

Department of Health and Human Services

**OFFICE OF
INSPECTOR GENERAL**

**ALASKA EXPERIENCED CHALLENGES IN
MEETING FEDERAL AND STATE FOSTER
CARE PROGRAM REQUIREMENTS
DURING THE COVID-19 PANDEMIC**

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Report in Brief

Date: June 2023

Report No. A-06-21-07006

U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES
OFFICE OF INSPECTOR GENERAL



Why OIG Did This Audit

In response to the declaration of a public health emergency for COVID-19, the Administration for Children and Families (ACF) provided flexibilities to States charged with administering the Federal foster care program. These flexibilities allowed for name-based criminal records checks for prospective foster parents until fingerprint-based checks could safely be done and for videoconferencing visits to count toward the requirement that caseworker visits take place in a child's home. We performed this audit because Alaska adopted flexibilities and faced numerous challenges within its foster care program during the COVID-19 pandemic.

Our objective was to determine whether Alaska complied with Federal and State foster care program requirements related to background checks and caseworker visits during the COVID-19 pandemic and to identify any vulnerabilities or gaps in policies or procedures that could place children at risk.

How OIG Did This Audit

Alaska approved the renewal of 554 foster care home licenses and licensed 269 new homes from April 1 through December 31, 2020. We randomly selected for review 50 providers, 15 renewals and 35 newly licensed homes. We reviewed documentation of background checks for foster parents and other household members, caseworker visits, and home inspections.

Alaska Experienced Challenges in Meeting Federal and State Foster Care Program Requirements During the COVID-19 Pandemic

What OIG Found

We did not identify any vulnerabilities or gaps in Alaska's policies or procedures. However, Alaska did not always comply with State and Federal requirements related to background checks and caseworker visits to foster homes during the COVID-19 pandemic, even when those requirements had been modified to provide flexibility. Specifically, Alaska did not conduct required background checks on all applicants before placing children in homes under emergency conditions and did not document all the required monthly caseworker visits. In addition, Alaska did not complete or document all home inspections as required for licensing foster homes. These issues occurred because Alaska did not consistently follow its policies and procedures for ensuring that background checks were conducted in a timely manner because high turnover limited training of its placement staff. In addition, the State agency faced challenges in conducting and documenting caseworker visits and home inspections.

What OIG Recommends and Alaska's Comments

We recommend that Alaska (1) ensure staff are adequately trained on policies and procedures to ensure required background checks are completed before placing children in foster homes under emergency conditions; (2) continue to identify ways to address the challenges related to meeting the requirements for conducting monthly caseworker visits and home inspections, including consulting with ACF; and (3) complete home inspections in accordance with requirements for the two foster homes identified by our audit as lacking completed inspections and the five foster homes requiring in-person inspections.

In written comments on our draft report, Alaska concurred with our recommendations and described actions it had taken related to conducting required caseworker visits and home inspections. Specifically, Alaska stated that caseworker visits are an existing item being addressed in the State's Child and Family Service Review Program Improvement Plan and through ongoing consultation with ACF. Alaska also said that it is partnering with Tribes to assist with completing home inspections and other licensing requirements. In addition, Alaska indicated that it had completed the home inspections that we identified as missing or needing to be conducted in person. On the basis of our review of Alaska's comments, we revised our finding on home inspections to remove two that we had previously identified as missing.

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INTRODUCTION

WHY WE DID THIS AUDIT

On January 31, 2020, the Department of Health and Human Services (HHS) declared a public health emergency for COVID-19.¹ In response, the Administration for Children and Families (ACF) provided flexibilities to State agencies charged with administering the Federal foster care program. These flexibilities allowed for name-based criminal records checks for prospective foster parents until fingerprint-based checks could safely be done, and for videoconferencing visits to count toward the requirement that at least half of caseworker visits take place in the child's home.²

COVID-19 has created extraordinary challenges for the delivery of health care and human services to the American people. As the oversight agency for the Department of Health and Human Services (HHS), the Office of Inspector General (OIG) oversees HHS's COVID-19 response and recovery efforts.

This audit, which is part of OIG's COVID-19 response strategic plan,³ is the first of three that focus on States' efforts to ensure the safety and well-being of children in foster care during the COVID-19 pandemic. We performed this audit of the Alaska Department of Family and Community Services, Office of Children's Services (State agency), because it adopted flexibilities and faced numerous challenges within its foster care program during the COVID-19 pandemic.

OBJECTIVE

Our objective was to determine whether the State agency complied with Federal and State foster care program requirements related to background checks and caseworker visits during the COVID-19 pandemic and to identify any vulnerabilities or gaps in policies or procedures that could place children at risk.

¹ The HHS declaration of a public health emergency is available online at <https://aspr.hhs.gov/legal/PHE/Pages/2019-nCoV.aspx>. Accessed on Jan. 31, 2023. The public health emergency ended May 11, 2023.

² The April 15, 2020, ACF letter providing Stafford Act flexibilities (additional details addressed below in the *Federal Flexibilities* paragraph), is available online at https://www.acf.hhs.gov/sites/default/files/documents/cb/stafford_act.pdf. Accessed on Jan. 31, 2023.

³ OIG's COVID-19 response strategic plan and oversight activities can be accessed at [HHS-OIG's Oversight of COVID-19 Response and Recovery | HHS-OIG](#).

BACKGROUND

Federal Foster Care Program

Title IV-E of the Social Security Act (the Act) established the Federal Foster Care program, which helps States provide safe and stable out-of-home care for children who meet certain eligibility requirements until they are safely returned home, placed permanently with adoptive families, or placed in other planned arrangements. Title IV-B of the Act authorizes Federal funding to States to promote flexibility in the development and expansion of coordinated child and family services programs that utilize community-based services, family support services, family preservation services, adoption promotion and support services, and time-limited family reunification services until a child may safely return home. These programs are implemented under Federal regulations (45 CFR §§ 1355, 1356, and 1357).

At the Federal level, ACF administers the Title IV-E Foster Care program. To be eligible to claim Federal support under the Title IV-E program, a State, territory, or Tribe must have a Title IV-E plan that contains the official policies and procedures established to fulfill the funding requirements of the program. The State must designate a State authority, or authorities, responsible for establishing and maintaining standards for foster family homes and child care institutions, including standards related to safety, and must apply the standards to any foster family home or child care institution receiving funds under sections IV-E or IV-B of the Act.⁴ The State must also develop and implement standards to ensure that children in foster care placements in public or private agencies receive quality services that protect their health and safety.⁵

States may claim Federal financial participation for payments under Title IV-E only if an eligible child is placed and the Title IV-E agency has completed fingerprint-based checks of national crime information databases (NCIDs)⁶ on foster or adoptive parents, legal guardians, or adults working in a child care institution.⁷ Additionally, the Act requires that, to receive Title IV-B funding, each State must ensure that not less than 50 percent of the total number of monthly caseworker visits during a Federal fiscal year occur in the residence of the child.⁸

⁴ The Act § 471(a)(10).

⁵ The Act § 471(a)(22).

⁶ As defined in Title 28 U.S.C. § 534(f)(3)(A).

⁷ The Act § 471(a)(20)(A), (C), and (D).

⁸ The Act § 424(f)(2)(A).

Federal Flexibilities

On April 15, 2020, ACF issued a letter to child welfare leaders notifying them that administrative conditions of Federal assistance programs could be modified or waived during the COVID-19 pandemic, based on the Secretary's declaration of a public health emergency on January 31, 2020, and subsequent trigger of authorities in the Robert T. Stafford Relief and Emergency Assistance Act (42 U.S.C. § 5121 et seq.) (Stafford Act). Specifically, Title IV-E agencies were given flexibility to perform name-based criminal background checks until fingerprint-based checks could safely be done and allowed video conferencing visits to count toward the requirement that 50 percent of caseworker visits occur in the child's home.⁹

On April 27, 2020, ACF issued a second letter, reminding States of already existing flexibilities in the Title IV-E statute, including the ability of States to modify their licensing standards, as long as the standards continue to comply with statutory requirements.¹⁰

Survey of States on Implementation of Flexibilities

We sent surveys to each State and the District of Columbia to identify States that adopted flexibilities in response to the COVID-19 pandemic. We received and reviewed responses from 43 States, gaining an understanding of the flexibilities that the States adopted, the policies and procedures implemented by the States to ensure the health and safety of the children in foster care, and an understanding of the challenges the States faced within their foster care programs because of the COVID-19 pandemic.¹¹

Of the 43 respondent States, 28 implemented flexibilities related to fingerprint-based criminal record checks for foster care providers, allowing for name-based checks to be conducted, and 39 States implemented flexibilities that allowed the use of virtual platforms for conducting monthly caseworker visits with the children. In addition, 34 of the 43 States modified foster home licensing standards, primarily to allow for virtual home inspections. States cited facing various challenges within their foster care programs during COVID-19, including recruiting and training prospective foster parents, the ability to conduct required face-to-face home studies, and the ability of foster parents to obtain certain required documents (i.e., vital records such as birth certificates and marriage licenses) due to the closure of many offices or businesses because of COVID-19.

⁹ In ACYF-CB-PI-20-10, issued on May 8, 2020, ACF addressed additional flexibilities afforded to State agencies by the Stafford Act ([ACYF-CB-PI-20-10 \(hhs.gov\)](https://www.hhs.gov/ACYF-CB-PI-20-10)).

¹⁰ The April 27, 2020, ACF letter providing followup guidance on Stafford Act flexibilities, is available online at [Children's Bureau Letter on Title IV-E Flexibility \(hhs.gov\)](https://www.hhs.gov/childrens-bureau/letter-on-title-iv-e-flexibility). Accessed on Feb. 3, 2023.

¹¹ We sent test surveys to four States during June and July 2020, and once we finalized the survey, sent it to the remaining States during September and October 2020. State responses covered the period from the beginning of the pandemic to the date of the response, which ranged from August 2020 to May 2021.

We selected Alaska for audit in part because of the extended time¹² the State allowed for the flexibility to complete fingerprint-based background checks as well as challenges identified by Alaska regarding COVID-19 and its impact on accessing rural areas of the State to administer the foster care program.

The Foster Care Program in Alaska

The State agency administers Alaska's Title IV-E program and works in partnership with families and communities to support the well-being of Alaska's children, provide them with a safe and permanent home, provide cultural connections, and help them realize their potential. On average, there are approximately 3,000 children each month in foster care in Alaska.

State Requirements

Background Check Requirements

State law requires a fingerprint-based criminal background check for each prospective foster parent.¹³ The background check requirement applies to all individuals aged 16 or older who reside in the home.¹⁴ Fingerprint-based checks are valid for 5 years before the State requires another check.¹⁵ In addition, children aged 12 and older that reside in the home and are not receiving services require a check of the Juvenile Offender Management Information System (JOMIS).¹⁶

The State agency performs several fingerprint-based criminal record and name-based registry checks, including:¹⁷

- FBI and State fingerprint checks of criminal records,
- Alaska's child abuse and neglect registry,

¹² We considered States that had not returned to fingerprint-based background checks at the time of our survey as allowing the fingerprint-based flexibility for an extended period, ranging from 5 to 14 months after the pandemic began, with Alaska's extended period of 7 months.

¹³ AS § 47.05.310.

¹⁴ Title 7 Alaska Administrative Code (AAC) § 10.910(a)(4). The regulations provide further detail at 7 AAC § 10.900(b)(5) and (6).

¹⁵ 7 AAC § 10.910(c).

¹⁶ *Office of Children's Services (OCS) Community Care Licensing Manual*, section 606.

¹⁷ *OCS Community Care Licensing Manual*, section 605; 7 AAC § 10.915(b).

- Child abuse and neglect registry checks for other States (for any States in which the individual lived during the last 5 years),
- Alaska Public Safety Information Network (APSIN) name-based check & Interstate Identification Index (Triple-III) fingerprint-based checks,¹⁸
- Alaska court system/Court View,
- National Sex Offender Registry,
- List of Excluded Individuals and Entities maintained by HHS/OIG,
- Alaska’s child protection records and previous licensing records, and
- Alaska’s medical assistance exclusion list.

See the *Emergency Conditions* section of this report for background check requirements when placing a child in a home under emergency conditions.

Caseworker Visit and Licensing Visit Requirements

Licensing requirements for foster homes are authorized in State statute¹⁹ and are detailed in the Alaska Administrative Code (AAC) and the *OCS Community Care Licensing Manual*. The State requires monthly in-person caseworker visits by a protective services specialist. The visits must be well-planned and focused on issues pertinent to case planning and service delivery to ensure child safety, permanency, well-being, and cultural continuity.²⁰

Licensing requirements include evaluation of the character and competency of the licensee, safety and appropriateness of the building and grounds, and child protection and criminal justice information.²¹

Before issuing a foster home license, a licensing specialist is required to conduct an in-person home visit to inspect the safety and appropriateness of the physical environment, including the building and grounds. The Foster Home Standard by Standard Evaluation form addresses

¹⁸ During normal operations, the Alaska Department of Public Safety uses the Triple-III to provide fingerprint-based background checks. During the pandemic, when fingerprinting was not available, background checks were conducted via name-based searches of the Triple-III.

¹⁹ 47 AS § 32.

²⁰ The *OCS Child Protective Services Manual*, section 3.2.1. If children are placed out of their region, a caseworker where the child is placed conducts the visits. If a child is placed out of State, the visits may happen by telephone.

²¹ *OCS Community Care Licensing Manual*, section 215, “Procedures,” C.2.

measurable items about the physical home that must be considered before the home may be considered compliant. Items such as smoke detectors, carbon monoxide detectors, and fire extinguishers must be checked to ensure they are operational.²²

Emergency Conditions

When “emergency conditions” exist, a provisional license may be issued for up to 90 days. Emergency conditions exist when a child must be placed immediately, there is no licensed foster home available, and placement would reduce the trauma of placement for the child. The Department of Health and Social Services will issue a provisional license under emergency conditions, regardless of whether the application is complete, if the child must be placed immediately and the department determines that it is in the child’s best interest to place the child in the applicant’s home.²³ The State did not implement any pandemic-related flexibilities that changed requirements for licensing under emergency conditions.

Before placing a child in a home under emergency conditions, the placement worker must (a) request an APSIN check, (b) check the National Sex Offender Registry, (c) check the Online Resource for Children in Alaska information system (ORCA) and Prober,²⁴ and (d) check JOMIS.²⁵

State Flexibilities

Due to the COVID-19 pandemic, Alaska implemented flexibilities related to background checks because most private fingerprinting businesses had suspended operations. During the Disaster Emergency Declaration,²⁶ the Alaska Department of Public Safety (DPS) temporarily allowed the State agency access to the Triple-III so that name-based checks could be performed. When the Emergency Declaration ended on April 30, 2021, the Alaska DPS resumed responsibility for performing fingerprint-based checks of Triple III.

In response to the COVID-19 pandemic, the State agency also issued Program Instruction (PI) 20-01, effective March 19, 2020: “Temporary OCS Policy Changes in Response to the COVID-19 Outbreak and Public Health Disaster Emergency.” The PI limited monthly caseworker and licensing visits to electronic methods such as FaceTime, Zoom, telephone visits, or other communication applications. The caseworkers were required to speak to each foster child

²² *OCS Community Care Licensing Manual*, section 215, ‘Procedures’ C.3.

²³ 7 AAC § 50.050(a).

²⁴ ORCA is the State agency’s current system recording child protection checks. The State agency used Prober before implementing ORCA and had to check both systems prior to all Prober data being transferred to ORCA.

²⁵ The *OCS Community Care Licensing Manual*, section 217.

²⁶ Alaska’s Governor issued the Public Health Emergency Declaration on March 11, 2020.

privately and alone and to use voice calls as a last resort. The State agency-issued PI 20-06, effective June 15, 2020, requiring the return of in-person caseworker and licensing visits.²⁷ The PI allowed exceptions to the in-person requirements when individuals in the home had positive responses to COVID-19 prescreening questions or in-person visits increased the risk of illness for vulnerable individuals in the home. According to State agency staff, some communities remained closed to visitors, so the staff did not have access to in-person visits.

HOW WE CONDUCTED THIS AUDIT

The State agency approved the renewal of 554 foster care home licenses and licensed 269 new homes from April 1 through December 31, 2020. We randomly selected 50 foster homes for review, 15 renewals and 35 newly licensed homes. Across the 50 providers, we reviewed background checks for 122 foster parents and other household members. For each of the 134 foster children placed in the 50 selected foster homes, we reviewed documentation of caseworker visits with the child for calendar year (CY) 2020, even if the child's placement changed. We also reviewed the supporting licensing documentation for home inspections.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix A contains the details of our audit scope and methodology.

FINDINGS

We did not identify any vulnerabilities or gaps in the State's policies or procedures. However, the State agency did not always comply with State and Federal requirements related to background checks and caseworker visits to foster homes during the COVID-19 pandemic, even when those requirements had been modified to provide flexibility. Specifically, the State agency did not conduct required background checks on all applicants before placing children in homes under emergency conditions and did not document all the required monthly caseworker visits. In addition, the State agency did not complete or document all home inspections as required for licensing foster homes. These issues occurred because the State agency did not consistently follow its policies and procedures for ensuring that background checks were conducted in a timely manner because high turnover limited training of its placement staff. In addition, the State agency faced challenges in conducting and documenting caseworker visits and home inspections.

²⁷ Both PI 20-01 and PI 20-06 refer to "routine licensing visits." As part of the licensing process, the *OCS Licensing Manual* requires licensing specialists to schedule a home visit and inspect the safety and appropriateness of the physical environment. The home must be compliant before the State agency may issue a license and place children in the home.

THE STATE AGENCY DID NOT ALWAYS CONDUCT REQUIRED BACKGROUND CHECKS FOR APPLICANTS BEFORE PLACING CHILDREN IN FOSTER HOMES UNDER EMERGENCY CONDITIONS

The State required the State agency to complete background checks on foster care providers and to receive satisfactory results before placing a child in a home under emergency conditions.²⁸ Before a child is placed in a home, the placement worker must (a) request an APSIN check, (b) check the National Sex Offender Registry, (c) check ORCA and Prober, and (d) check the JOMIS. This requirement was not modified during the pandemic.

The State agency placed children under emergency conditions in 10 of the 50 sampled homes before the required name-based checks were conducted on 17 applicants and other household members. For each of the 17 individuals, the State agency completed name-based checks from 2 to 237 days after placement of children in the home. According to a State agency official, the required checks were not always requested before placing children under emergency conditions because the State agency had high turnover with its placement staff, which sometimes limited the training the placement staff had received. Background checks are a critical component of the screening process for prospective foster parents, and the failure of the State agency to conduct the required background checks before placing children under emergency conditions could jeopardize the safety and well-being of children.

THE STATE AGENCY DID NOT DOCUMENT ALL REQUIRED CASEWORKER VISITS

According to Federal and State requirements in place before COVID-19, children in out-of-home care must be visited by a caseworker monthly, and the visits must be well-planned and focused on issues pertinent to case planning and service delivery to ensure safety, permanency, well-being, and cultural continuity. The visit must take place in the home or institution where the child is placed and should be in person. The State issued PI 20-01, effective March 19, 2020, to allow caseworkers to conduct the visit by speaking to each foster child privately through FaceTime, Zoom, or some other video conference method. Voice calls were to be used as a last resort.

The State agency did not document all required monthly caseworker visits for 96 of the 134 sampled children, regardless of how they were to be conducted. For some of these visits, the caseworker notes indicated that the visit was not conducted. For example, one note states that flights were canceled due to the weather, so the in-person visit could not occur. Another note states that the worker attempted contact for a virtual visit, but the foster child was in runaway status. State agency officials mentioned that the State agency faces challenges getting caseworker visits completed and documented and is working to identify ways to address some of the challenges. Challenges for completing visits include (1) accessing much of Alaska, which

²⁸ The State agency may issue a provisional license to an applicant if a child must be placed immediately and if the State agency determines it is in the child's interest to place the child in the applicant's home (7 AAC § 50.050).

is remote and rural and often has no road system to access many communities and thus short plane flights are required; (2) limited bandwidth capabilities; and (3) the severe weather conditions in Alaska. Challenges for documenting caseworker visits include (1) staffing challenges; i.e., caseworkers have to move from crisis to crisis and may not have time to enter their visits in the ORCA system, and (2) caseworkers have to return to their office to enter their visits in ORCA because they do not currently have the technology to access ORCA while in the field. These challenges occurred pre-pandemic and continued during the pandemic.

See Appendix B for a summary of the monthly caseworker visits.

THE STATE AGENCY DID NOT CONDUCT OR DOCUMENT ALL LICENSING VISITS TO SEVERAL FOSTER HOMES AS REQUIRED

Before issuing a foster home license and placing a child, a licensing specialist is required to conduct an in-person visit of the home to inspect the safety and appropriateness of the physical environment, including the building and grounds. The Foster Home Standard by Standard Evaluation form addresses measurable items about the physical home that must be completed before the home may be considered compliant. Items such as smoke detectors, carbon monoxide detectors, and fire extinguishers must be checked to ensure they are operational.²⁹ The State issued PI 20-01, effective March 19, 2020, to allow licensing staff to conduct virtual licensing visits. PI 20-06, effective June 15, 2020, rescinded, with exceptions, the flexibility for virtual licensing visits.³⁰

The State agency did not conduct an in-person or virtual visit of the home before issuing a foster home license and placing a child, as required, for 10 of the 50 licensed foster homes as follows:

- for 5 foster homes initially licensed or renewed in CY 2020, the State agency did not have any documentation of a completed home inspection,³¹ and
- for 5 foster homes, the State agency completed virtual home inspections after June 15, 2020, the effective date of the State agency's return to in-person home inspections.³²

State agency officials mentioned that the State agency faces challenges getting home inspections completed and documented. Challenges for completing home inspections included (1) COVID-19 limited staff availability and caused Tribes to lockdown their communities, (2)

²⁹ *OCS Community Care Licensing Manual*, section 215, "Procedures," C.3.b.

³⁰ Exceptions were allowed for positive responses to pre-screening questions and when vulnerable individuals participating in in-person contact caused increased risk.

³¹ For 3 homes, the State agency provided documentation that a home inspection was completed in CY 2021.

³² The documentation for the home inspections did not note a reason for an exception to the in-person inspection.

access to mobile communications, and 3) reliability of internet services and a large number of households without internet access. As a result, the safety and well-being of children were potentially at risk.

RECOMMENDATIONS

We recommend that the Office of Children's Services:

- ensure that staff are adequately trained on policies and procedures to ensure that required background checks are completed before placing children in foster homes under emergency conditions;
- continue to identify ways to address the challenges related to meeting the requirements for conducting monthly caseworker visits and home inspections, including consulting with ACF; and
- complete home inspections in accordance with requirements for the two foster homes identified by our audit as lacking completed inspections and for the five foster homes requiring in-person inspections.

STATE AGENCY COMMENTS AND OFFICE OF INSPECTOR GENERAL RESPONSE

In written comments on our draft report, the State agency concurred with our recommendation that staff be adequately trained on requirements for conducting background checks before children are placed in foster homes under emergency conditions. The State agency also concurred with our recommendations related to conducting required caseworker visits and home inspections and described actions it had taken.

The State agency stated that caseworker visits are being addressed in the State's Child and Family Services Reviews (CFSR) Program Improvement Plan as well as through ongoing consultation with ACF.³³ The State agency also stated that it has had meetings with ACF regarding a Federal regulation change that would recognize the quality caseworker visits performed by the Tribe as counting toward the caseworker visit requirements.

With respect to home inspections, the State agency stated that it is partnering with Tribes through the Alaska Tribal Child Welfare Compact to assist with completing home inspections and other licensing requirements.³⁴ The State agency also indicated that it had completed the home inspections for the foster homes we identified as missing or needing to be conducted in

³³ ACF periodically performs CFSRs to ensure that State child welfare systems conform with Federal child welfare requirements.

³⁴ The Alaska Tribal Child Welfare Compact is a State-Tribal initiative created to ensure continuity of services to Alaska families even when executive administrations change.

person. On the basis of our review of the State agency's comments, we revised our finding on home inspections to remove two that we had previously identified as missing. However, the State agency did not provide any documentation that we would have needed to further revise the finding.

We commend the State agency for the actions it has taken. The State agency's comments are included in their entirety as Appendix C.

APPENDIX A: AUDIT SCOPE AND METHODOLOGY

SCOPE

The State agency approved the renewal of 554 foster care home licenses and licensed 269 new homes from April 1 through December 31, 2020. We randomly selected 50 foster homes for review, 15 renewals and 35 new homes. Across the 50 homes, we reviewed background checks for 122 foster parents and other household members. For each of the 134 foster children placed in the 50 selected foster homes, we reviewed documentation of caseworker visits with the child for CY 2020, even if the child's placement changed. We also reviewed the supporting licensing documentation for home inspections.

Our audit focused on the flexibilities offered during the COVID-19 pandemic with respect to provider background checks, caseworker visits, and provider licensing. We limited our assessment of the State agency's internal controls to those related to determining whether the requirements for licensing providers were met and that monthly caseworker visits were conducted.

METHODOLOGY

To accomplish our objective, we:

- reviewed relevant Federal laws and regulations, ACF policies and procedures for COVID-19 pandemic flexibilities, and State laws and regulations and COVID-19 flexibilities utilized;
- met with State agency officials to determine what procedures the State used to ensure that name-based criminal history checks were completed for potential foster parents and that fingerprint-based checks were completed as soon as it was safe to do so and to determine the procedures for ensuring that checks were made of applicable child abuse and neglect registries;
- identified the options the State utilized for caseworker visitation to ensure the health and safety of caseworkers, foster children, and foster families;
- determined whether the State changed foster parent licensing requirements during CY 2020;
- obtained a list of foster homes that were either newly licensed or renewed their licenses during CY 2020;
- used random numbers to select a sample of 50 foster homes, which included 15 renewals and 35 newly licensed homes, and determined whether background checks

were completed as required for providers and any other individuals residing in the home;

- reviewed caseworker visits for all of CY 2020 for children placed in our 50 sampled foster homes;
- reviewed documentation of home inspections required for the licensing process;
- met with State agency officials to gain insights on the necessity of the ACF waivers for background check, visitation requirements, and any modification to licensing standards; and
- discussed our findings with the State agency officials.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

APPENDIX B: SUMMARY OF MONTHLY CASEWORKER VISITS

Child	Months in Placement	Visits Required	Documented Visits	Missing Visits
1	6	6	4	2
2	12	12	9	3
3	12	12	12	0
4	5	5	4	1
5	12	12	9	3
6	12	12	11	1
7	12	12	11	1
8	12	12	9	3
9	12	8	8	0
10	8	8	7	1
11	12	12	9	3
12	8	7	5	2
13	12	12	10	2
14	12	12	10	2
15	12	12	7	5
16	12	12	4	8
17	12	12	11	1
18	12	12	11	1
19	12	12	11	1
20	3	2	1	1
21	8	8	7	1
22	12	12	11	1
23	9	9	2	7
24	8	7	7	0
25	3	2	1	1
26	12	12	10	2
27	12	12	12	0
28	12	12	9	3
29	12	12	9	3
30	12	12	9	3
31	12	11	9	2
32	12	11	9	2
33	9	9	7	2
34	6	6	2	4
35	12	12	11	1
36	6	6	4	2
37	12	12	11	1

Child	Months in Placement	Visits Required	Documented Visits	Missing Visits
38	12	12	11	1
39	2	2	1	1
40	12	12	8	4
41	12	12	6	6
42	9	9	9	0
43	9	9	9	0
44	12	12	6	6
45	11	11	9	2
46	11	11	10	1
47	12	12	11	1
48	12	12	11	1
49	12	12	9	3
50	12	12	4	8
51	6	6	3	3
52	12	12	11	1
53	12	12	11	1
54	6	5	3	2
55	12	11	10	1
56	10	10	8	2
57	12	12	7	5
58	10	10	10	0
59	12	12	3	9
60	10	10	9	1
61	10	9	5	4
62	12	12	11	1
63	3	3	3	0
64	6	5	3	2
65	12	12	10	2
66	12	12	11	1
67	10	10	10	0
68	12	12	8	4
69	6	6	4	2
70	12	12	10	2
71	12	12	10	2
72	12	12	11	1
73	11	10	7	3
74	12	12	7	5
75	12	12	8	4
76	10	10	7	3

Child	Months in Placement	Visits Required	Documented Visits	Missing Visits
77	2	1	1	0
78	2	1	1	0
79	9	8	6	2
80	12	12	8	4
81	12	12	12	0
82	12	11	10	1
83	12	11	11	0
84	12	12	11	1
85	6	5	5	0
86	12	12	3	9
87	11	10	9	1
88	4	3	3	0
89	11	10	7	3
90	11	10	7	3
91	11	11	11	0
92	11	11	11	0
93	6	5	5	0
94	7	6	6	0
95	7	6	6	0
96	12	12	10	2
97	12	11	11	0
98	1	1	1	0
99	1	1	1	0
100	8	8	7	1
101	8	8	7	1
102	6	5	5	0
103	9	8	4	4
104	9	8	4	4
105	9	8	4	4
106	6	5	4	1
107	12	12	11	1
108	12	12	9	3
109	12	12	10	2
110	12	12	10	2
111	12	12	12	0
112	10	9	9	0
113	8	8	8	0
114	10	10	10	0
115	12	12	10	2
116	10	9	7	2

Child	Months in Placement	Visits Required	Documented Visits	Missing Visits
117	4	3	3	0
118	4	3	3	0
119	12	12	11	1
120	12	12	11	1
121	6	5	5	0
122	1	1	1	0
123	2	1	1	0
124	12	12	7	5
125	11	11	9	2
126	1	0	0	0
127	2	1	1	0
128	9	8	5	3
129	2	0	0	0
130	4	2	1	1
131	4	2	1	1
132	4	4	3	1
133	4	4	4	0
134	2	2	2	0
Total	1,240	1,191³⁵	952	239

³⁵ The number of months in placement did not always match the number of visits required because a caseworker visit was not required for months when the child was placed in a foster home or removed from a foster home.

APPENDIX C: STATE AGENCY COMMENTS



THE STATE
of ALASKA
GOVERNOR MIKE DUNLEAVY

Department of Family and Community Services

OFFICE OF CHILDREN'S SERVICES
Director's Office

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May 8, 2023

Sylvie Witten
Assistant Regional Inspector General
(512)-297-5102

Re: Report A-06-21-07006

Good Afternoon,

The State of Alaska, Office of Children's Services respectfully submits its response to the audit addressing state and federal program requirements during the COVID-19 pandemic. Upon review of the findings and recommendations Alaska submits the following comments regarding documentation of licensing visits:

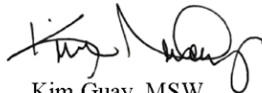
No.	Provider Number	Issue	Alaska Comments
1	516822	No Standard by Standard for 2020	A face-to-face SxS could not be conducted in 2020 due to the community being locked down due to COVID and not allowing entry. A virtual SxS was completed 2/16/21.
2	526029	No Standard by Standard for 2020	This providers biennial renewal was due in 2021 and was completed on 8/18/21.
3	528375	No Standard by Standard for 2020	SxS are required for licensed providers. This provider was an unlicensed relative so there would not be SxS.
4	528464	No Standard by Standard for 2020	Alaska records show the 2020 SxS was provided.
5	529412	No Standard by Standard for 2020	This provider was emergency licensed in December 2020, so the SxS was completed 3/16/21.
1	528611	No Standard by Standard	Alaska records show the 2020 SxS was provided.
2	528689	No Standard by Standard	Alaska records show the 2020 SxS was provided.
1	528840	Virtual SxS after 6/15/2020	The placement for this provider went on a trial home visit. A temporary extension was given to this provider pending outcome of the trial home visit. The child did not return to foster care and the provider closed their license.
2	528864	Virtual SxS after 6/15/2020	The was an emergency license. The provider closed their license prior to finishing the process only 2.5 months after issuance of the emergency license prior to the SxS completion.
3	529309	Virtual SxS after 6/15/2020	Provider closed their license prior to subsequent SxS
4	527333	Virtual SxS after 6/15/2020	Provider closed their license prior to subsequent SxS
5	527662	Virtual SxS after 6/15/2020	Provider closed their license prior to subsequent SxS

With regards to the recommendations:

- Ensure staff are adequately trained on policies and procedures to ensure required background checks are completed before placing children in foster homes under emergency conditions;
 - Alaska is in concurrence with this recommendation.
- Continue to identify ways to address the challenges related to meeting the requirements for conducting monthly caseworker visits and home inspections, including consulting with ACF;
 - Alaska is in concurrence with this recommendation. The sheer size of Alaska coupled with no road system is a barrier that Alaska continues to troubleshoot. Caseworker visits are an existing item being addressed in the state's CFSR Program Improvement Plan. Ongoing consultation with ACF is occurring and will continue to occur. Alaska has had meetings with ACF regarding a federal regulation change the state would like to see that would recognize the quality caseworker visits performed by the Tribe as counting towards the caseworker visit requirements.
 - Alaska is partnering with Tribes through the Alaska Tribal Child Welfare Compact to assist with completing of home inspections and other licensing requirements.
- Complete home inspections in accordance with requirements for the two foster homes identified by our audit as lacking completed inspections for the five foster homes requiring in-person inspections.
 - Alaska is in concurrence with this recommendation. All required SxS have been completed. Please see chart above.

Thank you for the opportunity to provide comment to the audit. Please don't hesitate to contact me for any follow-up.

Sincerely,



Kim Guay, MSW
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