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DEPARTMENT OF CHILDREN AND FAMILY SERVICES
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June 20, 2016

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

From: Philip L. Browning
Director

ROSEMARY CHILDREN'S 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 Rosemary Children's Services (the FFA) in October 2015. The FFA has two offices, one located in the Fifth Supervisorial District, and one in Riverside County. Both offices provide services to the County of Los Angeles DCFS placed children, Probation foster youth and to children from other counties. According to the FFA's Program Statement, its stated purpose is "to recruit, train, and monitor Foster Family Agency, Intensive Treatment Foster Care (ITFC), and Whole Foster Family Home (WFFH) foster parents who can offer nurturing, supportive treatment environments to children ages birth to 17, and also to Non-Minor Dependents".

At the time of the review, the FFA supervised 103 DCFS placed children in 53 Certified Foster Homes (CFHs). The placed children's average length of placement was nine months and their average age was 7.

SUMMARY

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 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 6 of 11 areas of CAD's Contract Compliance Review: Education and Workforce Readiness; Health and Medical Needs; Psychotropic Medication; Personal Rights and Social/Emotional Well-Being; Discharged Children; and Personnel Records.

CAD noted deficiencies in the following areas: Licensure/Contract Requirements, related to Community Care Licensing (CCL) citations; Certified Foster Homes, related to a CFP with an expired car registration; Facility and Environment, related to inadequate nutritious perishable and non-perishable food and lack of completed weekly monetary allowance logs; Maintenance of Required Documentation and Service Delivery, related to the FFA not documenting the efforts to obtain the DCFS Children's Social Worker's (CSW's) authorization to implement the Needs and Services Plan (NSP) and FFA Social Workers not developing timely Initial NSP reports; and Personal Needs/Survival and Economic Well-being, related to a lack of encouragement and assistance with maintaining a Life Book or Photo Album.

Attached are the details of CAD's review.

REVIEW OF REPORT

On November 30, 2015, Chinelo Maduike, DCFS CAD, and Gladys Hidayat, DCFS Out-of-Home Care Management Division, held an exit conference with the FFA representatives: Jana Trew, Executive Director, and Erin Ellis, FFA Program Director. The FFA representatives agreed with the review findings and recommendations; were 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 compliance CAP addressing the recommendations noted in this compliance report.

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

PLB:KR
LTI:cm

Attachments

c: Sachi A. Hamai, Chief Executive Officer
John Naimo, Auditor-Controller
Calvin C. Remington, Interim Chief Probation Officer
Public Information Office
Audit Committee
Jana Trew, Regional Director, Rosemary Children's Services
Lajuannah Hills, Regional Manager, Community Care Licensing
Lenora Scott, Regional Manager, Community Care Licensing

ROSEMARY CHILDREN'S SERVICES FOSTER FAMILY AGENCY
CONTRACT COMPLIANCE REVIEW SUMMARY

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	Contract Compliance Review	Findings: October 2015
I	**Licensure/Contract Requirements** (7 Elements)	
	1. Timely Notification of Child's Relocation	1. Full Compliance
	2. Timely, Cross-Reported SIRs	2. Full Compliance
	3. Runaway Procedures in Accordance with the Contract	3. Full Compliance
	4. Are there CCL Citations/OHCMD Safety Reports	4. Improvement Needed
	5. If applicable, FFA Ensures Complete Required Whole Foster Family Home Training	5. Full Compliance
	6. FFA Pays Certified Foster Parents (CFP) Whole Foster Family Home Payments	6. Full Compliance
	7. FFA Conducts an Assessment of CFP Prior to Placement of Two (2) or More Children	7. Full Compliance
II	**Certified Foster Homes (CFHs)** (12 Elements)	
	1. Home Study and Safety Inspection Conducted Prior to Certification	1. Full Compliance
	2. Agency's Inquiry with OHCMD for Historical Information Prior to Certification	2. Full Compliance
	3. Timely Criminal Clearances Federal Bureau of Investigation (FBI), California Department of Justice (DOJ), Child Abuse Central Index (CACI) Prior to Certification	3. Full Compliance
	4. Timely, Completed, Signed Criminal Background Statement	4. Full Compliance
	5. Health Screening & Tuberculosis (TB) Test Prior to Certification	5. Full Compliance
	6. All Required Training Prior to Certification	6. Full Compliance
	7. Certificate of Approval on File/Including Capacity	7. Full Compliance
	8. Safety Inspection Every Six Months or Per Approved Program Statement	8. Full Compliance
	9. Completed Annual Training Hours for Re-certification and Current CPR/First Aid/Water Safety Certificates	9. Full Compliance
	10. Current Driver's License/Auto Insurance/Annual Vehicle Maintenance Documentation for CFPs and Designated Drivers	10. Improvement Needed
	11. Criminal Clearances and Health Screening Driver's License/CPR/FBI/DOJ/CACI/Auto Insurance for Other Adults in the Home	11. Full Compliance
	12. FFA Assists CFPs in Providing Transportation Needs	12. Full Compliance

III	**Facility and Environment** (7 Elements)	
	1. Exterior/Grounds Well Maintained	1. Full Compliance
	2. Common Areas were 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 Food	5. Improvement Needed
	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 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	1. Improvement Needed
	2. CFPs Participated in Development of the NSPs	2. Full Compliance
	3. Children Progressing Towards Meeting NSP Goals	3. Full Compliance
	4. FFA Social Workers Develop Timely, Comprehensive Initial NSPs with Child's Participation	4. Improvement Needed
	5. FFA Social Workers Develop Timely, Comprehensive Updated NSPs with Child's Participation	5. Full Compliance
	6. Therapeutic Services Received	6. Full Compliance
	7. Recommended Assessments/Evaluations Implemented	7. Full Compliance
	8. DCFS Children's Social Worker's Monthly Contacts Documented in Child's Case File	8. Full Compliance
	9. FFA Social Workers Develop Timely, Comprehensive Quarterly Reports	9. Full Compliance
	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	Full Compliance (All)
	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	

VI	**Health and Medical Needs** (4 Elements) 1. Initial Medical Exams Conducted Timely 2. Follow-up Medical Exams Conducted Timely 3. Initial Dental Exams Conducted Timely 4. Follow-up Dental Exams Conducted Timely	Full Compliance (All)
VII	**Psychotropic Medication** (2 Elements) 1. Current Court Authorization for Administration of Psychotropic Medication 2. Current Psychiatric Evaluation Review	Full Compliance (All)
VIII	**Personal Rights and Social/Emotional Well-Being** (10 Elements) 1. Children Informed of Agency's Policies and Procedures 2. Children Feel Safe in the CFP Home 3. CFPs' Efforts to Provide Nutritious Meals and Snacks 4. CFPs Treat Children with Respect and Dignity 5. Children Allowed Private Visits, Calls and to Receive Correspondence 6. Children Free to Attend or not Attend Religious Services/Activities of Their Choice 7. Children's Chores Reasonable 8. Children Informed About Their Medication and Their Right to Refuse Medication 9. Children Aware of Right to Refuse or Receive Medical, Dental and Psychiatric Care 10. Children Given Opportunities to Participate in 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's Involvement in Selection of Their Clothing 4. Provision of Sufficient Supply of Towels and Personal Care Items Meeting Ethnic Needs 5. Minimum Weekly Monetary Allowances 6. Management of Allowance/Earnings 7. Encouragement/ Assistance with a 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 Driver's License and Auto Insurance 6. FFA Employees Signed Copies of FFA Policies and Procedures 7. FFA Employees Completed all Required Training and Documentation Maintained 8. FFA Social Workers Have Appropriate Caseload Ratio 9. FFA Maintained Written Declarations for Part-Time Contracted FFA Social Workers Caseloads Not Exceed Total of 15 Children	Full Compliance (All)

ROSEMARY CHILDREN'S SERVICES FOSTER FAMILY AGENCY
CONTRACT COMPLIANCE REVIEW
FISCAL YEAR 2015-2016

SCOPE OF REVIEW

The following report is based on a "point in time" review. This compliance report addresses findings noted during the October 2015 review. The purpose of this review was to assess Rosemary Children Services' (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 Rights and Social/Emotional Well-Being,
- Personal Needs/Survival and Economic Well-Being,
- Discharged Children, and
- Personnel Records.

For the purpose of this review, 13 placed children were selected for the sample. The Contracts Administration Division (CAD) interviewed 9 of 13 children. Four of the children were too young to be interviewed. During the home visits, the children were observed to be comfortable and well cared for in the Certified Foster Homes (CFHs), and their Certified Foster Parents (CFPs) were observed to be responsive to the children's needs. CAD reviewed the 13 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, four children were prescribed psychotropic medication. These children's case files were reviewed to assess the timeliness of Psychotropic Medication Authorizations and required documentation of psychiatric monitoring.

CAD reviewed six CFP files and five 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 five areas out of compliance:

Licensure/Contract Requirements

- Community Care Licensing (CCL) citations.

On April 1, 2015, CCL cited the FFA as a result of a complaint received by CCL on March 24, 2015. CCL substantiated allegations against the CFP, related to not assisting a

child with hygiene needs, sending the child to school in dirty clothes, and not maintaining the child's immunization records. CCL requested a Plan of Correction (POC), which required the FFA to ensure that the CFP maintains copies of children's immunization records; proof that the CFP is provided with additional training on how to assist foster children with personal hygiene needs and ensuring that they are sent to school in clean clothes. The POC cleared on April 8, 2015. The Department of Children and Family Services (DCFS) Emergency Response Children's Social Worker (ER CSW) conducted its own investigation, and deemed the allegations of General Neglect to be inconclusive. Out-of-Home Care Investigations Section (OHCIS) approved the Corrective Action Plan (CAP) requested from the FFA on September 30, 2015.

CCL cited the FFA as a result of a complaint received by CCL on February 26, 2015. According to the report dated June 25, 2015, CCL substantiated a Personal Rights violation. CCL requested a POC, which included de-certification of the home. The FFA decertified the CFH on February 25, 2015 and the POC cleared on June 19, 2015. DCFS ER CSW conducted its own investigation, and substantiated an allegation of General Neglect. OHCIS determined that the "Investigative Hold" that was in place would be amended to an "Indefinite Hold" and all the placed children were placed in a different CFH on March 2, 2015.

On August 4, 2015, CCL cited the FFA for a Lack of Supervision violation as a result of a complaint received on June 4, 2015. CCL substantiated allegations against the CFP related to a child's attempted suicide. CCL requested a POC, which required the FFA to provide additional training to CFPs in the areas of care and supervision needs. Further, CCL requested a copy of the training curriculum and sign-in sheets. The POC cleared on August 12, 2015. On June 3, 2015, Riverside County Department of Children's Services conducted its own investigation and deemed the allegation of General Neglect to be unfounded. An OHCIS investigation was not required, as this did not involve Los Angeles County DCFS placed children.

On September 30, 2015, CCL cited the FFA for a Personal Rights violation as a result of a complaint received on May 27, 2015. CCL requested a POC, which required the FFA to provide training to the CFPs in the following areas: Children's Personal Rights, Discipline Policy, and De-Escalation Skills. Further, CCL requested verification of the training. The POC cleared on September 30, 2015. DCFS ER CSW conducted its own investigation and deemed the allegation of General Neglect and Emotional Abuse to be unfounded. On October 8, 2015, OHCIS requested a CAP and approved it on November 16, 2015.

Recommendation:

The FFA's management shall ensure that:

1. The FFA complies with Title 22 Regulations and is free of CCL citations.

Certified Foster Home

- Certified Foster Parents (CFPs) did not have a valid vehicle registration.

CFPs in one CFH did not have a current vehicle registration for the car used in the transportation of the children. CAD instructed the CFPs not to transport the children in the car until the registration was verified as current. On November 20, 2015, CAD received a copy of the proof of vehicle registration payment showing valid registration until September 2016.

During the exit conference, the FFA representative stated that they would ensure that the CFPs monitor their car registrations and adhere to all federal and State laws.

Recommendation:

The FFA's management shall ensure that:

2. CFPs maintain valid vehicle registration.

Facility and Environment

- Non-perishable food did not adhere to expiration dates.

In 2 of 6 CFHs, there were expired canned goods, spices and boxed food. CFHs #2 and #3 had expired food in their pantries. CAD had the CFPs dispose of the expired food.

During the exit conference, the FFA representatives stated that they would ensure that the CFPs adhere to their protocol of noting the purchase and expiration dates on the non-perishable food containers. Additionally, the FFA representatives stated that the FFA would provide a refresher training to all CFPs and to staff responsible for conducting home inspections, regarding maintenance of perishable and non-perishable food.

- Appropriate and comprehensive monetary allowance logs were not maintained.

In 1 of 6 CFHs, they did not maintain an appropriate and comprehensive monetary allowance log. The weekly allowance received was not documented in a weekly log for the three children placed in the home. Only the amount of the allowance spent was documented. The children were too young to sign and no one signed on their behalf. During the exit conference, the FFA representative stated that the FFA will ensure the CFPs document weekly allowance in the allowance log and the FFA Social Workers would sign for the younger children.

Recommendations:

The FFA's management shall ensure that:

3. CFHs adhere to food product expiration dates.

4. Appropriate and comprehensive monetary allowance logs are maintained.

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).

In 10 of 13 NSPs reviewed, the FFA did not obtain the DCFS CSW's signature authorizing implementation of the NSP, and there was insufficient documentation of the efforts made by the FFA to obtain the DCFS CSW's signature.

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

In reviewing the Initial NSPs, 13 were not completed timely. All 13 NSPs were signed late with different dates. An Initial NSP that was due on September 7, 2015, was not signed until September 17, 2015. There was no documented effort made to obtain the DCFS CSW's signature. This NSP was also not comprehensive. The FFA did not offer Family Reunification, Adoption or Legal Guardianship as case plan goals prior to Planned Permanent Living Arrangement (PPLA) case goal option even though this was the child's first placement from their family. There was no documentation of why this information was not included.

During the exit conference, the FFA representatives stated that the FFA would provide additional training to the FFA's supervisors and social workers regarding timeliness and adequate documentation. Additionally, the FFA's supervisor will review the report due dates with their social workers during weekly supervision.

Recommendations:

The FFA's management shall ensure that:

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

6. The FFA Social Workers develop timely, comprehensive Initial NSPs.

Personal Needs/Survival and Economic Well-Being

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

One child stated that he did not have a Life Book or Photo Album and was provided with one a week before the interview date, but it had the name of another child that used to be in the home.

During the exit conference, the FFA representatives stated that the FFA staff and all CFPs would be reminded of the expectation regarding encouraging children to create a Life Book or Photo Album.

Recommendation:

The FFA's management shall ensure that:

7. Encouragement/Assistance with a Life Book or Photo Album is provided to all children.

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

The last compliance report from CAD, dated March 23, 2015, identified five recommendations.

Results:

Based on the results of this review, the FFA fully implemented 3 of 5 previous recommendations for which they were to ensure that:

- The CFPs maintain sufficient and adequate educational resources.
- Recommended assessments are implemented.
- Age-appropriate children's participation in Youth Development Services or equivalent services are facilitated.

Based on the results of this review, the FFA did not implement 2 of 5 prior recommendations for which they were to ensure that:

- The FFA complies with Title 22 Regulations and is free of CCL citations.
- CFH maintains an adequate amount of nutritious perishable and non-perishable food and adheres to product expiration dates.

Recommendation:

8. The outstanding recommendations from the prior report noted in this report as recommendation numbers 1 and 2 are fully implemented.

At the exit conference, the FFA's Regional Director expressed a desire to make sustainable changes to remain in compliance with Title 22 Regulation and contract requirements. The FFA will consult with OHCMD for additional support and technical assistance, and CAD will continue to assess implementation of the recommendations during the next Contract Compliance Review.