 30 to 60 days of the child entering care.</p>	<p>Review statistical data quarterly as provided through the CPRS system.</p>
<p><b>ACF DETERMINATION:</b>            The State informed ACF that use of the system by private providers administering the assessments has not moved beyond the pilot counties (Troop and DeKalb) and those counties are not using CPRS as adequately as anticipated. Therefore, there is no report which produces information sufficient to perform any statistical analyses as required by the PIP. On June 25, 2006, the</p>		

<p>State submitted additional information for consideration. ACF carefully reviewed the information and found that the original determination that the required PIP work was not completed.</p>		
<p><b>OUTCOME AREA</b></p>	<p><b>PIP ITEM N5</b></p>	<p><b>MEASURABLE BENCHMARK</b></p>
<p>Well Being 3</p>	<p>Georgia will complete technical assistance to DFCS staff and private providers as to how to use the collected information to meet the child's needs as it related to post substance abuse counseling, monitoring and support as a part of the early intervention process and/or in-home intensive treatment services. Once CPRS has the capability to capture data, the state office team will determine accuracy of information in the CPRS system regarding service needs of children and families indicated at the MDT meeting.</p>	<p>Provide 11 county site training to staff and providers beginning in 7/2002.</p>
<p><b>ACF DETERMINATION:</b> The State indicated in the 8<sup>th</sup> Quarterly Report that this step was not fully achieved as required by the PIP. On June 25, 2006, the State submitted additional information for consideration. ACF carefully reviewed the information and found that the original determination that the required PIP work was not completed.</p>		
<p><b>OUTCOME AREA</b></p>	<p><b>PIP ITEM N6</b></p>	<p><b>MEASURABLE BENCHMARK</b></p>
<p>Well Being 3</p>	<p>Complete a quarterly county-by-county report as it relates to the initial assessment of First Placement Best Placement Comprehensive Assessment and health care services available and the identified health needs of children.</p>	<p>Complete a report as to findings.</p>
<p><b>ACF DETERMINATION:</b> The State indicated in the 8<sup>th</sup> Quarterly Report that this step was not fully achieved as required by the PIP. On June 25, 2006, the State submitted additional information for consideration. ACF carefully reviewed the information and found that the</p>		

original determination that the required PIP work was not completed.

OUTCOME AREA	PIP ITEM O4	MEASURABLE BENCHMARK
Well Being 3	Development and implement statewide multi-agency protocol for assessment, including necessary safeguards.	Develop and implement protocol for sharing information.
<p><b>ACF DETERMINATION:</b>            The requirement of the step was for the Governor to institute a statewide assessment across all agencies which did not occur. On June 25, 2006, the State submitted additional information for consideration. ACF carefully reviewed the information and found that the original determination that the required PIP work was not completed.</p>		
OUTCOME AREA	PIP ITEM O9	MEASURABLE BENCHMARKS
Well Being 3	Identify the areas most in need of resource development and initiate development strategies to meet those needs.	Identification of areas most in need of services and recommendation of budget priorities made.
<p><b>ACF DETERMINATION:</b>            ACF has determined that this was not achieved. The State has instituted a level of care system to track individual child needs, but this does not meet the goal of O9 which was to identify the areas most in need to resource development and to initiate development in those areas. On June 25, 2006, the State submitted additional information for consideration. ACF carefully reviewed the information and found that the original determination that the required PIP work was not completed.</p>		