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DEPARTMENT OF CHILDREN AND FAMILY SERVICES

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October 2, 2015

To: Supervisor Michael D. Antonovich, Mayor
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Supervisor Sheila Kuehl
Supervisor Don Knabe

From: Philip L. Browning
Director

SOUTHERN CALIFORNIA FOSTER FAMILY AGENCY CONTRACT COMPLIANCE MONITORING REVIEW

The Department of Children and Family Services (DCFS) Contracts Administration Division (CAD) conducted a review of Southern California Foster Family (the FFA) in March 2015. The FFA has one licensed office in the First Supervisorial District and provides services to the County of Los Angeles DCFS placed foster children. According to the FFA's program statement, its mission is "to provide foster and adoptive families who offer stable, secure and nurturing environments to children, who are dependents of the court until they are reunited with their birth families, are adopted, or become independent."

At the time of the review, the FFA supervised 80 DCFS placed children in 114 certified foster homes. The children's average length of placement was one and a half years, and their overall average age was seven.

SUMMARY

During CAD's review, the interviewed children generally reported: feeling safe at the FFA certified foster homes; having been provided with good care and appropriate services; being comfortable in their environment; and being treated with respect and dignity. The certified foster parents reported being supported by the FFA staff in their efforts to provide care and supervision to the children placed in their homes.

The FFA was in full compliance with 8 of 11 sections of our Contract Compliance Review: Certified Foster Homes; Education and Workforce Readiness; Health and Medical Needs; Psychotropic Medication; Personal Rights and Social Emotional Well-Being; Personal Needs/Survival and Economic Well-Being; Discharged Children; and Personnel Records.

CAD noted deficiencies in the areas of: Licensure/Contract Requirements, related to Special Incident Reports that were not cross-reported; Facility and Environment, related to money and clothing allowance logs not being maintained; and Maintenance of Required Documentation and

Service Delivery, related to Initial Needs and Services Plans (NSPs) not being developed timely, updated NSPs not being developed timely, and quarterly reports not being developed timely.

Attached are the details of our review.

REVIEW OF REPORT

On March 19, 2015, Eboni Alexander, DCFS CAD held an Exit Conference with FFA representatives: Andrew Bridge, Chief Executive Officer (CEO); Janet Marinaccio, Chief Operating Officer; Robyn Harrod, Senior Director of Programs; and Kimberly Sutton, FFA Supervisor. DCFS staff included Aiyana Rios, Out-of-Home Care Management Division. The FFA representatives agreed with the review findings and recommendations; were receptive to implementing systemic changes to improve their compliance with regulatory standards; and were in agreement with addressing the noted deficiencies in a Corrective Action Plan (CAP).

A copy of this compliance report has been sent to the Auditor-Controller and Community Care Licensing (CCL).

The FFA provided the attached approved CAP, addressing the recommendations noted in this compliance report.

CAD conducted an on-site follow up visit on June 25, 2015, to verify implementation of the CAP.

PLB:EM
LTI:ea

Attachments

c: Sachi A. Hamai, Interim Chief Executive Officer
John Naimo, Auditor-Controller
Public Information Office
Audit Committee
Andrew Bridge, CEO, Southern California Foster Family Agency
Lajuannah Hills, Regional Manager, Community Care Licensing Division
Lenora Scott, Regional Manager, Community Care Licensing Division

SOUTHERN CALIFORNIA FOSTER FAMILY AGENCY
CONTRACT COMPLIANCE MONITORING REVIEW SUMMARY

155 N. Occidental Blvd.
Los Angeles, CA 90026
License Number: 191500291

	Contract Compliance Monitoring Review	**Findings: March 2015**
I	**Licensure/Contract Requirements** (7 Elements)	
	1. Timely Notification for Child's Relocation	1. Full Compliance
	2. Timely, Cross-Reported SIRs	2. Improvement Needed
	3. Runaway Procedures in Accordance with the Contract	3. Full Compliance
	4. Are there CCL Citations/OHCMD Safety Reports	4. Full Compliance
	5. If Applicable, FFA Ensures Complete Required Whole Foster Family Home Training	5. Non-Applicable
	6. FFA Pays Certified Foster Parents (CFP) Whole Foster Family Home Payments	6. Non-Applicable
	7. FFA Conducts an Assessment of CFP Prior to Placement of Two (2) or More Children	7. Full Compliance
II	**Certified Foster Homes (CFHs)** (12 Elements)	
	1. Home Study and Safety Inspection Conducted Prior to Certification	Full Compliance (All)
	2. Agency's Inquiry with OHCMD for Historical Information Prior to Certification	
	3. Timely, Criminal Clearances (DOJ, FBI, CACI) Prior to Certification	
	4. Timely, Completed, Signed Criminal Background Statement	
	5. Health Screening & TB Test Prior to Certification	
	6. All Required Training Prior to Certification	
	7. Certificate of Approval on File/Including Capacity	
	8. Safety Inspection Completed At Least Every Six Months or Per-Approved Program Statement	
	9. Completed Annual Training Hours for Re-certification and Current CPR/First-Aid/Water Safety Certificates	
	10. Current CDL/Auto Insurance/Annual Vehicle Maintenance Documentation for CFPs and Designated Drivers	
	11. Criminal Clearances and Health Screening/CDL/CPR/ DOJ/FBI/CACI/Auto Insurance for Other Adults in the Home	
	12. FFA Assists CFPs in Providing Transportation Needs	

III	**Facility and Environment** (7 Elements)	
	1. Exterior/Grounds Well Maintained	1. Full Compliance
	2. Common Areas Well Maintained	2. Full Compliance
	3. Children's Bedrooms/Interior Well Maintained	3. Full Compliance
	4. Sufficient and Appropriate Educational Resources	4. Full Compliance
	5. Adequate Perishable and Non-Perishable Food	5. Full Compliance
	6. CFP Conducted Disaster Drills and Documentation Maintained	6. Full Compliance
	7. Money and Clothing Allowance Logs Maintained	7. Improvement Needed
IV	**Maintenance of Required Documentation/Service Delivery** (10 Elements)	
	1. FFA Obtains or Documents Efforts to Obtain County Children's Social Worker's (CSW) Authorization to Implement NSPs	1. Full Compliance
	2. CFPs Participated in Development of the NSPs	2. Full Compliance
	3. Children Progressing Towards Meeting NSP Goals	3. Full Compliance
	4. FFA Social Workers Develop Timely, Comprehensive Initial NSP with Child's Participation	4. Improvement Needed
	5. FFA Social Workers Develop Timely, Comprehensive Updated NSPs with Child's Participation	5. Improvement Needed
	6. Therapeutic Services Received	6. Full Compliance
	7. Recommended Assessments/Evaluations Implemented	7. Full Compliance
	8. CSWs Monthly Contacts Documented in Child's Case File	8. Full Compliance
	9. FFA Social Workers Develop Timely, Comprehensive Quarterly Reports	9. Improvement Needed
	10. FFA Social Workers Conduct Required Visits	10. Full Compliance
V	**Education and Workforce Readiness** (5 Elements)	
	1. Children Enrolled in School Within Three School Days	Full Compliance (All)
	2. Children Attend School as Required and FFA Facilitates in Meeting Children's Educational Goals	
	3. Current Children's Report Cards/Progress Reports Maintained	
	4. Children's Academic Performance and/or Attendance Increased	
	5. FFA Facilitates Child's Participation in YDS or Equivalent Services and Vocational Programs	

VI	**Health and Medical Needs** (4 Elements) 1. Initial Medical Exams Conducted Timely 2. Follow-Up Medical Exams Conducted Timely 3. Initial Dental Exams Conducted Timely 4. Follow-Up Dental Exams Conducted Timely	Full Compliance (All)
VII	**Psychotropic Medication** (2 Elements) 1. Current Court Authorization for Administration of Psychotropic Medication 2. Current Psychiatric Evaluation Review	Full Compliance (All)
VIII	**Personal Rights and Social Emotional Well-Being** (10 Elements) 1. Children Informed of Agency's Policies and Procedures 2. Children Feel Safe in the CFP Home 3. CFPs' Efforts to Provide Nutritious Meals and Snacks 4. CFPs Treat Children with Respect and Dignity 5. Children Allowed Private Visits, Calls and to Receive Correspondence 6. Children Free to Attend or Not Attend Religious Services/Activities of Their Choice 7. Children 's Chores Reasonable 8. Children Informed About Their Medication and Right to Refuse Medication 9. Children Aware of Right to Refuse or Receive Medical, Dental and Psychiatric Care 10. Children Given Opportunities to Participate in Extra-Curricular Activities, Enrichment and Social Activities	Full Compliance (All)
IX	**Personal Needs/Survival and Economic Well-Being** (7 Elements) 1. Clothing Allowance Provided in Accordance with FFA Program Statement 2. On-going Clothing Inventories of Adequate Quantity and Quality 3. Children's Involvement in Selection of Their Clothing 4. Provision of Sufficient Supply of Clean Towels and Personal Care Items Meeting Ethnic Needs 5. Minimum Weekly Monetary Allowances 6. Management of Allowance/Earnings 7. Encouragement/Assistance with Life Book or	Full Compliance (All)

	Photo Album	
X	**Discharged Children** (3 Elements) 1. Completed Discharge Summary 2. Attempts to Stabilize Children's Placement 3. Child Completed High School (if applicable)	Full Compliance (All)
XI	**Personnel Records** (9 Elements) 1. Criminal Clearances (DOJ, FBI, CACI) Signed and Submitted Timely 2. Timely, Completed, Signed Criminal Background Statement 3. FFA Social Workers Met Education/Experience Requirements 4. Timely Employee Health Screening/TB Clearances 5. Valid CDL and Auto Insurance 6. FFA Employees Signed Copies of FFA Policies and Procedures 7. FFA Employees Completed All Required Training and Documentation Maintained 8. FFA Social Workers Have Appropriate Caseload Ratio 9. FFA Maintained Written Declarations for Part-Time Contracted FFA Social Workers Caseloads Not to Exceed a Total of 15 Children	1. Full Compliance 2. Full Compliance 3. Full Compliance 4. Full Compliance 5. Full Compliance 6. Full Compliance 7. Full Compliance 8. Full Compliance 9. Non-Applicable

SOUTHERN CALIFORNIA FOSTER FAMILY AGENCY
CONTRACT COMPLIANCE MONITORING REVIEW
FISCAL YEAR 2014-2015

SCOPE OF REVIEW

The following report is based on a "point in time" monitoring visit. This compliance report addresses findings noted during the March 2015 review. The purpose of this review was to assess Southern California Foster Family Agency's (the FFA's) compliance with the County contract and State regulations and included a review of the FFA's program statement, as well as administrative internal policies and procedures. The monitoring review covered the following 11 areas:

- Licensure/Contract Requirements,
- Certified Foster Homes,
- Facility and Environment,
- Maintenance of Required Documentation and Service Delivery,
- Educational and Workforce Readiness,
- Health and Medical Needs,
- Psychotropic Medication,
- Personal Rights and Social Emotional Well-Being,
- Personal Needs/Survival and Economic Well-Being,
- Discharged Children,
- Personnel Records.

For purposes of this review, ten placed children were selected for the sample. The Contracts Administration Division (CAD) interviewed five children. Five children were not interviewed as they were either pre-verbal or too young. During the home visits, the children were observed to be comfortable and well-cared for in the certified foster homes (CFHs) and their certified foster parents (CFPs) were observed to be attuned to the needs of the children. CAD reviewed ten case files to assess the level of care and services received by the children. Additionally, four discharged children's files were reviewed to assess the FFA's compliance with permanency efforts. At the time of the review, one placed child was prescribed psychotropic medication. The child's case file was reviewed to assess for timeliness of Psychotropic Medication Authorizations and required documentation of psychiatric monitoring.

CAD reviewed six CFP files and five staff files for compliance with Title 22 regulations and County contract requirements. Interviews were conducted with CFPs to assess the quality of care and supervision provided to children.

CONTRACTUAL COMPLIANCE

CAD found the following areas to be out of compliance:

Licensure/Contract Requirements

- Special Incident Reports (SIRs) were not cross reported.

CAD found five SIRs documenting injuries, hospitalizations or Absent without Official Leave (AWOLs) that were not cross reported to Community Care Licensing (CCL) as required in the SIR guide.

During the Exit Conference, the FFA representatives acknowledged the FFA's errors in cross-reporting SIRs and stated that each error occurred prior to trainings hosted by the Department of Children and Family Services (DCFS) on July 10, 2014, and December 3, 2014. The FFA later provided documentation to verify that all FFA staff attended the DCFS trainings in addition to FFA sponsored SIR trainings held on September 10, 2014, April 9, 2015, and April 15, 2015.

On June 25, 2015, CAD conducted a follow up visit and reviewed four SIRs. All reviewed SIRs were cross-reported in a timely manner to the appropriate parties.

Recommendation:

The FFA management shall ensure that:

1. SIR's are cross-reported.

Facility and Environment

- Money and clothing allowance logs were not maintained.

There were no signatures or dates from the FFA representatives or children verifying that sampled children actually received the allowance amounts indicated in the allowance logs. Clothing logs were not maintained by the FFA and the CFPs did not record or track the monthly clothing expenditures for the placed children.

During the review, the FFA Representatives acknowledged the deficiency in the FFA's money and clothing allowance documentation system and immediately rectified the problem by modifying the FFA forms in use. The FFA later provided documentation to show that all FFA social work staff received training on April 9 and 15, 2015, where the new money and clothing allowance tracking system was thoroughly reviewed. The modified monetary and clothing allowance logs were provided to CAD.

On June 25, 2015, CAD conducted a follow up visit and reviewed clothing and allowance logs for six children covering the months of April 2015 and May 2015. CAD noted that the FFA is utilizing the modified forms as indicated in the CAP; the signatures of the CFPs and the FFA representatives are obtained on each log; and each child received the appropriate allowance amounts for each month.

Recommendation:

The FFA management shall ensure that:

2. Money and clothing allowance logs are maintained.

Maintenance of Required Documentation/Service Delivery

- FFA social workers did not develop timely Initial Needs and Services Plans (NSPs) with the child's participation.

Three of ten sampled initial NSPs were signed late by the CFPs. A child's NSP due on June 5, 2014, was signed on June 10, 2014. The second child's NSP due on January 1, 2015, was signed on February 19, 2015. The third child's NSP due on January 1, 2015, was signed on February 19, 2015.

- FFA social workers did not develop timely updated NSPs with the child's participation.

One of ten sampled children did not sign their updated NSP. There was no Children's Social Worker (CSW) signature on another child's updated NSP and the only documented effort to obtain the CSW signature was on September 10, 2014, whereas the NSP was developed on July 25, 2014.

- FFA social workers did not develop timely quarterly reports.

One child's quarterly report was due on October 7, 2014, but was signed on December 22, 2014.

At the Exit Conference, the findings were discussed and the FFA representatives acknowledged the need to focus on improving how the FFA completes the quarterly reports, specifically regarding timely development of quarterly reports with the participation of all parties.

The FFA later provided documentation to verify that all FFA social worker staff received training on April 9, 2015, regarding report development and at an all-staff meeting on April 15, 2015, wherein signature timelines were thoroughly reviewed.

On June 25, 2015, CAD conducted a follow-up visit and reviewed three initial and three updated NSPs. Also, three quarterly reports were reviewed and it was noted that all of the documents were developed in a timely manner with the participation of all necessary parties including the DCFS CSW.

Recommendation:

The FFA management shall ensure that:

3. FFA social workers develop timely initial NSPs with the child's participation.

4. FFA social workers develop timely updated NSPs with the child's participation.

5. FFA social workers develop timely quarterly reports.

PRIOR YEAR FOLLOW-UP FROM DCFS OUT-OF-HOME CARE MANAGEMENT DIVISION (OHCMD) FOSTER FAMILY AGENCY CONTRACT COMPLIANCE MONITORING REVIEW

The OHCMD's last compliance report dated July 3, 2014, identified 3 recommendations.

Results

Based on the results of the current review, the FFA fully implemented 2 of 3 previous recommendations for which the FFA was to ensure that:

- The FFA is in full compliance with Title 22 regulations and free of CCL citations.
- All initial dental examinations are completed within 30 days of the date of placement.

Based on the results of the current review, the FFA did not implement 1 of 3 recommendations for which the FFA was to ensure that:

- Updated NSPs are developed timely.

Recommendation:

The FFA's management shall ensure that:

6. The outstanding recommendation from the July 3, 2014, monitoring report which is noted in this report as Recommendation 4 is fully implemented.

At the Exit Conference, the FFA representatives expressed their desire to remain in compliance with all Title 22 Regulations and Contract requirements. The FFA committed to include all CFPs and age appropriate children in the development of all NSPs. The FFA Director will conduct periodic checks to monitor compliance with the FFA's new protocol. CAD will follow-up on the implementation of the recommendations at the next review. OHCMD will provide on-going technical assistance prior to the next review.