County of Los Angeles
DEPARTMENT OF CHILDREN AND FAMILY SERVICES

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March 25, 2016

To: Supervisor Hilda L. Solis, Chair
Supervisor Mark Ridley-Thomas
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Supervisor Michael D. Antonovich

From: Philip L. Browning
Director

WALDEN ENVIRONMENT DBA WALDEN FAMILY SERVICES FOSTER FAMILY AGENCY CONTRACT COMPLIANCE REVIEW AND FISCAL COMPLIANCE ASSESSMENT

The Department of Children and Family Services (DCFS) Contracts Administration Division (CAD) conducted a Contract Compliance Review and a Fiscal Compliance Assessment of Walden Environment dba Walden Family Services Foster Family Agency (the FFA) in May and July 2015. The FFA has one licensed office in the Third Supervisorial District and one licensed office in Riverside County. Both offices provide services to the County of Los Angeles DCFS placed children and children placed by other counties. According to the FFA's program statement, its stated mission is "to support the lives of children and families through lasting relationships; and does so by providing advocacy and placement services for abused, neglected, and at-risk children in need of out-of-home placement."

At the time of the review, the FFA supervised 72 DCFS placed children in 42 Certified Foster Homes (CFHs). The placed children's average length of placement was 14 months and their average age was 7.

SUMMARY

CAD conducted a Fiscal Compliance Assessment which included an agency-wide review of the FFA's financial records such as, financial statements, bank statements, check register and personnel files to determine their compliance with the terms, conditions and requirements of the FFA 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 4 of 5 areas of the Fiscal Compliance Assessment: Loans, Advances and Investments; Board of Directors and Business Influence; Cash/Expenditures; and Payroll and Personnel.

CAD noted a deficiency in the area of: Financial Overview, related to an operational loss of $275,235 for the Fiscal Year that ended on December 31, 2014.

During CAD's Contract Compliance Review, the interviewed children generally reported: feeling safe at the FFA CFHs, 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 staff in their efforts to provide care, supervision and service delivery to the children placed in their homes.

The FFA was in full compliance with 7 of 11 sections of CAD's Contract Compliance Review: Certified Foster Homes; Facility and Environment; Education and Workforce Readiness; Health and Medical Needs; Psychotropic Medication; Personal Rights and Social/Emotional Well-Being; and Personal Needs/Survival and Economic Well-Being.

CAD noted deficiencies in the following areas: Licensure/Contract Requirements, related to a Special Incident Report (SIR) not being submitted timely or appropriately cross-reported; Maintenance of Required Documentation and Service Delivery, related to not obtaining the County Children's Social Worker's (CSW's) authorization to implement the Needs and Service Plans (NSPs), CFPs not participating in the development of the NSPs, initial NSPs not being timely developed, updated NSPs not being comprehensive and the County CSW's contacts not being documented in the children's case files; Discharged Children, related to a discharge summary not being completed; and Personnel Records, related to a staff not signing the criminal background statement timely.

Attached are the details of our review.

REVIEW OF REPORT

On August 21, 2015, Leticia Foster, DCFS CAD, held an Exit Conference with the FFA representatives: Sue Evans, Chief Operating Officer; Karen Crossan, Program Director; Heidi Dilley, Senior Supervisor; and Nicole Alexander, Social Worker Supervisor. DCFS staff included Gladys Hidayat, Out-of-Home Care Management Division (OHCMD). On July 1, 2015, Yvonne Kang, CAD Fiscal conducted an e-mail Fiscal Exit Conference with Sue Garcia, Controller. The FFA representatives were in agreement with the review findings and recommendations, were receptive to implementing systematic changes to improve their compliance with regulatory standards and were in agreement with addressing 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 report. On November 6, 2015, CAD conducted an on-site follow-up visit to verify implementation of the CAP.

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

PLB:EM:LTI:lf

Attachments

c: Sachi A. Hamai, Chief Executive Officer
John Naimo, Auditor-Controller
Public Information Office
Audit Committee
Sue Evans, Chief Operating Officer, Walden Family Services FFA
Lenora Scott, Regional Manager, Community Care Licensing Division
Lajuanna Hills, Regional Manager, Community Care Licensing Division

WALDEN ENVIRONMENT DBA WALDEN FAMILY SERVICES
FISCAL COMPLIANCE ASSESSMENT REVIEW
FISCAL YEAR 2014-2015

SCOPE OF REVIEW

The Fiscal Compliance Assessment included review of Walden Environment's (the FFA) financial records for the period of January 1, 2014 through March 31, 2015. Contracts Administration Division (CAD) reviewed the 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 Foster Family Agency Contract, the Auditor-Controller Contract Accounting and Administration Handbook (A-C Handbook) and other applicable federal, State, and County regulations and guidelines.

The 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 4 of 5 areas of the Fiscal Compliance Assessment: Loans, Advances and Investments; Board of Directors and Business Influence; Cash/Expenditures; and Payroll and Personnel.

FISCAL COMPLIANCE

CAD found the following area out of compliance:

Financial Overview

- The December 31, 2014 audited financial statement and single audit report indicated a loss from operations in the amount of $275,235.

The FFA had a positive net asset position of $1,530,725 at the beginning of the Fiscal Year (FY) 2014-2015. The operational loss reduced this amount to $1,255,490.

The FFA has cut expenditures in the FY 2014-2015 budget including reducing mileage expense and increasing employees' benefit contributions. The management team meets monthly to closely monitor expenditures for the prior month. The FFA also raises funds to contribute toward its total program operational costs as it considers the FFA rates to be too low. The FFA has also increased its Transitional Housing Placement Program Plus-Foster Care Program.

Recommendation:

The FFA's management shall ensure that:

1. A plan is developed and implemented to ensure it has sufficient funds to operate its programs without incurring losses.

MOST RECENT FISCAL REVIEW CONDUCTED BY THE A-C

A recent fiscal review report of the FFA has not been posted by the A-C.

NEXT FISCAL COMPLIANCE ASSESSMENT

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

WALDEN FAMILY SERVICES FOSTER FAMILY AGENCY
CONTRACT COMPLIANCE REVIEW SUMMARY

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6345 Balboa Blvd., Suite 130 (Building II)
Encino, CA 91316
License Number: 197805512

Riverside Office
3576 Arlington Ave, Suite 106
Riverside, CA 92506
License Number: 336403491

	CONTRACT COMPLIANCE REVIEW	FINDINGS: JULY 2015
I	**Licensure/Contract Requirements** (7 Elements) 1. Timely Notification for 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	1. Full Compliance 2. Needs Improvement 3. Full Compliance 4. Full Compliance 5. Full Compliance 6. Not Applicable 7. Full Compliance
II	**Certified Foster Homes (CFHs)** (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 (FBI,DOJ, 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/ FBI/DOJ/CACI/Auto Insurance for Other Adults in the Home 12. FFA Assists CFPs in Providing Transportation Needs	Full Compliance (All)

III	**Facility and Environment** (7 Elements) 1. Exterior/Grounds Well Maintained 2. Common Areas Well 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	Full Compliance (All)
IV	**Maintenance of Required Documentation/Service Delivery** (10 Elements) 1. FFA Obtains or Documents Efforts to Obtain County Children's Social Worker's (CSW's) Authorization to Implement NSPs 2. CFPs Participated in the Development of the NSPs 3. Children Progressing Towards Meeting NSP Goals 4. FFA Social Workers Develop Timely, Comprehensive Initial NSP 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 Workers 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. Needs Improvement 2. Needs Improvement 3. Full Compliance 4. Needs Improvement 5. Needs Improvement 6. Full Compliance 7. Full Compliance 8. Needs Improvement 9. Full Compliance 10. Full Compliance
V	**Education 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 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 Involved in the 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 a Life Book or Photo Album	Full Compliance (All)

X	**Discharged Children** (3 Elements) 1. Completed Discharge Summary 2. Attempts to Stabilize Children's Placement 3. Child Completed High School (if applicable)	 1. Needs Improvement 2. Full Compliance 3. Full Compliance
XI	**Personnel Records** (9 Elements) 1. Criminal Clearances (FBI,DOJ, 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. Needs Improvement 3. Full Compliance 4. Full Compliance 5. Full Compliance 6. Full Compliance 7. Full Compliance 8. Full Compliance 9. Full Compliance

WALDEN FAMILY SERVICES FOSTER FAMILY AGENCY
CONTRACT COMPLIANCE REVIEW
FISCAL YEAR 2014-2015

SCOPE OF REVIEW

The following report is based on a "point in time" visit. This compliance report addresses findings noted during the July 2015 review. The purpose of this review was to assess Walden Family Services 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 internal administrative policies and procedures. The compliance 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, ten placed children were selected for the sample. The Contracts Administration Division (CAD) interviewed each child and reviewed their case files to assess the care and services they received. Additionally, five discharged children's files were reviewed to assess the FFA's compliance with permanency efforts. At the time of the review, two placed children were prescribed psychotropic medications. Their case files were reviewed to assess for timeliness of Psychotropic Medication Authorizations and to confirm the required documentation of psychiatric monitoring.

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

CONTRACTUAL COMPLIANCE

CAD found the following four areas out of compliance.

Licensure/Contract Requirements

- Special Incident Reports (SIRs) were not timely submitted nor appropriately cross-reported.

A review of two SIRs determined that one was not timely submitted via the I-Track database and was not appropriately crossed-reported to Out-of-Home Care Management Division (OHCMD). An incident reported as an "accident" which took place on December 23, 2014, was not submitted via the I-Track database until December 26, 2014. This matter was also not cross-reported to OHCMD, per the SIR reporting guidelines. During the Exit Conference, the FFA representatives stated the FFA

would re-train the FFA social workers to ensure all SIRs are timely submitted and cross-reported. On August 25, 2015, the FFA trained staff on procedures for submitting SIRs.

Recommendation:

The FFA's management shall ensure that:

1. SIRs are timely submitted and appropriately cross-reported.

Maintenance of Required Documentation and Service Delivery

- County Children's Social Workers' (CSWs') authorizations to implement Needs and Services Plans (NSPs) were not obtained.

A review of 36 NSPs determined that 14 NSPs did not have the County CSWs' authorization to implement the NSP.

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

A review of 36 NSPs determined that six NSPs which were for a group of three siblings placed with one CFP, dated July 7, 2014 and April 7, 2015, were not signed by the CFP. CAD was unable to verify that the CFP participated in the development of the NSPs.

- FFA social worker did not develop timely initial NSPs.

CAD noted that two initial NSPs were signed late. The NSPs were due January 31, 2015 and the FFA social worker and CFP signed the NSPs on February 10, 2015.

- The FFA social workers did not develop comprehensive updated NSPs.

A review of 32 NSPs determined that 9 NSPs were not comprehensive. The NSPs were missing some monthly contacts with the CSWs.

- CSWs' monthly contacts were not documented in the children's case files.

A review of four placed children's files determined that FFA social workers did not document monthly contact with CSWs in the children's files.

During the Exit Conference, the FFA representatives stated that FFA social workers would be re-trained on NSP policy and procedures. CAD conducted a follow-up visit on November 6, 2015 and verified seven NSPs documented the monthly contact with the County CSWs. CAD verified the FFA completed NSP training for its social workers on August 25, 2015. Training included the development of initial and updated NSPs, documenting efforts to obtain CSWs signature, obtaining CFPs signatures and documenting monthly contact with CSWs in the children's files.

Recommendations:

The FFA's management shall ensure that:

2. The FFA obtains or documents efforts to obtain the County CSWs' authorization to implement the NSP.

3. CFPs participate in the development of NSPs.

4. FFA social workers develop timely initial NSPs.

5. FFA social workers develop comprehensive updated NSPs.

6. County CSWs' monthly contact is documented in the child's case file.

Discharged Children

- A Discharge summary was not completed.

A review of five discharged children's files determined that the FFA did not complete a discharge summary for one child.

During the Exit Conference, the FFA representatives stated that FFA social workers will ensure discharge summaries are completed for all discharged children. On November 6, 2015, CAD conducted a follow-up visit and verified that the FFA completed the discharge summary for two sampled files.

Recommendation:

The FFA's management shall ensure that:

7. A discharge summary is completed for each discharged child.

Personnel Records

- A criminal background statement was not timely signed.

A FFA social worker hired on July 1, 2013, did not have a signed criminal background statement on file at the time of the review. During the review, CAD notified the FFA administrator of the missing documentation and the FFA provided a signed criminal background statement dated July 13, 2015.

Recommendation:

The FFA's management shall ensure that:

8. Employees timely sign a criminal background statement.

PRIOR YEAR FOLLOW-UP FROM DCFS CAD'S FFA CONTRACT COMPLIANCE MONITORING REVIEW

CAD's last compliance report dated September 8, 2015, identified 19 recommendations.

Results:

Based on CAD's follow-up, the FFA fully implemented 16 of 19 recommendations which they were to ensure that:

- The FFA is compliant with Title 22 regulations, County contract requirements and free from Community Care Licensing citations.
- Criminal clearances for other adults in the home are maintained.
- Exterior grounds are well maintained.
- Common areas are well maintained.
- Children's bedrooms and/interior are well maintained.
- Sufficient and appropriate educational resources are maintained.
- CFP conduct disaster drills and documentation is maintained.
- Monetary and clothing allowance logs are maintained.
- FFA social workers develop timely updated NSPs with child's participation.
- Therapeutic services are provided.
- Quarterly reports are timely.
- Initial medical exams are conducted timely.
- Ongoing clothing inventories are of adequate quantity and quality.
- Provision of sufficient supply of clean towels and personal care items meeting ethnic need are maintained.
- Minimum weekly monetary allowance is provided.
- Encouragement/assistance with Life Books/Photo Albums is provided.

Based on the results of the current review, 3 of 19 recommendations were not implemented:

- FFA obtains or documents efforts to obtain the County CSW's authorization to implement the NSP.
- FFA social workers develop timely initial NSPs with child's participation.
- County CSWs' monthly contacts are documented in child's case file.

Recommendation:

9. The outstanding recommendations from the monitoring report dated September 8, 2015, which are noted in this report as recommendations 2, 4 and 6, are fully implemented.

At the Exit Conference, the FFA representatives expressed their desire to remain in compliance with all Title 22 regulations and contract requirements. CAD conducted a follow-up visit on November 6, 2015 and the FFA had fully implemented 3 of 8 recommendations. The FFA had not fully implemented cross-reporting SIRs, obtaining or documenting efforts to obtain the County CSWs' authorization to implement the NSPs, the CFPs' participation in the NSP, timely initial NSPs, or timely criminal background statements. The FFA was advised to fully implement their follow-up procedures. CAD will continue to assess implementation of the recommendations during our next review. OHCMD will provide ongoing support and technical assistance prior to the next review.

Walden Family Services
A Foster Family & Adoption Agency
Fostering Promising Futures

Walden Family Services Fiscal Corrective Action Plan 7/27/2015

Regarding the 7/1/15 Fiscal Compliance Assessment Summary of Findings showing a loss from operation in the amount of $275,235.

In order to eliminate the loss from operations in the future, Walden Family Services has cut expenditure in the 2015 budget, including reducing mileage and increasing employees benefit contributions.

Walden Family Services leadership team meet monthly to closely monitor expenditure for the prior month and make any decisions on further cuts. To date 2015 has not shown a loss in operations,

In 2015 Walden Family Services has continued to expand the THP + FC program, rather than expand the FFA program.

The reason Walden's FFA operates at a loss is because the current Rate provided to us is insufficient to provide the quality of foster care that our youth deserve. It is Walden's vision that every child having a loving family and the ability to realize their greatest potential toward becoming a self-sufficient and productive member of their community. For that to become a reality, all parties must make the necessary financial investment in our foster youth so that they may thrive. Walden does so by raising more than $500,000 annually to incur the additional expenses required for raising a foster child in today's economic times. However, without a FFA rate increase, this amount will continue to be insufficient to cover all costs necessary to provide the quality of life our foster children need to realize their full potential.

Teresa Stivers
Executive Director

Sue Evans
Chief Operating Officer

CC: Walden Board Chair Arlene Lieberman

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Walden Family Services

Fostering Promising Futures

LA County Annual Monitoring Review CAP

Date: 9/21/15

Re: FFA Monitoring Review Field Exit Summary from 9/21/15

Section: I. LICENSURE/CONTRACT REQUIREMENTS: #2

One special incident report was not appropriately documented and cross reported. This incident was not reported within 24 hours due to the holiday, (12/24/14).

Walden's Actions:

This incident was not reported within 24 hours due to the 12/24/14 holiday. Workers have been retrained on reporting guidelines, 8-25-15, on timeliness and cross reporting. This training also included training on leaving a message with the CSW even over a holiday or weekend and If a serious SIR is reported after hours, the CPS Hotline will also be contacted.

Section: IV. MAINTAINANCE OF REQUIRED DOCUMENTATION AND SERVICE DELIVERY

#27: Not all the NSP'S were signed by the CSW and some attempts were late
#28: 3 childrens reports did not show that foster parents had participated in the development of NSPs.
#30: 2 initial NSPs reports were not developed timely
#31: Not all the NSPs were comprehensive; several were missing the documentation of monthly DCFS CSW monthly contact
#34: Case notes in some files did not have appropriate documentation of monthly contact with DCFS CSW.

Walden's Actions:

Walden Social Workers were retrained on 8/25/15 regarding timelines and comprehensive documentation for initial and updated (quarterly) NSPs and process for obtaining DCFS CSW signature within 5 days of due date and documenting attempts. Retraining included the requirement to document DCFS CSW monthly contact in the case notes.
Retraining documentation has already been provided prior to this CAP.
Walden Social Workers are completing the NSP Dates Mailed Verification form (see attached)

Section X. DISCHARGED CHILDREN: #65

1 child did not have a discharge summary completed

Walden's Actions:

Walden Social Workers were retrained 8/25/15 in completing discharge summaries within 10 working days. Supervisors will review and sign these.

Section XI. Personnel Records:

#69 1 employee did not sign a criminal background statement in a timely manner.

Walden's Actions:

Walden could not locate the original signed criminal record statement. Walden immediately had the employee resign a new criminal statement.

Karen Crossan

Signed: Karen Crossan Program Director

Sue Evans

Signed: Sue Evans COO