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DEPARTMENT OF CHILDREN AND FAMILY SERVICES
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April 14, 2016

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

FLORENCE CRITTENTON SERVICES OF ORANGE COUNTY DBA CRITTENTON SERVICES FOSTER FAMILY AGENCY CONTRACT COMPLIANCE REVIEW

The Department of Children and Family Services (DCFS) Contracts Administration Division (CAD) conducted a Contract Compliance Review of Florence Crittenton Services of Orange County dba Crittenton Services Foster Family Agency (the FFA) in June 2015. The FFA has two licensed offices, one located in Orange County and another located in Riverside County. Both locations provide services to the County of Los Angeles DCFS placed children and children from other counties. According to the FFA's Program Statement, its stated mission is "to provide trained foster parents who can offer a nurturing and protecting environment to children of both sexes from birth to 17 years of age."

At the time of the review, the FFA supervised one DCFS placed child and three Non-Minor Dependents (NMDs) in three Certified Foster Homes (CFHs). The children's average length of placement was 15 months and their average age was 14.

SUMMARY

During CAD's Contract Compliance Review, the interviewed children generally reported: feeling safe at the FFA's CFHs, being provided with good care and appropriate services, being comfortable in their environment and treated with respect and dignity. The Certified Foster Parents (CFPs) reported the FFA staff supported them 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 10 applicable areas of CAD's Contract Compliance Review: Licensure/Contract Requirements; Certified Foster Homes; Facility and Environment; Education and Workforce Readiness; Health and Medical Needs; Discharged Children; and Personnel Records. The Psychotropic Medication section was not applicable as the child and NMDs were not prescribed psychotropic medication, at the time of the review.

CAD noted deficiencies in the following areas of Maintenance of Required Documentation and Service Delivery, related to the FFA not documenting monthly contact with the DCFS Children's Social Workers; Personal Rights and Social/Emotional Well-Being, related to one NMD reporting not feeling safe and not being treated with respect and dignity; and Personal Needs/Survival and Economic Well-Being, related to the CFPs not encouraging and assisting a child with updating a Life Book/Photo Album.

Attached are the details of CAD's review.

REVIEW OF REPORT

On July 30, 2015 Patricia Kirkpatrick, DCFS CAD and Kirk Barrow and Kristine Kropke-Gay, DCFS Out-of-Home Care Management Division, held an exit conference with FFA representatives: Colleen Velasco, Program Director of Foster Care and Ana Eykel, Vice President of Foster Care. The FFA's representatives agreed with the review findings and recommendations, were receptive to implementing systemic changes to improve the FFA's compliance with regulatory standards and to addressing the noted deficiencies in a Corrective Action Plan (CAP).

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

The FFA provided the attached approved contract compliance 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:pk

Attachments

c: Sachi A. Hamai, Chief Executive Officer
John Naimo, Auditor-Controller
Public Information Office
Audit Committee
Joyce Capelle, President/Chief Executive Officer, Florence Crittenton Services of Orange County
Leonora Scott, Regional Manager, Community Care Licensing Division
Lajuannah Hills, Regional Manager, Community Care Licensing Division

FLORENCE CRITTENTON SERVICES OF ORANGE COUNTY DBA
CRITTENTON SERVICES FOSTER FAMILY AGENCY
CONTRACT COMPLIANCE REVIEW SUMMARY

801 E. Chapman Avenue
Fullerton, CA 92831
License Number: 306099612

13800 Heacock Street, Suite C#118
Moreno Valley, CA 92553
License Number: 336424300

	Contract Compliance Review	**Findings: June 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	Full Compliance (All)
II	**Certified Foster Homes** (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 Driver's License (DL)/Auto Insurance/Annual Vehicle Maintenance Documentation for CFPs and Designated Drivers 11. Criminal Clearances and Health Screening/DL/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 and 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. Full Compliance 2. Full Compliance 3. Full Compliance 4. Full Compliance 5. Full Compliance 6. Full Compliance 7. Full Compliance 8. Improvement Needed 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	Not Applicable (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. CFP's 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 Medical, Dental and Psychiatric Care 10. Children Given Opportunities to Participate in Extracurricular Activities, Enrichment and Social Activities	1. Full Compliance 2. Improvement Needed 3. Full Compliance 4. Improvement Needed 5. Full Compliance 6. Full Compliance 7. Full Compliance 8. Full Compliance 9. Full Compliance 10. Full Compliance
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	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 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)

FLORENCE CRITTENTON SERVICES OF ORANGE COUNTY DBA
CRITTENTON SERVICES 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 June 2015 review. The purpose of this review was to assess Florence Crittenton Services of Orange County dba Crittenton Services Foster Family Agency's (the FFA's) compliance with its County contract and State regulations and included a review of the FFA's Program Statement as well as 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,
- 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.

For the purpose of this review, one placed child and three Non-Minor Dependents (NMDs) were selected for the sample. The Contracts Administration Division (CAD) interviewed the three NMDs. The placed child was not interviewed, as she was pre-verbal. During the home visit, this child was observed to be comfortable and well cared for in the Certified Foster Home (CFH) and the Certified Foster Parents (CFPs) were observed to be attentive to the needs of this child. CAD reviewed the four case files to assess the care and services they received. Additionally, four discharged children's files were reviewed to assess the FFA's compliance with permanency efforts. At the time of the review, the placed child and the NMDs were not prescribed psychotropic medication.

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

CONTRACTUAL COMPLIANCE

CAD found the following areas out of compliance:

Maintenance of Required Documentation and Service Delivery

- Monthly contacts with the Department of Children and Family Services (DCFS) Children's Social Workers (CSWs) were not documented in the children's case files.

The FFA did not have consistent documentation of its monthly contacts with the DCFS CSWs for one NMD for February 2015. Contacts were missing for July, August and October 2014 and February and March 2015 for the second NMD. The third NMD's contacts were missing for July 2014 and February and March 2015.

Recommendation:

The FFA's management shall ensure that:

1. Monthly contacts with DCFS CSWs are documented.

Personal Rights and Social/Emotional Well-Being

- One NMD reported not feeling safe in the CFH.

One NMD stated that she did not feel safe because she felt that her placement was in jeopardy. She stated that she had been threatened that she would have to leave the CFH and she did not want to leave. She stated she felt safe in the CFH, except for the fear of losing her placement.

- One NMD reported not being treated with respect and dignity.

The same NMD stated that she did not feel she was being treated with respect and dignity because she felt that she was sometimes blamed for things she did not do. She also stated that she was always provided with plenty of food but she had to cook it herself because the CFP no longer cooked meals for her.

During the exit conference, the FFA representatives stated that the NMD had not been threatened but had been spoken to about the possibility of having to move to another CFH if she did not abide by the house rules, as this was an ongoing issue. The FFA representatives also stated that one of her Independent Living Plan (ILP) goals is to learn to prepare her own meals, which is why the CFP provides food, but lets the NMD prepare it herself. The FFA representative stated that they would instruct the FFA Social Workers to routinely ask the NMDs if they have any questions or concerns and to include DCFS CSWs when NMDs express concerns, so that there is clear and open communication to reassure the NMDs that they are safe.

Recommendations:

The FFA's management shall ensure that:

2. Placed children and youth feel safe in the CFHs.

3. Placed children and youth are treated with respect and dignity.

Personal Needs/Survival and Economic Well-Being

- CFPs did not encourage and assist the NMDs to update a Life Book/Photo Album.

The three NMDs did not have a Life Book/Photo Album.

During the exit conference, the FFA representatives stated that they would ensure that all FFA CFPs are aware that they are required to assist placed children and youth to create and maintain a Life Book/Photo Album.

Recommendation:

The FFA's management shall ensure that:

4. CFPs encourage and assist placed children and youth to maintain a Life Book/Photo Album.

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

CAD's last compliance report, dated August 13, 2015, identified nine recommendations.

Results:

Based on CAD's follow-up, the FFA fully implemented 9 of 9 recommendations, for which the FFA was to ensure that:

- Criminal clearances, health screenings, and the CDL, CPR/FBI/DOJ/CACI clearances and auto insurance are obtained, reviewed, and maintained for all adults in the home.
- Exterior/grounds are well maintained.
- Common areas/interior are well maintained.
- Children's bedrooms/interior are well maintained.
- Disaster drills are conducted and documentation is maintained.
- Efforts to obtain CSW's authorization to implement NSPs is documented.
- Children are enrolled in school within three school days.
- Employees complete all required training and documentation is maintained.
- Written declarations for part-time contracted social workers' caseloads not to exceed a total of 15 children are maintained.

At the exit conference, the FFA representatives expressed their desire to remain in compliance with Title 22 Regulations and contractual requirements. CAD will assess implementation of the noted recommendations during our next review. Out-of-Home Care Management Division will provide ongoing support and technical assistance prior to the next review.

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November 5, 2015

Diana Flaggs, Section Manager
Contract Services Bureau Contracts Administration Division
Contract Compliance
3530 Wilshire Blvd. 5th Floor - # 524
Los Angeles, CA 90010

Dear Ms. Diana Flaggs:

CORRECTIVE ACTION PLAN FOR CRITTENTON SERVICES FOR CHILDREN AND FAMILIES, FOSTER FAMILY AGENCY, FOLLOWING MONITORING REVIEW

Please accept this revised corrective action plan in response to eight (4) findings identified on the FFA Monitoring Review Field Exit Summary (Exit Summary). The Exit Summary and findings were discussed in the debriefing on 7/30/15 in the Crittenton FFA office in Fullerton. The following is taken directly from the numbering on the Exit Summary.

 # 34. Are County workers contacted monthly and are the contacts appropriately documented in the case file?

Case files were missing documentation to reflect monthly contact with the County social worker.

Crittenton FFA will retrain Foster Care Social Workers (FCSW) to document their contacts with the child's County social worker (CSW) at minimum of one time per month. Crittenton FFA will document the training and each FCSW will sign, verifying the training once it is completed. In addition, Crittenton FFA will update the foster child Case Management Note to include a prompt for communication with the CSW. The prompt will serve as a visual reminder to have monthly contact with the child's CSW.

 # 49. Do children feel safe in the certified foster home? and # 51. Do children report being treated with respect and dignity?

One non-minor dependent reported not feeling safe in regards to her placement, because she is sometimes threatened that she is going to have to leave. This makes her feel unsafe because she wants to stay in the home. Also, the same non-minor dependent felt she is not treated with respect and dignity because she is blamed for things that she did not do, and feels she's a "scapegoat." She also stated that for the past few months the certified foster parent does not cook

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meals for her, because she got angry with the non-minor dependent. She stated that she's provided with food, but she has to cook her own food, even though the certified foster parent prepares meals for the rest of the family. She did state she wants to remain in this home until she gets on her "own feet."

We respect the non-minor dependent's feelings and perception and of the alleged events that the non-minor dependent reported to occurred in her foster home. However, the FFA has documentation that suggests that the non-minor dependent was not able/willing to follow the terms of the Shared Living Agreement she signed in coordination with her foster mother. For example, the non-minor dependent agreed to keep her section of her bedroom clean and to clean her shared bathroom on a weekly basis. The foster mother and FCSW reported that the non-minor dependent was not following through with her agreements, and this was putting her placement in jeopardy. In addition, the non-minor dependent agreed to Transitional Independent Living Plan (TILP) goals that included learning to prepare/cook her own meal at least one time per week.

Crittenton FFA plans to revise the Case Management Note to prompt the FCSW to routinely ask the child about how he/she is feeling (safety, respected, cared for, etc.). With this being explored regularly, concerns expressed by the child can be addressed more effectively and efficiently in the foster home. The case management note is filed in the child's chart. Furthermore, in the event a child expresses similar concerns, the FCSW will contact the CSW in order to maintain open communication and coordinate interventions.

 # 64. Does the certified foster parent encourage and assist children to update a life book or a photo album?

None of the three non-minor dependents have a life book or photo album, although one of them expressed that she would like to create one. One of the non-minor dependents stated that she has pictures on her phone that she would like to print out to put in a life book or photo album, but has not been provided assistance or been asked if she would like one. One DCFS placed child is an infant and could not be interviewed; however, the certified foster parents have a photo album for her with a large number of pictures.

All children in foster care placement will receive a life-book, photo album, and/or keepsake box from their foster parent(s). To ensure this occurs, the Foster Parent Manuel will be updated to include the expectation that foster parents provide the materials necessary for the child to create and maintain

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current their life-book/photo album/keepsake box. Also, the Foster Parent Case Note will be updated to include a prompt for the FCSW to check that the FP has initiated and is maintaining the life-book/photo album/keepsake box.

Thank you for you continued collaboration. Please do not hesitate to contact me with any additional questions or concerns.

Colleen Velasco

Colleen Velasco, MSW, ASW
Program Director of Foster Care

Ana Eykel

Ana Eykel, MFT-I
Vice-President of Foster Care