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

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April 7, 2016

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

PENNY LANE CENTERS FOSTER FAMILY AGENCY CONTRACT COMPLIANCE REVIEW

The Department of Children and Family Services (DCFS) Contracts Administration Division (CAD) conducted a Contract Compliance Review of Penny Lane Centers Foster Family Agency (the FFA) in May 2015. The FFA has three licensed offices located in the First, Third, and Fifth Supervisorial Districts and provides services to the County of Los Angeles DCFS placed children, Probation placed youth as well as children from other counties. According to the FFA's Program Statement, its stated purpose is "to provide children with continuity of care, nurturance and services to meet their individual needs and those of their families."

At the time of the review, the FFA supervised 332 DCFS placed children in 218 Certified Foster Homes (CFHs). The placed children's average length of placement was 14 months and their average age was seven.

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 the placement environment and being 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 9 of 11 areas 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; Personal Needs/Survival and Economic Well-Being; Discharged Children; and Personnel Records.

CAD noted deficiencies in the areas of: Licensure/Contract Requirements, related to Special Incident Reports not timely submitted or appropriately cross-reported and Community Care Licensing (CCL) citations; Maintenance of Required Documentation and Service Delivery, related to the FFA not obtaining or documenting efforts to obtain the DCFS Children's Social Worker's authorization to implement Needs and Services Plans (NSPs), the FFA Social Workers not developing timely,

comprehensive Initial and Updated NSPs with the child's participation and the FFA Social Workers not developing timely and comprehensive quarterly reports.

Attached are the details of CAD's review.

REVIEW OF REPORT

On November 30, 2015 Theodore Howard, DCFS CAD and Greta Walters, DCFS Out-of-Home Care Management Division (OHCMD) held an exit conference with the FFA representatives: Dr. Judith Sandino LCSW, Director of the FFA, Adoption and Family Preservation Programs; Trisha Stewart, Regional Director; Monica Smith, Regional Director; Charita Carillo, Regional Director; and Shannon Houselog, Assistant Regional Director. The FFA's representatives were in agreement with the review findings and recommendations, were receptive to implementing systemic changes to improve the FFA's compliance with regulatory standards and were in agreement with addressing the noted deficiencies in a Corrective Action Plan (CAP).

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

The FFA provided the attached approved CAP addressing the recommendations noted in this compliance report. OHCMD provided technical assistance to the FFA on December 7, 2015, to assist the FFA with implementing their CAP.

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

PLB:EM:LTI:th

Attachments

c: Sachi A. Hamai, Chief Executive Officer
John Naimo, Auditor-Controller
Calvin C. Remington, Interim Chief Probation Officer
Public Information Office
Audit Committee
Sybil Brand Commission
Ivelise Markovits, M.F.C.C. Founder and Chief Executive Officer, Penny Lane Centers
Lenora Scott, Regional Manager, Community Care Licensing Division
Lajuannah Hills, Regional Manager, Community Care Licensing Division

PENNY LANE CENTERS FOSTER FAMILY AGENCY
CONTRACT COMPLIANCE REVIEW SUMMARY

15305 Rayen Street North Hills, CA 91343 License No: 197804493	1020 E. Palmdale Blvd. Palmdale, CA 93550 License No: 197805739	5628 E. Slauson Ave. Commerce, CA 90040 License No: 197806410

	Contract Compliance Review	Findings: May 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. Improvement Needed 3. Full Compliance 4. Improvement Needed 5. Full Compliance 6. Full Compliance 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. Safety Inspection Every Six Months or Per Approved Program Statement 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. Auto Insurance/Annual Vehicle Maintenance Documentation for CFPs and Designated Drivers, if applicable, care seat(s) 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 DCFS Children's Social Worker's (CSW's) 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 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. DCFS 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. Improvement Needed 2. Full Compliance 3. Full Compliance 4. Improvement Needed 5. Improvement Needed 6. Full Compliance 7. Full Compliance 8. Full Compliance 9. Improvement Needed 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 Medications** (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 Extracurricular 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/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)	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 Driver's License (DL) 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)

PENNY LANE CENTERS FOSTER FAMILY AGENCY
CONTRACT COMPLIANCE REVIEW
FISCAL YEAR 2014-2015

SCOPE OF REVIEW

The following report is based on a "point in time" review. This compliance report addresses findings noted during the May 2015 review. The purpose of this review was to assess Penny Lane Centers 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 compliance review covered the following 11 areas:

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

For the purpose of this review, 12 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. During the interviews, the children were observed to be comfortable and well cared for in the Certified Foster Homes (CFHs) and the Certified Foster Parents (CFPs) were observed to be attuned to the needs of the children. Additionally, four discharged children's files were reviewed to assess the FFA's compliance with permanency efforts. At the time of the review, 15 placed children were prescribed psychotropic medication. CAD reviewed the children's case files to assess for timeliness of Psychotropic Medication Authorizations and to confirm the required documentation of psychiatric monitoring.

CAD reviewed 10 CFP files and five staff files for compliance with Title 22 Regulations and County contract requirements. Interviews were conducted with 10 CFPs to assess the quality of care and supervision provided to the children.

CONTRACTUAL COMPLIANCE

CAD found the following two areas out of compliance:

Licensure/Contract Requirements

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

CAD reviewed 27 SIRs and found that one was not submitted timely and appropriately cross-reported to the Out-of-Home Care Management Division (OHCMD), Community Care Licensing (CCL) and the

DCFS Children's Social Worker (CSW). The incident involved a child who received a citation for shoplifting but the corresponding SIR was not in the file.

- CCL citations.

CCL cited the FFA as a result of a complaint received on October 30, 2014. According to the report dated March 30, 2015, CCL substantiated an allegation that a CFP transported a placed child without a booster car seat on or about September 5, 2014. The FFA immediately relocated the child and the other placed children from the CFH. There were other investigations in progress. The FFA involuntary decertified this CFH effective February 6, 2015. The Out-of-Home Care Investigations Section (OHCIS) placed the CFP on an "Indefinite Hold" effective February 25, 2015. CCL accepted the FFA's decertification of the CFP as the Plan of Correction (POC) on February 6, 2015.

CCL cited the FFA as a result of a complaint received on March 6, 2014. According to the report dated October 1, 2014, CCL substantiated an allegation that the CFP grabbed the face of a placed child in an attempt to get the child's attention. On July 8, 2014, CCL required the FFA's POC to include personal rights and appropriate discipline training for the CFP, a reduction of the CFPs capacity to one child, weekly one-on-one meetings in the CFH and regular unannounced visits. CCL accepted the POC on October 1, 2014.

Recommendations:

The FFA's management shall ensure that:

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

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

Maintenance of Required Documentation and Service Delivery

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

For one reviewed file there was no DCFS CSW signature on two Updated NSPs. There were no documented attempts by the FFA to obtain the DCFS CSW's signature.

- The FFA Social Workers did not develop timely, comprehensive Initial NSPs with the child's participation.

For one reviewed file the Initial NSP was signed five business days after it was due. For another reviewed file the Initial NSP was not signed by the child.

- The FFA Social Workers did not develop timely, comprehensive Updated NSPs with the child's participation.

For two reviewed files an Updated NSP was not signed by the child. For another reviewed file an Updated NSP was signed by the child more than five business days after it was due.

- The FFA Social Workers did not develop timely, comprehensive quarterly reports.

For one reviewed file, one quarterly report was 30 days late and another quarterly report was not in the file.

Recommendations:

The FFA's management shall ensure that:

3. The FFA obtains or documents efforts to obtain the DCFS CSW's authorization to implement NSPs.

4. The FFA Social Workers develop timely, comprehensive Initial NSPs with the child's participation.

5. The FFA Social Workers develop timely, comprehensive Updated NSPs with the child's participation.

6. The FFA Social Workers develop timely, comprehensive quarterly reports.

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

The OHCMD's last compliance report dated July 8, 2013, identified eight recommendations.

Results:

Based on the results of this review, the FFA implemented 5 of 8 previous recommendations for which they were to ensure that:

- Prior to certification of a foster home, the FFA will submit an inquiry to OHCMD for historical information.

- Placed foster children are supervised by the CFPs or substitute caregivers at all times and the FFA staff will ensure that the CFPs are routinely reminded of the supervision policy and will monitor the homes for ongoing compliance.

- All CFPs have the required health screenings to include verification of Tuberculosis tests in accordance with Title 22 Regulations and that documentation is maintained in the CFP files.

- Vehicle maintenance for all CFPs or their designated drivers will be completed annually and documentation will be maintained in the CFP's files.

- DCFS CSWs are contacted monthly by the FFA Social Workers and contacts are appropriately documented in the children's case files.

Based on the results of the current review, 3 of 8 recommendations were not implemented.

- SIRs are appropriately reported and documented in a timely manner.

- The FFA is in compliance with Title 22 Regulations and free of CCL citations.

- The FFA staff documents efforts to obtain the DCFS CSW's authorization to implement the NSPs.

Recommendation:

7. The outstanding recommendations from the report dated July 8, 2013, which are noted in this report as recommendations 1, 2 and 3 are fully implemented.

The FFA representatives expressed their desire to remain in compliance with Title 22 Regulations and contractual requirements. The FFA will implement procedures to strive towards greater compliance. CAD will continue to assess implementation of the recommendations during the next review. OHCMD will provide ongoing support and technical assistance prior to the next review.

Penny Lane

Foster / Adoption Families

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Ivelise Markovits, MFCC

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DCFS Contract Services Bureau, Contracts Administration Division
3530 Wilshire Blvd 5th Floor #524
Los Angeles, CA 90010
Attn: Diana Flaggs

December 10, 2015
Amended: February 10, 2016

Regarding: Monitoring Review Corrective Action Plan

Dear Diana Flaggs,

1) Licensing/Contract Requirements Section
   a. Free of substantiated Community Care Licensing (CCL) complaints. Penny Lane Centers had two CCL substantiated findings during the fiscal year.
      i. Penny Lane agrees to review Title XXII policies and procedures with all families and Social Workers to prevent any incident reports on safety and physical plant deficiencies.
      ii. Training for the Social Workers will take place on 1/25/2015 and training for the Foster Families will occur throughout the month of January, which will focus on Title XXII policies and procedures.
   b. Special Incident Reports (SIRs) appropriately documented and cross-reported. To ensure compliance Penny Lane Centers has implemented the following policies:
      i. Social Worker Supervisor will review and submit I-track SIRs when notified of an incident by the end of each day.
      ii. Quality Assurance Manager will review I-track dates of submission and will report issues to each office Regional Director weekly or upon identification of a concern.
      iii. The Quality Assurance Manager will meet weekly with the Quality Assurance Coordinator to review and analyze SIR data and trends.
      iv. The Quality Assurance Coordinator will collect data on a weekly bases tracking total number of SIRs, a breakdown and graph of incident types, and will identify any possible trends that may have been observed. This data and statistics are presented to the FFA Management Team at the end of each

month. The data is also provided to the Penny Lane Research and Development Department for continued quality improvement support.

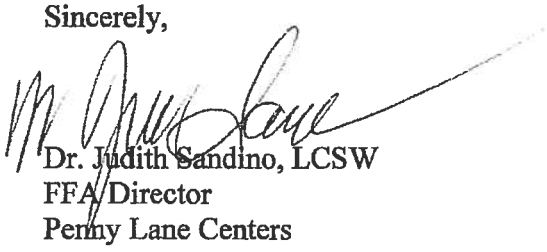
v. All data that is collected is also present to the Penny Lane Executive team on a Quarterly Basis as part of the Key Performance Indicators collected and compiled by the Research and Development Department.

2) Maintenance of required documentation and service delivery section.
   a. Documented efforts to obtain the County worker's authorization to implement the Needs and Service Plan.
      i. Penny Lane will conduct a thorough training for all PLSWs on 1/25/15.
      ii. The training will include required steps to obtain CSW approval of the NSP and will include expectations involving the signatures and documentation of all efforts made.
      iii. All NSPs should be signed by the CSW. Penny Lane Social Workers will ensure that a minimum of 3 attempts to obtain signatures are made.
   b. FFA social workers developed timely, comprehensive, updated (NSPs) with the participation of the developmentally age appropriate child.
      i. During the PLSW training to be held on 1/25/15 all Penny Lane Social Workers will be trained on Child and Family Teaming (CFT) and how to ensure families and children have a voice by participating in the development of goals and that there is written documentation of their participation and approval of the goals. All children that are developmentally age appropriate shall sign their Needs and Service Plan Goals prior to the due date.

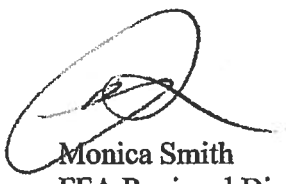
Penny Lane Centers is thankful for the support and continued collaborative efforts with the Out of Home Care Division. We strive to provide top quality care by ensuring safety, wellbeing and permanency for all children at all times. Penny Lane Centers will ensure that all Social Workers are trained and motivated to participate in a collaborative and team driven model of support and care for all children.

Please contact Monica Smith, Regional Director and Quality Assurance Manager at (818) 894-3384 ext. 1291 with any questions or concerns.

Sincerely,



Dr. Judith Sandino, LCSW
FFA Director
Penny Lane Centers



Monica Smith
FFA Regional Director