

REPORT OF THE  
VIRGINIA BOARD OF SOCIAL SERVICES

STUDY ON  
MANDATES AND REGULATIONS

TO THE SENATE FINANCE COMMITTEE  
AND THE HOUSE APPROPRIATIONS COMMITTEE



Commonwealth of Virginia  
Richmond  
January 1, 1985



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EXECUTIVE SUMMARY

The 1984 Appropriations Act specified: "The State Board of Social Services shall present a plan to reduce state mandates and regulatory requirements by January 1, 1985, to the Chairmen of the Senate Finance and House Appropriations Committees." Organizational and other preliminary work began on this study in May of 1984. Three subcommittees composed of State Board members were established to study Benefit Programs, General Administration, and Service Programs. These subcommittees were assisted in developing recommendations by state and local welfare/social service staff. These recommendations were thoroughly reviewed and individually adopted by the full Board of Social Services.

The following synopsis of the recommendations is listed according to the authority having primary responsibility to evaluate and, if appropriate, implement the recommendation.

VIRGINIA GENERAL ASSEMBLY

The State Board is requesting action by the Virginia General Assembly on the following recommendations related to benefit programs which offer financial assistance to clients:

- Request federal approval for Virginia to develop its own:
  - 1) budget requirements for determining eligibility and grant amount for Aid to Dependent Children (ADC) and Food Stamps. (Pages 27-28, 41-42)
  - 2) criteria regarding which ADC recipients must report changes in their circumstances every month. (Pages 36-37)
- Encourage the Department of Taxation to automate the local property records and provide the Department of Social Services access to such files. (Pages 28-30, 47-48)
- After automation of the local property tax records, modify the Privacy Protection Act of 1976, if it precludes access by the Department of Social Services to those records. (Pages 47-48)
- Encourage the Social Security Administration to determine client disability in a more expeditious manner. (Pages 50-51)
- Provide incentives to employers of ADC recipients to assist local welfare/social service agencies with amount and verification of recipient income. (Pages 32-33)
- Amend state statutes to require potential financial support from cohabitants in ADC cases, as currently done for stepparents. (Pages 30-31)
- Take action to modify State law as may be required for a simpler inter-agency process. (Pages 31-32)



- 2) add service effectiveness indicators to the VACIS documents (Pages 15-16),
  - 3) continue upgrading and streamlining the Child Protective Service Information System (CPSIS) (Pages 69-71)
  - 4) automate one of the manual Employment Service reports (Page 71)
  - 5) examine feasibility of full automation for all manual reporting throughout the Department (Pages 71-72), and
  - 6) use an existing automated system or initiate a system to manage the tracking and periodic reporting of overpayment collections. (Pages 38-39)
- Emphasize training throughout the social service system by:
    - 1) establishing skills training courses for local welfare/social service employees and providing some motivation for them to attend,
    - 2) providing training for new local directors and board members, and
    - 3) assessing Food Stamps training needs and responding, as appropriate. (Pages 17-18, 44-45)
  - Base authorization for local staff on a 40-hour work week. (Pages 13-14)
  - Develop performance standards/indicators for programs and provide incentives for local agencies to improve performance. (Pages 12-13)
  - Determine the feasibility of encouraging agencies to use the same worker to do intake for both services and benefit programs. (Pages 14-15)

The State Board is asking the Department to take appropriate action on the following recommendations related to benefit programs which offer financial assistance to clients:

- Study ways to reduce seasonal start-up burdens for fuel program. (Pages 46-47)
- Assess contracting for, rather than hiring workers to handle the fuel assistance program. (Pages 45-46)
- Continue efforts to gain instant computer access by the Eligibility Worker to relevant data in the files of the Division of Motor Vehicles as it relates to eligibility for ADC and Medicaid. (Pages 28-30, 47-48)
- Continue and improve the current process for reviewing forms used in the ADC, Food Stamps and Medicaid programs. (Pages 31, 43-44, 50)
- Study communication delays regarding amount of support collection that involves judicial systems, Division of Support Enforcement, VACIS, the local welfare/social service worker, and recommend improvements. (Pages 37-38)

- Determine whether applicants for Auxiliary Grants should be screened for need for placement in Homes for Adults, and how such screening should be managed. (Pages 39-40)
- Continue current process for improving the way policy is written and maintain local input into policy development. (Pages 44-45)
- Request the consultant studying Auxiliary Grants to recommend solutions for problems caused by increases in payment rates for Homes for Adults that are determined after local budgets are finalized. (Pages 40-41)
- Coordinate the language of those sanctions of the Fraud Manual and ADC Program Manual that relate to computing overpayments involving fraud. (Page 38)

The State Board is asking the Department to take appropriate action on the following recommendations related to service programs (non-financial assistance) for clients:

- Increase public knowledge of service programs through:
  - 1) a brochure,
  - 2) revised state budget narrative, and
  - 3) revised local budget forms. (Pages 73-74)
- Explore additional alternative funding sources to supplement child day care funds. (Pages 78-79)
- Consolidate standards for individual providers approved and used by local welfare/social service agencies. (Pages 79-81)
- Explore the feasibility of developing a Social Service Block Grant to localities. (Pages 62-65)

This study has been a positive, learning experience for all involved. Due to time constraints the study does not address every issue that was considered burdensome; rather it addresses those thought most burdensome by the most people. During the course of the study, it was found that some mandates and regulations that are burdensome are essential to efficient program operations and should not be reduced. In fact, reducing certain mandates could even place the state at risk of federal fiscal sanctions. It was also found that some burdensome regulations, if changed, would reduce benefits to clients and this was not the intent of the Board. Very careful review of each issue was necessary because of the interrelatedness of programs and the potential impact of each action discussed. In the months ahead the State Board of Social Services, with the assistance of the Department of Social Services, will continue to assess the impacts and will develop plans for the implementation of appropriate recommendations.



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## I. INTRODUCTION

### A. Legislative Charge

The 1984 Appropriations Act specified: "The State Board of Social Services shall present a plan to reduce state mandates and regulatory requirements by January 1, 1985, to the Chairmen of the Senate Finance and House Appropriations Committees."

### B. Definition of Mandate

For the purposes of this study the following definition of mandate was adopted: "Mandates are federal laws or policies, state laws or policies, and Virginia Board and Department of Social Services actions that place requirements on local government. This definition includes any constraint placed on a locality related to social services that has a fiscal or personnel impact."

### C. Statement of Purpose/Goal

The following statement explains the Board's approach to the study: "In order to comply with the requirements of the 1984 Appropriations Act, the State Board of Social Services will review Benefit and Service Programs and General Administrative functions to determine the extent of the program mandates, which of the mandates appear to be most burdensome, and whether we could reduce or eliminate the mandate and the resulting regulations without serious detriment to the effective delivery of services to needy persons; and to determine the impact of each proposed change. In making this determination, the Board will be guided by such considerations as the desire to minimize administrative burdens and costs, and the desire to emphasize results rather than process as well as the desire to simplify access to services for clients."

### D. Objectives

While the goal/purpose statement generally defined the scope of the study, there was also thought to be a need for further specificity. Therefore a number of objectives have been developed for the study. These objectives are described as follows:

- To review and revise present mandates and regulations in order to provide the maximum local flexibility without detriment to the effective delivery of services to needy persons.
- To emphasize, where possible, the outcomes of program delivery rather than the process for providing the program.
- To initially consider for inclusion in the study all mandates and regulations irrespective of the number that can and should be changed.
- To seek local input from welfare/social service departments and boards in order to determine the most burdensome mandates and to do a more thorough review of those areas.
- To look for opportunities in the study to reduce administrative costs, including the elimination of any unnecessary paperwork.

- To increase state support for the Department's programs.
- To recommend necessary actions regarding mandates and regulations even if these actions might result in increased costs.

These objectives are grounded in the State Board's recognition of the tension between state control and local control. Virginia's social service system is established in the Code of Virginia as state supervised, locally administered. This very language has produced a healthy tension in seeking the appropriate balance between administration and supervision. As the federal controls have lessened in some areas this has brought increased local discussion of greater local control. On the other hand, with the absence of federal regulations there has been the demand to keep a minimum statewide level of services. It can be seen that the Code of Virginia established the dual nature of Virginia's social service system. The task of this study is to work within that framework and develop a plan for needed changes in mandates and regulations.

#### E. Organization of the Study

##### 1. Staffing

The State Board of Social Services determined that the following subcommittees would be needed to accomplish the study: General Administration, Benefit Programs and Service Programs. The Chairperson of each of these subcommittees also served on a Coordinating Subcommittee. The General Administration Subcommittee reviewed such areas as budget, personnel and computerized data systems. The Benefit Programs Subcommittee reviewed such programs as Aid to Dependent Children, Food Stamps and General Relief. The Service Programs Subcommittee reviewed such programs as Foster Care, Day Care and Employment Services. The Coordinating Subcommittee provided overall parameters for and direction to the study.

State Board members serving on each subcommittee were as follows:

General Administration - Allen C. Gooden, Jr., Chairman  
Wilford P. Ramsey  
Naomi R. Warder

Benefit Programs - James A. Payne, Chairman  
Henry S. Campell, M.D.  
E. B. Pendleton

Service Programs - Jean W. Cunningham, Chairman  
H. Douglas Turner  
Joseph S. Wholey

Local staff assisting the subcommittees with their work throughout the course of the study were as follows:

Braxton L. Apperson, III, Director,  
Buckingham Department of Social Services  
Benefit Programs Subcommittee  
Cilla P. Brown, Director,  
Campbell Department of Social Services  
General Administration Subcommittee

Samuel E. Bush, Director  
Greensville/Emporia Department of Social Services  
Coordinating Subcommittee  
Corinne B. Gott, Superintendent  
Roanoke City Department of Social Services  
Benefit Programs Subcommittee  
A. Michael Hall, Director  
Wythe Department of Social Services  
Service Programs Subcommittee  
Karen L. Morris, Director  
Albemarle Department of Social Services  
Service Programs Subcommittee  
Bobby L. Ralph, Director  
Suffolk Department of Social Services  
General Administration Subcommittee  
Allen D. Richardson, Superintendent  
Northampton Department of Social Services  
Benefit Programs Subcommittee  
Jean T. Smith, Director  
Chesterfield/Colonial Heights Department of Social Services  
Service Programs Subcommittee  
Ruth E. Stephens, Superintendent  
Fredericksburg Department of Welfare and Social Services  
General Administration Subcommittee

State staff liaisons throughout the course of the study were as follows:

William L. Lukhard, Commissioner  
Steven M. Lewis, Assistant Director, Division of Administration  
Howard Reisinger, Assistant Bureau Chief,  
Division of Benefit Programs  
D. Ray Sirry, Director, Division of Service Programs  
Margaret A. Smith, Executive Assistant and Planner

## 2. Format of the Report

The three Subcommittees were organized to include the three major areas essential for this study. Therefore, the report itself is organized according to these three major areas. Section I contains general information, Sections II, III, and IV contain information on the approach to the study, the data resources used and the recommendations and implementation plans developed. Section V contains overall conclusions.

While every attempt was made to assure the maximum uniformity among sections, some differences in approach were unavoidable. For Sections II, III, and IV local board and agency surveys were utilized, as well as input from the local and state staff assisting the Board members. About 90% of the local welfare/social service agencies responded to the survey, the following agencies did not: Amelia, Arlington, Bland, Campbell, Cumberland, Frederick, Greene, Madison, Northumberland, Norton, Page, Smyth and Washington. Not all agencies responded to each program area. There were differences in how this input was utilized and this process is described in II.A., III.A., and IV.A. Throughout the course of the study, the total Board reviewed and critiqued each section of the report.

## II. GENERAL ADMINISTRATION MANDATES AND REGULATIONS

### A. Introduction

The Administration Subcommittee was charged by the State Board of Social Services with reviewing mandates on local welfare/social service agencies that fell under the board's definition of administration. Broadly this definition included any operation that did not come under the purview of the Division of Benefit Programs or the Division of Service Programs. Specifically, the areas that were reviewed by the Administration Subcommittee were:

- Fiscal Operations
- Statistical Reporting
- Local Budgeting
- Personnel
- Local Boards

The State Board of Social Services decided that a survey of local welfare/social service agencies would provide valuable insight into the types of problems that were prevalent at the local level. Each subcommittee was required to adhere to the same format for the survey but was given latitude in determining the mandates and components of mandates that were included in the questionnaire. The Administration Subcommittee made the decision that it would give primary consideration to those issues that received the most attention of local agencies and, therefore, were apparently the most burdensome.

All 124 local welfare/social service agencies were sent copies of the survey. A total of 110 agencies responded. The Subcommittee devoted considerable time to reviewing the detailed policy and procedures of each mandate listed on the administration portion of the survey. This coupled with the response of the local welfare/social service agencies provided an administrative road map of potential areas of change. In some instances, no recommendations for change have been made since the mandate has its basis in federal law or statute. Other areas have their basis in State code, State Board of Social Services policy, or State Department of Social Services procedure and, depending on the complexity of the mandate, can potentially be altered. Lastly, the Subcommittee also included recommendations on specific changes that were considered enhancements to programs or practices but did not directly relate to a mandate.

### B. Summary of Local Board Comments on General Administration

This section only includes a summary of those comments related to the General Administration issues reviewed by the Board Subcommittee. Comments on General Administration are grouped by administrative program area.

The highest number of responses dealt with Caseload Standards. Comments were mixed as to whether to have caseload standards. Those supporting them said that standards should be revised to keep up with program changes and standards should allow for innovative programs. A new study of standards was needed for all programs according to several respondents. Other comments suggested that the local Board should determine local staffing. Still others simply said to drop caseload standards altogether.

The second highest number of comments dealt with budget preparation. The different timeframes for the local and state budgets were identified as burdensome to some Boards. The budgeting process itself needed revision according to some respondents. It was also suggested that the locality should provide certain basic data and then the state should develop the actual budget documents on the computer.

Data Systems Operation was also identified as a problem area. It was suggested that local welfare/social service agencies should be given the opportunity to help set priorities for program automation. Other suggestions were that the state should provide computer terminals for each local worker, that each local agency should have data entry personnel to generate required data and that the number of hard copy turnaround documents should be reevaluated. It was also suggested that changes in computer programs should be sent to the local welfare/social service agencies with more lead time to implement the changes.

Other comments dealt with Personnel, Capital Outlay and Fiscal Reporting. For Personnel it was suggested that recruitment and hiring have become too complicated and delay hiring. It was further suggested that certain personnel specifications inhibit the locality's ability to effectively organize their workload. With regard to Capital Outlay, the main concern was with timely approval of these requests. For Fiscal Reporting the concern was to simplify and clarify the financial reporting procedures.

A couple other comments related to Budget Adjustment. It was suggested that the local Board be allowed to make certain transfers without state approval and that the time for state approval be shortened. A comment was also made that the state should do a functional analysis study of General Administration.

## C. Summary of Local Agency Comments on General Administration

### 1. Budget Preparation

Seventy-one (71) of the 110 agencies responding to the survey indicated some degree of difficulty with some aspect of the budget preparation process. The comments received from the agencies generally dealt with the problem of coordinating the State Department of Social Services' requirements with the local governing body budget process. Almost every agency providing comments on this segment of the survey stated that the lack of a uniform process at the State and local level worked a hardship on the local agency. Further, many agencies indicated they had to submit "draft" budgets, which had not been approved at the local level, to meet the deadlines of the Department of Social Services.

Other comments concerned the complexity of the budget process and the detail of the forms required by the State Department of Social Services. Many agencies felt it was difficult to share fiscal information with other staff members since non-budget staff could not readily understand the process or forms used in budgeting.

The last area of comments related to inadequate funding being available to meet local department of social services needs.

Agencies also indicated that they would like to receive an approved copy of the BF-8 to see where money had been approved or denied.

2. Budget Adjustment

Budget adjustment did not appear to be a large area of concern by the local agency responses. Only 46 of the 110 agencies answering the questionnaire indicated any problems with the process. The comments related to this mandate dealt with the lack of timely response to questions. Several agencies indicated that more staff were needed at the Central Office level to provide immediate answers to questions raised by the local governing bodies about budget adjustments and the Department of Social Services cannot always provide answers within the timeframes needed.

Other agencies suggested that a system be set in place whereby all inquiries concerning budget adjustments be answered within ten days.

The last major area of concern dealt with the possibility of the Department of Social Services providing a narrative explanation back to a locality if a change is made to the budget which that locality submitted for approval.

3. Capital Outlay

The area of capital outlay was a significant concern of the local agencies responding to the survey. Sixty-two (62) of the 110 agencies indicated some degree of difficulty with the capital outlay process. The largest problem listed by the local agencies was the inadequate funding for the capital outlay program. Almost every agency indicated that funds had been frozen for two years and that little, if any, money was approved for use by local agencies in this category. Related to this concern, several agencies indicated they were spending large amounts of money repairing equipment that should be replaced. Additionally, agencies stated that when money was approved for capital expenditures it was so late in the year that it was nearly impossible to abide by the tenets of the Virginia Procurement Act.

Several agencies suggested using the block grant approach of approval for capital outlay funds. This would mean a certain amount of money would be given to each agency at the beginning of the fiscal year and that agency would be allowed to purchase whatever they chose. Related to this suggestion was the proposal that the Department of Social Services approve an amount of money for capital outlays and keep a certain amount in reserve, for emergencies, that could be released at the end of the Fiscal Year if it was not needed.

4. Caseload Standards

Caseload Standards was an area of concern for sixty-three (63) of the 110 agencies that responded to the survey. Comments were largely concerned with the fact that Caseload Standards attempted to measure the activities of social workers. Many of the agencies



felt you could not apply an industry practice of measuring activity to a profession such as social work since Caseload Standards gave credit to activity rather than quality of service being provided. Some of the agencies responding suggested that the Department of Social Services should consider not including social work activities in the Caseload Standards process.

Other agencies were concerned that the Standards did not provide a way to measure work that was being performed even though a staff member was on vacation or a position was vacant.

Nearly all comments related to the Caseload Standard Program said the Standards were outdated and did not reflect the reality of current workloads. Additionally, local agency staff said they did not understand how the Standards were developed or worked and that the reports coming to them were two to three months old.

5. Data Systems

At the time of the survey, data systems were not identified as one of the top three burdens. Forty-eight (48) of the 110 respondents indicated some level of difficulty with data systems. The majority of the comments concerned the amount of paperwork which the system generated. The other major comment concerned the amount of "down" time which agencies had been experiencing in the past few months.

Technical comments were concerned with the need for additional staff at the Central and Regional level to provide assistance to localities when questions arose. Additionally, localities felt the manuals and instructions were complex and that the Local Agency Personnel Management System (LAPS) Program was confusing to understand and difficult to operate. Several agencies suggested that codes should be uniform in all programs.

From a management standpoint, many of the agencies stated they felt there was no one at the Central Office level to set priorities in VACIS (Virginia Client Information System) programs since local agencies had been asking for a Food Stamp Program for several years, but that the State had only been adding service programs.

6. Fiscal Reporting

A request for simplification of reporting requirements was the main theme of the fifty-six (56) of 110 agencies that indicated a problem with fiscal reporting. The majority of the comments surrounded the number of forms that a local agency must complete as part of the fiscal reporting process and the fact that a majority of the forms are due on the same date.

Many of the comments also stated that there was no routine training for new fiscal officers or new directors related to the fiscal process. The comments also mentioned that new forms were frequently accompanied by unclear instructions.

The last major comment concerning fiscal reporting was related to the Cost Allocation Program. According to the comments, the process a local agency must go through for spreading salaries in the Cost Allocation process is cumbersome and time consuming.

7. Statistical Reporting

A total of fifty-four (54) of the 110 agencies responding indicated a problem with some aspect of statistical reporting. The single most mentioned area was the fact that a large portion of statistical reporting was still completed manually while a vast amount of information was already present in the computer system. Many agencies suggested adding fewer programs to the system and concentrating on making the existing system more effective for the local agency by having the computer generate the needed statistical reports. A second option set forth was the possibility of developing screens for each of the reports and allowing the agencies to use the computer to fill out the material rather than having to type the information and mail it to Richmond.

Similar concerns were expressed in this area about the need to stagger due dates on the reports since a large number of the reports are currently required on the same day. The statement was also made here that instructions on new forms were frequently unclear or confusing and that regular training sessions were needed for new workers and directors.

8. Local Board Training

Only thirty-six (36) of the 110 agencies participating in the survey indicated any level of problem with the local board training mandate. The majority of the comments received dealt with the need to establish a formal orientation and training session for board members. The comments also stated, however, that this would be a difficult program to mandate or operate since the majority of board members are employed and do not have large amounts of time to dedicate to special training events. The suggestion was offered several times that training be kept to a minimum and conducted at night when everyone could attend.

Alternative suggestions were offered in terms of either having regional staff conduct the training after regular board meetings or in having pre-packaged modules developed that would be sent to local directors who would then be responsible for doing the skills training of board members.

9. Personnel

Forty-four (44) of the 110 agencies responding indicated they had some type of problem with one of the aspects of the personnel section of the questionnaire. Most of the comments revolved around the process of establishing knowledge, skills and abilities (KSA) for positions. Respondents indicated that they felt the KSA process had resulted in a lower caliber of staff being certified for positions and that the old practice of testing had been more equitable. Further, those answering the survey stated that the new process required localities to interview some people a number of times even though the locality had decided that person was unsuitable for employment.

Other comments related to more specific portions of the personnel mandate and expressed opinions that the manuals were too wordy; the Local Agency Personnel Management Computer System was cumbersome and confusing, training was poor and insufficient; and cut-off dates for advertisements of positions needed to be coordinated more with local agency needs.

D. Issues, Actions, and Recommendations

RECOMMENDATION 1: The Department of Social Services should strictly enforce the deadlines set forth in the budget letter to eliminate delays in the system brought about by agencies that submit their request late. Further, any agency that misses the imposed deadline for budget submittal should have their estimated budget approved based on the previous year's approved allocation, and that agency would have to submit separate requests for additional funding and take the chance that funds will be available to meet their requests.

1. Analysis

- a. Explanation of Problem/Situation: Each of the 124 local welfare/social service agencies are required to submit a budget of anticipated expenditures every year. These estimated budgets are compiled into a total request and used by the Bureau of Fiscal Management to determine what funds are needed by the Department of Social Services to operate the various programs. This information is also used by the Department to determine the amounts to be allocated to localities if the requests are greater than the funds available to the Department. Some local agencies do not complete the required forms within the timeframes established by the Department of Social Services.
- b. Reason for Recommendation: The Department of Social Services cannot complete the budget process until all local budgets have been submitted since the total amount of funds available must be compared to the total requests of local departments of social services. When localities miss budget deadlines, the Department of Social Services cannot complete its process and cannot approve budgets of localities that adhered to and met the deadlines. As a result, many local departments of social services cannot complete programmatic and fiscal planning because of the delays in the budget process.

2. Plan

- a. Action Required: The Department of Social Services should enforce the deadlines set forth in the budget letter. If an agency does not meet the deadline for budget submittal, their request should be based, for planning purposes, on their previous year's approved amount. If that locality needs additional funds at a later date, a supplemental request would have to be filed and the locality would have to take the chance that funds may be available. This action would be administrative in nature.

- b. Timeframes: It is recommended that this proposal be implemented during the 1985-86 budget development process.
- c. Benefits and Consequences: This change would initially expedite the budget process by providing the means to have a total estimate of need at the time scheduled in the budget letter. Additionally, it would allow more planning time for those localities that completed their budget process on time by getting those localities an approved budget request faster than is currently being done.

The negative consequences of this action would be to work a fiscal hardship on those agencies that cannot control their submission time as a result of their local budgeting process. For all practical purposes, local budgeting processes will probably not be adapted for the concern of the local agency; therefore, the local agency will be given an approved budget based on their allocation from the previous year and will be forced into the role of requesting supplemental allocations. There will be no cost savings by this action. In fact, costs may increase slightly in the Bureau of Fiscal Management to process the supplemental requests. Also, local agencies will spend more time in requesting supplemental funds.

**RECOMMENDATION 2:** The State Board supports the Department of Social Services sending an approved copy of the budget back to the local agency to eliminate any confusion over what has been approved by the Department versus what has been submitted by the local agency.

**1. Analysis**

- a. Explanation of Problem/Situation: Prior to last year, when a local agency's budget was approved that agency was not given a copy of the document that showed how the Bureau of Fiscal Management spread the funding when determining the approved amounts by category.
- b. Reason for Recommendation: Without specific knowledge of what dollars were approved in what categories, local welfare/social service agencies had problems in planning for expenditures during the course of the Fiscal Year.

**2. Plan**

- a. Action Required: None, because the Bureau of Fiscal Management now makes a copy of the local agency's approved budget and sends it to the agency for their information.
- b. Timeframes: Ongoing.
- c. Benefits and Consequences: The local agencies are able to improve planning for fiscal and programmatic issues as a result of knowing exactly what funds have been allocated by category.

RECOMMENDATION 3: The Department of Social Services should insure that responses to questions about budget adjustments be completed within 30 days.

1. Analysis

- a. Explanation of Problem/Situation: Some local agencies stated they were having problems getting prompt answers to questions about budget adjustments. Part of the problem centers on inadequate funding for various categories and the fact that answers were not forthcoming since decisions had not been made at the Central Office level on how funds were to be used.
- b. Reason for Recommendation: At times local agencies need answers to questions about potential budget adjustments to answer questions raised by local governing bodies. Delays in getting the answers causes problems at the local level.

2. Plan

- a. Action Required: The Assistant Director of Administration or the Chief of the Bureau of Fiscal Management will provide answers to budget adjustment questions within 30 days. The answer may simply be that the question cannot be answered at that time. In those instances, the local agency will also be given the best estimate of when the answer can be provided.
- b. Timeframes: This procedure is currently being implemented.
- c. Benefits and Consequences: This procedure should assist in planning at the local level. There are no negative consequences.

RECOMMENDATION 4: The Department of Social Services should determine the feasibility of approving and distributing the capital outlay budgets for local welfare/social service agencies on a quarterly basis. The local welfare/social service agencies would be given an amount of capital outlay funds, at the beginning, of each quarter, and allowed to purchase up to the limit of the approved funds. The local agency would have to set priorities and would then be allowed to purchase from the approved list within the available approved capital outlay funds for that quarter. The Department of Social Services would hold a percentage of the total available capital outlay funds in reserve for use at the end of the Fiscal Year.

1. Analysis

- a. Explanation of Problem/Situation: Local welfare/social service agencies are required to submit a plan for procurement of capital outlay expenditures. The Department of Social Services approves a capital expenditure amount for each local agency. The local agency is then supposed to be able to purchase up to the amount of their approved allocation. In the past two years, the capital outlay funds have been frozen as the Department of Social Services did not have adequate funds to cover all aspects of local operations. Some capital outlay expenditures were allowed in the last quarter of the Fiscal Year.

- b. Reason for Recommendation: The lack of approval of capital outlay funds causes problems with local agencies since new equipment is needed and large amounts of money are being spent repairing equipment that should be replaced. Additionally, when approval is given for procurement it is so late in the year agencies have difficulty adhering to regulations governing equipment purchasing.

## 2. Plan

- a. Action Required: The Department of Social Services should withhold funds in the amount necessary to cover administrative costs, but should dedicate some funds for capital expenditure at the local level. These funds would be allocated to agencies in quarterly amounts and the agencies would have to set priorities for such purchases by quarters. The agencies would then be allowed to make purchases off the approved list. Any funds approved for expenditure in one quarter, but unexpended, could be carried over and spent in the next quarters of that fiscal year.
- b. Timeframes: The proposal could be implemented by making a procedural change. Due to the restricted funding situation within the Department of Social Services for the 1985-86 Fiscal Year, it is recommended that no action be taken on this proposal until after the 1985 session of the General Assembly.
- c. Benefits and Consequences: The recommendation would provide local departments of social services with a budgeted amount for capital expenditures, that would assist in their long range planning, yet provide the Department with a reserve fund for administrative costs, if needed.

The only negative aspect of the proposal would be the possibility of the Department of Social Services having to freeze all capital outlay funds, and the resulting problems that would cause at the local level if a local department of social services had planned on having a certain level of capital outlay funds available.

RECOMMENDATION 5: The Department of Social Services should consider the incorporation of performance standards as part of, or in place of, the caseload standards system to measure the quality and effectiveness of services being provided by a local welfare/social service agency. This program should be concerned with determining those agencies with a below average performance level and assisting those agencies in improving their operations. Further, this program would identify agencies that provide the best caliber of services and allow these agencies to experiment with innovative approaches to service delivery.

### 1. Analysis

- a. Explanation of Problem/Situation: The current system of establishing caseload standards deals only with the time it takes various categories of staff to perform different types of activities. These activities are grouped together to derive a standard that is applied against an agency's caseload to determine the number of staff that agency needs.

- b. Reason for Recommendation: The current system only sets standards and captures activities performed by workers. The system does not incorporate any element that attempts to measure the quality or effectiveness of services.

2. Plan

- a. Action Required: The system would have to be overhauled to include the above recommendation. The criteria for measuring the services, in terms of effectiveness, would have to be developed and tested and included in a system that still provided the information needed for the caseload standards program.
- b. Timeframes: This effort would take considerable time from both development to implementation. Present staff are familiar with the establishment of caseload standards, but current staff have no experience in establishment of performance standards. This segment of the proposal would have to be contracted or existing staff would have to be educated in the basics needed to establish performance indicators.
- c. Benefits and Consequences: The proposal would provide a rough means of estimating performance of staff and effectiveness of services. The negative aspects of the system are concerned with the time and expense involved in the project, and the fact the system will still involve someone trying to assess a quality level of service with a management tool that is geared to measurement of productivity.

RECOMMENDATION 6: The Department of Social Services shall consider basing authorization for staff in a local welfare agency on a 40-hour work week.

1. Analysis

- a. Explanation of Problem/Situation: The current system of caseload standards and reimbursement to localities makes no distinction between agencies that work 40-hours a week and agencies that work less than 40-hours a week in terms of approving authorized staff levels.
- b. Reason for Recommendation: The current practice of authorizing approved staff levels, regardless of an agency's work hours, is not equitable.

2. Plan

- a. Action Required: No special action would be required to implement this policy. The caseload standard system is in the process of being revalidated. This process should be completed before the recommendation is implemented to provide an accurate base for the Department to use in assigning staffing levels to local departments of social services.

- b. Timeframes: This policy would be dependent on the time it takes to revalidate the caseload standards system.
- c. Benefits and Consequences: If implemented, the recommendation would provide an equitable system of approving staff levels and provide some cost savings to the Department. The costs could not be accurately determined until the caseload standards program was revalidated and new levels of staff were derived for each local department of social services. Localities might have to hire more staff out of local funds if they worked less than a forty hour week but quality of service will not be allowed to slip.

RECOMMENDATION 7: The Department of Social Services should review the acceptability of moving to generic intake and if permissible will study the feasibility of establishing pilot programs to assess the effectiveness of generic intake workers. These workers would be knowledgeable in eligibility and services policy and concentrate on providing clients with a total range of preventive and motivational services.

1. Analysis

- a. Explanation of Problem/Situation: As a result of the number and complexity of public assistance and service programs, workers are divided into different specialist categories and usually deal with a limited number of programs. Clients are, therefore, forced into seeing more than one worker when applying for public assistance.
- b. Reason for Recommendation: In most agencies there is no one place that deals with the client and his/her needs in total. The client is dealt with in different areas by different staff.

2. Plan

- a. Action Required: The recommendation would establish pilot program(s) to look at the feasibility of having one worker deal with the client's entire needs.
- b. Timeframes: This effort could not be started until basic issues were researched. Agencies currently using some form of generic workers would be contacted. Also, the question of the cost of the effort, and who would bear the cost, would have to be answered.
- c. Benefits and Consequences: The recommendation would increase the quality of services to the client if knowledgeable workers could be found to adequately handle all areas in which an applicant or recipient would need help.

The biggest hurdles regarding the recommendation will be the ability to run the program and satisfy the various regulations regarding cost allocation or worker's time and expenses if a worker is handling both public assistance and service programs.



If this effort cannot be funded with federal funds, then additional General Funds will have to be found to operate the pilot programs.

**RECOMMENDATION 8:** The Department of Social Services should consider the development of a process, within the Divisions, for the regular review of VACIS documents to determine any potential for consolidation of application or reports.

1. Analysis

- a. Explanation of Problem/Situation: The VACIS computer system provides a large number of management reports that are sent to different staff in local agencies. In some instances these reports have similar types of information.
- b. Reason for Recommendation: Since the reports from VACIS are generated from the same data base of information, there is potential for duplication of effort. This recommendation would look at ways of combining reports or applications to provide for the most efficient system possible.

2. Plan

- a. Action Required: The program divisions involved in this recommendation will have to work out the best means of reviewing documents that cross more than one area of responsibility.
- b. Timeframes: This recommendation can be easily implemented and is already underway at certain levels as part of the ongoing operation of the VACIS program.
- c. Benefits and Consequences: This recommendation should result in only essential documents going to local departments of social services and a lessening of the paperflow into a local agency.

**RECOMMENDATION 9:** The Department of Social Services should give consideration to adding elements to the VACIS documents that would provide indicators of the effectiveness of the services being provided to clients.

1. Analysis

- a. Explanation of Problem/Situation: The present computer system deals only with the collection of data related to providing benefits or services.
- b. Reason for Recommendation: There is no system in place that attempts to measure the effectiveness of the service being provided to the clients.

3. Plan

- a. Action Required: The program indicators that would be added to the system would have to be defined and tested as to their ability to capture the type of data referenced in the recommendation. If the indicators were developed, the system would have to be evaluated to determine how the new elements would be included into the programs. Further, a decision would have to be made concerning the cases already in the data base with respect to how they would fit in a new program.
- b. Timeframes: This effort would take considerable time and expense to implement as a result of the changes that would have to be made to the computer system. The biggest factor that would have to be addressed, if the indicators can be developed, would be the best time to reprogram the computer. This is especially critical in terms of the effort the Department is undertaking in the development of an automated Food Stamp program.
- c. Benefits and Consequences: The recommendation would provide a tool for assessing the effectiveness of services being provided if measurable indicators can be developed. The effort will be expensive to implement as a result of the reprogramming that would have to be done to VACIS and the resulting impact such a change would have on the existing data base.

RECOMMENDATION 10: The State Board of Social Services requests, as part of its 1985-86 planning, an analysis and feasibility study from the Department concerning relieving the heavy start-up activity of the Fuel Assistance program. This study will address contacting and screening recipients of public assistance benefits in early fall, and the deeming of other public assistance recipients eligible for fuel assistance.

1. Analysis

- a. Explanation of Problem/Situation: Clients are required to complete a separate application form for the Fuel program. In some instances, programs and the information related to their eligibility is already in the VACIS system.
- b. Reason for Recommendation: This recommendation would simplify the eligibility process for the Fuel program, resulting in administrative cost savings for the Department of Social Services and improved services to clients using the program.

2. Plan

- a. Action Required: The Division of Benefit Programs would have to set forth the options which the Department of Social Services has for amending the application process for the Fuel Program. Discussion has occurred regarding using existing data in the VACIS program to do an initial determination of eligibility for Fuel assistance.

- b. Timeframes: The main consideration related to time will be whatever alterations have to be made to the existing computer program for Fuel assistance. The impacts on the system are unknown at this time.
- c. Benefits and Consequences: This recommendation would make application and certification for the Fuel assistance program easier, and might result in an administrative cost savings. The cost savings would be dependent on the amount of reprogramming that would have to be done on the computer system.

RECOMMENDATION 11: The Department of Social Services should consider developing and implementing a formal training curriculum for new directors and board members. Local board members and directors would be encouraged to participate in and attend training sessions while bearing in mind their respective responsibilities in the Code of Virginia. The formal training sessions would specifically provide orientation on the local agency operations, and an overview of public assistance and service programs. The sessions would ideally provide board members with the information necessary to become knowledgeable representatives of social services in their respective communities.

1. Analysis

- a. Explanation of Problem/Situation: There are no formal requirements for local board or new director training beyond the reference in the Code of Virginia that at least one session a year must be an orientation session.
- b. Reason for Recommendation: The complexities of public assistance and services policy are such that formal training sessions on policy and other skills related to effective administration are needed by local board members and new directors.

2. Plan

- a. Action Required: The Department of Social Services would have to work with directors of local departments of social services in developing formal training curricula which would provide program knowledge and administrative skills that board members and new directors will need to become effective in their respective areas of responsibility.
- b. Timeframes: This process could begin with the formal adoption of this document.
- c. Benefits and Consequences: The recommendation would result in a better informed, more effective group of board members and new directors.

RECOMMENDATION 12: The Department of Social Services should consider developing a staff training program for local welfare/social service agencies that would set forth a curricula of skills training for improvement courses for different classifications of staffing that would allow a worker to improve their individual job efficiency and effectiveness.

This program would be directly tied to the evaluation criteria used in assessing the effectiveness of workers and would be one of the criteria used in advancing employees into additional areas of responsibility.

1. Analysis

- a. Explanation of Problem/Situation: There is no formal career ladder process in place in local departments of social services and no way to credit staff that attempt to improve themselves through additional education or skills development.
- b. Reason for Recommendation: Staff should be afforded the opportunity of improving themselves and their job skills and then compensated in some fashion for their efforts.

2. Plan

- a. Action Required: The Office of Personnel should be charged with determining what aspects of the recommendation could be implemented with respect to federal regulations concerning personnel policy. After that has been completed, discussions should be held with the Department and the Virginia League of Social Services Executives to determine the future direction of the effort.
- b. Timeframes: After this document is completed, the Office of Personnel could begin to immediately assess the potential for developing and implementing such a program.
- c. Benefits and Consequences: This recommendation would establish a formal skills training effort and career ladder program for each job classification at the local level. If such a program is used to require people to be trained prior to promotion, this effort could be in violation of federal merit system principles.

### III. BENEFIT PROGRAMS MANDATES AND REGULATIONS

#### A. Introduction

While the local agency questionnaires represent the largest volume of input, the recommendations incorporate also the concerns of local agency representatives on the State Board study and the concerns of local boards.

A major task of the State Board was to analyze and synthesize the large volume of "input" from the local agency questionnaires.

One hundred six (106) completed questionnaires concerning Benefit Programs were received from local agencies and reviewed. A total of 772 iterations of "high burden" for all benefit programs was identified. This report identifies (1) those "burdens" cited most frequently by local agencies, (2) which of these burdens are common to at least three agencies, (3) which "agent" has authority to modify such burdens, and (4) other implications of change. The process utilized in dealing with the responses is summarized below:

1. Those program components most frequently cited as burdensome across all Benefit Programs were identified.
2. The study was limited to those programs of the total number where high burdens were most frequently cited.
3. Within these programs, certain components were cited as "high burdens" much more frequently than others, and attention was concentrated on these components.

It should be noted that the frequent identification of resources as a burdensome component of the Medicaid Program was, in part, a reaction to changes in resource policy consequent to the provisions of Medicaid Transmittal #49. This transmittal has been withdrawn, and the frustrations generated thereby should be relieved. Nonetheless, the burden of resource determination is still recognized as particularly acute in Medicaid, due to the nature of the program.

#### B. Summary of Local Board Comments on Benefit Programs

The local board comment related to Benefit Programs was treated in the same manner as that submitted by the local welfare/social service agencies. Only those concerns which appeared three or more times in the comment have been included in this synopsis.

The first major issue was the area of prescribed forms. The following recommendations were offered to address this problem:

- Simplify or consolidate forms;
- Computer should complete as many forms as possible;
- Establish a user group or hire consultants to streamline forms;
- Avoid frequent changes of forms.

\*The component "Other" has been used to record concerns which could not be reflected within the suggested Program Matrix.

The second major issue was that policy changes should be less frequent. The following comments were made:

Frequent policy changes lead to errors;

Frequent policy changes cause hardships for clients as well as workers;

The State Board should encourage less frequent federal policy changes;

When policy changes are necessary, there should be sufficient lead time to provide training and an orderly implementation of the policy.

There were thirty-eight (38) different responses received from local boards and very appropriately a number of these endorsed the specific comments submitted by their local welfare agencies. Many of the comments from the local boards reflected their broader concerns with the total system while others dealt particularly with administrative concerns. The study participants appreciated the quantity and quality of this input and felt that it helped to broaden their perspective on this study.

C. Summary of Local Agency Comments on Benefit Programs

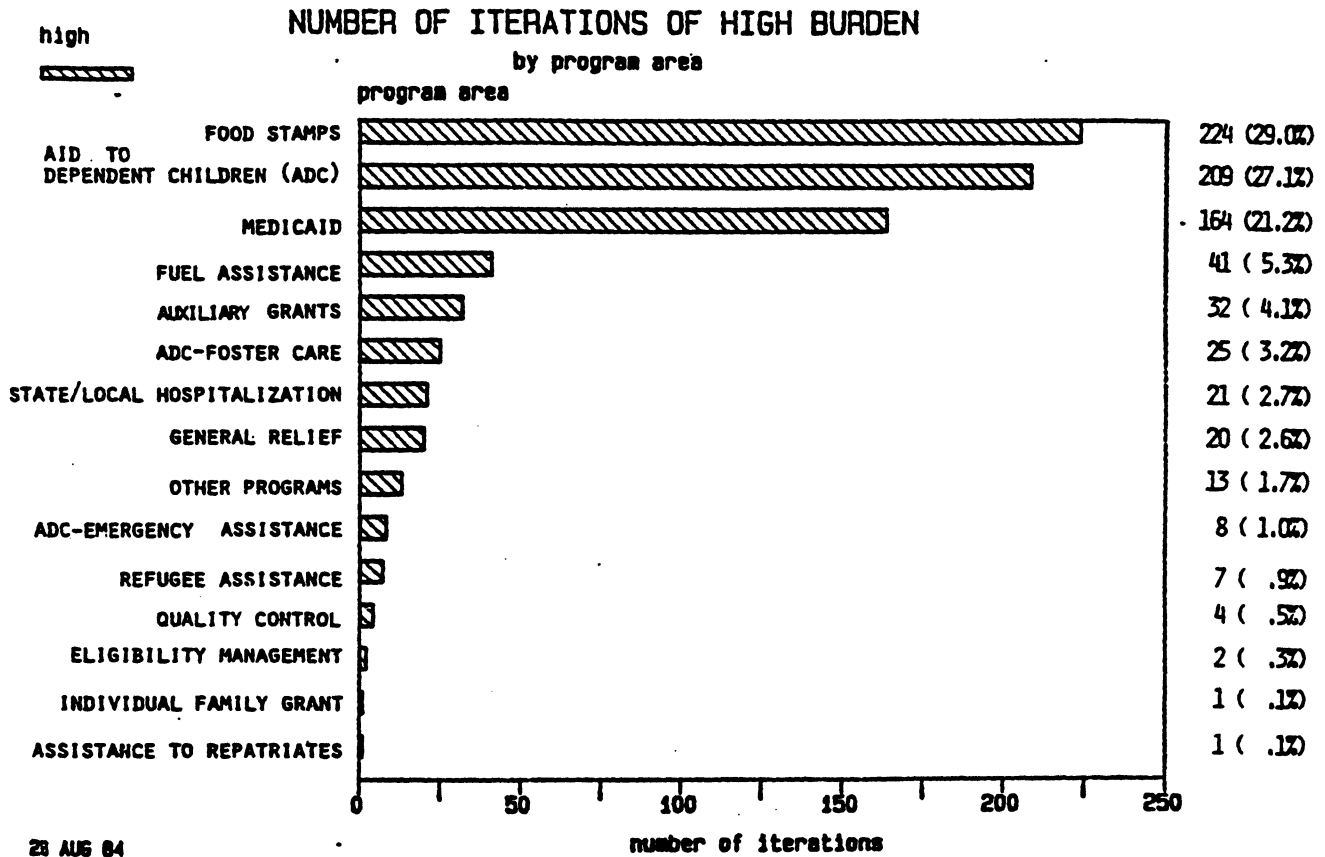
Local agencies were provided a grid for local input that provided for identification of low, medium and high burdens by program(s) deemed burdensome, and by component(s) of such program(s) deemed burdensome. All major program areas in Benefit Programs, and support systems, were listed. (See chart on page 21.)

In addition, a space to add "Other" was provided for the addition of any program or support area of Benefit Programs not listed.

A list of eleven components of such programs was developed. It included a space to specify "Other" for any area not otherwise covered, to more closely define the particular burden within the program. These components are listed on the chart on page 22.

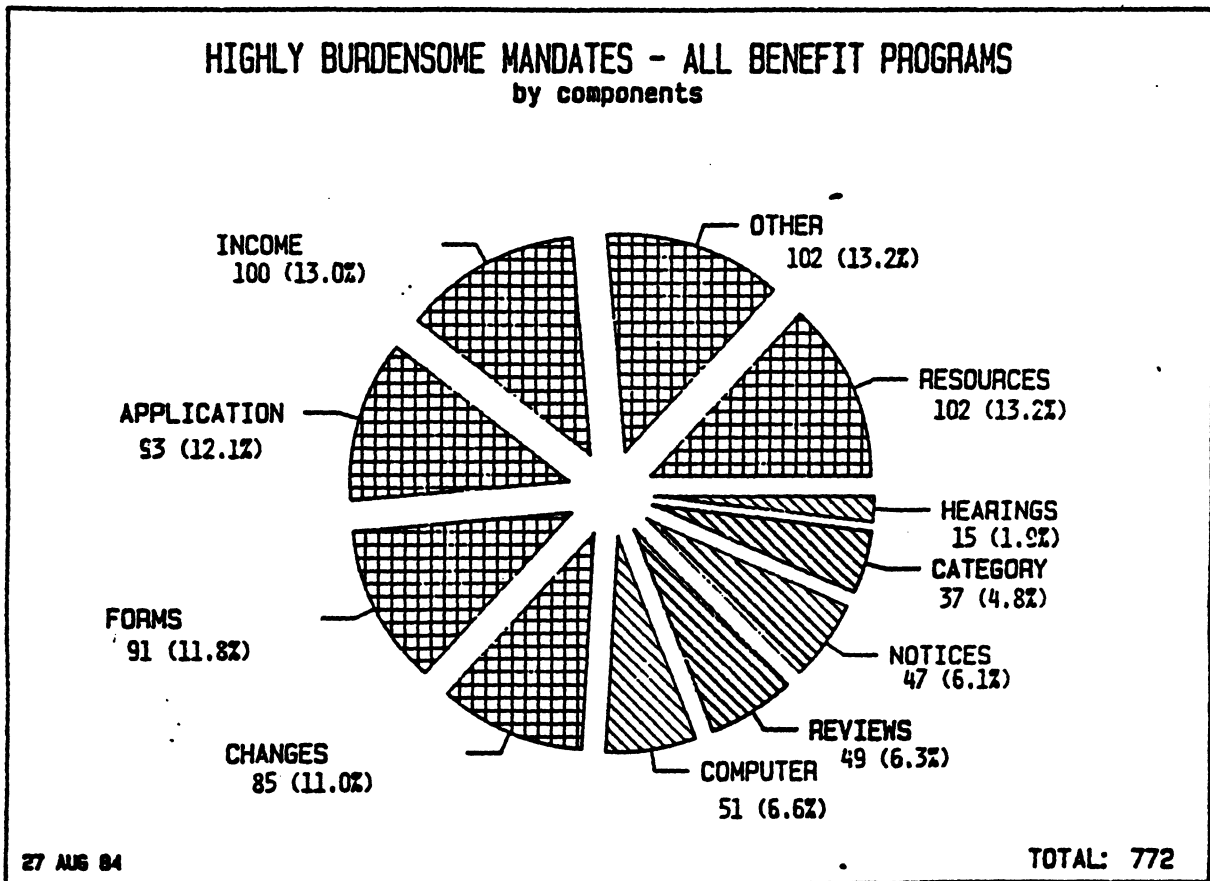
All programs were analyzed to determine in which programs high burdens were most frequently identified. The Food Stamp Program had the highest frequency of identified "High" burdens, at 224, followed by the Aid to Dependent Children Program, at 209, and the Medicaid Program, at 164. The number of iterations of "High" burden in these three programs represents 77.33% of the total identifications of highly burdensome areas for all program areas. For this reason, the focus was on these three program areas. Fuel Assistance, with 41 "High" burdens identified, trailed Medicaid by a huge gap, and the number of times "High" burdens were identified in the other programs in no case exceeded 5% of the total identifications.

The following chart summarizes these reports by program area:



The conclusion was made to add the Fuel Assistance and Auxiliary Grants programs to the three already identified for concentration in relieving burdensome mandates.

Each program component area was also analyzed to determine the number of times it was cited as a high burden, without regard to program area. "Resources" and "Other" tied for the most frequently identified, with 102 each. The "Application Process" was third, with 100 iterations, and prescribed forms was fourth, with 91. It should be noted that frustrations indicated under "Application" process frequently involved the forms used as a part of that process. The following chart summarizes these reports, by component area:



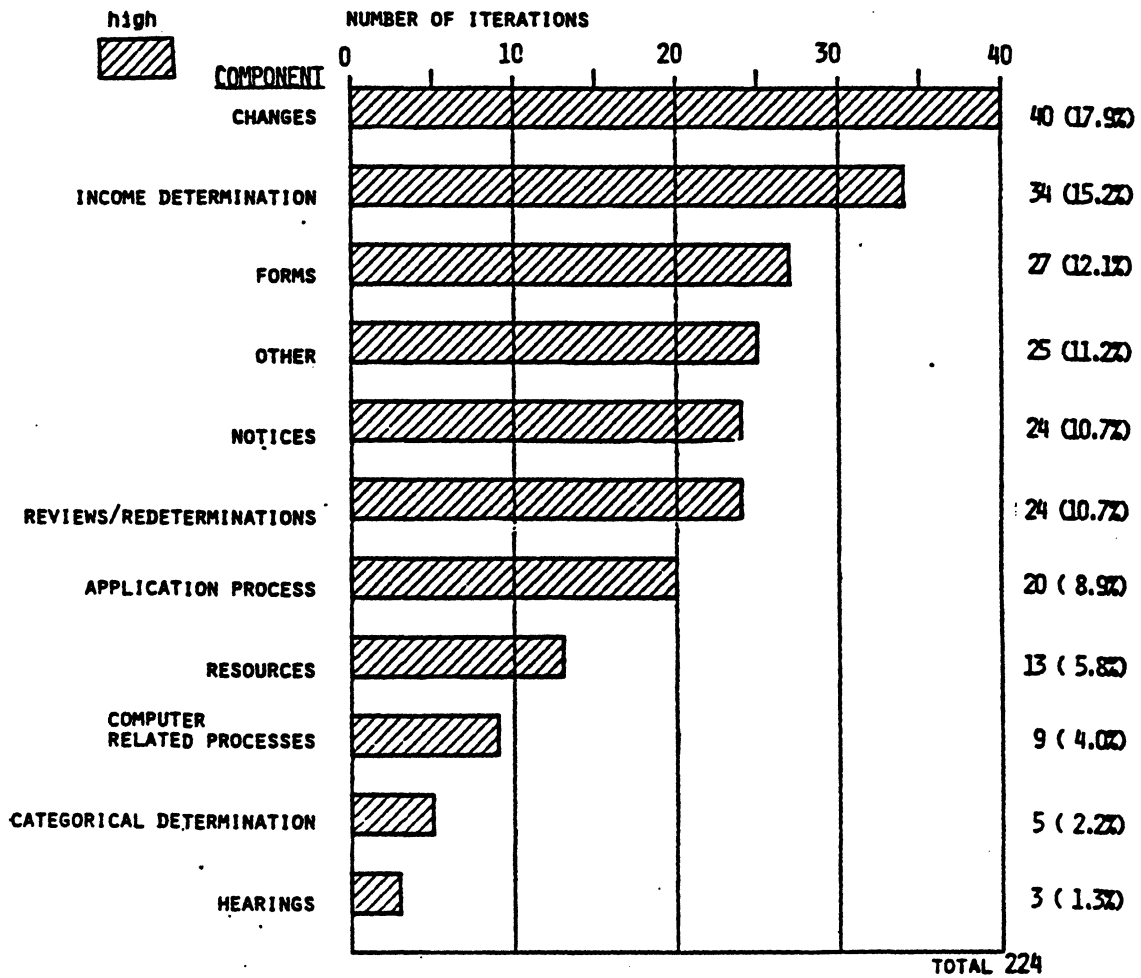
A study was then made of the frequency with which each component within each of the three most burdensome programs was identified as a high burden. The charts that follow summarize these findings, by program.

\*The component "Other" has been used to record concerns which could not be reflected within the suggested Program Matrix.



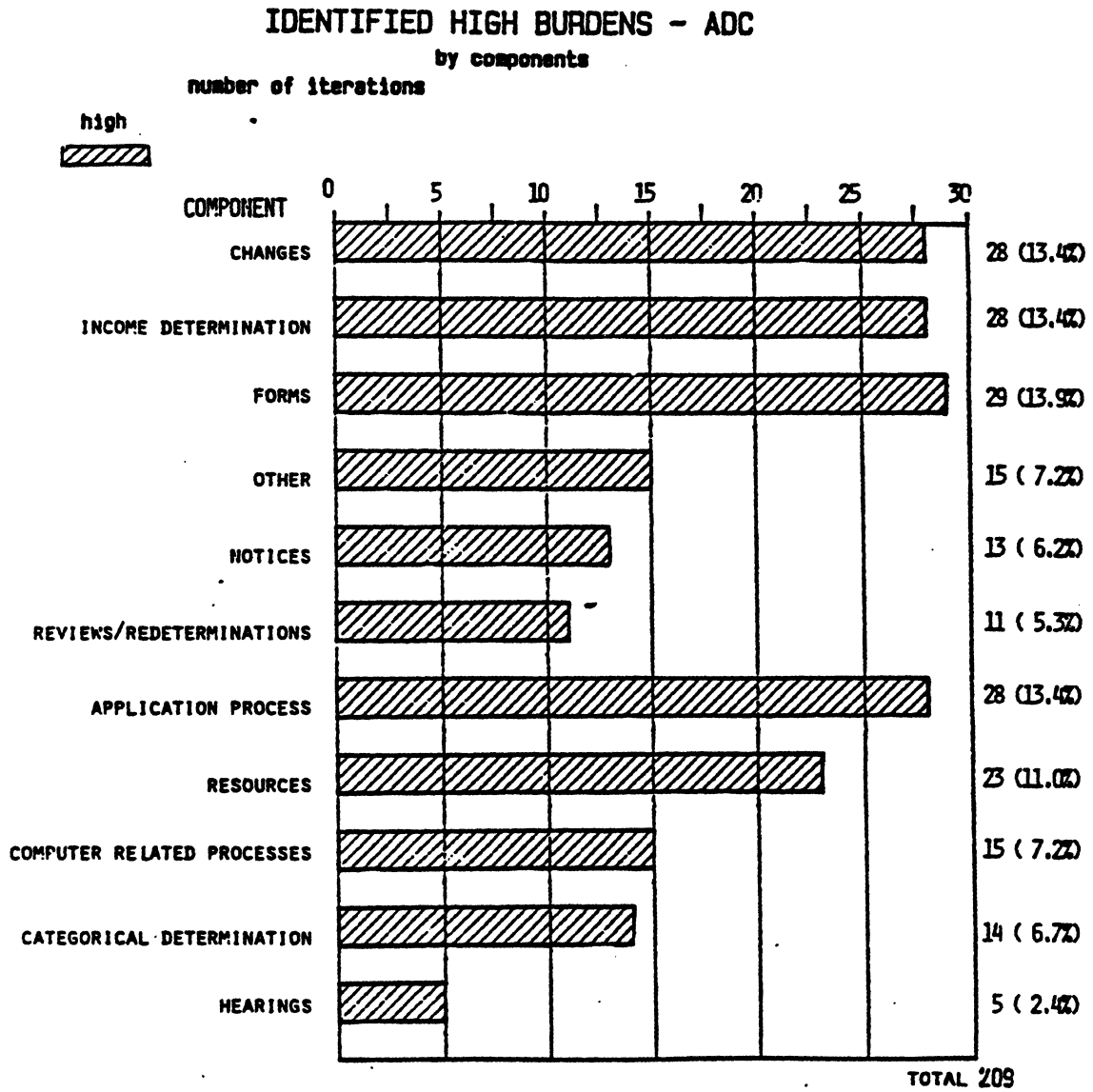
FOOD STAMPS:

IDENTIFIED HIGH BURDENS - FOOD STAMPS  
BY COMPONENT



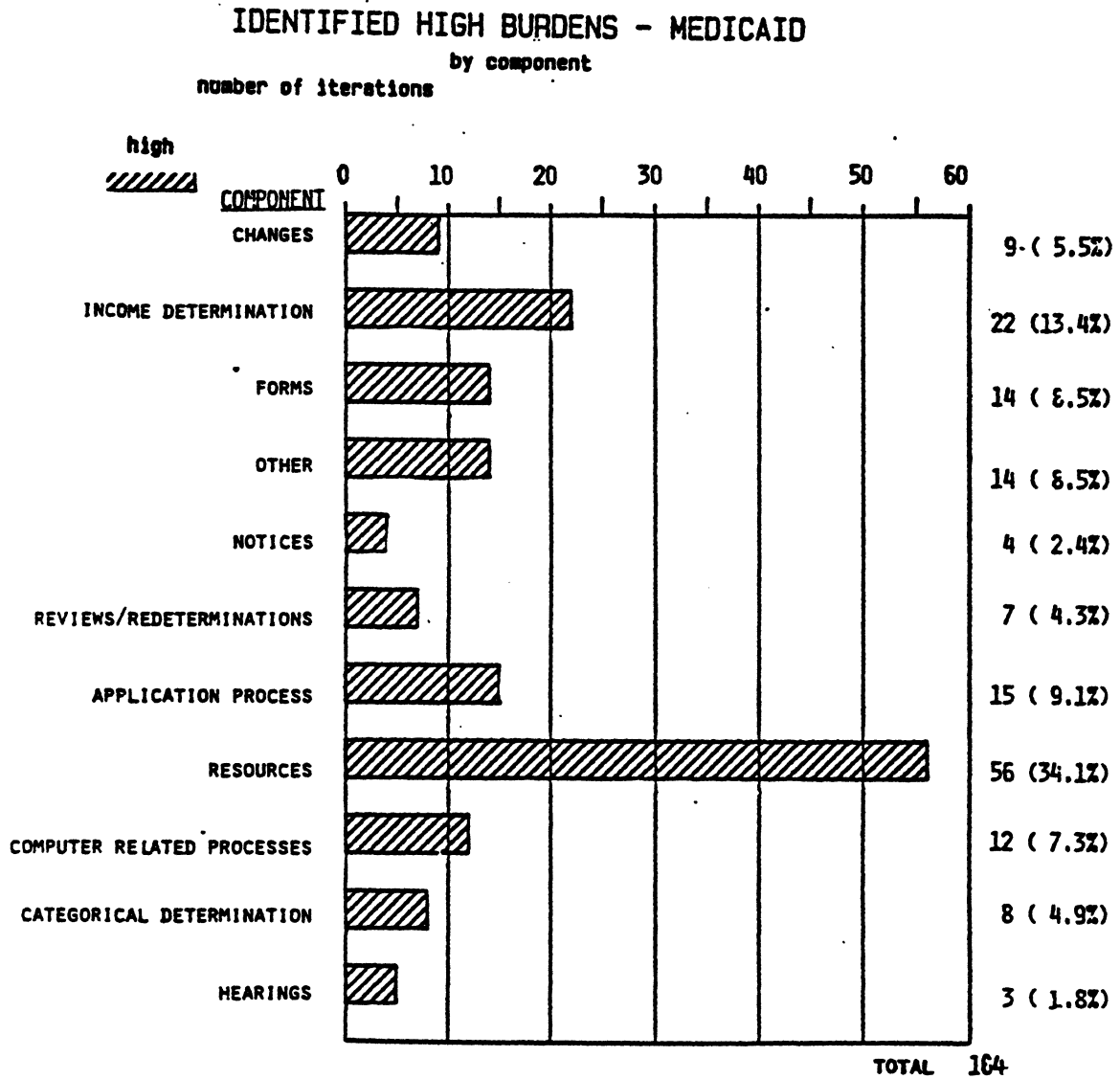
27 AUG 84

AID TO DEPENDENT CHILDREN:



27 AUG 84

MEDICAID:



04 SEP 84

Some concerns in these programs are common (e.g. Income Determination, Resource Determination, and Prescribed Forms), and some areas present no pressing concern (e.g. Fair Hearings).

The top three areas of local concern in the Food Stamp, Aid to Dependent Children and Medicaid programs were reviewed in depth. From the local input, the following specific areas have been identified for this study as the areas of highest concern, by program and by component area:

AID TO DEPENDENT CHILDREN

PRESCRIBED FORMS: The Forms Themselves.

INCOME DETERMINATION: Prospective/Retrospective Budgeting; Cohabitant Income Policy; Verification of Income; Counting Support; Management of Overpayment Recovery; Income Verification Process.

REPORTED CHANGES: Monthly Reporting.

RESOURCE DETERMINATION: Disparity in Resource Assessment; Resource Verification Process.

OTHER: Verification of Birth; Inconsistent Fraud Recoupment Procedures.

x x

FOOD STAMPS

PRESCRIBED FORMS: The Forms Themselves.

INCOME DETERMINATION: Prospective/Retrospective Budgeting.

REPORTED CHANGES: Action on Changes and Notifications to Client.

OTHER: Implementation of Policy.

x x

MEDICAID

RESOURCES: Resource Verification Process; Disparity in Resource Levels.

PRESCRIBED FORMS: The Forms Themselves.

INCOME DETERMINATION: Determining Income Eligibility.

CATEGORICAL DETERMINATION: Determining Disability.

The Fuel Assistance and Auxiliary Grants programs ranked fourth and fifth in expressed concern from the local agencies. The following areas were identified as highly burdensome for these two programs from local input:



on-going case has a change in earnings, continuing eligibility is determined using the Prospective method, but grant amount for the next grant is calculated using the Retrospective method.

Since irregular income is common, the Prospective method of anticipating income results frequently in an incorrect projection of earnings. This requires the eligibility worker to perform a grant adjustment once actual income is known. In addition, it is extremely difficult to explain these two budgeting methods to the applicant/recipient, together with the required adjustment and the applicant's/recipient's responsibilities for providing required wage information to the local agency. This situation is made worse by the fact that income projections frequently result in grant payments out of synchronization with income actually available in a given month.

While budget calculation is by nature a complex area of eligibility determination and no method is without some problems, the State Board feels that the operation could be simplified and improved if the State had latitude in developing its own approach. A simpler approach would help clients better understand the budgeting requirements and require fewer budget adjustments with a reduced risk of payment errors. Under current federal law, however, the State would risk severe fiscal sanctions utilizing a different budget approach without federal approval.

Plan/Action/Recommendation

- o The State Board of Social Services requests that the General Assembly take appropriate action to request federal approval for the State to develop a simpler, more appropriate budgeting method.

b. Issue

**RESOURCE VERIFICATION PROCESS:** Determining eligibility requires an assessment of the value of a client's resources. This task is both difficult and time consuming.

Summary

MANDATE:	SOURCE:	CLIENT CONSEQUENCES:	OTHER CONSEQUENCES:
<p>Resource Verification Process</p> <p>RECOMMENDATION: Simplify methods of verification for eligibility worker and client, including better use and compatibility of automated systems.</p>	<ol style="list-style-type: none"> <li>1. Federal (Congress)</li> <li>2. State Board of Social Services</li> </ol>	<p><u>POSITIVE:</u> Reduce client efforts in eligibility determination process; possibly result in earlier eligibility determination.</p>	<p><u>POSITIVE:</u> Ease time and burden of determining eligibility for eligibility worker; fewer pending cases. Possible reduction in errors with increase of data retrieval.</p>

### Analysis

The needs test to determine eligibility for the Aid to Dependent Children Program requires an assessment of the real and personal property available to the family. Federal regulations hold states responsible for making a correct determination with respect to the availability and value of real and personal property, potentially subjecting states to financial sanctions if, upon federally required verification in the Quality Control process, such determination is found to be faulty. Therefore, the State Board of Social Services has imposed a time-consuming and complex--but deemed necessary--requirement to verify both the availability and value of potential resources of the Aid to Dependent Children applicant/recipient.

The burden could be eased by assuring eligibility workers on-line access to automated files maintained at the Division of Motor Vehicles. The Department currently runs a tape file of applicants, and all active cases due for a six-month eligibility review, against the Division of Motor Vehicles' data file. Matches from this operation assist the eligibility worker in discovering and verifying motor vehicles that applicants/recipients may fail to report. However, we believe on-line access to the Division of Motor Vehicles' file would enhance the eligibility worker's ability to secure and verify current motor vehicle ownership for his or her entire caseload whenever desirable.

The task of determining real property could be facilitated greatly if (1) the Division of Taxation had a single, current file of real property owned by all individuals throughout the Commonwealth, and (2) the Department had on-line access to relevant data on such a file. Property records are now maintained in separate local political jurisdictions across the State and are most frequently not automated. Consequently, it is often difficult--and sometimes impossible--to discover unreported property of an applicant/recipient that is situated outside of his or her county or city of residence.

On-line access by the Department of Social Services to data files described above should, in addition, reduce eligibility payment errors.

### Plan/Action/Recommendation

- o The State Board of Social Services recommends that the Department continue its efforts with the Division of Motor Vehicles to gain on-line access by the eligibility worker to relevant data on the Division of Motor Vehicles' data file.
- o The State Board of Social Services requests whatever action is required of the General Assembly to ensure that the Department of Taxation develop and maintain a current, centralized automated data file of all real property in Virginia owned by citizens of the Commonwealth.

- o The State Board of Social Services requests that the General Assembly review the Privacy Protection Act of 1976 and modify same as required to ensure that the Department of Social Services does not encounter legal barriers to on-line access to relevant client data on automated files such as those described above.

c. Issue

COHABITANT INCOME POLICY: Local agencies encounter a negative reaction from the general public because income of stepparents can be deemed available while income of cohabitants cannot.

Summary

MANDATE:	SOURCE:	CLIENT CONSEQUENCES:	OTHER CONSEQUENCES:
Cohabitant Income Policy	General Assembly (State Code)		POSITIVE: Provide more eligibility worker time for the eligibility determination process. Treating stepparent and cohabitant same increases community credibility in the program.
RECOMMENDATION: Deem income of cohabitant available to unit, same as stepparent.		NEGATIVE: Income might be counted against Assistance Unit that was not actually available, as in stepparent cases.	NEGATIVE : Does not necessarily reflect income available to Assistance Unit.

Analysis

State law establishes that a stepparent is responsible for his/her husband/wife with whom he/she is living. Federal law requires the eligibility worker to establish the amount of contribution due from the stepparent, and deem this amount available for the purposes of eligibility determination. State law also establishes that a cohabitant is responsible for children with whom he/she lives. For this purpose, a cohabitant is a man or woman living with one of the opposite sex as husband and wife without benefit of marriage. This relationship is defined by the eligibility worker from a declaration of the applicant. However, there is no federal or State law permitting (or prohibiting) the eligibility worker to deem an expected contribution from the cohabitant. In the absence of deeming, the cohabitant's income is still to be verified and an expected contribution determined. Only that income actually made available can be counted in the eligibility process. The general public sees injustice when State law holds the stepparent and cohabitant equally responsible, but only the income of the individual who "accepts his or her moral responsibility" through marriage (i.e. the stepparent) can be deemed when determining eligibility. This disparity in the eligibility process related to the stepparent when compared



with the cohabitant could be rectified by changing State law to require deeming of the cohabitant's expected contribution in determining eligibility for the Aid to Dependent Children Program.

Plan/Action/Recommendation

- o The State Board requests that the General Assembly amend State law to require the contribution of a cohabitant to be deemed to those with whom he or she is living. This change would equalize the treatment of stepparent and cohabitant in determining eligibility.

d. Issue

PRESCRIBED FORMS: Agencies believe the eligibility process could be improved for the applicant/recipient and eligibility worker if forms prescribed for this process were improved.

Summary

MANDATE:	SOURCE:	CLIENT CONSEQUENCES:	OTHER CONSEQUENCES:
Prescribed Forms	Administrative Action (Benefit Program staff)	POSITIVE: Make eli- gibility process clear and simpler, especially by elimi- nating redundancy for multiple program assistance.	POSITIVE: Fewer forms for the eligibility worker to complete, and easier to explain process.
RECOMMENDATION: Simplify, clarify, consolidate, change field space available.			

Analysis

The State has prescribed forms for the eligibility determination process. Users of these forms question whether such forms could be simplified and clarified through consolidation and review. Fewer and more easily understood forms would assist both the agency worker and client. The Department's Division of Benefit Programs already has established a process for evaluating forms for necessary modification. Such evaluation is currently accomplished by program staff in the Division.

Plan/Action/Recommendation

- o The State Board of Social Services has recommended that the Department continue and also improve its forms review process.
- o The improvement shall include a sounding board of representative forms users to evaluate necessary modification.

e. Issue

VERIFICATION OF BIRTH: Local agencies find making payments for birth certificates from the Bureau of Vital Statistics a burdensome process.

	<u>Summary</u>	CLIENT	OTHER
MANDATE:	SOURCE:	CONSEQUENCES:	CONSEQUENCES:
Verification of Birth	Bureau of Vital	None.	POSITIVE: Less cost to
RECOMMENDATION:	Records and Health		local agencies.
Remove charge to	Statistics and		Saves eligibility
local welfare agency	General Assembly.		worker time.
by Bureau of Vital			NEGATIVE: Number and
Records and Health			cost of requests made
Statistics for birth			to the Bureau of Vital
certificates.			Records and Health
Alleviate burden on			Statistics might
local welfare agency			increase.
of check writing.			

Analysis

A birth certificate verifies the age and relationship of individuals applying for Aid to Dependent Children assistance. As a part of the eligibility determination process, the eligibility worker frequently must secure a birth certificate from the Bureau of Vital Records and Health Statistics. There is a charge of \$5.00 to the local agency on a one-by-one basis for each birth certificate supplied to the local agency. State and federal funds do eventually reimburse localities for 80% of this administrative cost, for which local agencies have put up the front money. However, the individual payment of these fees by local agencies on a one-by-one basis is an unnecessary administrative expense.

Plan/Action/Recommendation

- o The State Board of Social Services has recommended that the Department explore with the Bureau of Vital Records and Health Statistics a more efficient process. Such a process might require the Bureau of Vital Records and Health Statistics to keep track of those certificates supplied to local agencies and bill the State Department of Social Services collectively (rather than local agencies individually) for such services on a periodic basis. A desirable alternate solution would involve a change in State law to exempt the Department of Social Services from the fee charged for verification of birth.
- o The State Board of Social Services requests that the General Assembly take action to modify State law as may be required for a simpler inter-agency process.

f. Issue

VERIFICATION OF INCOME: Employers often are not motivated to provide verifications of client income and to assist with reported changes of client income.

	<u>Summary</u>		
MANDATE:	SOURCE:	CLIENT CONSEQUENCES:	OTHER CONSEQUENCES:
Verification of Income	General Assembly	POSITIVE: Clients would be required to make fewer repayments of overpayments on fraudulent situations. Less fraud.	POSITIVE: Eligibility workers might have fewer pending cases; fewer fraud cases and recoupment process reduced.
RECOMMENDATION: Assure more timely information: Initi- ate State incentives (such as tax incen- tives) for employers to report information more timely.			

Analysis

Current Aid to Dependent Children regulations require that the recipient report income, and changes in income, to the local agency so that this income can be calculated in determining the proper grant. Failure to receive a prompt report of income changes--and verification of same--often results in overpayments and sometimes recipient fraud allegations. Recoupment of overpayment and pursuit of fraud are costly administrative processes that may also create hardships for recipients and financial losses to the State. It is believed that the situation would occur less frequently if employers were more motivated to report employee income more frequently and assist with verification of income.

Plan/Action/Recommendation

- o The State Board of Social Services requests the General Assembly to provide, by State law, incentives (such as tax incentives) to encourage employers to assist the Department of Social Services with reporting and verifying income of Aid to Dependent Children recipients.

g. Issue

INCOME VERIFICATION PROCESS: Certain types of client income are far more difficult for the agency worker to verify. This burden could be relieved by permitting the local agency to accept client declarations in these situations in lieu of verifications.

	<u>Summary</u>		
MANDATE:	SOURCE:	CLIENT CONSEQUENCES:	OTHER CONSEQUENCES:
Income Verification Process	Action by State Board	POSITIVE: Faster and easier determinations of eligibility; not thwarted by uncoopera- tive employers.  NEGATIVE: Recoupment for erroneous payments.	POSITIVE: Faster, easier determinations for the eligibility worker.  NEGATIVE: Quality Control errors would increase, with the risk of federal fiscal sanctions; grant adjustments by eligi- bility workers would increase.
RECOMMENDATION: The suggestion that local agencies accept declarations of income in "difficult to verify" situations, at least initially, with written verifi- cation following, is not supported by the State Board.			

### Analysis

Federal regulations require that states determine the income of an applicant/recipient of the Aid to Dependent Children Program, both for the determination of eligibility and for the amount of the grant. While federal regulations do not specifically require verification of such income, the State is held responsible by the federal government for making an accurate determination of such income. Quality Control is required to verify all income for accuracy in its random review process of Aid to Dependent Children cases. Errors found in the Quality Control review process constitute the official State error rate. If this error rate is not at or below a federal tolerance level, the State potentially faces severe fiscal sanctions. Federal regulations in 1973 permitted the State to utilize a declaration or verification approach to eligibility determination. The case error rate for the Aid to Dependent Children Program at that time exceeded 40%. To control errors, the State Board opted to require use of verifications and documentation and has stressed this approach ever since. Program staff are certain that the reduction in error rate to the latest official payment error rate of 3.3% (October 1981-March 1982 sample period) could not have been achieved--and could not be maintained--without the current verification process. For these reasons, the State Board of Social Services requires a time consuming and complex--but deemed necessary--burden to verify all income in the process of determining eligibility and amount of grant. It would facilitate the task of the eligibility workers, applicants/recipients and employers if income declarations could be accepted in lieu of verifications. However, based on past experience, lifting these verification mandates would drastically increase the State's error rate and expose the State to severe fiscal sanctions. If declarations were accepted for an earlier and easier first determination of eligibility, followed by subsequent verifications of this same income by the eligibility worker, it appears that this would be more, rather than less, burdensome. The task of verification would merely be postponed for the eligibility worker,

applicant/recipient and employer, following an additional process of requesting and computing income based on a declaration. Further, the subsequent verification would frequently lead to correcting the payment made based on the earlier declaration.

Plan/Action/Recommendation

- o The State Board recommends not changing this mandate because of the risk of increasing the payment error rate and incurring federal fiscal sanctions.

h. Issue

DISPARITY IN RESOURCE ASSESSMENT: Eligibility workers and clients involved with multiple assistance programs are frustrated by differences in the manner in which resources are assessed from program to program.

Summary

MANDATE:	SOURCE:	CLIENT CONSEQUENCES:	OTHER CONSEQUENCES:
Disparity in Resource Assessment	Federal (Congress) State Board	POSITIVE: Eliminate confusion, difficulties for clients served by several programs.  NEGATIVE: Compromises might hurt some clients.	POSITIVE: Facilitate eligibility determination by eligibility worker.  NEGATIVE: Perhaps there should be differences.
RECOMMENDATION: The State Board will harmonize assessment procedures where appropriate.			

Analysis

Federal regulations require that the value of real and personal property be assessed in determining eligibility for the various federal assistance programs. Those resources which must be assessed, and the methods of determining availability and value of those resources are not consistent from federal program to federal program. This lack of consistency creates problems for the eligibility worker who is generic to several programs. Clients served by multiple programs also find the differences in resource assessment confusing. The State Board currently attempts to establish consistency where appropriate and when permitted by federal regulations. However, it is not within the power of the State Board to achieve total uniformity, nor is the State Board convinced that the burden of federally required differences should be lifted. Different programs appropriately are designed for different needs.

Plan/Action/Recommendation

- o The State Board of Social Services will continue to monitor problems arising from differences in resource assessment requirements.

- o The State Board will continue to harmonize differences in requirements of resource assessment from program to program to the extent compatible with program objectives.

i. Issue

MONTHLY REPORTING: The federal mandate requiring monthly reporting by clients lacks the flexibility to permit the most administratively practical and cost effective use of this requirement from state to state.

Summary

MANDATE:	SOURCE:	CLIENT CONSEQUENCES:	OTHER CONSEQUENCES:
Monthly Reporting  RECOMMENDATION: Permit the State to select what groups--if any--should report, where error rate performance justifies.	Federal (Department)	POSITIVE: Eliminate associated difficulty, confusion and penalties.	POSITIVE: Same as client plus simplification of grant management. (The State sought and was granted a federal waiver for limited monthly reporting, based on the cost savings information included in the Appendix.)

Analysis

Federal regulations require that the Aid to Dependent Children recipient complete a report about any changes in circumstances every month and return this completed report to the local agency by a given deadline [or lose income disregards, and possibly program eligibility]. Therefore, federal law makes monthly reporting a condition of program eligibility. Providing the monthly reporting forms to the recipients and the related state processes are very expensive. The original federal mandate required that the State subject all Aid to Dependent Children recipients to this monthly reporting process. The Department sought and received a waiver and currently is requiring only certain recipients to report monthly. The waiver was based on the State's Quality Control findings which substantiated that for certain groups of Aid to Dependent Children recipients every ten cents saved cost ninety cents in administrative dollars. In order to add or delete other groups from monthly reporting, another federal waiver must be sought. This often takes months to accomplish and hours of staff time. (See Appendix A.) [The only requirement addressed here is that for a STRUCTURED monthly report. Every Aid to Dependent Children recipient is required to report changes in circumstances to the local agency whenever they occur or to be subject to recoupment and possibly fraud prosecution.] States should be permitted to omit or to add groups of applicants and recipients from the structured monthly reporting requirement whenever the State's Quality Control findings and administrative cost information prove the reporting process financially unprofitable. Because monthly reporting is now a condition of eligibility, cases would be found in error by federal Quality

Control and the State would be subject to fiscal sanctions if State policy specified reporting groups different from those federally designated.

Plan/Action/Recommendation

- o The State Board of Social Services requests that the General Assembly request that Congress permit states to determine the most efficient and effective means of managing the State's caseload.

j. Issue

COUNTING SUPPORT: Delays in reporting support collections create difficulties for the local agency in establishing a correct grant amount under policy prescribed by the Division of Benefit Programs.

Summary

MANDATE:	SOURCE:	CLIENT CONSEQUENCES:	OTHER CONSEQUENCES:
Counting Support  RECOMMENDATION: Communication of information with respect to collections and redirection of support (involving the Judicial System, the State Department of Social Services' Division of Support Enforcement and Bureau of Data Systems, and local agencies) should be more timely.	State Department of Social Services and Court Systems	POSITIVE: Make accurate payments in synchronization with available support.	POSITIVE: Better case management. Fewer grant adjustments.

Analysis

State and federal law require that Aid to Dependent Children payments made to eligible recipients be considered a debt to the State of Virginia owed by any responsible relatives of the recipient(s). Therefore, support payments from such responsible relatives are redirected to the State of Virginia. The initial evaluation of this support and the mechanisms of managing collection of this support require proper timing and communication among various administrative authorities: the court system, the Department of Social Services' Division of Support Enforcement and Bureau of Data Systems, and the local agencies managing the case. When this timing is faulty, there is potential for an incorrect grant that may need to be subsequently corrected. In the current system, there sometimes is a delay between the reporting of redirection of support from the

recipient to the State (or, conversely, redirection to the recipient when he or she becomes ineligible) for management by the eligibility worker in grant computation. A study will be done by the Department to determine why the problem is occurring, after which corrective measures can be taken.

Plan/Action/Recommendation

- o The State Board of Social Services has recommended that the Department of Social Services examine this problem and report what corrective measures could or should be implemented.
- o The State Board of Social Services may need the support of the General Assembly should corrective measures involve the State's judicial system.

k. Issue

INCONSISTENT FRAUD RECOUPMENT PROCEDURES: Local departments have conflicting instructions to compute overpayments and fraud.

Summary

MANDATE:	SOURCE:	CLIENT CONSEQUENCES:	OTHER CONSEQUENCES:
Inconsistent Fraud Recoupment Pro- cedures	State staff	None.	POSITIVE: Clear under- standing of requirement.

RECOMMENDATION: Resolve conflicting instructions in fraud and program manuals.

Analysis

Local agencies are instructed by the Department of Social Services' Aid to Dependent Children Program manual to compute and recover overpayments. However, the Department also has issued a fraud manual which specifies the computation processes for overpayments involving fraud. These instructions are inconsistent.

Plan/Action/Recommendation

- o The State Board has requested that the Department resolve conflicting instructions for computing overpayments that involve fraud.

l. Issue

MANAGEMENT OF OVERPAYMENT RECOVERY: Local agencies find that tracking and reporting recovery of overpayments from clients is time-consuming and should be automated.



<u>Summary</u>			
MANDATE:	SOURCE:	CLIENT CONSEQUENCES:	OTHER CONSEQUENCES:
Management of Overpayment Recovery	Department of Social Services	None.	POSITIVE: Relieve staff with other responsibilities; more accuracy.  NEGATIVE: Feedback process cost to the State.
RECOMMENDATION: Provide an automated process to reduce the local agency burden of tracking overpayment recovery.			

Analysis

Federal regulations require recovery of Aid to Dependent Children overpayments, whether such payments are the result of errors by the agency or by the recipient. The State now requires the local agency to repay the State for any overpayments whether the error was by the local agency or by the recipient and whether or not the agency collects the overpayment from the recipient. When the local agency collects overpayments from the recipient, such payments must be deducted from the current grant. These payments involve local agency staff manually logging, tracking and reporting collections. Better use of State automated systems could replace this time-consuming task and could also provide periodic reports of progress in collection of overpayments.

Plan/Action/Recommendation

- o The State Board of Social Services has recommended that the Department consider utilizing an existing automated system or, if necessary, initiating a system to manage the tracking and periodic reporting of overpayment collections.

2. AUXILIARY GRANTS (AG)

a. Issue

DETERMINING ELIGIBILITY: Because Auxiliary Grant applicants are not screened to determine need for care in a home for adults, Auxiliary Grant payments may be made to individuals who are in homes for adults but who have no need for this level of care.

<u>Summary</u>			
MANDATE:	SOURCE:	CLIENT CONSEQUENCES:	OTHER CONSEQUENCES:
Determining Eligibility	State Board	Unknown; but perhaps fewer eligible clients.	POSITIVE: More appropriate distribution of funds.  NEGATIVE: More complex and possibly slower eligibility determination.
RECOMMENDATION: This issue should be referred to the contractor studying			

Analysis

Current policy requires that the individual be residing in a home for adults in order to be found eligible for an Auxiliary Grant payment. Because the determination of eligibility for an Auxiliary Grant does not include evaluating the need for placement, some individuals might be found eligible for an Auxiliary Grant in a home for adults, although their needs could be met more appropriately in a nursing home. In 1983, the Department recognized that it needed assistance to resolve problems related to need for placement in homes for adults as well as other issues in the Auxiliary Grants Program. The Department has contracted with the firm of Ernst & Whinney to study this program. This study will also involve findings of the Long Term Care Council, as well as experiences of the State Health Department in screening for nursing home care.

Plan/Action/Recommendation

- o The State Board of Social Services has recommended that the Department assure that the contractor for the Auxiliary Grants study explore thoroughly this area of concern, and provide appropriate recommendations to the Department to alleviate the problem.

b. Issue

**BUDGETING:** The current budgeting process for funding the Auxiliary Grants Program does not permit a locality to adjust its local budget to reflect actions by the General Assembly which modify the State budget.

Summary

MANDATE:	SOURCE:	CLIENT CONSEQUENCES:	OTHER CONSEQUENCES:
Budgeting	General Assembly	None	POSITIVE: Relieve problem of trying to match local dollars budgeted to State budget for the program.
<b>RECOMMENDATION:</b> This issue should be referred to the contractor studying Auxiliary Grants.			

Analysis

The Auxiliary Grants Program is funded by a combination of State and local match funds. The General Assembly may approve increases in funds for the Auxiliary Grants Program but after the local agency's deadline for submitting its budget to the State. When an increase in the Auxiliary Grants rate for Homes for Adults is published by the General Assembly, local agencies must then return to their administrative structure to request additional funds for the rest of their Fiscal Year.

This program is mandated for every locality with no local contract, the General Assembly setting the rates. For these

reasons, it has been suggested by local agencies that the General Assembly provide 100% of the funding for the program, rather than the current State/local match. It appears 100% State funding would resolve local budgeting problems, provided localities did not have to put up the "front money" for Auxiliary Grants. Also, 100% State funding would alleviate problems related to which local agency is responsible for payment to an individual placed in a home for adults located outside of the jurisdiction of prior residence. One hundred percent State funding would cost the State an additional \$4.3 million per year, based on the General Assembly appropriation for FY'85.

Another resolution might lie in a change in General Assembly budgeting for the Auxiliary Grants Program. By such a change, increased rates would be authorized by General Assembly action in the even year (e.g. February 1984) with the rates taking effect for the second year of the biennium (e.g. July 1985). This would provide local agencies the lead time they desire to establish their local budgets for this program.

In 1983, the Department recognized that it needed assistance to resolve multidimensional problems and issues related to the Auxiliary Grants Program. The Department contracted with the firm of Ernst & Whinney to study this program. This study will address the local agency budgeting issue in the context of other program recommendations for the Department's consideration.

Plan/Action/Recommendation

- o The State Board of Social Services has recommended that the Department assure that the contractor for the Auxiliary Grants study explore solutions to this local budgeting concern, in the context of other program issues and resolutions, and provide to the Department their recommendation with respect to this problem.

3. FOOD STAMPS

a. Issue

PROSPECTIVE/RETROSPECTIVE BUDGETING: The complicated federally mandated prospective/retrospective budgeting process is unnecessarily complex and error-prone.

Summary

MANDATE:	SOURCE:	CLIENT CONSEQUENCES:	OTHER CONSEQUENCES:
Prospective/Retro- spective Budgeting	Federal (Congress)	POSITIVE: More easily understood; more in step with time of need.	POSITIVE: Fewer adjust- ments by eligibility worker and fewer errors in grant calculations.  NEGATIVE: Not all agencies satisfied by any one method.
RECOMMENDATION: Gain federal approval to develop a simpler, more appropriate budgeting method.			

### Analysis

Current federal regulations for the Food Stamp Program require a combination of prospective and retrospective budgeting methodology to determine eligibility and issuance amount for Food Stamp applicants and recipients. Eligibility workers are required to secure a Food Stamp household's income in the month of application, or the month prior to it, to determine eligibility and issuance amount for the month of application and following month (i.e. Prospective Budgeting). For households that are not required to participate in monthly reporting, the eligibility worker must use the income two months prior to the third issuance month to determine on-going eligibility and issuance amount in the third issuance month and for the balance of the certification period (Retrospective Budgeting). For households with required monthly reporting, the actual income reported on each monthly report is used to determine eligibility and issuance amount for the month following the month in which the report is received. For recertifications of non-reporting households, the Retrospective budgeting method described above is used to determine eligibility and issuance amount. For recertifications of households with required monthly reporting, actual income reported on the monthly report is used to determine eligibility and issuance amount.

While budget calculation is by nature a complex area of eligibility determination and no method is without some problems, the State Board feels that the operation could be simplified and improved if the State had latitude in developing its own approach. A simpler approach would help clients better understand the budgeting requirements and require fewer budget adjustments with reduced payment errors. However, the State would risk severe fiscal sanctions utilizing a different budget approach without federal approval.

### Plan/Action/Recommendation

- o The State Board of Social Services requests that the General Assembly support the Department in its request for federal approval for the State to establish a simpler, more appropriate budgeting method.

### b. Issue

**ACTION ON CHANGES AND NOTIFICATIONS TO CLIENT:** The federally prescribed advance notice period and agency time to act on reported changes are not consistent from federal program to federal program.

Summary

MANDATE:	SOURCE:	CLIENT CONSEQUENCES:	OTHER CONSEQUENCES:
Action on Changes and Notifications to Client	Federal; State Board	POSITIVE: Easier for client to understand agency actions, when served by more than one program.	POSITIVE: Easier for generic worker to manage cases.
RECOMMENDATION: Make timeframes consistent in all programs where permitted and appropriate			NEGATIVE: Consistency may not be in best interest of different program objectives.

Analysis

Federal regulations for the Food Stamp Program provide that the recipients be notified of proposed actions by the local agency within a given period of time (i.e. 10 days). The period of time the agency has to act on changes in the recipient's circumstances reported to it is also prescribed (i.e. 10 days). These timeframes do not necessarily coincide with the timeframes specified by federal regulations for these same activities in other federal programs. It is difficult for eligibility workers working with different programs to correctly apply such slightly differing regulations. It is also difficult for the recipient to understand why these requirements would differ when a single local agency is involved. The State Board is not willing to ask the Federal government to make these requirements consistent in all programs, since different programs serve different interests. However, modifications to these timeframes should be made where consistent with program objectives.

Plan/Action/Recommendation

- o The State Board of Social Services will request that the federal government review differences in these timeframes from program to program and reconcile them whenever possible and appropriate.

c. Issue

PRESCRIBED FORMS: Agencies believe the eligibility process could be improved for the applicant/recipient and eligibility worker if forms prescribed for this process were improved.

Summary

MANDATE:	SOURCE:	CLIENT CONSEQUENCES:	OTHER CONSEQUENCES:
Prescribed Forms	Administrative action (Benefit Programs staff)	POSITIVE: Make eligibility clearer and simpler, especially by eliminating redundancy for multiple program assistance.	POSITIVE: Fewer forms for the eligibility worker to complete, and easier to explain process.
RECOMMENDATION: Simplify, clarify, consolidate, change field space available.			

Analysis

The State has prescribed many forms to be used in the eligibility determination process. Users of these forms question whether such forms could be simplified and clarified through consolidation and review of appropriate field space. Fewer and more easily understood forms would assist both the agency worker and client. The Department's Division of Benefit Programs already has established a process for evaluating forms for necessary modification upon low stock notice. Such evaluation is currently accomplished by program staff in the Division.

Plan/Action/Recommendation

- o The State Board of Social Services has recommended that the Department continue and also improve its forms review process.
- o The improvement shall include a sounding board of representative form users to evaluate necessary modifications upon low stock notice.

d. Issue

IMPLEMENTATION OF POLICY: Local agency eligibility workers sometimes find policy unclear as written, and consequently must seek State clarifications in its application.

Summary

MANDATE:	SOURCE:	CLIENT CONSEQUENCES:	OTHER CONSEQUENCES:
Implementation of Policy	State Benefit Program staff	POSITIVE: Consistent application of policy.	POSITIVE: Relieve need to seek policy clarifications; greater consistency.  NEGATIVE: Less flexibility.
RECOMMENDATION: Write policy more clearly and precisely.			

Analysis

The State is provided federal regulations for the Food Stamp Program from which the Department of Social Services develops policy for implementation by local agencies. Local agencies sometimes have difficulty applying this policy to individual situations and have to seek clarifications from State staff. It should be noted that the policy developed by the State for the Food Stamp Program--more than for any other program--is required to be a direct reflection of federal regulations. To this extent, the problems with State policy are rooted in problems with the federal regulations. Federal policies are often very complex to implement. In addition, sometimes the State makes a conscious decision to permit flexibility and judgement by eligibility workers in certain areas. Questions result when eligibility workers prefer not to make decisions in these areas. However, State staff should be alert to improving the writing of policy. Training needs should be assessed as a part of this recommendation.

Plan/Action/Recommendation

- o The State Board of Social Services is supportive of and reinforces efforts of State staff underway to improve policy writing through processes such as the use of sounding boards including local agency workers, in policy development.
- o The Department should continue to assess local agency training needs and respond as appropriate.

4. FUEL ASSISTANCE

a. Issue

PERSONNEL: Personnel hired by local agencies in the fall to manage the Fuel Assistance Program are released by local agencies at the conclusion of the program the following spring, and, thereupon, may become eligible for costly unemployment benefits.

Summary

MANDATE:	SOURCE:	CLIENT CONSEQUENCES:	OTHER CONSEQUENCES:
Personnel	State Board	None	POSITIVE: Eliminate payment of unemployment benefits.

RECOMMENDATION:  
Look into possibility of contracting for personnel in such a way as to eliminate the need for unemployment benefits.

Analysis

The Fuel Assistance Program is unique among the programs of the Department since it is seasonal rather than operating throughout the year. Personnel must be hired at the start-up of the program. The services of those individuals hired are no longer needed once the program is terminated the following spring. These individuals then may become eligible for unemployment benefits.

Plan/Action/Recommendation

- o The State Board of Social Services has recommended that the Department consider studying the feasibility of providing for Fuel Assistance staff through contracting as a local option.

b. Issue

YEARLY START-UP: The large numbers of applicants for the Fuel Assistance Program at start-up each November creates a burden for local agencies.

Summary

MANDATE:	SOURCE:	CLIENT CONSEQUENCES:	OTHER CONSEQUENCES:
Yearly Start-Up	State Board	POSITIVE: Facilitate knowledge, availability and application process for Food Stamp and Aid to Dependent Children recipients.  NEGATIVE: May introduce inequity by early findings for Food Stamps and Aid to Dependent Children recipients, rendering other later applicants ineligible when funds exhausted.	POSITIVE: Ease local agency start-up pressures each year.
RECOMMENDATION: Relieve heavy start-up activity in November by contacting and screening recipients of benefit programs earlier, or deeming such recipients eligible. The State Board requests an analysis and feasibility study by the Department.			

Analysis

As the program is currently administered, accommodating the heavy influx of applicants at start-up each November is a burden to local agencies. However, any change that includes pre-screening must consider that the program operates with fixed, limited funding and may terminate early upon exhaustion of available funds. Therefore, pre-screening must not favor eligibility determination of certain groups--such as recipients of other benefits known to an agency--at the expense of later applicants favored by regulations as target populations (e.g. aged individuals).



Plan/Action/Recommendation

- o The State Board of Social Services requests, as part of its 1985-86 planning, an analysis and feasibility study from the Department concerning relieving the heavy start-up activity of the Fuel Assistance program. This study will address contacting and screening recipients of public assistance benefits in early fall, and the deeming of other public assistance recipients eligible for fuel assistance.

5. MEDICAID

a. Issue

RESOURCE VERIFICATION PROCESS: Determining eligibility requires an assessment of the value of a client's resources. The task is both difficult and time-consuming.

Summary

MANDATE:	SOURCE:	CLIENT CONSEQUENCES:	OTHER CONSEQUENCES:
Resource Verification Process	Federal (Congress); State Board of Health; Department staff	POSITIVE: Reduce client effort in eligibility determination process; possibly result in earlier eligibility determination of Medicaid family unit.	POSITIVE: Ease time and burden of determining eligibility for the eligibility worker; fewer pending cases. Possible reduction in errors with increase of data access.
RECOMMENDATION: Simplify methods of verification for eligibility worker and client, including better use and compatibility of automated systems.			

Analysis

The federally required needs test to determine eligibility for the Medicaid Program requires an assessment of the real and personal property available to the family. Federal regulations

hold states responsible for making a correct determination of eligibility with respect to the availability and value of real and personal property, potentially subjecting states to financial sanctions if, upon required verification in the Quality Control process, such determination is found to be incorrect. Therefore, the Board of the State Department of Health has imposed a time-consuming and complex--but deemed very necessary--requirement to verify both the availability and the value of potential resources of the Medicaid applicant/recipient.

The burden could be eased by assuring eligibility workers on-line access to automated files maintained at the Division of Motor Vehicles. The Department currently runs a tape file of applicants, and all active cases due for a six-month eligibility review, against the Division of Motor Vehicles' data file. Matches from this operation assist the eligibility worker in discovering and verifying motor vehicles that applicants/recipients may fail to report. However, we believe on-line access to the Division of Motor Vehicles' file would enhance the eligibility worker's ability to secure and verify current motor vehicle ownership for his or her entire caseload whenever desirable.

The task of determining real property could be facilitated greatly if (1) the Division of Taxation had a single, current file of real property owned by all individuals throughout the Commonwealth, and (2) the Department had on-line access to relevant data on such a file. Property records are now maintained in separate local political jurisdictions across the State and are most frequently not automated. Consequently, it is often difficult--and sometimes impossible--to discover unreported property of an applicant/recipient that is situated outside of his or her county or city of residence.

On-line access by the Department of Social Services to data files described above should, in addition, reduce eligibility payment errors.

Plan/Action/Recommendation

- o The State Board of Social Services recommends that the Department continue its efforts with the Division of Motor Vehicles to gain on-line access by the eligibility worker to relevant data on the Division of Motor Vehicles' data file.
- o The State Board of Social Services requests whatever action is required of the General Assembly to ensure that the Department of Taxation develop and maintain a current, centralized automated data file of all real property in Virginia owned by citizens of the Commonwealth.
- o The State Board of Social Services requests that the General Assembly review the Privacy Protection Act of 1976 and modify same as required to ensure that the Department of Social Services does not encounter legal barriers to on-line access to relevant client data on automated files such as those described above.

b. Issue

DISPARITY IN RESOURCE LEVELS: Eligibility workers and clients involved with multiple assistance programs are frustrated by the differences in resource levels specified as eligibility criteria from program to program.

	<u>Summary</u>	CLIENT CONSEQUENCES:	OTHER CONSEQUENCES:
MANDATE:	SOURCE:		
Disparity in Resource Levels	Federal (Congress) State Boards of Health and Social Services	POSITIVE/NEGATIVE: Depends upon accommodation made.	POSITIVE: Easier for generic worker to determine eligibility.  NEGATIVE: May not best meet differing objectives of programs.
RECOMMENDATION:			
The State Board will continue to set consistent resource levels from program to program to the extent it is compatible with the objectives of those programs.			

### Analysis

The maximum level of real and personal property that an eligible Medicaid recipient may retain does not coincide with the maximum for other benefit programs. For example, the resource level in Medicaid for one person is \$1500 (\$1600, effective January 1984), whereas the resource level for an Aid to Dependent Children assistance unit is \$600. These differences make the generic eligibility worker's job frustrating.

To reconcile this problem, federal regulations permit the State to raise its Aid to Dependent Children resource level as high as \$1000, which still would not coincide with the Medicaid level, and would increase the cost of the Aid to Dependent Children Program. For Medicaid purposes, Virginia is a "209.B" state, which means the Medicaid resource levels could be lowered by the State Department of Health to the resource levels in the Aid to Dependent Children Program, because the \$600 amount is not more restrictive than the approved Medicaid resource level in effect in Virginia in 1972. However, the resource level for the recipients of Supplemental Security Income (SSI) payments for the aged, blind and disabled (i.e. SSI Categorically Needy Medicaid cases) would have to be set at the same level. It is felt that this more restrictive resource level likely would meet with much public disfavor. In addition, Virginia now accepts the resource determination of the Social Security Administration with respect to the financial and Medicaid eligibility of the Supplemental Security Income Categorically Needy Medicaid applicant because the resource levels are the same. With different resource levels, the eligibility worker would be faced with the considerable new burden of having to determine whether the Categorically Needy Supplemental Security Income recipient met the more restrictive resource levels for Medicaid eligibility.

Plan/Action/Recommendation

- o The State Board of Social Services will continue to monitor problems arising from differences in resource levels.
- o The State Board of Social Services will continue to harmonize resource levels from program to program, to the extent permitted by federal regulations and consistent with program objectives.

c. Issue

**PRESCRIBED FORMS:** Agencies believe the eligibility process could be improved for the applicant/recipient and eligibility worker if forms prescribed for this process were simplified.

Summary

MANDATE:	SOURCE:	CLIENT CONSEQUENCES:	OTHER CONSEQUENCES:
Prescribed Forms  <b>RECOMMENDATION:</b> Simplify, clarify, consolidate, change field space available.	Administrative Action (Benefit Programs staff)	<b>POSITIVE:</b> Make eligibility process clearer and simpler, especially by eliminating redundancy for multiple program assistance.	<b>POSITIVE:</b> Fewer forms for the eligibility worker to complete, and easier to explain process.

Analysis

The State has prescribed forms for the eligibility determination process. Users of these forms question whether such forms could be simplified and clarified through consolidation and review. Fewer and more easily understood forms would assist both the agency worker and client. The Department's Division of Benefit Programs already has established a process for evaluating forms for necessary revision. Such evaluation is currently accomplished by program staff in the Division.

Plan/Action/Recommendation

- o The State Board of Social Services has recommended that the Department continue and also improve its forms review process.
- o The improvement should include a sounding board of representative form users to evaluate necessary modifications.

d. Issue

**DETERMINING DISABILITY:** Eligibility workers are frustrated by the length of time it takes the State Department of Rehabilitative Services, under contract to the Social Security Administration, to determine disability for a Medicaid applicant.

<u>Summary</u>		CLIENT	OTHER
MANDATE:	SOURCE:	CONSEQUENCES:	CONSEQUENCES:
Determining Disability	Federal (Social Security Administration)	POSITIVE: Earlier finding of eligibility; fewer problems with medical creditors.	POSITIVE: Less pending time for eligibility worker and fewer pending cases; less retroactive claims processing by State Department of Health.
RECOMMENDATION: Have the General Assembly take appropriate actions to ensure that the Social Security Administration expedites determination of disability.			NEGATIVE: Perhaps more costly to Social Security Administration; perhaps less thorough evaluation.

Analysis

The Medicaid Program in Virginia accepts the determination of disability made by the State Department of Rehabilitative Services, under contract to the Social Security Administration, for the Categorically Needy Supplemental Security Income applicants, and the Medically Needy Categorically Related Supplemental Security Income applicants. Eligibility workers are frustrated that the Social Security Administration often takes longer than they feel is necessary to reach a decision about the disability status of an applicant.

Plan/Action/Recommendation

- o The State Board requests that the General Assembly review disability determination by the Social Security Administration and take action, if appropriate.

e. Issue

DETERMINE INCOME ELIGIBILITY: Local agency workers and clients are frustrated by the differences in policy with respect to income eligibility determination in the Medicaid Program from that for other programs.

Summary

MANDATE:	SOURCE:	CLIENT	OTHER
		CONSEQUENCES:	CONSEQUENCES:
Determine Income Eligibility	Federal (Congress) and State Boards of Health and Social Services	POSITIVE/NEGATIVE: Depends upon accommodation made.	POSITIVE: Easier for generic worker to determine eligibility.
RECOMMENDATION: Make income guidelines consistent from program to program, as long as such consistency is within federal requirements and compatible with program objectives.			NEGATIVE: Consistency may not best meet differing objectives of programs.

Analysis

Eligibility workers are frustrated and applicants/recipients confused since guidelines for determining income eligibility, including permissible deductions from gross income, are not the same in Medicaid as in other programs. Most of the differences result from different federal program requirements. The State Board of Social Services is not ready to request that the federal government resolve these differences, which are the result of different program objectives. Within federal guidelines, the State Board will continue to minimize differences from program to program to the extent it finds uniformity consistent with objectives of programs.

Plan/Action/Recommendation

- o The State Board will continue to harmonize criteria for determining income eligibility to the extent permissible by federal regulations and consistent with program objectives.

#### IV. SERVICE PROGRAMS MANDATES AND REGULATIONS

##### A. Introduction

As a part of the ongoing efforts of the Department to reduce costs, Service Programs have been reviewed twice since the passage of the Social Service Block Grant in 1981. The first effort focused on existing programmatic policy and procedures. The second effort, the Administrative Functional Analysis Project, focused on administrative functions and costs. The latter project is still underway. Based on the results of these two efforts, changes in both programmatic policy and procedures and administrative requirements have already been made. Therefore, the level of detail in Service Programs may be different than that provided in General Administration or Benefit Programs.

##### Service Programs Administrative Functional Analysis

Based on the direction of the Virginia Board of Social Services at the June 1983 meeting, the Division of Service Programs undertook a Service Programs Administrative Functional Analysis project. The ultimate goal of the project is to assure service administrative costs are at a minimum without sacrificing accountability. The interim goal was to realize administrative savings for transfer to actual service delivery beginning January 1984 or as soon as possible thereafter.

In order to accomplish the project, the Division of Service Programs involved its own staff, other Central Office staff, Regional Office staff, and numerous representatives from local social service agencies. The scope of the Service Programs Administrative Functional Analysis project was to examine: 1) all administrative functions and costs such as planning, budgeting, policy development, and reporting; 2) service delivery functions and costs which relate to client tracking, record-keeping, and workflow; and 3) resource development functions and costs such as the day care and foster home approval process.

In the process of examining administrative cost reductions, the project recognized that in service programs, administrative functions are not easily separated from direct service delivery and resource development functions. In financial assistance programs, it is easier to consider the salaries and costs associated with eligibility determination and redetermination as a cost of administering the money payments given to recipients. The same parallel cannot be drawn with service programs. In services, the local agency staff is both the administrator and deliverer of social services.

The project identified functions in three major areas. These areas are service delivery, resource development, and administration.

Service delivery functions at the local level are primarily performed by service workers in their interactions with clients. Resource development functions involve the approval and utilization of resources. These resources include foster homes, adoptive homes, family and in-home day care providers, chore and companion providers, volunteers, purchase of service vendors, and other community resources.

Based on the analysis of the three major functional areas, the Service Programs Administrative Functional Analysis project focused on issues and resulting recommendations which would streamline administrative functions. By streamlining administrative functions, more emphasis could be given to service delivery and resource development. However, some issues were also examined in resource development and service delivery.

The final report and the resulting 47 recommendations were presented to the State Board in December, 1983. The recommendations from this project are contained in Appendix F.

As a result of the project, major changes were made in the planning process for the Title XX Block Grant for Fiscal Year 84-85. These included collapsing of thirty (30) services into seven direct services and simplifying the plan development process beginning in December, 1983. The seven direct services are: Intake Services, Adult Services, Family Services, Adult Protective Services, Child Protective Services, Foster Care and Adoption Services, and Employment Services.

Effective January, 1984, statistical and fiscal reporting were simplified. Two statistical reports were eliminated.

Effective July, 1984, statistical and fiscal reporting were further simplified. Statistical reporting for direct services was changed to reflect the reduction of services to seven areas and four components. The Department's automated system is now utilized to print out the report format for service workers.

All changes already implemented are identified in Appendix G. Reductions in fiscal reporting requirements for purchased services in the Employment Services Program are illustrated in Appendix H.

The Department continues to proceed with implementation of the recommendations contained in the Service Programs Administrative Functional Analysis Final Report. Some recommendations are being tested such as the concept of making direct services accessible to everyone, regardless of income. This is discussed later under Issue 6 in this report.

The State Board reviewed and analyzed the process and results of the Service Programs Administrative Functional Analysis project, focusing on the recommendations not yet implemented. Some of the same recommendations are identified in the Board study. The Board also analyzed the survey results and comments from local agencies and the comments from local boards.

#### B. Summary of Local Board Comments on Service Programs

The remarks about Service Programs were almost all directed toward specific programs/services. Therefore this summary is, in general, grouped by program/service area.

There were close to the same number of comments about each area in Service Programs. With regard to Forms/Reporting, it was suggested that the manual and computer reporting be streamlined. For Child Protective Services it was suggested that the computerized information system needs to be overhauled and that workers need to be relieved of paperwork in



order to handle the increasingly complex cases. Suggestions for the Foster Care program related to streamlining and clarifying forms and reports including the instructions. For Title XX the suggestion was for increased local control.

It was also urged that all of the recommendations of the Final Report on Functional Analysis be implemented. A respondent urged that Early Periodic Screening, Diagnosis and Treatment be placed entirely with the Health Department, while another respondent said that clients must retain the right to use their own physicians.

C. Summary of Local Agency Comments on Service Programs

Survey Instrument

The survey of local agencies on Service Programs requested that local agencies complete a survey instrument by denoting burdensome areas. The survey instrument contained twenty-four (24) program/mandate areas. These areas were grouped by the seven broad services. Within these, specific subsets of the broad services were included. The twenty-four (24) areas are:

ADULT SERVICES

Home Based Services (Chore, Companion, Homemaker)  
Local Long Term Care Coordinating Committee  
Pre-Admission Screening Committee  
Other Adult Services

ADULT PROTECTIVE SERVICES

CHILD PROTECTIVE SERVICES

EMPLOYMENT SERVICES

Day Care-Children  
Employment Services Program  
Other Employment Services

FAMILY SERVICES

Court Services  
EPSDT (Early Periodic Screening, Diagnosis and Treatment)  
Family Planning  
Independent Adoption  
Other Family Services

FOSTER CARE AND ADOPTION

Adoption - Agency Placed  
Child Foster Care

INTAKE SERVICES

TITLE XX - OTHER

REFUGEES

VOLUNTEERS

Each program/mandate area was divided into eight components as follows:

**DIRECT CLIENT SERVICES:** Requirements related to actual direct services to clients.

**RESOURCE APPROVAL:** Requirements related to the recruitment, screening, approval, location and use of resources (foster homes, day care homes, volunteers, etc.) exclusive of purchase of service vendors.

**PURCHASE OF SERVICE:** Requirements related to contracting with, use of, and payment to purchase of service vendors.

**FORMS:** Required forms, exclusive of resource approval, purchase of service, statistical and fiscal reporting and automated information systems (VACIS, CPSIS, etc.). Forms related to these specific areas were considered under the appropriate component.

**STATISTICAL REPORTING:** Requirements related to client categories and subcategories, caseload standards compilation and other statistical reports.

**FISCAL REPORTING:** Requirements related to the completion of warrant registers and fiscal reports.

**AUTOMATED INFORMATION SYSTEMS:** Requirements related to input and output for VACIS, CPSIS, and other automated systems.

**PLANNING PROCESS:** Requirements related to the development and completion of planning documents or involvement in planning conducted by other agencies/organizations such as the long term care coordinating committee.

Agencies were asked to rank any areas which caused problems by denoting those which were highly burdensome, moderately burdensome, and least burdensome. For each area denoted to be highly burdensome, written comments were requested.

### Survey Results

A total of 108 of the 124 local agencies responded to the survey for service programs. The results of the survey were analyzed in two ways: one, by weighting the scores; and two, by analyzing written comments.

The rankings of program/mandate areas were weighted. Each designation by a local agency of high burden received three points, moderate burden received two points, and low burden received one point. All points given to each component of each program/mandate were totalled. This total weighted score each area received is displayed in Appendix B. The ranking by program/mandate is shown in Appendix C. The ranking of program/mandate by component is shown in Appendix D.

The four program/mandate areas which ranked as the most burdensome are:

FOSTER CARE AND ADOPTION: Child Foster Care  
CHILD PROTECTIVE SERVICES  
EMPLOYMENT: Employment Services Program  
EMPLOYMENT: Day Care - Children

The ranking of components of these four programs are displayed in Appendix E.

Written Comments

The written comments from local agencies were reviewed and analyzed by program area.

Child Foster Care

A total of sixty-five (65) local agencies provided written comments on Child Foster Care, ranked the most burdensome program. Forms for foster care ranked as the most burdensome component. Comments from local agencies indicate that: paperwork limits actual casework; duplicate information is required on forms; forms are difficult and not useful; form completion is time consuming and case records are full of forms; the review system does not fit all circumstances, and "too much stress is placed on forms and hearings and not enough on the quality of life for the child."

Comments on resource approval included: requirements for foster parents are too stringent for annual tuberculosis tests, physical examination every three years, water standards for homes, and requirements for monthly contact with foster parents; approval of foster parents is time consuming and difficult in rural areas; and severe shortage of foster homes due to low rate of pay.

Comments on automated systems included: the service supplement needs to be updated; time spent keeping data updated does nothing to help children and families; redundancy of information on generic case document; resource subsystem requires a lot of time but is not helpful; action overdue notices are not accurate; eligibility documents have priority causing service supplements to be late; VACIS (Virginia Client Information System) resource subsystem is unnecessary for a small agency as agency is able to keep up with information on foster homes manually, and eliminate the need to record visits in VACIS.

In regard to purchasing services, comments included: paperwork and payment system are very complex for vendors and local agency; rates in residential facilities have significantly increased, causing a financial burden especially on a small agency; and purchase of service rates are not timely.

Other comments on child foster care included: multiple funding sources for foster care are confusing; split responsibility between eligibility and service staff for ADC-FC and Medicaid is a problem; required court

hearings for dispositional reviews and service plans are burdensome; should be one time hearing at court for all cases; and credit in caseload standards should be given for the extensive work done with natural parents.

#### Child Protective Services

A total of forty-eight (48) local agencies provided written comments on Child Protective Services. The most burdensome component was automated information systems. The comments regarding information systems included: complicated and repetitious to use two automated systems, CPSIS (Child Protective Services Information System) and VACIS; two systems should be combined; no time to fill out forms to meet deadlines; system outdated; inaccurate information; staff overburdened with paperwork for automated system; CPSIS requires four different monthly reports with different deadlines; reduce reports to one at final disposition; 14 day report is burdensome; and too much emphasis on reporting to State and how cases are classified.

Other comments in Child Protective Services included: manual statistical reporting on certain cases should not be necessary with an automated system in place; no uniform method to screen complaints exists; need better screening for invalid, minor complaints; immediate response requirement is difficult to meet; difficult to find resources; caseload standards do not consider extensive work for highly complicated investigations; and educational neglect policy is too vague.

#### Employment Services Program

A total of fifty-four (54) local agencies provided written comments on the Employment Services Program. The comments on automated information systems, the most burdensome component, included: an error in programming required reentry of data; paperwork so heavy that there is not enough time to work with clients with barriers to employment; disproportionate amount of time spent maintaining VACIS updates, given the large caseloads; action due reports inaccurate; keeping up with numerous assessments and reassessments is difficult; overall local monitoring requires significant worker time but does not necessarily result in clients obtaining employment and, therefore, better for Regional staff to sample cases; and every change made by eligibility or service staff results in printouts which need to be filed.

Other comments on Employment Services Program included: excellent program which benefits client; funding is inadequate; fiscal reporting for allocation of costs to different funding sources is difficult; highly burdensome for underdeveloped rural communities; caseloads are too large to provide quality services; and difficult to share information between services and eligibility.

#### Day Care for Children

A total of fifty-three (53) local agencies provided written comments on Day Care for Children. The most burdensome component was resource approval. Comments included: standards are restrictive and difficult;

annual TB test and medicals are burdensome; high standards and procedures are too much for the small amount providers are paid; ratios of children to adults are difficult to determine for mixed aged children; ratios are too restrictive; in-home approval is ridiculous for relatives; water and safety standards are burdensome; very short-term care needs do not fit with the standards and process; forms used for provider approval are long and cumbersome; reapproval process should be simpler than initial approval; ESP clients cannot comply with program requirements if an approved home is not already available; and no credit in caseload standards is given for the approval process.

Other comments included: VACIS resource subsystem is a constant headache; purchase orders are too time consuming; time providers must wait to receive payment is ridiculous; and with high standards and low pay, why should private providers accept welfare clients.

#### Adult Services

A total of thirty-five (35) local agencies commented on Home Based Services (Chore, Companion and Homemaker Services) and other Adult Services. Comments included: the resource subsystem of VACIS is not beneficial for companion providers; the system of purchasing services is difficult for agency and providers; lack of resources and funding; State Board requirement for 15% of the Title XX allocation to be designated for Home Based Services is unreasonable; three definitions for in-home service at differing costs is confusing; and low rate of pay for providers makes it difficult to obtain companions.

A total of twenty-five (25) local agencies provided written comments about the Local Long Term Care Coordinating Committee. These comments included: planning process in the committee is time consuming and not effective; continual tracking of clients is difficult and unnecessary; the role and purpose is not clearly defined; reports are long, detailed, and repetitive; and insufficient training and directions.

A total of fourteen (14) local agencies provided written comments on the Nursing Home Pre-Admission Screening. These included: form used is lengthy, complicated, and too medically oriented; guidelines are difficult to interpret, and difficult to coordinate available time with Health Department to do assessments.

#### Adult Protective Services

A total of thirty-one (31) local agencies commented on Adult Protective Services. These comments included: direct services are difficult because of lack of authority of agency against client's will; court actions are difficult; guidance needed for self-neglect; manual chapter is too vague and needs to be expanded to clearly define local responsibilities; need funds for emergency housing; purchased services too restrictive to help meet client needs; lack of ongoing training; and agencies need resources for payee such as a public guardian.

### Family Services

A total of thirty-three (33) local agencies provided written comments on EPSDT (Early Periodic Screening, Diagnosis and Treatment). These comments included: the screening process is very time consuming; it is a "paperwork jungle"; much work is done to set up appointments and the client does not follow through; local welfare/social service agency should only inform clients through intake and the rest should be handled by the Health Department; and required submission of Medicaid form creates duplication with VACIS and suggest information for Medicaid be obtained through VACIS.

A total of eighteen (18) local agencies commented on Court Services. These included: home studies ordered by the juvenile court are more appropriate for court service staff; such studies are extensive and time-consuming; and there should be a way to charge for this service.

A total of fourteen (14) local agencies commented on independent adoption, family planning and other Family Services. These included: local agencies should be allowed to contract with private agencies for independent adoptions or be able to charge fees; family planning should be Health Department function entirely; agencies providing family therapy are not given adequate credit in caseload standards for this intensive family counseling; and no time available to plan parenting groups or new directions for services.

### Agency Placed Adoptions

A total of thirteen (13) local agencies provided written comments on Agency Placed Adoptions. These included: more adult adoptees are requesting information on natural parents; problems with Medicaid eligibility being limited to certain categories after final adoption; lack of standardization for home study makes approval somewhat arbitrary and difficult; resource subsystem of VACIS for adoptive home studies is of limited use; and subsidies should be guaranteed rather than subjecting families to uncertainty of annual approvals.

### Intake Services

A total of ten (10) agencies commented on Intake Services. These included: application is a duplicate of the generic case document in VACIS and should be combined; application should be combined with Benefit Programs applications and redesigned to simplify process; application form should be streamlined, especially if direct services become universal access, and eliminate notices to clients; and restrictive policies in ADC and Food Stamps require additional assistance from services to assist clients obtain food and other basic needs.

### Title XX - Other

A total of fifteen (15) local agencies provided comments on Title XX in general, not related to specific programs. These comments included: allocation formula should not be changed from year to year; provide block grant to local agency and allow local board to decide how funds will be utilized; currently there is little local flexibility due to

State mandated services and staffing limits based on caseload standards; Title XX plan should be completed every two years; localities need more funding, especially for purchased services; and fiscal reporting needs to be simplified as there is no need to have separate reports for each expenditure.

#### Volunteer Program

A total of five (5) local agencies provided comments on the Volunteer Program. These included: volunteer development takes much time at night and weekends; use of volunteers is complex; agency does not receive caseload standards credit for work with volunteers; and volunteers should be given more incentives such as income tax exemptions and status pins.

#### Miscellaneous Topics

A total of eighteen (18) local agencies provided written comments on automated systems which were not directed at any particular program. These included: automated systems continue to be very cumbersome and inflexible; usefulness of the VACIS system is limited, especially the resource subsystem and the yet-to-be implemented service delivery and financial management subsystems; automated system requirements are reducing time workers would spend delivering direct services; VACIS should be able to do all statistical and fiscal reporting; additional computer terminals should be available for each worker to avoid "sinking in a sea of computer printouts"; integrate all automated systems into one; State automated systems do not meet local needs; and automation has been helpful to workers with case management and overall organization.

A total of thirty-four (34) local agencies commented on other miscellaneous topics. These include: the purchase of service system is cumbersome; purchase of service orders need to be redesigned; too much of worker's time is spent in accountability and not enough on service delivery; an ongoing program to provide training in all areas is needed; caseload standards are expensive and ineffective; efforts of functional analysis should be continued to simplify service eligibility and reduce reporting; and reporting of Refugee services is very burdensome.

Based on the analysis of the local agency survey results, the State Board selected the four most burdensome areas to concentrate its initial focus. These areas are Child Foster Care, Child Protective Services, Employment Services Program, and Day Care for Children.

#### D. Issues, Actions, and Recommendations

In examining mandates and requirements in Service Programs, the following goals and objectives should be considered:

- a. To minimize administrative burdens and costs associated with the delivery of seven basic services (Intake Services, Adult Services, Family Services, Adult Protective Services, Child Protective Services, Foster Care and Adoption, and Employment Services).

Objectives:

- 1) Eliminate unnecessary paperwork in order to maximize the use of available resources in delivering needed services to the citizens of Virginia.
  - 2) Emphasize analysis of the outcomes of service delivery rather than the process used to deliver services.
- b. To increase State support for seven basic services and the necessary systems to assess service delivery.

Objectives:

- 1) Increase the understanding and awareness of the General Assembly members and the general public of the seven basic services and key components.
  - 2) Demonstrate the outcomes of service delivery rather than the processes used to deliver services.
  - 3) Secure the necessary resources to maximize the benefits and usage of computerization.
- c. To assure the citizens of Virginia equal treatment and access to needed services.

Objectives:

- 1) Establish standards for expected program outcomes to assure a basic level of service delivery in all areas of Virginia.
- 2) Achieve a balance between local administration and State supervision to assure that local/regional needs are addressed and that service delivery is accomplishing what is intended.
- 3) Simplify access to services by citizens of Virginia in need of services.

In service programs, administrative requirements could be drastically minimized based on the limited requirements in the Title XX Block Grant. However, the State Board believes that certain administrative activities are necessary to demonstrate the results of service activity and provide accountability. Therefore, all three goals should be considered together when examining mandates.

#### Issue 1 SOCIAL SERVICES BLOCK GRANT TO LOCALITIES

##### Summary

Based on the Title XX Social Services Block Grant, the Department is responsible to prepare a pre- and post-expenditure report. This report should include information on the types of activities and categories or characteristics of individuals to be served related to the expenditure of Social Service Block Grant funds. The regulations permit flexibility for the State within the broad parameters of the federal requirements.



Virginia has utilized an annual planning process which establishes broad requirements for local agencies to follow. These include the mandating of certain services to be provided to certain eligible groups, the process for public participation at the local level, and the format for the display of the local plan. The State allocates funds to localities, approves each local plan, publishes the composite of local plans and holds a public comment period.

Within the parameters of the State Code, the Department has established reimbursement rates for direct and purchased services. Currently Title XX direct service costs are reimbursed at the same level as other local administrative costs. The reimbursement for purchased services varies, depending on the service and the source of the local match. If local donated funds are used, regardless of the purchased service, no State funds are reimbursed. Further, the State collects 1½% of the total purchase cost when donated funds are used. This 1½% is taken before federal funds are reimbursed to the locality.

The following chart illustrates current reimbursement under Title XX:

	Federal	State	Local
Local direct service and administration	75	5	20
Purchased Services:			
Child Day Care	75	15	10
Child Foster Care, CPS, Home Based Services	75	5	20
Other (local appropriated funds)	75	0	25
Other (donated funds)	73 3/4	0	26 1/4

Recommendation (very high priority)

The State Board and the Department will explore the feasibility, likely cost, and likely value of developing a Social Service Block Grant to local agencies. Such a block grant would take seriously into consideration the following:

1. allocation of funds to local welfare boards;
2. mandates in federal requirements, and in State Code as well as others imposed by the State Board;
3. consistent match of 20% local funds and consistent reimbursement of 80% federal/State funds for both direct and purchased services;
4. local flexibility to plan for seven broad direct and purchased services;
5. a two year plan rather than an annual one; and
6. simplification of local planning.

## Analysis

If the local planning procedures were simplified, local agencies would have more flexibility in meeting client and community needs. The administrative burden associated with the planning process would be reduced. With reduced administrative burdens, more time could be spent in the delivery of services to clients.

The State would lose some control of local agencies with this approach. Depending on the way localities implement the local flexibility, there may be less input from clients and interested parties on the types of services to be provided. The specificity currently available to identify funds and number of clients to be served would be reduced.

Utilizing a consistent reimbursement rate for all Title XX services would decrease the accounting for and reporting of expenditures. The impact of a consistent reimbursement rate would depend on the level at which it was set. If it was established at a rate higher than the average of the current reimbursements across the State, more State funding would be needed.

If it were set based on averaging the current expenditures within all reimbursement rates, the levels of federal and State dollars in services would not change on a statewide basis. However, the impact for each locality may result in more or less local funds being required, depending on the service areas currently being funded.

Consistent reimbursement would have little direct impact on clients. However, in those localities where additional funds were necessary but not secured, some client services may be reduced. Clients may benefit in those localities needing less local funds to match the federal/State funds where the locality continued to use those funds for services. In addition, if additional State funding was secured in order to raise the average reimbursement rate, clients may benefit from the additional funds.

The concept of consistent reimbursement is contrary to the idea that more funds should be made available by the State for mandated services. In addition, if the direct services/administrative reimbursement is different for services than benefit programs, local reporting may increase since the reimbursement rate for both is currently the same.

However it is not intended that consistent reimbursement requirements would exclude the possibility of matching local funds to federal funds when unanticipated federal funds become available and additional State funds are unavailable.

## Plan/Action

The Department will begin to explore in December of 1984 all aspects of this recommendation and prepare recommendations for change to the State Board in sufficient time for the possible modification of the planning process for implementation of changes effective July 1, 1986. This would include a study of the impacts of consistent match and consistent reimbursement on localities. If determined necessary, the Department

would include additional funding for reimbursement to localities in the budget submission covering the biennium for 1986-88. If determined necessary, the Department will also comply with requirements of the Administrative Process Act. Those changes which are not possible to implement in time for the FY 86 planning would be considered for the next planning cycle.

If appropriate, the State Board will take necessary action to modify the 1986 planning process and, if determined necessary, approve the planning process for public comment and then take final action.

## Issue 2 EMPLOYMENT SERVICE PROGRAM BLOCK GRANT

### Summary

By State Code, the Department must reimburse local agencies for costs incurred in the operation of programs. For the Employment Services Program, the State Code requires each local agency to establish and operate a program of employment opportunities, subject to availability of either federal or State funds, or both.

Based on an Attorney General's opinion, reimbursement to local agencies for the costs of operating the Employment Services Program must be at the 100% level. These costs are those which are incurred in the activities previously performed by the Virginia Employment Commission. Supportive services costs such as for day care and transportation are reimbursed at 90%.

### Recommendation (medium priority)

The State Board recommends that the Virginia General Assembly, at its 1986 session, change the State Code to allow State Board to establish the reimbursement rate for the Employment Services Program at no less than 80%. The State Board and Department will then develop a formula for consistent reimbursement within the Employment Services Program.

### Analysis

A consistent reimbursement for ESP would simplify the accounting and reporting procedures at both local and State levels. A State Code change would be necessary, preferably one which gave the State Board the flexibility to set the rate.

The intent of this recommendation is to average the current expenditures within both reimbursement rates to determine a rate based on current expenditures. This methodology would neither increase nor decrease the levels of federal and State dollars in the program. However, the impact for each locality may result in more or less local funds being required, based on the current expenditures between the two reimbursement levels.

This recommendation would have little direct impact on clients. However, in those localities where additional local funds were necessary but not secured, some client services may be reduced. In those localities where less local funds were necessary but continued to be used for services, clients would benefit from improved service.

#### Plan/Action

The Department will, in its 1986 legislative package, propose a change in the State Code to allow the State Board to establish the reimbursement rate for the Employment Services Program at no less than 80%. The Department will further study current reimbursements in this service and develop a proposal for State Board.

The State Board will endorse the reimbursement rate to be utilized by the Department for the Employment Services Program beginning July 1, 1986.

The General Assembly should consider the proposal developed by the Department and take appropriate action at the 1986 session.

#### Issue 3 PERFORMANCE INDICATORS, STANDARDS, AND INCENTIVES

##### Summary

The State Board adopts rules and regulations for social services provided through local welfare/social service agencies. By State Code, the Commissioner of the Department of Social Services supervises local agency provision of services. He also is responsible to collect statistics and data to assist in improving care of persons and in correcting conditions which contribute to dependency and delinquency.

The federal Title XX Block Grant regulations require the State to report on how goals and objectives were met and how the funds were used.

The data collected in Service Programs provides basic information but does not reflect the results of service delivery. The Department also monitors local agencies through the use of caseload standards. This system weights different categories of cases and the transactions involved in those cases to provide local agencies with credit for work. Caseload standards results are used to determine local staffing levels. They are also used as part of the federally approved cost allocation plan.

##### Recommendation (high priority)

The State Board and Department will focus on performance indicators, standards and incentives for local agencies. This approach would emphasize outcome measures to the extent practical and reasonable and utilize performance standards as part of, or in place of, caseload standards.

##### Analysis

With limited funding, it is more and more important to determine service effectiveness to assure that service expenditures are producing desired results. If performance indicators and standards are developed, local agencies could be monitored on their performance, allowing the flexibility for localities to determine the best use of their funding to meet the goals and objectives established by the Department. This approach fits well with the concept of block grants to local agencies discussed earlier.

To illustrate, some examples of performance indicators and standards for Foster Care and Employment Services are listed in Appendix I.

In developing performance indicators and standards, it is recognized that special consideration will need to be given for very small agencies with small caseloads. Other factors which may significantly impact an agency's compliance with performance indicators and standards may also need to be considered.

This approach will provide better documentation of results which can assist in securing funding. Results data can also improve planning, and efficiency and effectiveness of service delivery. Clients served would benefit from improved casework and treatment resulting from an outcome approach.

Non-monetary incentives such as awards to the local agency and recognition letters to staff can improve staff morale and professionalism. These could also improve the image of the local agency in the community and improve participation in service delivery by other public and private community organizations. All of these effects can indirectly benefit the client being served.

Monetary incentives such as additional funds to local agencies can improve the services clients are receiving or enable more clients to receive services. They could allow for innovative approaches in service delivery to be undertaken which allocated funds might not be able to cover.

If the present system of caseload standards is replaced or modified, the administrative burden of reporting cases in multiple categories could be reduced at both the local and State level.

#### Plan/Action

The Department should consider developing, testing, and, if appropriate, implementing performance indicators and standards for the services of Foster Care, Employment, and Child Protective Services by July 1, 1985. The Department should consider developing, testing, and, if appropriate, implementing performance indicators and standards for the remaining services by July 1, 1986.

The State Board of Social Services will endorse the performance indicators and standards prior to implementation. The Board will begin to take appropriate steps toward providing non-monetary incentives to local agencies by July 1, 1985. The Board will also begin, if appropriate, to take appropriate steps toward providing monetary incentives to local agencies by July 1, 1987.

#### Issue 4 SHIFT IN REPORTING

##### Summary

By State Code, the State Board is responsible to establish rules and regulations for social services delivered by local welfare/social service agencies. In order for the Board to assess the results of rules and

regulations, current data is needed. By State Code, the Commissioner is responsible to collect statistics and data to assist in improving care of persons and in correcting conditions which contribute to dependency and delinquency. The local board is responsible to itemize and verify in a manner required by the Commissioner those expenditures for which the local board seeks reimbursement.

The Commissioner is also responsible to prescribe the form and submission schedule of reports. Based on the requirements of the Title XX Social Services Block Grant, the Department must report how the funds were used.

Currently, the Department requires local agencies to report certain data manually. In addition, the Virginia Client Information System (VACIS) provides a source of data on cases and activities.

#### Recommendation (medium priority)

The State Board has requested the Department to explore the possible revision of the reporting system in order to:

1. reduce process reporting and obtain outcome data;
2. reduce data collection by utilizing sampling as an alternative to 100% reporting wherever appropriate;
3. focus on seven broad services and key components;
4. report costs of direct service delivery separate from administrative costs using a sampling methodology; and
5. develop a review process for data collection and local recordkeeping.

#### Analysis

With the concept of the Social Service Block Grant which provides more flexibility for local agencies, the detailed reporting currently required by the Department could be reduced to save administrative time and paperwork. For example, local agencies could be required to submit necessary data at the end of the year so the State can compile it to submit to the federal agency.

With the movement toward performance criteria and standards, available data would need to correspond. There would be less process data needs and more outcome data needs.

Rather than collecting data on all cases all the time, sampling may be appropriate to obtain necessary information. Sampling can be accomplished by collecting data on a statistically valid sample of cases. It could also include collection of information for a sample period of time. Sampling cases is one method for obtaining data on results of service delivery.

In moving toward the block grant to localities and the performance standards as recommended, current data needs and availability must be determined and modified to correspond. Further, data collection and the

forms used should be reviewed regularly to determine continued need. Without a conscientious effort to review existing forms and data collected, there is a tendency to add on new data collection without eliminating data which is no longer necessary.

Currently there is no attempt to separate out costs of delivering direct services for administration of social services. Based on an appropriate sampling methodology, this could be accomplished. The results would demonstrate that the activities at the local agency involve both direct services and administration, and both are necessary activities.

#### Plan/Action

The Department should consider reviewing existing data collection and use for Service Programs and making changes necessary to carry out this recommendation. This will be accomplished in conjunction with the block grant and performance standards recommendations.

The State Board will be aware of these efforts and make clear its anticipated data needs for ongoing information.

#### Issue 5 AUTOMATED INFORMATION SYSTEMS

The State Board has three areas of recommendations related to automated systems. These are (A) Child Protective Services Information System, (B) Workman's Compensation Data for Employment Services Program, and (C) Full Automation. The first two areas relate to changes in existing systems. The third area is much broader and could encompass all aspects of local operations.

#### Part A: Child Protective Services Information System

##### Summary

By State Code, the Department must maintain a central registry of all reports of child abuse and neglect. Currently, the Department utilizes the Child Protective Service Information System (CPSIS) for this purpose. This system is outdated and inefficient, and it has become very burdensome for local agencies. In addition, a lack of clarity in some sections of Child Protective Service policy has decreased the reliability of some data contained in the system.

##### Recommendation (high priority)

The State Board supports the efforts currently underway and encourages the upgrading of the Child Protective Service Information System (Central Registry) to:

1. Eliminate unnecessary forms and busywork;
2. Collect useful information;
3. Explore linkage into VACIS, avoiding the need to enter data in two systems; and
4. Test and, if appropriate, implement an on-line system at local level.

## Analysis

In Child Protective Services, the most burdensome components involved automated systems. The Child Protective Services Information System (CPSIS) which serves as the central registry for complaints and findings is being redesigned.

Based on work being done by the Department to redesign the information system, the purposes for a central registry include:

1. to provide useful, timely and accurate nonidentifying statistics on all complaints/reports of child abuse and neglect;
2. to assist and support local, regional and State departments in the areas of case compliance with legal mandates, case management, and the identification of service needs and availability; and,
3. to identify certain victims and significant caretakers for purposes of aiding the assessment of CPS cases and the treatment of families and for screening/approving child care providers and institutions.

In conjunction with system changes, work is being done to propose a system of assessing future risk of serious harm to the child. This approach, if approved by State Board, rather than the disposition of the complaint, would be used to determine whether or not name data should be entered in the system.

System changes proposed would facilitate use of the system by local agencies. It would reduce some administrative costs by reducing the number of reports sent back to agencies. The system would provide more meaningful data.

To further reduce administrative costs two longer range goals need to be examined. This includes the linkage with VACIS so local agencies do not need to enter data into two systems. It also includes the testing and, if appropriate, implementing on-line capability at the local level to allow local data entry and inquiry. With this latter goal, the issue of confidentiality and accessibility of this sensitive data needs to be considered carefully.

## Plan/Action

The Department will continue to develop changes to the central registry system and Child Protective Service policy/procedures. This includes writing system changes, constructing and testing the data base, updating user guides, piloting changes, modifying the system as needed, and, if appropriate, implementing the new system by January, 1986. Concurrent with the system changes, new policy/procedures for risk assessment would be developed and tested. If necessary, the Department would propose policy to State Board and comply with the Administrative Process Act in order to implement changes by January, 1986. If determined necessary, the Department may propose a change in State Code related to exceptions to the timeframe for dispositions. If this is necessary, the proposed change would be included in the Department's legislative proposal for the 1986 session of the General Assembly.



The Department should develop a plan for the interface of CPSIS and VACIS. (This is currently underway.)

The Department will also study the feasibility of CPSIS data entry, update and retrieval at the local level and if appropriate, develop a plan to accomplish it.

The State Board, if necessary, will take the appropriate action to approve policy related to risk assessment.

#### Part B: Workmen's Compensation Data for Employment Services Program

##### Summary

By State Code, the Department must provide workers' compensation coverage to Employment Services Program registrants participating in Work Experience. The State's insurance carrier requires a quarterly count of participants by major areas of employment.

The Department currently obtains this data through manual reports from local agencies.

##### Recommendation (medium priority)

The State Board has requested that the Department consider automating the manual report on Employment Services Program registrants participating in work experience. This report is now sent to the insurance carrier.

##### Analysis

By automating this report, local and State staff time can be saved. If the worker spends less time reporting manually, more time can be spent delivering services.

Based on the local survey, the most burdensome components in the Employment Services Program involved automated systems. The major problems of its automation have been worked on by the Department and the results of that effort are scheduled for implementation by the first of the calendar year.

##### Plan/Action

The Department should consider developing a plan and making necessary changes to the VACIS system to incorporate this recommendation.

#### Part C: Full Automation

##### Summary

The Department has developed the Virginia Client Information System (VACIS) to track cases and clients, approved resources, and purchased services. The case client and resource subsystems are implemented in all local agencies with the exception of three. Two other subsystems are being tested.

#### Recommendation

The State Board has requested that the Department examine the feasibility of full automation at the local and State level to determine its cost/benefit.

#### Analysis

Automated systems in local agencies are not fully beneficial to local staff due to limited hardware. If individual terminals were available, local workers could directly inquire and enter/update information in the system. This would eliminate the need to complete input documents and wait for data entry operators to access VACIS.

The cost/benefit considerations relate to whether the cost of additional equipment would be offset by the time local workers could save, thus increasing productivity. With increased productivity, more clients could be served.

Further, full automation at the local level may include areas which currently require manual reporting.

#### Plan/Action

The Department will examine the feasibility of full automation at the State and local level and develop a plan to accomplish this if appropriate.

#### Issue 6 AVAILABILITY OF SOCIAL SERVICES

##### Summary

Under current State Board policy, clients must meet financial income criteria to be eligible for certain services. The direct services of Adult Protective Services, Child Protective Services, Foster Care and Adoption, Intake, and the preventive protective service components of Family and Adult Services are currently available to individuals without regard to income.

The Title XX Social Services Block Grant places no restriction on who may be served.

##### Recommendation (medium priority)

The State Board and Department will explore the feasibility of eliminating financial income criteria for eligibility for all social services provided directly by local agencies with the exception of the Employment Services Program.

##### Analysis

Eliminating the requirement for a financial income test for direct services would allow local agencies to better provide preventive and supportive services to families and individuals based on need. With no financial eligibility determination, clients may receive services sooner.

This change would allow the local agencies to better serve the total community. It would also allow the agencies to more accurately reflect services provided rather than mislabeling cases as Child or Adult Protective Services. It would also reduce paperwork associated with eligibility determination.

There may be negative consequences to the elimination of eligibility criteria. The services to the poor population may be reduced. If "need" criteria is used, its application may result in discriminatory judgements. The local agency may potentially be overwhelmed by the clients requesting services. In addition, the local agency could potentially compete with other community agencies who charge fees for services.

Based on these potential negative consequences, the Department began to test this concept in May, 1984, with seven pilot agencies. Control agencies were also utilized to determine the impacts of eliminating financial income criteria.

Financial eligibility criteria would continue to be required for purchased services except when they are critical for protection of individuals and families.

The Employment Services Program is limited by State statute to public assistance recipients and applicants. The Virginia Employment Commission is responsible to serve all others. Therefore, this recommendation does not apply to the Employment Services Program.

#### Plan/Action

Based on the results of the pilot efforts, the Department will, if appropriate, propose policy to eliminate financial income criteria for direct social services except the Employment Services Program. The Department will request State Board action for approval and comply with requirements of the Administrative Process Act. The target date for implementation of this policy change is October 1, 1985, assuming that procedural barriers to implementation related to federal cost allocation, and caseload standards can be worked out.

The State Board will take the necessary action to approve this policy change for public comment and finalize it if appropriate.

#### Issue 7 COMMUNICATION

##### Summary

In the Title XX planning process for Fiscal Year 1985, the Department collapsed thirty (30) services into seven broad direct services. These services are Intake Services, Adult Services, Family Services, Adult Protective Services, Child Protective Services, Foster Care and Adoption Services, and Employment Services. This collapsing was done to reduce planning and reporting time but it also provides more understandable terminology to communicate local agency service activity.

The State budget currently identifies local agency activities as "administration." The annual local agency budget forms for submission to the Department also utilize this terminology.

Recommendation (medium-low priority)

The State Board has requested that the Department consider developing ways to communicate local agency service provision by:

1. revising the State budget narrative to reflect local social service delivery, not just administration, and highlight the seven services;
2. revising the local agency budget forms to correspond with the State budget; and
3. developing an inexpensive brochure which describes service delivery and highlights the seven services which can be used to inform the General Assembly and the general public.

Analysis

By highlighting the seven services in both the State and local budget and in a brochure, the Department and local agencies can better communicate the use of funds and the activities in service delivery at the local level.

Plan/Action

The Department should consider proposing revision to the narrative and terminology in the State biennial budget for Fiscal Year 1987. Corresponding changes could be made in the local budget forms submitted to the State for Fiscal Year 1987. The Department will also analyze the effectiveness and use of a brochure which highlights the seven services.

Issue 8 CHILD FOSTER CARE

Summary

The State Code defines foster care and requires the reimbursement of localities for expenditures for foster care children.

Currently the Department receives an allocation of State funds to be used for maintenance costs (room, board, clothing) for foster care children. This source of funds requires 50% local funds to match the State funds. Under the present definitions of foster care found in the Code of Virginia, these funds cannot be used for any costs incurred to keep families together and thereby prevent children from entering foster care. Public Law 96-272 allows corresponding federal funds to be used for the prevention of children entering foster care as well as for other child welfare services.

The Department has recently funded fourteen pre-placement prevention grants to determine the impact of providing preventive services on Foster Care caseloads. These grants are being monitored and some positive results are being demonstrated.

Recommendation (very high priority)

The State Board recommends that the General Assembly allow the expenditure of State and local foster care maintenance funds for children at risk of placement consistent with the treatment of federal funds. This can be accomplished by expanding the definition of "foster care" to include those children at risk of placement. The State Board further recommends that the General Assembly allow funds that are not used by the end of the Fiscal Year to be available for the next Fiscal Year.

Analysis

With Public Law 96-272, the federal government allows federal funds to be used for preventive and other child welfare services. Virginia has taken advantage of this flexibility in its use of funding through Public Law 96-272.

The change identified by the recommendation would permit localities to provide preventive services to at-risk families in order to minimize out-of-home placements of children. The localities would suffer no financial penalties because they could use the State/local foster care funds to design the most efficient mix of preventive and maintenance services. No new or additional funds would be needed.

Precedent for this approach exists in two states. Colorado has enacted (1979) The Alternatives to Out-of-Home Placement Act, and it has been successfully implemented. California has enacted (1975, amended 1977) the Family Protection Act, and it too has been successful. Further support for the recommendation can be found in Virginia itself. Since 1976 the implementation of a strong permanency planning effort has reduced each year the number of children in foster care. Assuming further annual reductions for the next few years, there should be a concomitant increase in unused maintenance funds at the local level. Those funds can be put to good use in prevention services and in services to keep families together. The benefits of this change are expected to be fewer children entering foster care as a result of family breakup or other external pressures.

Data collected thus far from the local welfare/social service agencies, juvenile courts, and private family agencies involved in the fourteen pre-placement preventive services grants tend to support this expectation. For example, in Prince William County during the first eleven months of the project, eighteen (18) families were served involving forty-one (41) children, twenty-nine (29) of whom were targeted at risk of placement into foster care within ninety days. Twenty-seven (27) of the children were prevented from coming into foster care. Two children (brothers) did come into foster care for purposes of placement into an adoptive home.

Further examination of the Prince William experience reveals that in Fiscal Year 83, one hundred and ten (110) children entered the agency's foster care program. In Fiscal Year 84 (during the project), only eighty-six (86) children came into care even though the county's youth population increased. This reduction from ten (10) to seven (7) children per month entering care is attributed to the project. Thus far in Fiscal Year 85, the average number entering care is down to 6.

From a financial standpoint, the monthly room and board costs alone for the twenty-seven (27) Prince William children who were prevented from entering the foster care system would have been \$5,356 for maintenance (room, board, clothing). The monthly cost of providing the prevention project services was \$3,500. Thus, a substantial monthly savings of \$1,856 was realized.

Other local agencies involved in the prevention projects report similar results.

A possible consequence of not expanding the definition of foster care can be found in many of the status reports from agencies participating in the pre-placement prevention grants. They pointed out that under present fiscal constraints and service mandates, there is no more flexibility in local budgets to allow for changing needs and creative service delivery.

The State Board also examined the burdensome areas in Child Foster Care identified by local agencies. The most burdensome components involved the form requirements. The Department has revised forms to be consistent with changes in State Code and piloted these revisions.

Resource approval and automated systems were also burdensome components. The resource approval burdens which were identified in the comments may be relieved if the standards and approval procedures for foster homes are simplified. Generic standards for agency approved providers are addressed under Issue 11.

After studying Foster Care requirements and their rationale, the State Board concluded that most of the burdens in that program area are necessary and produce positive results. Many of the requirements considered burdensome by local departments of social services resulted from revisions in the Code of Virginia and are considered necessary to:

- . insure that a written service plan exists for every child in foster care;
- . insure that services and placement of foster care children are monitored on a regular basis; and
- . insure that services are likely to result in the foster care child returning home, being adopted, or being placed in another appropriate permanent living arrangement.

These goals are considered beneficial by the State Board; therefore, the State Board has no other recommendations in Child Foster Care.

#### Plan/Action

The Department will consider for inclusion in its legislative package for the 1986 session of the General Assembly a proposal to change four sections of the State Code as follows:

1. 63.1-55 (child welfare and other services)
2. 63.1-55.8 (definition of foster care services)

3. 63.1-56 (authority of State Board to prescribe rules, etc.)
4. 63.1-195, 16.1-228(k) (definition of foster care)

The State Board will support the Department in the proposal to change State Code.

The General Assembly should consider these changes in State Code at the 1986 session. However, if the General Assembly wished to consider these changes at its 1985 session, the State Board would endorse such action.

#### Issue 9 SERVICES FOR THE COURT

##### Summary

By State Code, the court has the authority to order a social history of a child subject to its jurisdiction. A judge may order any governmental agency or employee to render information, assistance, services, and cooperation provided by local, State or federal law or regulation.

Currently, local agency staff spend considerable time preparing studies and reports for the court. These studies involve areas such as custody investigations and include both the cost of conducting the study and court appearances. The cost of these studies is borne by local agencies through their regular service funding. The local agencies are very willing to provide these services but find it difficult to do so because of limited funding.

##### Recommendation (high priority)

The State Board recommends that the General Assembly appropriate State funds to reimburse local agencies for the cost of studies or reports ordered by all divisions of the court.

##### Analysis

The court already has a methodology to assess the ability of persons to pay fees. For those persons for whom the local agency will conduct a study and who could afford to pay, the court could charge a fee. For those unable to pay, a pool of funds should be established. The fees charged to those able to pay would reimburse this pool. A State appropriation of funds would be necessary to cover the cost of those persons unable to pay. This pool of funds could be utilized by the Department to reimburse local agencies for the cost of providing services to the court.

There are positive consequences to establishing this pool of funds. More funding would be available to serve clients receiving other services. A cost associated with the study may reduce the number of requests, thus causing less disruption of local staff's other work.

Negative consequences would also exist. Some persons who would currently receive the services of the local agency at no cost would have to pay. Administrative costs would increase to determine appropriate local agency charges, maintain the pool of funds, keep track of services provided for the court, and reimburse agencies.

#### Plan/Action

The Department should explore administrative procedures necessary to manage funds for Court Services, if appropriated, including the development of a methodology to reimburse local agencies for services ordered by all divisions of the court.

The State Board will take the necessary action, if any, to carry forth with the plan to implement this recommendation.

The General Assembly should consider any proposal developed by the Department, if necessary, and take appropriate action at the 1986 session. If the General Assembly wished to take action at the 1985 session related to this, the State Board would endorse such action.

#### Issue 10 CHILD DAY CARE

##### Summary

Based on State Code and State Board policy, local agencies are mandated to provide child day care to ADC recipients who are employed or in education or training leading to employment.

From Fiscal Years 1980-81 to 1983-84, child day care purchased expenditures have decreased 65%. The purchased expenditure, including Title XX and the federal Work Incentive Program (WIN), was \$7,700,058 in 1980/81. The purchased expenditures in 1983/84, including Title XX and ESP funds, was \$2,724,043.

A corresponding decrease in the number of children being served has occurred. The impacts of this decrease can only be hypothesized. Until 1982, the former recipient of ADC was mandated to receive day care. Currently, more women may be forced to return to welfare dependency after obtaining employment which does not pay sufficiently to cover day care costs. This can be a barrier to the long term success of the Employment Services Program. More children may become "latch key" children at home by themselves.

##### Recommendation (high priority)

The State Board has requested that the Department explore alternate funding sources to supplement Title XX and Employment Service Program funding for child day care to include:

1. use of Title IVA funds, either on a statewide basis or for those local agencies utilizing local only funds;
2. increase the State share of day care costs by obtaining more State funds;
3. increase the percent of ESP funds used for day care and obtain a corresponding increase in funds for that program; and
4. set aside funds from the Refugee program and/or family violence program (HR 1904, Family Violence Prevention and Services) for child day care.



### Analysis

The dramatic decrease in the expenditure of child day care services in the last few years does not appear to be an indication of the level of need. Instead, it appears to be a direct reflection of the results of federal reductions in Title XX funding to the State.

Alternate funding is necessary to continue providing child day care to clients in need of that service. Any substantial increase in this funding may need to come from State funds.

The current matching ratio for Title IVA funds (ADC recipients) is 43.66% State funds as contrasted to the Title XX share of 15% State funds and 10% local funds for child day care. However, the federal requirements attached to the use of these funds may not make this a viable source for Virginia unless some exceptions are granted.

Based on the local survey, the most burdensome component of child day care was resource approval, followed by forms and then automated systems. The major comments indicated that the major problems in all three components focused on the approval and use of family day care and in-home day care providers. The consolidation of standards, approval procedures and forms for all agency approved providers is included under Issue 11. The results of this effort would simplify the major burdensome areas in day care identified through local comments.

### Plan/Action

The Department should explore any alternate sources of funds for child day care, including a federal waiver of requirements associated with Title IVA. If appropriate, a few changes could be implemented by July 1, 1985. Increases in State funding would not be feasible until July 1, 1986. If determined necessary and appropriate, the Department will request and justify the need for additional State dollars for child day care.

The State Board will support the Department's efforts in seeking alternate funding for child day care.

### Issue 11 STANDARDS AND REQUIREMENTS FOR AGENCY APPROVED PROVIDERS

#### Summary

The State Code requires that local agencies use suitable homes in the placement of children or adults. The State Board requires that local agencies determine suitability by the application of standards.

Currently, separate standards and requirements exist for local agency approved providers for the following programs:

- Adoption - Agency Placed
- Adult Day Care
- Adult Family Care
- Adult Foster Care
- Chore
- Companion

Day Care for Children:  
Family Day Care Homes  
Level I In-Home Providers  
Level II In-Home Providers  
Foster Care for Children

These sets of standards were developed at different times and are not consistent. Some sets of existing standards are more administratively burdensome than others based on the results of the local agency survey.

Recommendation (medium priority)

The State Board has initiated action to replace existing standards with generic standards for local agency approved providers. As proposed, the generic standards would be applicable to:

Out-of-Home Providers:

Adoptive Parents  
Adult Day Care  
Adult Foster/Family Care  
Family Day Care  
Foster Parents

In-Home Providers:

Chore  
Companion  
In-Home Day Care

Analysis

Standards assure a degree of safety and protection for clients and establish objective, uniform criteria across the State for minimum requirements for suitability of providers and adequacy of care for clients. Consolidating standards among all programs can allow greater consistency and a reduction in the number of different forms and manual material. A provider in one program area can more easily become a provider in another program area.

Based on the approach of consolidating existing standards and requirements and making them more generic, some providers will be subject to simpler requirements than those which exist currently. Some other providers may need to meet additional standards beyond those currently required.

Deletions in requirements under current day care, child foster care and adult family care regarding mandatory physical examinations will save the cost of the examinations for providers and household members. Relaxing the requirement for a mandatory water and sanitation inspection will save the cost of the inspections which local agencies do not feel are necessary.

Requirements for medical statements that verify absence of tuberculosis for certain Companion providers will add the cost to either the Companion or the local agency. The requirement for smoke detectors for out-of-home providers will increase the cost for these providers if a smoke detector is not present. The requirement that Family Day Care providers who transport children be in compliance with the child restraint device law will increase costs for some providers.

Administratively, local agency costs to approve providers should be reduced. Training and use of staff may not need to be specialized by program. Generic forms, wherever feasible, would reduce paperwork. Moving from a one year reapproval period to a two year period would reduce paperwork and computer entry time.

#### Plan/Action

The Department will consolidate standards and requirements for local agency approved providers. The Department has received State Board approval to begin the public comment requirements of the Administrative Process Act. The target date for implementation of the revised standards and requirements is July 1, 1985. The Department will further study the feasibility of simplifying the gathering of necessary information for the approval of agency approved providers such as the search of criminal records and the search of the Child Protective Service Central Registry.

The State Board has taken the necessary actions to approve standards and requirements for public comment and to finalize them if appropriate.

#### Issue 12 CHILD PROTECTIVE SERVICES

After studying Child Protective Services requirements, the State Board concluded that the burdens, other than CPSIS, discussed under Issue 5, Part A, are positive and necessary to ensure children are adequately protected from abuse and neglect. Child Protective Services require timely investigation of complaints and provision of services when necessary. These services may be provided for children remaining in their own home and their families or for children removed from their home and their families. Every effort is made to keep families intact. Therefore, the State Board had no further recommendations in Child Protective Services.



## APPENDICES



I. Comparison of Costs vs Cost Benefits (three methods) for the non-monthly reporting group.

A. Method I

<u>Actual Costs</u>		vs.	<u>Actual Cost Savings</u>	
\$27,000	Costs of agency in-appropriate handling	\$18,898	Closings	
152,969	Administrative costs			
<u>\$179,969</u>	Total	<u>\$18,898</u>	Total	
\$ 3.78	per case	\$ .39	per case	
Ratio - Costs \$1		Savings - \$.10		

This method compares the actual costs to the State of sending a monthly report to the actual benefit derived. Closings are the only actual cost savings we have experienced since implementation of monthly reporting. Prior to monthly reporting (April-September, 1981) 2.2% of all payments made were overpaid because the client did not report or reported inaccurately. In the most recent sample period (October-March, 1983) 2.2% of all payments made continued to be overpaid for that reason. Monthly reporting has not resulted in decreased client errors.

B. Method II

<u>Actual Costs</u>		vs.	<u>Actual + Potential Cost Savings</u>	
\$27,000	Costs of agency in-appropriate handling	\$18,898	Closings	
152,969	Administrative Costs	142,350	Client errors that could potentially be avoided	
<u>\$179,969</u>	Total	<u>\$161,248</u>	Total	
\$ 3.78	per case	\$ 3.39	per case	
Ratio - Costs \$1		Savings -- \$.90		

This method compares the actual costs to the State of sending a monthly report to a combined figure of what could be saved if monthly reporting eliminated all client errors and we continued with the same rate of closings due to monthly reporting.

Please note that even if monthly reporting eliminated all client errors, the costs would still outweigh the costs savings.

## C. Method III

<u>Actual Costs</u>		vs	<u>Actual + Potential Cost Savings</u>	
\$ 27,000	Cost of agency in-appropriate handling		\$ 18,898	Closings
142,350	Ongoing client overpayments that monthly reporting has not eliminated		142,350	Client errors that could potentially be avoided
<u>152,969.</u>	Administrative costs			
\$322,319	Total		\$161,248	Total
\$ 6.78	per case		\$ 3.39	per case
Ratio Costs - \$1			Savings - \$.50	



APPENDIX B

IDENTIFICATION OF BURDENSOME AREAS  
SURVEY RESULTS FOR SERVICE PROGRAMS  
TOTAL WEIGHTED SCORES

Total scores are shown for each component by program/mandate. The higher the score the greater the burden. Scoring is based on burdens identified by 107 local agencies as follows: High=3, Moderate=2, Low=1

Program/Mandate	Direct Client Services	Resource Approval	Purchase of Services	Forms	Statist. Reporting	Fiscal Reporting	Automated Info. (VACIS, CPSIS, etc)	Planning Process	Total
ADULT								17	17
Home Based (Chore, Companion, Homemaker)	63	75	94	74	57	55	92		510
Local Long Term Care Committee	49	32		68	53			86	291
Pre-Admission Screening Committee	62	43		99	44	34			286
Other	11	7	2	5	3	1	7		36
AFS	111	52	61	61	49	34	64	39	491
CPS	99	68	57	86	107	42	162	53	674
EMPLOYMENT								28	28
Day Care-Children	63	180	79	124	54	42	91		633
Employment Services Program	85	69	58	89	82	53	166	70	672
Other	12	6	8	7	6	4	9		52
FAMILY								17	17
Court	86	31		46	40		51		255
EPSDT	112	40		113	58		70		393
Family Planning	45	30	27	39	38	32	40		251
Independent Adoption	51	29		56	42	27	55		260
Other	10	8	10	4	7	5	11		55
FOSTER CARE & ADOPTION								12	12
Adoption-Agency Placed	64	67	43	71	52	40	80		417
Child Foster Care	91	152	92	215	83	67	152		852
INTAKE	26	21	20	31	29	22	29	17	195
TITLE XX - OTHER	35	34	42	39	40	34	49	44	317
REFUGEES	15	15	15	19	20	17	21	16	138
VOLUNTEERS	28	30		36	30	25			149

Top ten scores ( Most burdensome areas) are circled.

IDENTIFICATION OF BURDENSOME AREAS  
SURVEY RESULTS FOR SERVICE PROGRAMS  
BURDENSOME RANKING BY PROGRAM/MANDATE

1. FOSTER CARE AND ADOPTIONS: Child Foster Care
2. CHILD PROTECTIVE SERVICES
3. EMPLOYMENT: Employment Services Program
4. EMPLOYMENT: Day Care - Children
5. ADULT: Home Based
6. ADULT PROTECTIVE SERVICES
7. FOSTER CARE AND ADOPTIONS: Adoption-Agency Placed
8. FAMILY: EPSDT
9. Title XX - Other
10. ADULT: Local Long Term Care Committee
11. ADULT: Preadmission Screening Committee
12. FAMILY: Independent Adoption
13. FAMILY: Court
14. FAMILY: Family Planning
15. INTAKE

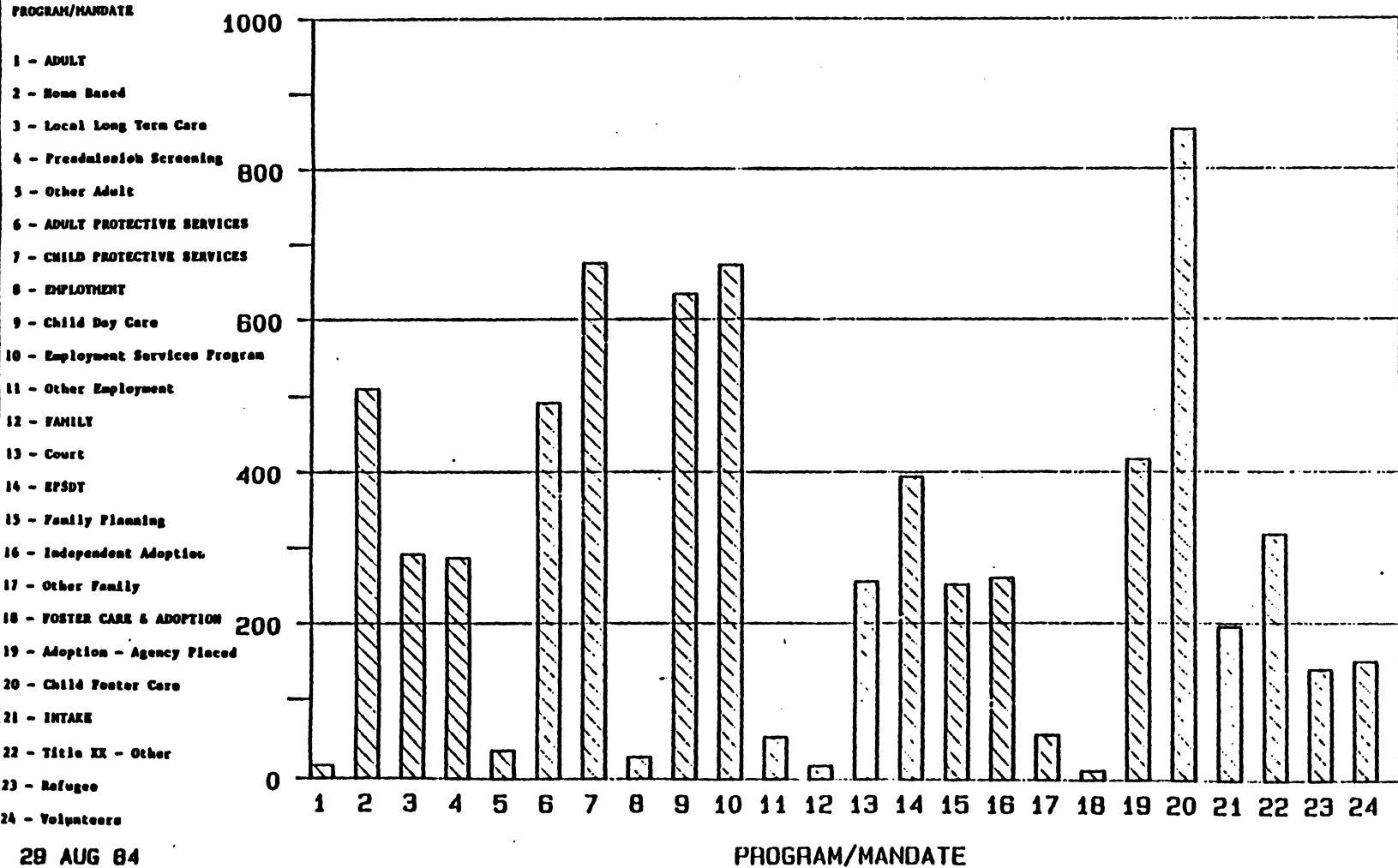
Ranking is based on total score of all components of each program/mandate. Scores were weighted based on burdens identified by 107 local agencies as follows:

High = 3,            Moderate = 2,            Low = 1.

# SURVEY FOR SERVICE PROGRAMS

ranking by program/mandate

TOTAL WEIGHTED SCORES



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IDENTIFICATION OF BURDENSOME AREAS  
SURVEY RESULTS FOR SERVICE PROGRAMS

BURDENSOME RANKING OF PROGRAM/MANDATE BY COMPONENT

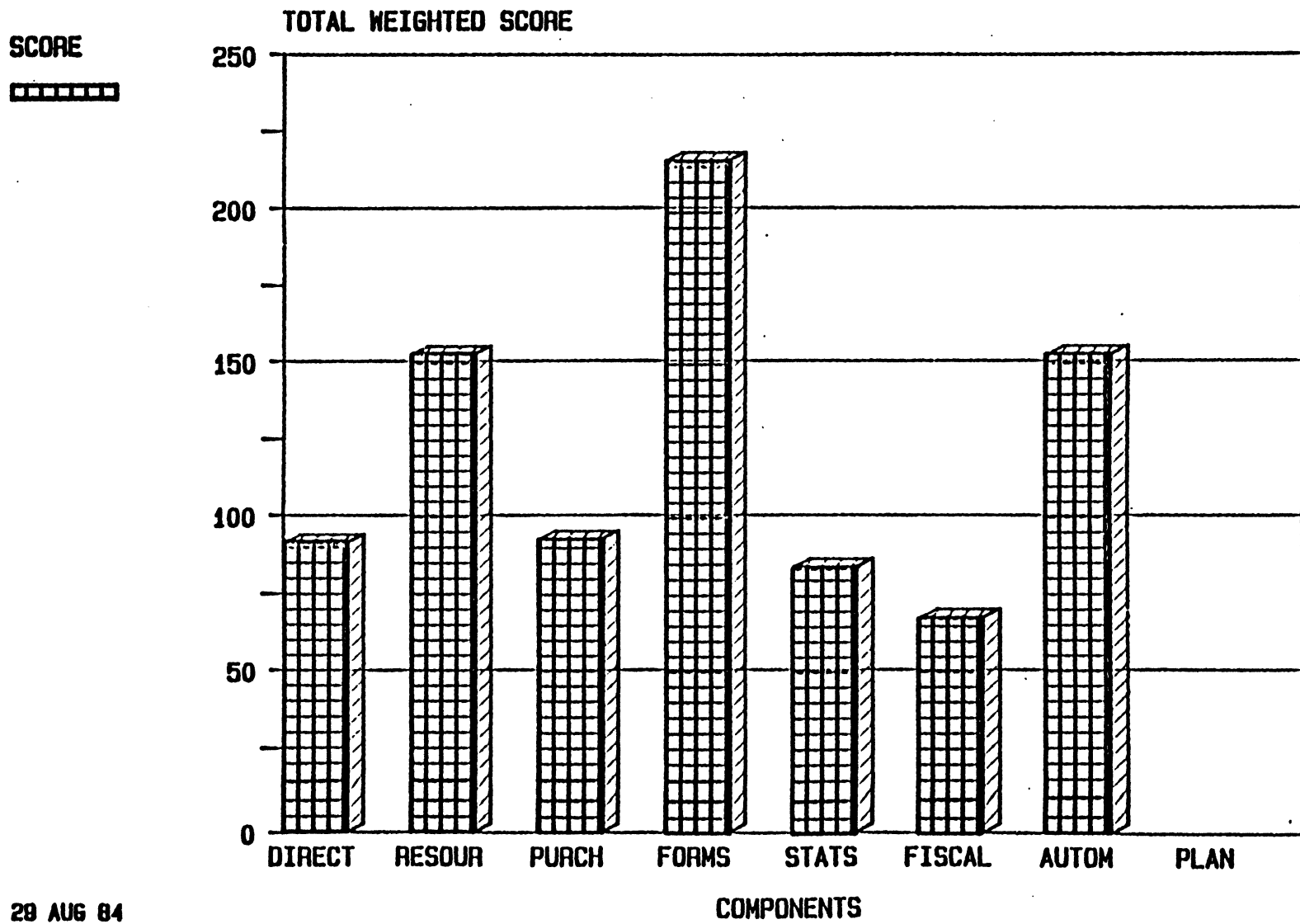
1. Child Foster Care: Forms
2. Day Care - Children: Resource Approval
3. Employment Services Program: Automated Information
4. Child Protective Services: Automated Information
5. } Child Foster Care: Resource Approval
6. } Child Foster Care: Automated Information
7. Child Day Care: Forms
8. Family-EPSDT: Forms
9. Family - EPSDT: Direct Client Services
10. Adult Protective Services: Direct Client Services
11. Child Protective Services: Statistical Reporting
12. } Adult - Preadmission Screening Committee: Forms
13. } Child Protective Services: Direct Client Services
14. } Adult - Home Based Services: Purchase of Service
15. } Child Foster Care: Purchase of Service
16. } Day Care - Children: Automated Information
17. } Child Foster Care: Direct Client Services
18. Employment Services Programs: Forms
19. } Adult - Local Long Term Care Committee: Planning Process
20. } Child Protective Services: Forms
21. } Family - Court: Direct Client Services

Ranking is based on total score for each component of each program/mandates.  
Scores were weighted based on burdens identified by 107 local agencies as follows:

High = 3,    Moderate = 2,    Low = 1.

# SURVEY FOR SERVICE PROGRAMS

## CHILD FOSTER CARE



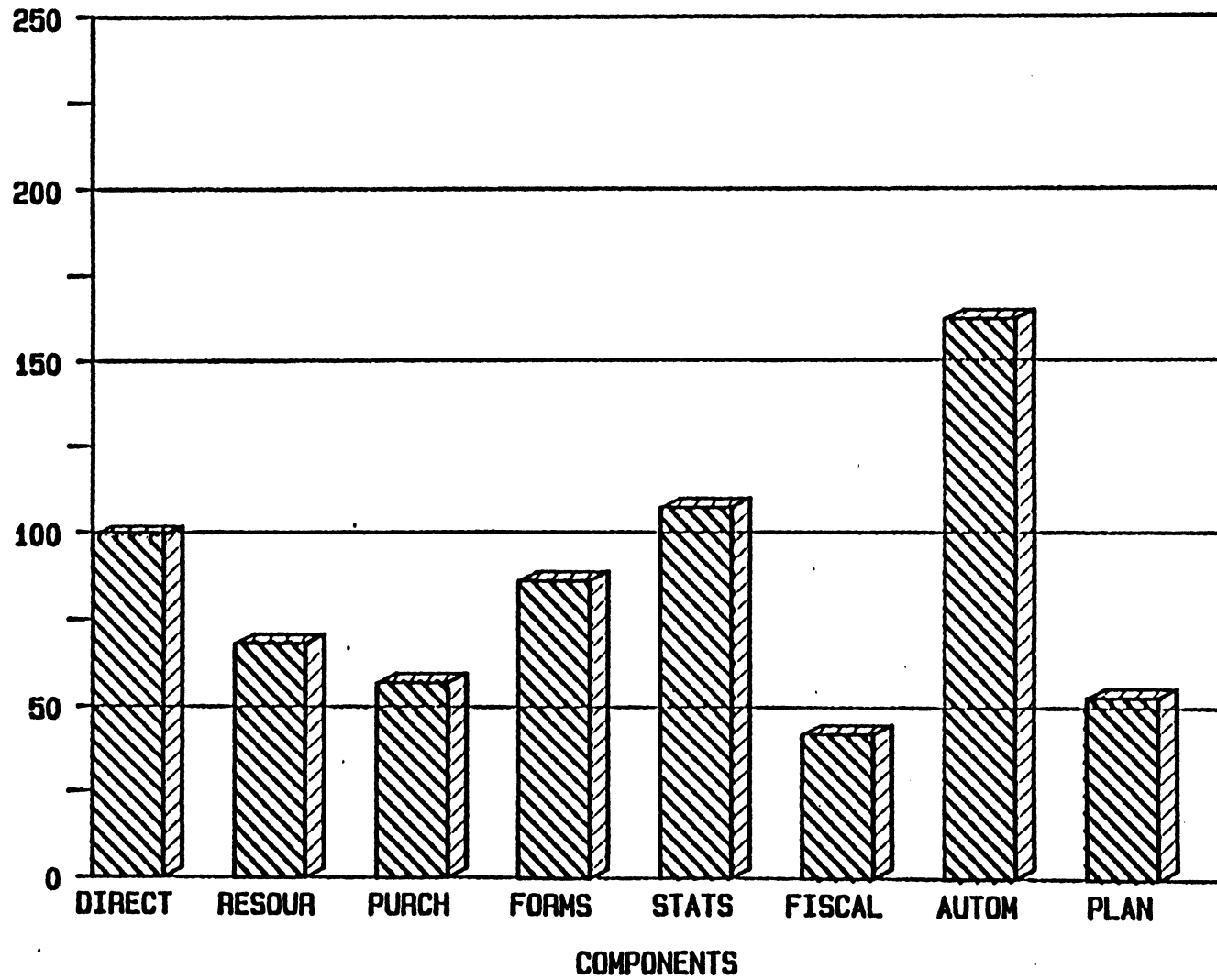
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# SURVEY FOR SERVICE PROGRAMS

## CHILD PROTECTIVE SERVICES

TOTAL WEIGHTED SCORE

SCORE



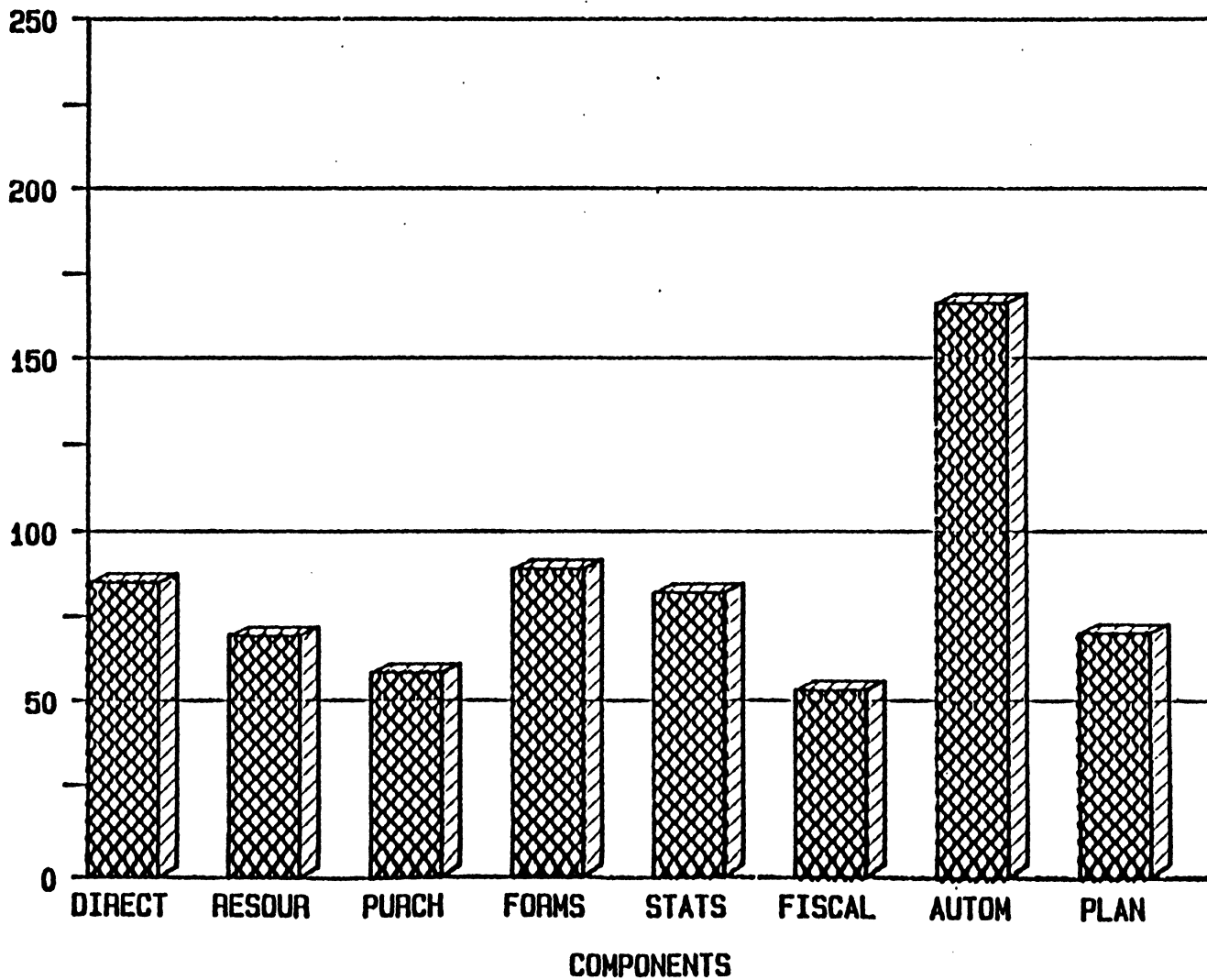
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# SURVEY FOR SERVICE PROGRAMS

## EMPLOYMENT SERVICES PROGRAM

TOTAL WEIGHTED SCORE

SCORE



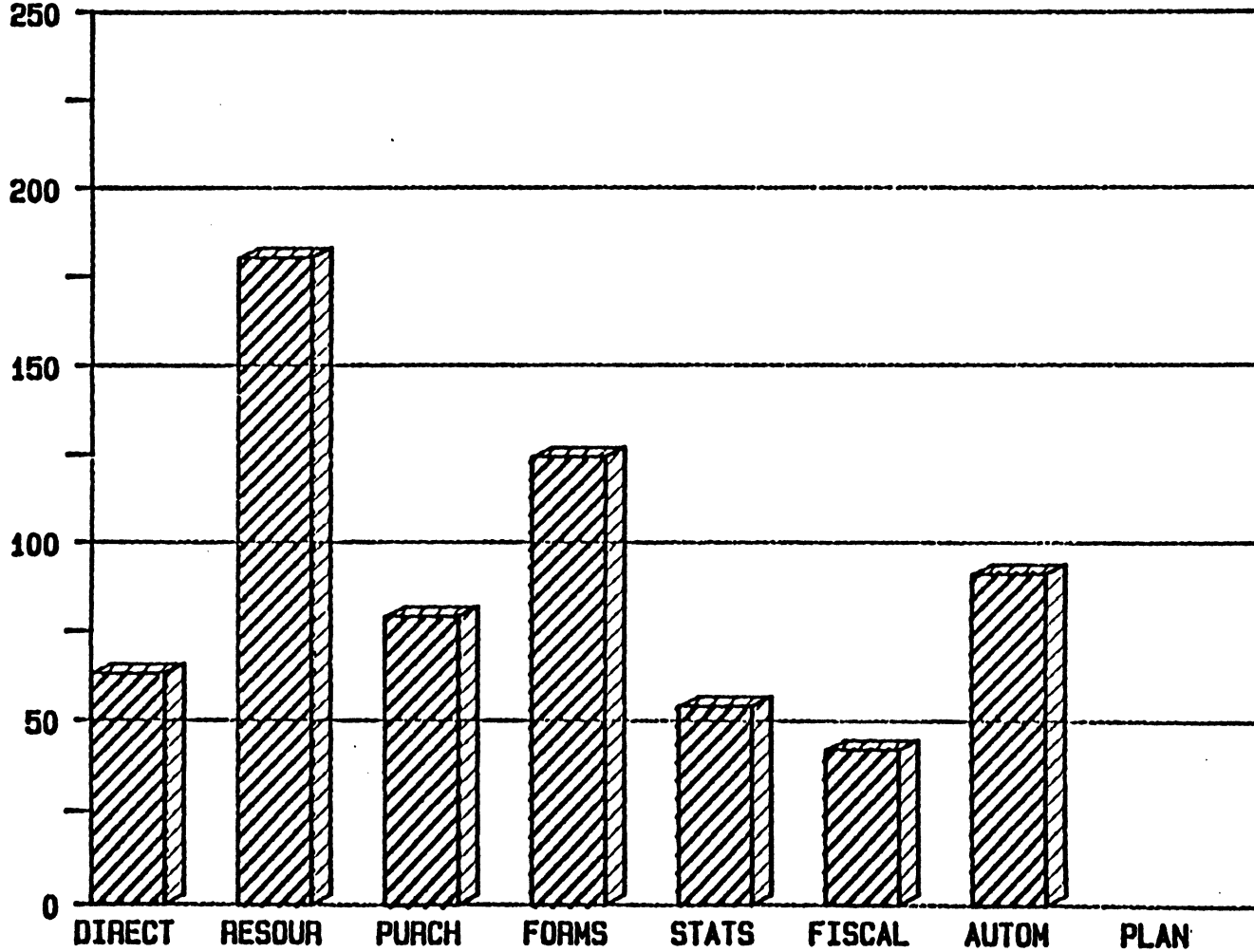
29 AUG 84

# SURVEY FOR SERVICE PROGRAMS

## DAY CARE - CHILDREN

TOTAL WEIGHTED SCORE

SCORE



29 AUG 84

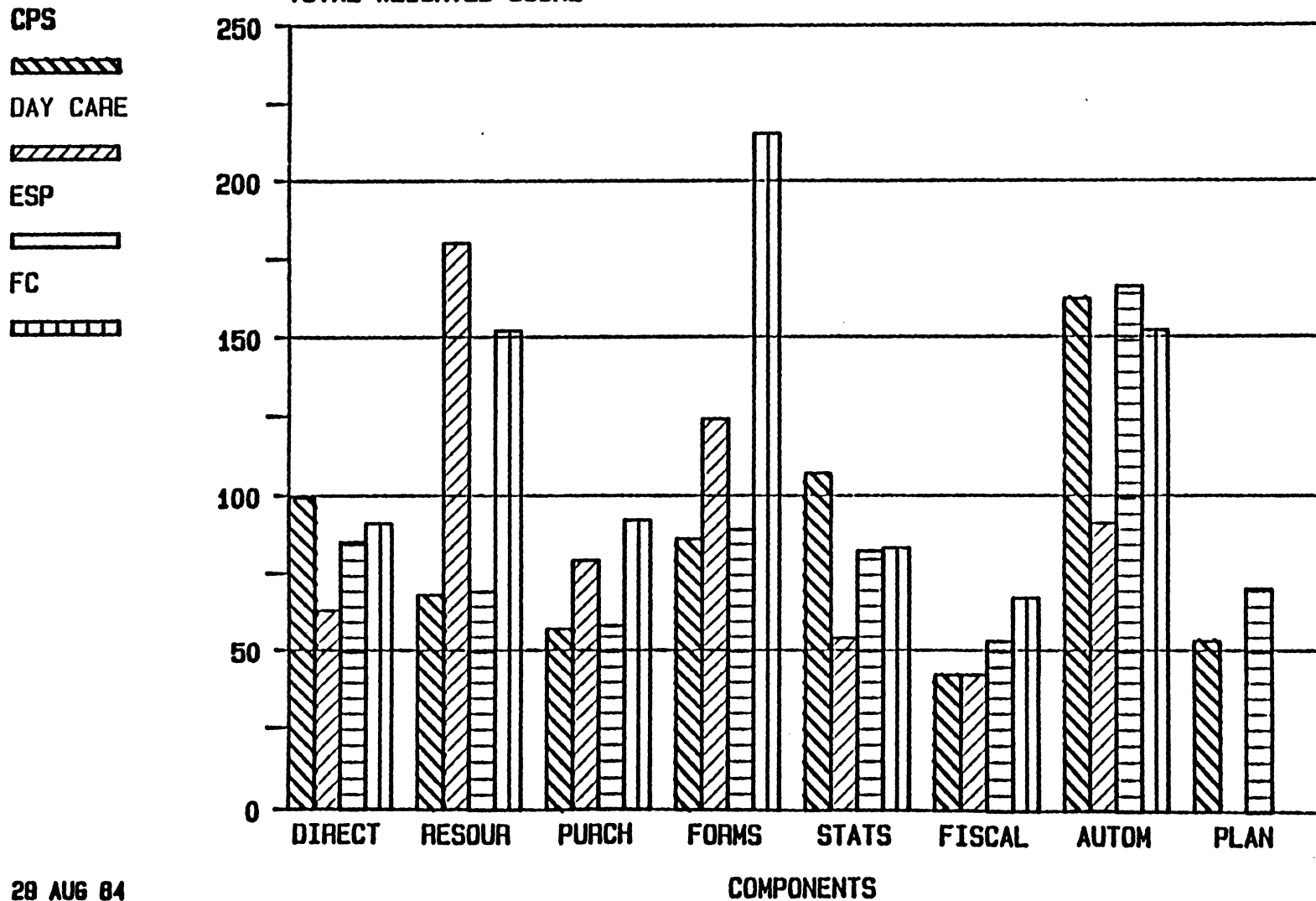
COMPONENTS



# SURVEY FOR SERVICE PROGRAMS

## COMPARISON BY PROGRAM

TOTAL WEIGHTED SCORE



28 AUG 84

SERVICE PROGRAMS ADMINISTRATIVE FUNCTIONAL ANALYSIS  
ISSUES AND RECOMMENDATIONS

SERVICE CONFIGURATIONS

ISSUE: Existing service configurations complicate planning and reporting

RECOMMENDATION

- 1 Collapse 30 services into seven

PLANNING AND BUDGETING

ISSUE: The complexity of the planning process and published plan document

RECOMMENDATIONS

- 2 Plan and budget to the seven broad services
- 3 Develop a consistent method to allocate direct service cost
- 4 Reduce the number of category codes used for planning
- 5 Simplify the plan development process and documents
- 6 Publish State plan every two years

ISSUE: Complexity of the budgeting process for Service Programs

RECOMMENDATIONS

- 7 Simplify budgeting documents
- 8 Consistent method for joint cost distribution for budget and actual reimbursement
- 9 Greater correlation between State biennial and local agency budgets

ISSUE: Inconsistent match requirement/reimbursement

RECOMMENDATIONS

- 10 Consistent match between planned and actual reimbursement
- 11 Maximum rates/units of services should not result in different reimbursement rates
- 12 Consistent reimbursement for all categories of clients served
- 13 Consistent match requirement/reimbursement for all services

ISSUE: Lack of a comprehensive services plan

RECOMMENDATION

- 14 Develop a more comprehensive services plan document for service programs

ISSUE: Targeted funds for services increase administrative costs

RECOMMENDATION

- 15 Decisions to target dollars should be made at the local level to the maximum extent possible

SERVICE POLICY/PROCEDURES DEVELOPMENT

ISSUE: Eligibility for direct services is based upon financial criteria rather than need

RECOMMENDATIONS

- 16 Eliminate financial eligibility criteria for direct services

ISSUE: Burdensome policy restrictions and requirements that are not needed to meet federal or State mandates

- 17 Reduce and eliminate unnecessary policy restrictions

- 18 Develop family services policy and procedures

- 19 Develop intake services policy and procedures

ISSUE: The social service manual is not reflective of the revised services

RECOMMENDATIONS

- 20 Develop a social services manual to reflect the revised services

- 21 Case record content should be addressed

- 22 Develop a separate resource manual

- 23 Manual material should be available by section/chapter based on need

- 24 Develop a brochure which describes service delivery

ISSUE: Policy is developed without the consistent input of those responsible for implementation

RECOMMENDATION

- 25 Establish a policy review committee

REPORTING

ISSUE: Complexity of statistical reporting

RECOMMENDATIONS

- 26 Reduce client category and subcategory statistical reporting
- 27 Eliminate quarterly and yearly counts of services and separate child/adult counts
- 28 Report based on seven services
- 29 Eliminate unnecessary statistical reports
- 30 Automate statistical reporting for direct service provision
- 31 Eliminate separate statistical reporting to the Department for the Visually Handicapped

ISSUE: Complexity of fiscal reporting

RECOMMENDATIONS

- 32 Reduce fiscal client category and subcategory reporting
- 33 Consolidate fiscal reporting
- 34 Eliminate separate fiscal reporting to the Department for the Visually Handicapped

ISSUE: Cumbersome cost allocation plan

RECOMMENDATIONS

- 35 Reduce client categories and eliminate subcategories
- 36 Implement random moment sampling

EVALUATION

ISSUE: Lack of program effectiveness measures

RECOMMENDATION

- 37 Identify measureable outcome indicators for seven services

ISSUE: Collection of unnecessary data

RECOMMENDATIONS

38 Determine data needs prior to program implementation

39 Establish a sunset provision for all forms used for data collection

ISSUE: Lack of a comprehensive evaluation schema for evaluating service programs

RECOMMENDATIONS

40 Develop a schema for evaluating service programs

41 Utilize ad hoc reporting and sampling techniques

ISSUE: Direct service delivery work is not standardized

RECOMMENDATION

42 Develop an accurate method for determining staffing level efficiency or another method for determining local agency effectiveness and efficiency

OTHER ADMINISTRATIVE ISSUES

ISSUE: Lack of employee understanding of entire welfare system

RECOMMENDATION

43 Develop generic new employee training package

ISSUE: Inefficient distribution of written communication

RECOMMENDATIONS

44 Separate information items from action required items

45 Distribute mail in efficient manner to localities

ISSUE: Complexity of VACIS

RECOMMENDATIONS

46 Incorporate changes in VACIS

47 Orderly conversion to technology

SERVICE PROGRAMS ADMINISTRATIVE FUNCTIONAL ANALYSIS  
MAJOR CHANGES

PLAN MANUAL FOR FY 84-85

12-83

- Collapsed 30 services into 7 direct services
- Plan and budget to 7 direct services and 23 purchased services
- Consistent method to allocate direct costs
- Reduced number of client category codes used for planning from 17 to 4
- Simplified plan development process and documents
- Consistent match between planned and actual reimbursement
- Incorporated ESP funding with Title XX Plan

BUDGET DOCUMENTS FOR FY 84-85

12-83

- Simplified budgeting documents for joint cost distribution

STATISTICAL/FISCAL REPORTING EFFECTIVE 1-84

- Reduced client category and subcategory reporting
- Eliminated quarterly and yearly unduplicated counts of primary recipients
- Eliminated separate child/adult counts of primary recipients
- Eliminated two unnecessary statistical reports

STATISTICAL/FISCAL REPORTING EFFECTIVE 7-84

- Report on 7 direct services, 4 components
- Utilize VACIS in reporting direct services
- Eliminate 2 separate reports for VACIS agencies
- Eliminate separate reporting to DVH for LWAs
- Simplify fiscal reporting requirements for purchased services

CONSISTENT MATCH EFFECTIVE 7-84

- Suspend maximum rates and units of services for Home Based Services
- Reimburse the purchase of Home Based Services at the same percentage rate regardless of client category.



## DRAFT PERFORMANCE INDICATORS AND STANDARDS

The following performance indicators and standards are examples:

## FOSTER CARE

1. Compliance with State Policy
  - a. \_\_\_\_\_% of the required Administrative Panel Reviews will be completed in a timely manner (within 30 days of the due date).
  - b. \_\_\_\_\_% of the required Disposition Hearings will be held in a timely manner (within 30 days of the due date).
  - c. \_\_\_\_\_% of the foster care records will be in compliance\* with State Policy. (\*In compliance with State Policy includes: having appropriate service plans; documentation of the 18 safeguards established by Public Law 96-272; documentation of the pre-placement preventive services offered.)
2. Achievement of Goals for Clients
  - a. \_\_\_\_\_% of children with the goal of return home and the goal of placement with relatives will have the goal achieved within 12 months of the date the goal is selected.
  - b. \_\_\_\_\_% of children with the goal of return home and the goal of placement with relatives will have the goal achieved within 24 months of the date the goal is selected.
  - c. \_\_\_\_\_% of the children who have had the goals of return home or placement with relatives achieved\* will not reenter foster care within 12 months (\*The goals are considered achieved when custody is returned to the parent, prior custodian or granted to a relative).
  - d. \_\_\_\_\_% of children with the goal of adoption will have the goal achieved\* within 24 months of the date of termination of parental rights (\*The goal is considered achieved when the final order of adoption is entered.)
  - e. The median length of stay for children in Foster Care shall decrease by \_\_\_\_\_ months per year.
  - f. There will be a \_\_\_\_\_% reduction in an agency's foster care caseload in comparison with the average agency foster care caseload for the years 1977 through 1980.



EMPLOYMENT SERVICES PROGRAM

1. Compliance with State Policy

\_\_\_\_\_ % of the Employment Services Program records will be in compliance with State policy.

2. Achievement of Goals for Clients

- a. \_\_\_\_\_ % of an agency's registrants will actually participate in an active\* component of the Employment Services Program (\*Active components of ESP are: individual job search; group job search or job club; work experience; education and training; and other locally developed employment related activities).
- b. \_\_\_\_\_ % of an agency's registrants will enter employment. (Different standards for different unemployment rates.)
- c. \_\_\_\_\_ % of an agency's registrants who enter employment will maintain it for at least thirty (30) days.
- d. \_\_\_\_\_ % of an agency's registrants who enter employment will maintain it for at least 180 days.
- e. An agency's grant reduction savings for registrants who enter employment will be \_\_\_\_\_ % higher than its Employment Services Program's allocation.
- f. An agency's ADC caseload registered for Employment Services Program will be reduced by \_\_\_\_\_ % as a result of the Employment Services Program.
- g. The median length of stay for clients on ADC will decrease by \_\_\_\_\_ months per year.





