



November 6, 2013

Dear CPA/TFC Provider,

This email is in response to your inquiry about the Performance Report, specifically the Staff Security element. As we presented and discussed in the September provider meetings, the COMAR Safety monthly report (previously known as the Title IV-E monthly report) is required to be submitted to the Office of Licensing and Monitoring (OLM) via the designated email account, OLM.CPAupdates@maryland.gov.

According to the definition of Child Safety/Staff Security, the following is required (the contract language is in quotes with any supporting COMAR regulation cited).

- 1) "100% compliance for Child Protective Services (CPS) clearances and Criminal Background (CB) checks for all employees and prospective employees;" – **COMAR 07.05.01.09 Screening Employees, Volunteers, and Governing Board Members.**
- 2) "Timely submission for each monthly report;" – **required to be submitted by the 10th of every month (unless the 10th falls on a weekend or state holiday and then it would be due by the next state business day).**
- 3) "CPS and CB check request dates are prior to the employee hire date;" – **COMAR 07.05.01.09 Screening Employees, Volunteers, and Governing Board Members. It should be noted that although the contract states request dates prior, CPA COMAR requires review of the results prior to hire.**
- 4) "Each employee meets COMAR 14.31.06.05 standards for indicated child abuse and criminal convictions; and" – **COMAR 07.05.01.09 Screening Employees, Volunteers, and Governing Board Members.**
- 5) "For TFC Agencies, 100% of foster parents have an initial certification and timely re-certifications." – **COMAR 07.05.02, specifically but not limited to the following:**
 - a. **07.05.02.06 Foster Parent Medical Requirements (Initial at time of application and then at least every 2 years);**
 - b. **07.05.02.13 Recommendation for Certification (including A (2) – (4) CPS, federal & state clearances);**
 - c. **07.05.02.16 Agency Maintenance of Certified Foster Parents (including C – F 60 day Suspension and 30 day Revocation;**
 - d. **07.05.02.16 G (4) Recertify or deny certification before the current certification expires; and**
 - e. **07.05.02.16 G (7) If a member of the foster parent's household becomes 18 years old during the year before recertification, a federal and State criminal background check and a child abuse clearance shall be completed on the household member before recertification.)**

"OLM will conduct random checks of the COMAR Safety Requirement reports for each Contractor to ensure 100% compliance for CPS clearances, CB checks, and foster parent certification/re-certifications." Consequently, if one instance of non-compliance was identified, then the provider falls short of 100% compliance.

Should you have any additional questions or need further clarification, please do not hesitate to contact Adele Black at 410-767-7743 or via email at Adele.Black@maryland.gov .

Sincerely,

A handwritten signature in cursive script that reads "Darlene Ham".

Darlene Ham
Executive Director

Cc: Carnitra White, SSA Executive Director
David Ayer, SSA Deputy Director of Operations
Lynn Wisner, OLM Deputy Director
Richard Berger, OLM CPA Program Manager