County of Los Angeles
DEPARTMENT OF CHILDREN AND FAMILY SERVICES
425 Shatto Place, Los Angeles, California 90020
(213) 351-5602

PHILIP L. BROWNING
Director

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Fifth District

December 7, 2015

To: Supervisor Michael D. Antonovich, Mayor
Supervisor Hilda L. Solis
Supervisor Mark Ridley-Thomas
Supervisor Sheila Kuehl
Supervisor Don Knabe

From: Philip L. Browning
Director

TRINITY YOUTH SERVICES FOSTER FAMILY AGENCY FISCAL ASSESSMENT AND CONTRACT COMPLIANCE REVIEW

The Department of Children and Family Services (DCFS) Contracts Administration Division (CAD) conducted a fiscal compliance assessment and contract compliance review of Trinity Youth Services Foster Family Agency (the FFA) in September 2014. The FFA has five licensed sites, one located in the First Supervisorial District; one in the Fourth Supervisorial District; one in the Fifth Supervisorial District; and two located in San Bernardino County. All sites provide services to DCFS placed children and children from other counties. According to the FFA's Program Statement, its mission is "to provide children with an appropriate family match and give the families support and training to ensure that placements will be beneficial in meeting the children's needs."

At the time of the review, the FFA supervised 132 DCFS placed children in 67 certified foster homes. The children's average length of placement was 9 months and their average age was 10.

SUMMARY

CAD conducted a fiscal compliance assessment, which included an on-site review of the FFA's financial records, such as financial statements, bank statements, check register, and personnel files to determine the FFA's compliance with the terms, conditions, and requirements of the contract, the Auditor-Controller Contract Accounting and Administration Handbook (A-C Handbook) and other applicable federal, State, and County regulations and guidelines.

The FFA was in full compliance with 3 of 5 areas of the Fiscal Assessment: Financial Overview; Loans Advances and Investments; and Board of Directors and Business Influence.

CAD noted deficiencies in the following areas: Cash/Expenditures, related to an inadequately supported expenditure and an incomplete fixed asset inventory list; and in Payroll and Personnel related to a missing employee's signature on a time card.

During CAD's contract compliance review, the interviewed children generally reported: feeling safe in the FFA's homes, having been provided with good care and appropriate services, being comfortable in their environment and treated with respect and dignity. The Certified Foster Parents (CFPs) reported they were supported by the FFA in their efforts to provide care, supervision and service delivery to the children placed in their homes.

The FFA was in full compliance with 8 of 11 areas of the contract compliance review: Licensure/Contract Requirements; Certified Foster Homes; Educational and Workforce Readiness; Health and Medical Needs; Psychotropic Medication; Personal Rights and Social/Emotional Well-Being; Discharged Children; and Personnel Records.

CAD noted deficiencies in the areas of: Facility and Environment, related to exterior/grounds, common areas and children's bedrooms/interior not being well maintained, and inadequate perishable/ non-perishable food; Maintenance of Required Documentation and Service Delivery, related to the FFA not documenting the efforts to obtain the County Children's Social Worker's (CSW's) authorization to implement the Needs and Services Plan (NSP), CFPs not participating in development of NSPs, children not progressing towards meeting NSP goals, FFA social workers not developing timely, comprehensive initial or updated NSPs with child's participation and FFA social workers not developing timely, comprehensive quarterly reports; and Personal Needs/Survival and Economic Well-being, related to lack of encouragement and assistance with maintaining a Life Book or Photo Album.

Attached are the details of our review.

REVIEW OF REPORT

On October 22, 2014, Patricia Kirkpatrick, DCFS CAD, held an Exit Conference with the FFA's representatives: John Neiuber, Chief Executive Officer; Cher Ofstedahl, Chief Administrative Officer; Father John Alexandres, Executive Director of Programs; and Jackie Jakob, Foster Care & Adoptions Director. DCFS staff included: Molly Sun, CAD Fiscal, and Kirk Barrow, Out-of-Home Care Management Division (OHCMD). The FFA representatives were in agreement with the review findings and recommendations, were receptive to implementing systemic changes to improve compliance with regulatory standards and to address the noted deficiencies in a compliance Corrective Action Plan (CAP) and a Fiscal Corrective Action Plan (FCAP).

A copy of this report has been sent to the A-C and Community Care Licensing.

The FFA provided the attached approved CAP and FCAP addressing the recommendations noted in this compliance report. Fiscal staff verified implementation of the FCAP in January, 2015. CAD Compliance conducted a follow-up visit to the FFA in April 2015, to verify implementation of the CAP.

If you have any questions, your staff may contact me or Aldo Marin, Board Relations Manager, at (213) 351-5530.

PLB:EM
LTI:pk

Attachments

c: Sachi A. Hamai, Chief Executive Officer
John Naimo, Auditor-Controller
Public Information Office
Audit Committee
John Neiuber, Chief Executive Officer, Trinity Youth Services
Lenora Scott, Regional Manager, Community Care Licensing Division
Lajuannah Hills, Regional Manager, Community Care Licensing Division

TRINITY YOUTH SERVICES FOSTER FAMILY AGENCY
FISCAL COMPLIANCE ASSESSMENT REVIEW
FISCAL YEAR 2014-2015

SCOPE OF REVIEW

The fiscal compliance assessment included a review of Trinity Youth Services Foster Family Agency's (the FFA's) financial records for the period of January 1, 2012, through July 31, 2014. Contracts Administration Division (CAD) reviewed the financial statements, bank statements, check register and personnel files to determine the FFA's compliance with the terms, conditions, and requirements of their contract, the Auditor-Controller Contract Accounting and Administration Handbook (A-C Handbook) and other applicable federal, State, and County regulations and guidelines.

The on-site fiscal compliance assessment review focused on five key areas of internal controls:

- Financial Overview,
- Loans, Advances and Investments,
- Board of Directors and Business Influence,
- Cash/Expenditures, and
- Payroll and Personnel.

The FFA was in full compliance with 3 of 5 areas of the fiscal assessment review: Financial Overview; Loans, Advances and Investments; and Board of Directors and Business Influence.

FISCAL COMPLIANCE

CAD found the following areas out of compliance:

Cash/Expenditures

- No written policy is in place to cover one employee's medical insurance reimbursement.

The FFA did not have a policy in place for medical insurance reimbursement. Therefore, the FFA was not in compliance with the Office of Management and Budget (OMB) Circular A-122, Paragraph 8.g (2) Fringe benefits - Employer Contributions related to social security, employee insurance, worker's compensation insurance, pension plan costs and the alike are allowable, provided such benefits are granted in accordance with established written organization policies.

- Non-payroll check issued to an employee was missing proper supporting documentation.

- The inventory list of fixed assess did not include all the required information.

The list of fixes assets was missing the serial number, date of purchase, acquisition cost and funding source.

Recommendations:

The FFA management shall ensure that:

1. A written policy is established and maintained for all employee fringe benefits in accordance with applicable OMB Circular A-122.

2. All expenditures are supported by required documentation.

3. An inventory list of fixed assets is maintained that includes item description, serial number, and date of purchase, acquisition cost and funding source.

Payroll and Personnel

- One time card did not have the employee's signature.

Recommendation:

The FFA management shall ensure that:

4. All time cards are signed by employees and approved by a supervisor.

MOST RECENT FISCAL REVIEW CONDUCTED BY THE AUDITOR-CONTROLLER

The most recent fiscal review of the FFA was posted by the A-C on June 26, 2014. The A-C noted $53,151 in unallowable or inadequately supported expenditures. The FFA repaid the funds, but owes $238 in FFA overpayments. The FFA has been making payments in accordance with invoice dates.

NEXT FISCAL COMPLIANCE ASSESSMENT

The next Fiscal Compliance Assessment of the FFA will be conducted in County Fiscal Year 2015-2016.

TRINITY YOUTH SERVICES FOSTER FAMILY AGENCY
CONTRACT COMPLIANCE MONITORING REVIEW SUMMARY

1520 W. Cameron Ave., Suite 151
West Covina, CA 91790
License Number: 197805193

4201 Long Beach Blvd., Suite 421
Long Beach, CA 90807
License Number: 197805095

42225 N. 10 St. West, Suite D
Lancaster, CA 93534
License Number: 197805093

9540 Center Ave., #130
Rancho Cucamonga, CA 91730
License Number: 366426133

15500 W. Sand Street, Suite 4
Victorville, CA 92392
License Number: 366425464

	Contract Compliance Monitoring Review	**Findings: September 2014**
I	**<u>Licensure/Contract Requirements</u>** (7 Elements) 1. Timely Notification of Child's Relocation 2. Timely, Cross-Reported SIRs 3. Runaway Procedures in Accordance with the Contract 4. Are there CCL Citations/OHCMD Safety Reports 5. If applicable, FFA Ensures Complete Required Whole Foster Family Home Training 6. FFA Pays Certified Foster Parents (CFP) Whole Foster Family Home Payments 7. FFA Conducts an Assessment of CFP Prior to Placement of Two (2) or More Children	Full Compliance (All)
II	**<u>Certified Foster Homes (CFHs)</u>** (12 Elements) 1. Home Study and Safety Inspection Conducted Prior to Certification 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 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	Full Compliance (All)

	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 2. Common Areas were Maintained 3. Children's Bedrooms/Interior Well Maintained 4. Sufficient and Appropriate Educational Resources 5. Adequate Perishable and Non-Perishable Food 6. CFP Conducted Disaster Drills and Documentation Maintained 7. Money and Clothing Allowance Logs Maintained	 1. Improvement Needed 2. Improvement Needed 3. Improvement Needed 4. Full Compliance 5. Improvement Needed 6. Full Compliance 7. Full Compliance
IV	**Maintenance of Required Documentation and Service Delivery** (10 Elements) 1. FFA Obtains or Documents Efforts to Obtain County Children's Social Worker's (CSW) Authorization to Implement NSPs 2. CFPs Participated in Development of the NSPs 3. Children Progressing Towards Meeting NSP Goals 4. FFA Social Workers Develop Timely, Comprehensive Initial NSPs with Child's Participation 5. FFA Social Workers Develop Timely, Comprehensive Updated NSPs with Child's Participation 6. Therapeutic Services Received 7. Recommended Assessments/Evaluations Implemented 8. County Children's Social Worker's Monthly Contacts Documented in Child's Case File 9. FFA Social Workers Develop Timely, Comprehensive Quarterly Reports 10. FFA Social Workers Conduct Required Visits	 1. Improvement Needed 2. Improvement Needed 3. Improvement Needed 4. Improvement Needed 5. Improvement Needed 6. Full Compliance 7. Full Compliance 8. Full Compliance 9. Improvement Needed 10. Full Compliance

V	**Educational and Workforce Readiness** (5 Elements) 1. Children Enrolled in School within Three School Days 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	Full Compliance (All)
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 Their 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. Ongoing Clothing Inventories of Adequate Quantity and Quality 3. Children's Involvement in Selection of Their Clothing 4. Provision of Sufficient Supply of 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 Photo Album	1. Full Compliance 2. Full Compliance 3. Full Compliance 4. Full Compliance 5. Full Compliance 6. Full Compliance 7. Improvement Needed
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 Exceed Total of 15 Children	Full Compliance (All)

TRINITY YOUTH SERVICES 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 September 2014 review. The purpose of this review was to assess Trinity Youth Services Foster Family Agency's (the FFA's) compliance with its County contract and State regulations and included a review of the FFA's program statement as well as internal administrative policies and procedures. The 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, and
- Personnel Records.

For the purpose of this review, 12 County of Los Angeles Department of Children and Family Services (DCFS) placed children were selected for the sample. The Contracts Administration Division (CAD) interviewed ten children. Two of the children were not interviewed because 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. All 12 case files were reviewed to assess the care and services the children received. Additionally, four discharged children's files were reviewed to assess the FFA's compliance with permanency efforts. One of the reviewed children was prescribed psychotropic medication. The child's case file was reviewed to assess for timeliness of Psychotropic Medication Authorization and to confirm the required documentation of psychiatric monitoring.

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

CONTRACTUAL COMPLIANCE

CAD found the following areas out of compliance:

Facility and Environment

- Exterior/grounds were not well maintained.

CFH #1 had exposed building material in the backyard. The CFP assured CAD that the building material would be safely stored as soon as possible. CAD verified during a follow-up visit on September 29, 2014 that the building material was safely stored.

During the Exit Conference, the FFA representatives stated that the FFA will provide additional training to all CFPs and to staff responsible for conducting home inspections, regarding exterior/grounds maintenance.

On April 16, 2015, CAD conducted a follow-up visit and received copies of the FFA's sign-in sheets as verification that CFPs and staff attended training on exterior/grounds maintenance in November 2014.

- Common areas were not well maintained.

CFH #2 had a fireplace with no screen, a metal carriage for wood that had sharp edges and an uncapped gas line. CAD verified during a follow-up visit on September 26, 2014 that a fireplace screen had been installed, the metal carriage for wood had been removed and the gas line had been capped.

During the Exit Conference, the FFA representatives stated that the FFA will provide additional training to all CFPs and to staff responsible for conducting home inspections, regarding common areas maintenance.

On April 16, 2015, CAD conducted a follow-up visit and was provided with copies of the FFA's sign-in sheets as verification that the CFPs and staff were provided training on common areas maintenance in November 2014.

- Children's bedrooms/interiors were not well maintained.

CFH #1 had inadequate lighting and a bureau with a broken drawer in the children's bedroom. CAD verified during a follow-up visit on September 29, 2014 that an additional lamp had been placed in the children's bedroom and the bureau drawer had been repaired.

During the Exit Conference, the FFA representatives stated that the FFA will provide additional training on the maintenance of the children's bedrooms to all CFPs and to staff responsible for conducting home inspections.

On April 16, 2015, CAD conducted a follow-up visit and was provided with copies of the FFA's sign-in sheets as verification that CFPs and staff were provided training on how to maintain a children's bedroom in November 2014.

- Adequate perishable and non-perishable food was not maintained.

CFHs #1 and #2 had expired canned goods in their pantries. CAD informed the CFPs of the expired canned goods and those products were immediately discarded.

During the Exit Conference, the FFA representatives stated that the FFA will provide additional training to all CFPs and to staff responsible for conducting home inspections, regarding maintenance of perishable and non-perishable food. Additionally, the FFA's home inspection tool has been revised to include inspecting food products for expiration dates.

On April 16, 2015 CAD conducted a follow-up visit and was provided with copies of the FFA's sign-in sheets as verification that CFPs and staff were provided training on the maintenance of perishable and non-perishable food, as well as a copy of the FFA's revised home inspection tool.

Recommendations:

The FFA management shall ensure that:

1. Exterior grounds are well maintained.

2. Common areas are well maintained.

3. Children's bedrooms are well maintained.

4. Adequate perishable and non-perishable food is maintained.

Maintenance of Required Documentation/Service Delivery

- The FFA did not obtain or document efforts to obtain County Children's Social Worker's (CSW's) authorization to implement Needs and Services Plans (NSPs).

In three NSPs reviewed, the FFA did not obtain the County CSW's signature authorizing implementation of the NSP and there was insufficient documentation of efforts by the FFA to obtain the CSW's signature.

- CFP did not participate in the development of the NSP.

One CFP did not sign two NSPs. During the interview, the CFP was not aware of the child's NSP goals.

- Children were not progressing toward meeting NSP goals.

One child was not progressing toward meeting his NSP goals, and there was no documentation of the FFA's efforts to assist in improving the child's progress.

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

Three children's initial NSPs were not completed timely. One child's NSP due December 25, 2013 was completed on January 16, 2014; one child's NSP due August 12, 2014 was completed on August 16, 2014 and one child's NSP due August 23, 2013 was completed on September 25, 2013.

One child did not participate in the development of his initial NSP. The child stated during his interview that he did not sign his initial NSP or participate in the development of his initial NSP.

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

Four children's updated NSPs were not completed timely. One child's NSP due May 20, 2014 was completed on June 19, 2014; one child's NSP due May 25, 2014 was completed on June 12, 2014; one child's NSP due July 6, 2014 was completed on July 23, 2014; and one child's NSP due July 23, 2014 was completed on August 26, 2014.

One child did not participate in the development of his updated NSP. The child stated during his interview that he did not sign his updated NSP or participate in the development of his updated NSP.

- FFA social workers did not develop timely, comprehensive quarterly reports.

Four children's quarterly reports were not completed timely. One child's quarterly report due on May 20, 2014 was completed on June 19, 2014; a second child's quarterly report due on May 25, 2014 was completed on June 12, 2014; a third child's quarterly report due on July 6, 2014 was completed on July 23, 2014; and a fourth child's quarterly report due on July 23, 2014 was completed on August 26, 2014.

One child's quarterly report was not comprehensive. The quarterly report was almost an exact duplicate of the child's initial NSP.

During the Exit Conference, the FFA representatives stated that the FFA will provide additional training to the FFA's supervisors and the social workers regarding timelines and adequate documentation. Additionally, the FFA's directors and supervisors will review the report due dates with their social workers during weekly supervision.

CAD conducted a follow-up visit on April 16, 2015 and was provided with copies of the FFA's sign-in sheets as verification that additional NSP training was provided to the FFA supervisors and social workers in November 2014.

Recommendations:

The FFA management shall ensure that:

5. FFA obtains or documents efforts to obtain the County Children's Social Worker's authorization to implement NSPs.

6. All CFPs participate in the development of NSPs.

7. All Children are progressing towards meeting NSP goals.

8. FFA social workers develop timely, comprehensive initial NSPs with the child's participation.

9. FFA social workers' develop timely, comprehensive updated NSPs with the child's participation.

10. FFA social workers develop timely, comprehensive quarterly reports.

Personal Needs/Survival and Economic Well-Being

- Encouragement/assistance with a Life Book/Photo Album was not provided.

One child stated that he did not have a Life Book or Photo Album and had not been encouraged to create one in the four months he had been placed in CFH #10.

During the Exit Conference, the FFA representatives stated that FFA staff and all CFPs will be trained regarding encouraging children to create Life Books.

On April 16, 2015, CAD conducted a follow-up visit and was provided with copies of the FFA's sign-in sheets as verification that FFA staff and CFPs were provided additional training regarding Life Books and Photo Albums in November 2014.

Recommendation:

The FFA management shall ensure that:

11. Encouragement/assistance with Life Book or Photo Album is provided to all children.

PRIOR YEAR FOLLOW-UP FROM DCFS OUT-OF-HOME-CARE MANAGEMENT DIVISION'S (OHCMD) FFA CONTRACT COMPLIANCE MONITORING REVIEW

The OHCMD's last compliance report dated April 11, 2014, identified eight recommendations:

Results

Based on our review, the FFA successfully implemented 4 of 8 recommendations, for which they were to ensure that:

- Prior to placing more than two children in a CFH, the CFPs must have at least 12 months experience as per the County contract.

- Assessments document how the CFP is able to meet the needs of all the placed children when placing more than two children in a certified foster home.

- All CFPs with children that require car seats, use car seats and are familiar with the Child Safety California Law.

- FFA social workers have current cardiopulmonary resuscitation and First-Aid certificates at all times.

Based on the results of this review, the FFA did not fully implement 4 of 8 previous recommendations, for which they were to ensure that:

- Initial NSPs are signed timely by the DCFS CSWs, the FFA's social worker, and the FFA supervising social worker.
- CFPs participate in the development of NSPs.
- FFA social workers develop comprehensive initial NSPs and all the fields/sections are completed in accordance with the NSP template.
- All children have a Life Book or Photo Album.

Recommendation:

The FFA management shall ensure that:

12. The outstanding recommendations from the April 11, 2014, report which are noted in this report as recommendations 5, 6, 8 and 11, are fully implemented.

That the Exit conference FFA representatives expressed their desire to remain in compliance with all Title 22 regulations and Contract requirements. CAD conducted a follow-up visit on April 16, 2015 and verified that the FFA had implemented all recommendations noted in this report. CAD will continue to assess for implementation of the recommendations during our next monitoring review. OHCMD will provide ongoing technical assistance prior to the next review.

Molly Sun
Los Angeles County
Department of Children and Family Services
RE: Response to Fiscal Compliance Assessment

November 3, 2014

Molly,

On behalf of Trinity Youth Services, I again want to thank you and your team for the opportunity to collaboratively and mutually strive to strengthen our processes and improve the contract compliance and oversight relationship.

During the Exit Summary and Request for Corrective Action Plan meeting held on October 22, 2014, Trinity Youth Services was presented with three fiscal items needing response:

- **Agency did not have a written policy as supporting documentation for employee's medical insurance reimbursement.**

  Trinity has established a comprehensive written policy to address the existing procedure for TYS' Board of Directors' responsibility for establishment, annual review and fiduciary oversight of the CEO's salary and benefits compensation. Although the board has always conducted this practice, the written policy, ***Trinity Youth Services' Policy and Process for Evaluating the Chief Executive Officer's Performance and Establishing and Reviewing Salary and Benefits.*** was approved by the Board of Directors and entered into record on September 12, 2014.

- **The listing of fixed assets did not include serial number, purchase date and funding source.**

  As discussed during the review, Trinity Youth Services recently addressed this issue with the LA County Auditor-Controller's office. Trinity does have procedures in place to fully comply with the contract requirements regarding Fixed Assets, however, we have only purchased one capital asset since 2006; a roof for one of our facilities, purchased primarily with non-program funds, and we cannot provide all sources of funding for items purchased prior to that time. For items that have no manufacturer's serial number, a system and location number are created at the time of purchase to identify each item. For those items that have been assigned an inventory

number and *also* have a manufacturer's serial number, the manufacturer's serial number will be added to the fixed asset listing by our next annual physical inventory in June, 2015.

- **Time card was not signed by an employee.**

  Trinity has adopted very stringent procedures to ensure that time cards are signed. The time card that was missing a signature belonged to an On-Call staff who worked early in the payroll period and was not called in again. The time card was processed according to legal requirements after the supervisor verified and signed for the accuracy of hours worked. This was noted on the timecard. We have taken further steps to insure original signatures, by adding an addendum to Trinity's existing **Payroll/Time Sheet, Retroactive Pay and Pay Reconciliation Procedures.** On Call staff will now sign their timecard at the completion of each shift worked. This directive and updated procedure was issued to staff in October and labels which will be adhered to the timecards of all on-call staff for their signatures have been ordered. Staff will begin using the labels beginning January 1, 2015.

If you have any questions regarding our responses, please do not hesitate to call. Again, thank you for the opportunity to work together to improve the quality of services to children in placement.

Sincerely,

Cher Ofstedahl,
Chief Administrative Officer
Trinity Youth Services

Mission Office
Foster Care • Residential Services

November 14, 2014

Patricia Kirkpatrick, CSA I
Children's Service Administrator
Contracts Compliance Section
Contracts Administration Division
3530 Wilshire Blvd, 4th floor
Los Angeles, CA 90010

Re: FFA Monitoring Review Field Exit Summary received 10/22/14.

Dear Patricia,

Trinity Youth Services (TYS) is in receipt of the Summary as stated above, created following the contract compliance review of our agency, which was conducted by Contracts Administration Division for 2014. We would like to thank you for your professionalism and support during the program review of our Foster Care Program.

TYS has reviewed the above referenced report and submits the following Corrective Action Plan (CAP) to address the recommendations noted. TYS Staff were trained on 11/4/14, 11/5/14, 11/6/14 and on 11/10/14. TYS foster parents were trained by their social workers after their training.

TYS's Directors shall ensure that:

1. Foster parents' homes' exterior and the grounds of the home are well maintained.
    - All TYS Directors, Supervisors and Social Workers will be retrained on conducting home inspections.
    - Foster parents will receive training keeping their home exteriors and grounds well maintained.
    - All active foster homes will receive a home inspection by 11/30/14.
2. Foster parents' home's common area/interiors are well maintained.
    - All TYS Directors, Supervisors and Social Workers will be retrained on conducting home inspections.
    - Foster parents will receive training keeping their home common area/interiors well maintained.
    - All active foster homes will receive a home inspection by 11/30/14.
3. All children's bedrooms are well maintained.
    - All TYS Directors, Supervisors and Social Workers will be retrained on conducting home inspections.
    - Foster parents will receive training keeping their children's rooms well maintained.

- All active foster homes will receive a home inspection by 11/30/14.

4. Foster parents adhere to products "use or freeze by", "best by", "sell by", or expiration dates.
    - All TYS Directors, Supervisors and Social Workers will be retrained on conducting home inspections.
    - Certification and Yearly Home Inspection tool was revised to include this item.
    - Foster parents will receive training on ensuring that their can goods are not expired.
    - All active foster homes will receive a home inspection by 11/30/14.
5. TYS Social Workers shall obtain or document efforts to obtain CSW's authorization to implement the NSP.
    - All TYS Directors and Social Workers were trained regarding ensuring that they request CSW's signatures within the 5 day grace period after report is due. Efforts must be documented on the NSP. Social Workers will attach copy of cover letter sent to CSWs to the copy of NSP, when NSP is mailed. Social Workers will attach copy of fax confirmation to copy of NSP when NSP is faxed. Social workers will attach copy of email if report is emailed.
6. All certified foster parents are familiar and participate in the development of the NSPs.
    - All TYS Directors, Supervisors, and Social Workers were trained regarding ensuring that all certified foster parents are familiar and participate in the development of the NSPs.
    - All certified foster parents were trained regarding the NSPs. If there is more than one certified foster parent in a home, both will be trained regarding the NSPs. Foster parents will participate in the development of NSP goals for the foster children in their homes. Foster parents were trained that they need to sign the completed NSP. Foster parents will receive a copy of the goals and maintain it in the foster child home file.
7. All TYS Social Workers document children's progress towards meeting NSP case goals.
    - All TYS Directors, Supervisors and Social Workers were trained regarding developing SMART goals and ensuring that progress or lack of progress is well documented on NSPs.
    - Social Workers, will discuss NSP and goals with foster parents and foster children. Any progress both positive and negative will be addressed with FPs and FC. This will be documented in child case notes.
    - At the time an NSP needs to be updated, Social Worker, FP, and FC will meet to discuss current goals and future goals. All will participate in the development of the new goals.
8. All TYS Social Workers shall develop timely, comprehensive, initial and updated NSPs with the participation of the developmentally age-appropriate child.
    - Directors/Supervising Social Workers will review reports due report with their social worker during weekly supervision.
    - Social Workers will ensure that children participate in the development of their NSP and children 6 and up sign them.
    - Social workers will send out NSPs to CSWs within 5 days of report's due date.
9. All certified foster parents encourage and assist children to update a life book or photo albums.
    - All TYS Directors and Social Workers were trained regarding ensuring that all certified foster parents have a life book/photo album for all children in their care.

- All certified foster parents were trained to maintain a life book/photo album for each child in their care.
- Life books are to include photographs of the children.

Thank you for taking the time to evaluate our Foster Care Program. Your compliance review has provided us with valuable feedback to improve our program. Please contact me if you have any questions or further suggestions.

Sincerely,

Jackie Jakob, MSW
Foster Care & Adoptions Director

Cc. John Neiuber, CEO