County of Los Angeles
DEPARTMENT OF CHILDREN AND FAMILY SERVICES

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March 25, 2016

To: Supervisor Hilda L. Solis, Chair
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From: Philip L. Browning
Director

FRED JEFFERSON MEMORIAL HOME FOR BOYS FOSTER FAMILY AGENCY CONTRACT COMPLIANCE REVIEW

The Department of Children and Family Services (DCFS) Contracts Administration Division (CAD) conducted a Contract Compliance Review of Fred Jefferson Memorial Home for Boys Foster Family Agency (the FFA) in July 2015. The FFA has three licensed offices. One located in the Second Supervisorial District, one located in Riverside County and another located in San Bernardino County. All locations provide services to the County of Los Angeles DCFS placed children. According to the FFA's program statement, its stated mission is "to maintain minors placed in our homes within their existing support system. In doing so, we maintain the minor's existing attachments that they are familiar and comfortable with. We maintain attachments to birth parents when possible and when appropriate. When birth parents are not available our goal then becomes centered on developing and maintaining substitute parents. All children must be attached to an adult that is loving, nurturing and consistently there for them. Without appropriate relationship with adults that are consistent, minors are unable to develop appropriately."

At the time of review, the FFA supervised 143 DCFS placed children in 59 Certified Foster Homes (CFHs). The children's average length of placement was 16 months and their average age was 10.

SUMMARY

During CAD's Contract Compliance Review, the interviewed children generally reported: feeling safe at the FFA's 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 5 of 11 areas of CAD's Contract Compliance Review: Certified Foster Homes; Psychotropic Medication; Personal Rights and Social/Emotional Well-Being; Discharged Children; and Personnel Records.

CAD noted deficiencies in the following areas: Licensure/Contract Requirements, related to Special Incident Reports (SIRs) that were not submitted timely nor cross-reported to all required parties and Community Care Licensing (CCL) citations; Facility and Environment, related to comprehensive monetary

and clothing allowance logs not properly maintained; Maintenance of Required Documentation and Service Delivery, related to FFA social workers not obtaining or documenting efforts to obtain County Children's Social Worker's (CSW's) authorization to implement Needs and Services Plans (NSPs), CFPs not participating in the development of the NSPs, placed children not progressing toward meeting their NSP case goals, FFA social workers not developing timely initial or updated NSPs, and FFA social workers not developing timely, comprehensive quarterly reports; Education and Workforce Readiness, related to children not being enrolled in school within three school days, the FFA not ensuring children attend school as required, a child's academic performance and/or attendance did not increase and the FFA did not facilitate the age-appropriate children's participation in Youth Development Services; Health and Medical Needs, related to initial medical examinations and initial dental exams not conducted timely; and Personal Needs/Survival and Economic Well-Being, related to not encouraging or assisting children to update a Life Book or a Photo Album.

Attached are the details of our review.

REVIEW OF REPORT

On August 26, 2015, Jennifer Higuchi, DCFS CAD and Kristine Kropke-Gay, Out-of-Home Care Management Division held an Exit Conference with FFA representative Niquelle Lewis, FFA Administrator. The FFA representative was in agreement with the review findings and recommendations, was receptive to implementing systemic changes to improve the FFA's compliance with regulatory standards and agreed to address the noted deficiencies in a Corrective Action Plan (CAP).

A copy of this compliance report has been sent to the Auditor-Controller and CCL.

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

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

PLB:EM:LTI:jh

Attachments

c: Sachi A. Hamai, Chief Executive Officer
John Naimo, Auditor-Controller
Public Information Office
Audit Committee
Cecilia Freeman-Jefferson, Chief Executive Officer, Fred Jefferson Memorial Home for Boys
Lenora Scott, Regional Manager, Community Care Licensing Division
Lajuannah Hills, Regional Manager, Community Care Licensing Division

FRED JEFFERSON MEMORIAL HOME FOR BOYS FOSTER FAMILY AGENCY
CONTRACT COMPLIANCE REVIEW SUMMARY

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	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 (WFFH) Training 6. FFA Pays Certified Foster Parents (CFP) WFFH Required Supplemental Payments 7. FFA Conducts an Assessment of CFP Prior to Placement of Two (2) or More Children	 1. Full Compliance 2. Improvement Needed 3. Full Compliance 4. Improvement Needed 5. Non-Applicable 6. Non-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 Inspections Completed At Least Every Six Months or Pre-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	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 Foods	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's) Authorization to Implement NSPs	1. Improvement Needed
	2. CFPs Participated in Development of the NSPs	2. Improvement Needed
	3. Children Progressing Towards Meeting NSP Goals	3. Improvement Needed
	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. County Children's Social Workers 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	1. Improvement Needed
	2. Children Attend School as Required and FFA Facilitates in Meeting Children's Educational Goals	2. Improvement Needed
	3. Current Children's Report Cards/Progress Reports Maintained	3. Full Compliance
	4. Children's Academic Performance and/or Attendance Increased	4. Improvement Needed
	5. FFA Facilitates Child's Participation in YDS or Equivalent Services and Vocational Programs	5. Improvement Needed

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	1. Improvement Needed 2. Full Compliance 3. Improvement Needed 4. Full Compliance
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 Choices 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 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 (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	Full Compliance (All)

FRED JEFFERSON MEMORIAL HOME FOR BOYS FOSTER FAMILY AGENCY
CONTRACT COMPLIANCE REVIEW
FISCAL YEAR 2015-2016

The following report is based on a "point in time" visit. The compliance report addresses findings noted during the July 2015 review. The purpose of this review was to assess Fred Jefferson Memorial Home for Boys 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 administrative internal 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, 12 placed children were selected for the sample. The Contracts Administration Division (CAD) interviewed nine children and reviewed their case files 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. At the time of the review, one child was prescribed psychotropic medication. This case file was reviewed to assess for timeliness of Psychotropic Medication Authorizations and to confirm the required documentation of psychiatric monitoring.

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

CONTRACTUAL COMPLIANCE

CAD found the following areas out of compliance:

Licensure/Contract Requirements

- Special Incident Reports (SIRs) were not submitted timely or appropriately cross-reported.

A review of 93 SIRs revealed that 14 were not submitted to the I-Track database in a timely manner. Additionally, five SIRs were not appropriately cross-reported to the Out-of-Home Care Management Division (OHCMD), Community Care Licensing (CCL) or the Department of Children and Family Services (DCFS) Children's Social Workers (CSWs) per the SIR reporting guidelines.

- Community Care Licensing (CCL) citations.

CCL cited the FFA as a result of a complaint received by CCL on October 30, 2014. According to the report dated April 20, 2015, CCL substantiated a complaint against a CFP who allegedly yelled at a child and left the child home alone. CCL requested a Plan of Correction (POC), but since the home was involuntarily decertified on December 4, 2014, the POC was not required. This referral was investigated by DCFS Emergency Response (ER) CSW and the allegations of Physical Abuse and Sibling At-Risk were determined to be inconclusive and allegation of General Neglect was determined to be unfounded. The Out-of-Home Care Investigations Section (OHCIS) conducted a supplementary investigation on February 5, 2015 and confirmed the CFP had been decertified by the FFA. The children were removed from the home on October 20, 2014.

CCL cited the FFA as a result of a complaint received by CCL on December 5, 2014. According to the report dated June 19, 2015, CCL substantiated a complaint against a CFP for a personal rights violation. The complaint involved a CFP that left a child in a car seat while she completed her chores in the house. CCL requested a POC. The children were removed from the home on December 12, 2014. The FFA did not complete the POC as it involuntarily decertified the home on February 4, 2015. This referral was investigated by DCFS ER CSW and allegations of Physical Abuse was determined to be inconclusive. The OHCIS conducted a supplementary investigation on March 5, 2015 and determined the CFP would not be used as a placement resource for DCFS children.

CCL cited the FFA as a result of a complaint received by CCL on January 26, 2015. According to the report dated April 23, 2015, CCL substantiated a complaint against a CFP who was arrested for using counterfeit bills to purchase gasoline and the police officer observed live ammunition and signs of marijuana use in her car. CCL requested a POC, but the FFA did not complete the POC due to the home being decertified on June 3, 2015. There were no children placed in this home at the time of CCL's investigation. The OHCIS conducted a supplementary investigation and placed the CFH on an "Indefinite Hold" status and determined it would no longer be used as a placement resource for DCFS placed children. The OHCIS concluded their investigation on May 29, 2015.

Recommendations:

The FFA's management shall ensure that:

1. SIRs are submitted timely and appropriately cross-reported in accordance with the SIR reporting guidelines.

2. The FFA is in compliance with Title 22 regulations and free of CCL citations.

Facility and Environment

- Clothing and monetary allowance log not maintained.

During review of the children's files, eight of the 12 children in the sample did not have adequate monetary and clothing allowance logs. The monetary allowance disbursed did not match the actual

amounts the children received. One child did not have any completed logs in her file. Three children were receiving monthly monetary allowances instead of weekly allowances.

During the Exit Conference, the FFA representative stated that she was not aware the children needed to receive weekly monetary allowances. In addition, the FFA representative stated that she would modify the clothing and monetary allowance logs and retrain all the CFPs. This training was conducted on October 20, 2015.

Recommendation:

The FFA's management shall ensure that:

3. Money and clothing allowance logs are maintained.

Maintenance of Required Documentation and Service Delivery

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

CAD found that 24 of 42 NSPs reviewed did not have the County CSW's signature or sufficient documentation of the FFA's efforts to obtain the County CSW's signature.

The FFA representative stated that she was not aware that three documented attempts must be made to obtain the County CSW's signature within 5 days of the NSP due date and that all FFA social workers would receive training on this requirement. The FFA conducted this training on October 15, 2015.

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

A child's quarterly and updated NSP was not signed by the CFP.

- The placed children are not progressing toward meeting their NSP case goals.

CAD noted that 3 of 12 children in the sample were not progressing toward meeting their NSP goals. A child did not make any measurable progress in a ten-month period with improving her grades and her social skills. Another child did not make any progress in three consecutive NSPs. The third child did not make any measurable progress in a nine-month period with improving her grades and her hygiene.

During the Exit Conference, the FFA representative stated that goals will be modified to make it more achievable and appropriate for each child. In addition, the FFA will train their staff to develop Specific Measurable, Attainable, Realistic, and Timely (SMART) goals for the children and to monitor them closely to ensure the children are progressing towards meeting their goals. This training was conducted on October 15, 2015.

- FFA social workers did not develop timely initial NSPs.

A child's initial NSP due on November 14, 2014 was not signed by the County CSW until December 10, 2014. The FFA's documentation indicates that the NSP was faxed to the County CSW on December 9, 2014 to obtain the County CSW's signature.

- FFA social workers did not develop timely, comprehensive updated NSPs.

A child's NSP dated December 20, 2014, had the same goals as the child's previous NSP dated September 20, 2014. The goals were not new, but the start dates had been changed to reflect the December 20, 2014 date. The NSP was not timely because it was emailed to the County CSW on July 24, 2015, to obtain their signature. The County CSW signed it on August 4, 2015. The FFA social worker did not date her signature, the CFP did not sign the NSP and the date for the child's signature line was pre-typed. For the same child, a NSP dated June 20, 2015, was lacking information pertaining to the child's medical appointments. It was also not timely because it was emailed to the County CSW on August 13, 2015 and it did not contain the County CSW's signature. In addition, the child and the FFA social worker's signature line had pre-typed dates and there was no date next to the CFP's signature.

A child's NSP dated April 11, 2015, had goals that were not properly modified. Goals number 2, 3, and 4 were copied from a previous NSP and the child had already met the goals. In addition, it was not timely, the CSW signed this NSP on June 12, 2015 and there was no documentation that the FFA social worker attempted to obtain the County CSW's signature within five days of the NSP due date. For the same child a NSP dated October 11, 2014, was signed by the County CSW on November 4, 2014 and there was only one documented attempt to obtain the County CSW's signature.

A child's NSPs dated December 9, 2014 and June 9, 2015, were not comprehensive. The NSPs lacked information pertaining to the child's initial medical and dental exam, the child's need for medical devices such as inhalers, Individualized Education Program (IEP), Independent Living Program (ILP) status and contact dates with the County CSW. In addition, the child's name was spelled incorrectly throughout the NSP.

A child's NSP dated May 13, 2015, was not comprehensive as it lacked information about the child's visitation with her siblings and ILP referral information.

A child's NSPs dated December 9, 2014 and June 9, 2015, were not comprehensive. A NSP dated December 9, 2014, did not include information about her enrollment into junior college, employment status and a permanency goal. A NSP dated June 9, 2015, did not include information about her completion of ILP classes and transitional housing.

A child's NSP dated April 17, 2015, did not include information about the child's ILP services and referrals.

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

A child's quarterly report dated September 9, 2014, was not timely because the County CSW signed it on August 5, 2015. There was no date by the child's signature line and there was no CFP signature.

It was not comprehensive because it lacked information pertaining to the child's initial medical and dental exams, school enrollment information, dates on which the County CSW was contacted and details about ILP classes. In addition, the goals were unchanged from September 9, 2014.

During the Exit Conference, the FFA representative stated that a contracted social worker was terminated due to poor performance and that the remaining contracted social workers will be trained in how to develop comprehensive NSPs. This training was conducted by the FFA on October 15, 2015.

Recommendations:

The FFA's management shall ensure that:

4. FFA obtains or documents efforts to obtain County CSW's authorization to implement NSPs.

5. CFPs will participate in the development of the NSPs.

6. Children will progress toward meeting their NSP case goals.

7. FFA social workers develop timely initial NSPs.

8. FFA social workers develop timely, comprehensive updated NSPs.

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

Education and Workforce Readiness

- Children were not enrolled in school within three school days after placement.

A child placed on September 29, 2014, was enrolled in school on October 8, 2014. The FFA representative did not have an explanation as to the reason for the delay in the child's enrollment. The child's NSP indicated that the child was enrolled on October 1, 2014, but the child's report card noted the enrollment date as October 8, 2014.

A child placed on October 14, 2014, was enrolled in school on October 22, 2014. The FFA representative stated that the school district refused to enroll the child because she was previously in an out-of-county placement. The FFA did not have documentation of their efforts to expedite the child's enrollment or of their contacts to DCFS for immediate assistance in enrolling the child in school

- The FFA did not ensure that the child attend school as required.

A child stated she wanted to continue attending the same high school she attended before placement because she was in the 11th grade and close to graduating. This child had to take two separate buses, which took her about two hours to get to school every morning. Due to bus delays or waking up late, the child's absence in first period increased from one in the Fall of 2014 semester to six in Spring 2015 semester. The child stated that the CFP does not provide her with transportation from

the CFH located in Los Angeles to the school which is located in Long Beach. The FFA representative stated that the FFA social workers will now document all efforts made by the agency and the CFP to ensure that placed children attend school as required.

- The child's academic performance and/or attendance did not increase.

A child's GPA decreased from the date of placement in November 12, 2014, until the end of the school year in June 2015. In addition, the child failed her geometry class. The FFA did not provide documentation as to how the FFA and the CFP monitored the child's academic progress during the school year.

- The FFA did not facilitate the age-appropriate children's participation in Youth Development Services (YDS) or equivalent services and vocational training programs.

There is no record of ILP services or referrals for two 17 year-old children. This was brought to the attention of the FFA which will be addressed.

Recommendations:

The FFA's management shall ensure that:

10. Children are enrolled in school within three school days after placement.

11. The FFA will ensure the child attends school as required.

12. Based on the services provided by the FFA, the child's academic performance and/or attendance will increase.

13. The FFA will facilitate the age-appropriate children's participation in YDS or equivalent services.

Health and Medical Needs

- Initial medical examinations were not conducted timely.

A child's initial medical exam was due on December 12, 2014, but was not completed until January 13, 2015. The CFP stated that she was unable to obtain an appointment within 30 days due to the holidays and the doctors were not available to see the child until January 2015. The CFP was provided an appointment date with the Medical Hub within 30 days of placement, but refused to keep the appointment due to the driving distance. The CFP stated it was too far to transport the child to the appointment and waited until the local pediatrician was available to see the child.

A child's initial medical exam was due on October 29, 2014, but was not completed until November 20, 2014. The CFP stated that she was unaware that her pediatrician did not accept Medi-Cal.

A child placed on January 20, 2015, received her initial medical exam on May 27, 2015. The FFA representative stated that the child's Medi-Cal was not approved until March 4, 2015. The FFA did not document its efforts that alternative pediatricians were contacted or that the CSW was contacted to make an appointment with the Medical Hub.

- Initial dental examinations were not conducted timely.

A child's initial dental exam due on October 29, 2014, was not completed until November 21, 2014.

Recommendations:

The FFA's management shall ensure that:

14. Initial medical examinations are conducted timely.

15. Initial dental examinations are conducted timely.

Personal Needs/Survival and Economic Well-Being

- The CFP did not encourage and assist children to update a Life Book/Photo Album.

A child selected for the interview was relocated to another CFH during the contract compliance review; therefore, her interview took place at her new placement. This child stated that she did not have a Photo Album and that she did not have any pictures from her previous placement. The child had been in placement for nine months before she was replaced.

Recommendation:

The FFA's management shall ensure that:

16. CFPs encourage and assist children to update a Life Book/Photo Album.

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

CAD's last compliance report dated April 22, 2015, identified 11 recommendations.

Results:

Based on CAD's follow-up, the FFA fully implemented 5 of 11 recommendations for which the FFA was to ensure that:

- SAFE Home Studies are completed and dated prior to certification.
- Common areas are well maintained.
- Children's bedrooms/interior are well maintained.
- Follow-up dental examinations are conducted timely.

- There is a current psychiatric evaluation review.

Based on CAD's follow-up, the FFA did not implement 6 of 11 recommendations for which the FFA was to ensure that:

- SIRs are submitted timely and are cross-reported.
- The FFA is in full compliance with Title 22 regulations and free of CCL's citations.
- The FFA will maintain comprehensive monetary and clothing allowance logs.
- FFA will obtain or document efforts to obtain County CSW's authorization to implement NSPs.
- FFA Social Workers develop timely and comprehensive initial NSPs.
- FFA facilitates child's participation in YDS or equivalent services and vocational programs.

Recommendation:

17. The outstanding recommendations from the report dated April 22, 2015, which are noted in this monitoring report as recommendations 1, 2, 3, 4, 7 and 13 are fully implemented.

At the Exit Conference the FFA representative expressed their desire to remain in compliance with Title 22 regulations and contractual requirements. The FFA made efforts to utilize information from the review to strive towards greater overall compliance. The FFA provided a listing of their efforts in the attached details of their new protocol. CAD will continue to assess implementation of the recommendations during our next monitoring review. The OHCMD will provide ongoing support and technical assistance prior to the next review.

Fred Jefferson Memorial Homes For Boys
152 West Walnut Street Suite #150
Gardena, Ca 90248

Phone # (310) 763-1660 **Fax # (310) 763-0357**

September 29, 2015

Department of Children and Family Services
Contract Compliance Section
Jennifer Higuchi
9320 Telestar Avenue Suite
El Monte, CA 91731

Dear Ms. Higuchi,

Regarding: August 2014- June 2015 Contract Compliance Review

Fred Jefferson FFA is submitting the corrective action plan for the review period of August 2014 through June 2015. Below you will find a response to each finding listed on the monitoring review field exit summary. The Administrator will monitor and ensure all corrections are implemented immediately upon all training. The Administrator will also ensure that the agency remains in compliance with all State and County regulations.

I. Licensure/Contract Requirements

Finding
The agency was found to not report Special Incident Reports appropriately documented and cross reported.

Action Taken
Fred Jefferson Memorial Foster Family Agency would like to ensure that at all times we report incidents in a timely manner. The foster parents will be trained again on Incident Reports on October 20, 2015. At this time the required time frames will be issued as well as discussed in detail. A copy of the sign in sheet for this training will be provided to the assigned reviewer to ensure that each foster parent was in attendance at the training. A copy of the material provided to each foster parent regarding incident reports is attached to this corrective action plan.
If foster parents fail to report incidents in a timely manner, they will be required to come in the office for a meeting with the Administrator. At this meeting incident reporting requirements will be reviewed on an individual basis. If the parent continues to report

incidents late, the agency will reduce the capacity in the home. If the foster parent continues to report the incidents late the agency will consider decertifying the parent. The staff at the agency will also be trained by the Administrator on September 29, 2015. A copy of the requirements will be reviewed with them as well.

Finding
The Agency was found to not be free of substantiated Community Care Licensing complaints/reports on safety and physical plant deficiencies for this review period.

Action Taken
The agency will also continue to review all Community Care Licensing Regulations with each certified foster parent in hope to decrease the number of substantiated reports for Community Care Licensing. At the meeting on October 20, 2015 Title 22 Regulations and Personal Rights will be reviewed in a newsletter form with each foster parent. A copy of the newsletter for Title 22 Regulations Building and Ground Section and the Children's Personal Right Sheet is attached for your review.

III. Facility and Environment

Finding
The Agency was found to not have appropriate and comprehensive monetary and clothing logs being maintained.

Action Taken
At Fred Jefferson Memorial Foster Family Agency allowance will be issued on a weekly basis. The social worker will ensure that the allowance documented on the log has been issued on a weekly basis. Allowance will be separated from all children's cellular phone bills. If children in the agency have a cellular phone, the foster parent will allow the child to earn extra allowance to pay the bill. The extra allowance may be earned by completion of appropriate approved chores. The foster parents may also include monetary incentives for various things. A few examples would be earning grades above average, achieving goals or improved behaviors. This will be implemented immediately following the meeting for the foster parents on October 20, 2015.

IV. Maintenance of required Documentation and Service Delivery
Finding
The Agency was found to not obtain or document efforts to obtain the County Worker's authorization to implement the NSP.

Action Taken
Each agency social worker will be required to fax the quarterly/ NSP to the CSW initially. They will also follow up via email to the CSW to ensure receipt of the report. At this time they will also request the signature page to be returned. If the signature page is not returned or there is no response, the social worker will follow up again via email.

There will be a total of three attempts within a five business day period to request approval of the report. Each attempt will be placed in the child's file along with the report. The attempts made will also be included in the CSW Contact Note section. At the Social Worker Meeting on October 15, 2015 each social worker will be trained on how to properly request the approval of the CSW to implement the NSP.

Finding
The Agency was found to not have the foster parents participate in the development of the NSP.

Action Taken
The agency social worker will ensure that at the time of development of the NSP the foster parent is present and actively participating in the development of the report. At the end of the development process the foster parent and child will sign. Their signature will represent their approval and willingness to participate in the progress of meeting each goal listed in the NSP. The social worker will be trained on the importance of this implementation at the meeting on October 15, 2015.

Finding
The Agency was found to not have placed children progressing toward meeting the NSPs case goals.

Action Taken
The agency social worker will document once per month the child's progress toward the goals that were last implemented on the quarterly/NSP report. If the child is not progressing toward the goal all barriers that are reported by the child will be documented in the case notes. This section of the case note will be updated monthly at the start of each month.

Finding
The agency was found to not have the social workers develop timely, comprehensive, initial (NSPs) with participation of the developmentally age-appropriate child.

Action Taken
The Social Workers will have an initial training on October 15, 2015 on goal writing to assist with the improvement of the development of creating timely, comprehensive, age appropriate goals. At the training Social Workers will discuss S.M.A.R.T. goals as well. In an effort to continue proper goal writing the Social Worker Supervisors will implement goal writing exercises in the Social Worker meetings at least every other month. The Supervisors will also ensure that each report has the proper goals when submitted by the assigned Social Worker.

Finding
The agency was found to not have the social workers develop timely, comprehensive, updated (NSPs) with participation of the developmentally age-appropriate child.

Action Taken
The Social Workers will have an initial training on October 15, 2015 on goal writing to assist with the improvement of the development of creating timely, comprehensive, age appropriate goals. At the training Social Workers will discuss S.M.A.R.T. goals as well. In an effort to continue proper goal writing the Social Worker Supervisors will implement goal writing exercises in the Social Worker meetings at least every other month. The Supervisors will also ensure that each report has the proper goals when submitted by the assigned Social Worker.

Finding
The Agency was found to not have the FFA social worker complete timely, comprehensive, quarterly reports.

Action Taken
Each agency social worker will be required to fax the quarterly/ NSP to the CSW initially. They will also follow up via email to the CSW to ensure receipt of the report. At this time they will also request the signature page to be returned. If the signature page is not returned or there is no response, the social worker will follow up again via email. There will be a total of three attempts within a five business day period to request approval of the report. Each attempt will be placed in the child's file along with the report. The attempts made will also be included in the CSW Contact Note section. At the Social Worker Meeting on October 15, 2015 each social worker will be trained on how to properly request the approval of the CSW to implement the NSP.

V. Education and Workforce Readiness

Finding
The Agency was found to not enroll the child in school within three school days after placement or the FFA document efforts.

Action Taken
The agency social worker assigned to the children in the agency will complete the newly developed Education Information Log. This form will be completed within the first seven days of placement and placed in the child's file. A copy of the document is attached for approval. This form will include the date the child was enrolled in school. If the child was not enrolled within three school days, there will be a very detailed explanation as to why. The document will address efforts made and school officials that the foster parent and agency representatives encountered during the school enrollment process.
All social workers will be trained on this document at the scheduled social worker meeting on October 15, 2015 at 5pm. Once the social worker has completed the education information sheet they will be required to submit it to their Supervisor for approval and/or follow up.

Finding
The FFA was found to not ensure the child attend school as required and facilitate in meeting the child's educational goals for applicable children placed over 90 days.

Action Taken
The social worker will document all efforts made by the agency and the foster parent to ensure that placed children attend school as required. The assigned social worker will include in the quarterly reports and needs and service plans the arrangements made to support the children in school. When issues such as transportation arrangements cause conflict, the social worker will discuss it with the CSW to ensure that they are aware of the barriers and also document changes made if any. This information will be documented in the quarterly reports and CSW contacts.

Finding
It was found that based on the services provided by the Agency the child's academic performance and/or attendance did not increase.

Action Taken
Each Social Worker will monitor the child's progress in school. If progress is not being made, the quarterly reports will begin to reflect the reasons why and what the barriers are that hinder the children from progressing. Efforts to assist in the improvement of grades will also be documented within the quarterly reports that are submitted to the CSW.

Finding
The agency was found to not facilitate the age appropriate children's participation in YDS or equivalent services, and vocational training programs or document barriers to obtaining such services and efforts to resolve issues, when applicable.

Action Taken
The agency social worker will continue to request ILP services from the CSW. These attempts may be made via telephone and/or email. The initial request will be made via email. The email will show proof that the agency social worker has requested the service. The proof of email will be included with the CSW contact in the child's file. The agency social worker will request this service monthly via telephone or email until the need is fulfilled. All efforts made will be included in the quarterly reports and CSW monthly contact.

VI. Health and Medical Needs

Finding
The agency was found to not complete required medical and/or dental exams timely.

Action Taken

The agency social worker supervisor will ensure that each child placed in the agency has met the required timeframes for all medical and dental appointments. At the time the child comes into the office for intake the social worker assistants will complete the newly implemented Medical/ Dental Information Sheet. This form is attached for your approval. This form will address all initial medical appointments. There will be space for the supervisor to document the upcoming appointments for the child placed. There will also be space for the supervisor to document any unforeseen issues regarding the set appointment for example, invalid medi-cal number. The supervisor will also be able to document if any follow up appointments were needed and ensure that each appointment has been met. A copy of this document will be kept by the supervisor until all appointments have been met. Once all appointments have been met the document will be placed in the child's file for review. The Supervisors and Social Worker Assistants will be trained on this document in the weekly office staff meeting on Tuesday, September 29, 2015 at 11am.

IX. Personal Needs/Survival and Economic Well-Being

Finding

The Agency was found to not have certified parents encourage and assist children to update a life book or photo album.

Action Taken

All foster parents will be trained on the importance and requirements of the life books and photo albums at the meeting. The Social Workers assigned to each home will also be trained on the requirements of life books. The certified parent will be responsible for encouraging the life book while the social worker will be responsible to ensure that the life book continuously grows. The social worker will report the progress on the life books in each quarterly report. The social worker will be trained on this at the meeting on October 15, 2015.

Attached you will find a form that the agency has implemented for teenage children placed over the age of fourteen. At this age the child is able to opt out of having a life book if they have an electronic device where they can utilize social media websites such as Facebook or Instagram only. It will be explained to the child that they need to be willing to show their social worker how they are accessing the site and show the social worker that they are posting pictures on a regular basis so that it can be updated in the quarterly reports.

To assist in improving the documentation efforts made by the Social Workers the agency Administrator will also be providing a training on appropriate documentation. This topic will be discussed at the meeting to be held on October 15, 2015. Attached you find the information and examples that will be provided to the social workers at this time. Improving the documentation for the above required areas will be the focus with the Social Worker department effective immediately. A copy of the agenda and sign in sheets will be provided to the Contract Compliance Section of Department of Children and Family Services no later than October 21, 2015. All trainings will be completed by this date.

If further information is needed regarding the items addressed above please feel free to contact me. I can be reached at (310) 763-1660 ext. 118 or (714) 767-5494.

Respectfully submitted,

Niquelle Lewis
Administrator