



**County of Los Angeles  
DEPARTMENT OF CHILDREN AND FAMILY SERVICES**

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June 20, 2016

To: Supervisor Hilda L. Solis, Chair  
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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.

*"To Enrich Lives Through Effective and Caring Service"*

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 Maduiké, 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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Riverside, CA 92507  
License Number: 336409997

	<b>Contract Compliance Review</b>	<b>Findings: October 2015</b>
<b>I</b>	<p><b><u>Licensure/Contract Requirements</u></b> (7 Elements)</p> <ol style="list-style-type: none"> <li>1. Timely Notification of Child's Relocation</li> <li>2. Timely, Cross-Reported SIRs</li> <li>3. Runaway Procedures in Accordance with the Contract</li> <li>4. Are there CCL Citations/OHCMD Safety Reports</li> <li>5. If applicable, FFA Ensures Complete Required Whole Foster Family Home Training</li> <li>6. FFA Pays Certified Foster Parents (CFP) Whole Foster Family Home Payments</li> <li>7. FFA Conducts an Assessment of CFP Prior to Placement of Two (2) or More Children</li> </ol>	<ol style="list-style-type: none"> <li>1. Full Compliance</li> <li>2. Full Compliance</li> <li>3. Full Compliance</li> <li>4. Improvement Needed</li> <li>5. Full Compliance</li> <li>6. Full Compliance</li> <li>7. Full Compliance</li> </ol>
<b>II</b>	<p><b><u>Certified Foster Homes (CFHs)</u></b> (12 Elements)</p> <ol style="list-style-type: none"> <li>1. Home Study and Safety Inspection Conducted Prior to Certification</li> <li>2. Agency's Inquiry with OHCMD for Historical Information Prior to Certification</li> <li>3. Timely Criminal Clearances Federal Bureau of Investigation (FBI), California Department of Justice (DOJ), Child Abuse Central Index (CACI) Prior to Certification</li> <li>4. Timely, Completed, Signed Criminal Background Statement</li> <li>5. Health Screening &amp; Tuberculosis (TB) Test Prior to Certification</li> <li>6. All Required Training Prior to Certification</li> <li>7. Certificate of Approval on File/Including Capacity</li> <li>8. Safety Inspection Every Six Months or Per Approved Program Statement</li> <li>9. Completed Annual Training Hours for Re-certification and Current CPR/First Aid/Water Safety Certificates</li> <li>10. Current Driver's License/Auto Insurance/Annual Vehicle Maintenance Documentation for CFPs and Designated Drivers</li> <li>11. Criminal Clearances and Health Screening Driver's License/CPR/FBI/DOJ/CACI/Auto Insurance for Other Adults in the Home</li> <li>12. FFA Assists CFPs in Providing Transportation Needs</li> </ol>	<ol style="list-style-type: none"> <li>1. Full Compliance</li> <li>2. Full Compliance</li> <li>3. Full Compliance</li> <li>4. Full Compliance</li> <li>5. Full Compliance</li> <li>6. Full Compliance</li> <li>7. Full Compliance</li> <li>8. Full Compliance</li> <li>9. Full Compliance</li> <li>10. Improvement Needed</li> <li>11. Full Compliance</li> <li>12. Full Compliance</li> </ol>

<p><b>III</b></p>	<p><b><u>Facility and Environment</u></b> (7 Elements)</p> <ol style="list-style-type: none"> <li>1. Exterior/Grounds Well Maintained</li> <li>2. Common Areas were Maintained</li> <li>3. Children's Bedrooms/Interior Well Maintained</li> <li>4. Sufficient and Appropriate Educational Resources</li> <li>5. Adequate Perishable and Non-Perishable Food</li> <li>6. CFP Conducted Disaster Drills and Documentation Maintained</li> <li>7. Money and Clothing Allowance Logs Maintained</li> </ol>	<ol style="list-style-type: none"> <li>1. Full Compliance</li> <li>2. Full Compliance</li> <li>3. Full Compliance</li> <li>4. Full Compliance</li> <li>5. Improvement Needed</li> <li>6. Full Compliance</li> <li>7. Improvement Needed</li> </ol>
<p><b>IV</b></p>	<p><b><u>Maintenance of Required Documentation and Service Delivery</u></b> (10 Elements)</p> <ol style="list-style-type: none"> <li>1. FFA Obtains or Documents Efforts to Obtain DCFS Children's Social Worker's (CSW's) Authorization to Implement NSPs</li> <li>2. CFPs Participated in Development of the NSPs</li> <li>3. Children Progressing Towards Meeting NSP Goals</li> <li>4. FFA Social Workers Develop Timely, Comprehensive Initial NSPs with Child's Participation</li> <li>5. FFA Social Workers Develop Timely, Comprehensive Updated NSPs with Child's Participation</li> <li>6. Therapeutic Services Received</li> <li>7. Recommended Assessments/Evaluations Implemented</li> <li>8. DCFS Children's Social Worker's Monthly Contacts Documented in Child's Case File</li> <li>9. FFA Social Workers Develop Timely, Comprehensive Quarterly Reports</li> <li>10. FFA Social Workers Conduct Required Visits</li> </ol>	<ol style="list-style-type: none"> <li>1. Improvement Needed</li> <li>2. Full Compliance</li> <li>3. Full Compliance</li> <li>4. Improvement Needed</li> <li>5. Full Compliance</li> <li>6. Full Compliance</li> <li>7. Full Compliance</li> <li>8. Full Compliance</li> <li>9. Full Compliance</li> <li>10. Full Compliance</li> </ol>
<p><b>V</b></p>	<p><b><u>Education and Workforce Readiness</u></b> (5 Elements)</p> <ol style="list-style-type: none"> <li>1. Children Enrolled in School within Three School Days</li> <li>2. Children Attend School as Required and FFA Facilitates in Meeting Children's Educational Goals</li> <li>3. Current Children's Report Cards/Progress Reports Maintained</li> <li>4. Children's Academic Performance and/or Attendance Increased</li> <li>5. FFA Facilitates Child's Participation in YDS or Equivalent Services and Vocational Programs</li> </ol>	<p>Full Compliance (All)</p>

<p><b>VI</b></p>	<p><b><u>Health and Medical Needs</u></b> (4 Elements)</p> <ol style="list-style-type: none"> <li>1. Initial Medical Exams Conducted Timely</li> <li>2. Follow-up Medical Exams Conducted Timely</li> <li>3. Initial Dental Exams Conducted Timely</li> <li>4. Follow-up Dental Exams Conducted Timely</li> </ol>	<p>Full Compliance (All)</p>
<p><b>VII</b></p>	<p><b><u>Psychotropic Medication</u></b> (2 Elements)</p> <ol style="list-style-type: none"> <li>1. Current Court Authorization for Administration of Psychotropic Medication</li> <li>2. Current Psychiatric Evaluation Review</li> </ol>	<p>Full Compliance (All)</p>
<p><b>VIII</b></p>	<p><b><u>Personal Rights and Social/Emotional Well-Being</u></b> (10 Elements)</p> <ol style="list-style-type: none"> <li>1. Children Informed of Agency's Policies and Procedures</li> <li>2. Children Feel Safe in the CFP Home</li> <li>3. CFPs' Efforts to Provide Nutritious Meals and Snacks</li> <li>4. CFPs Treat Children with Respect and Dignity</li> <li>5. Children Allowed Private Visits, Calls and to Receive Correspondence</li> <li>6. Children Free to Attend or not Attend Religious Services/Activities of Their Choice</li> <li>7. Children's Chores Reasonable</li> <li>8. Children Informed About Their Medication and Their Right to Refuse Medication</li> <li>9. Children Aware of Right to Refuse or Receive Medical, Dental and Psychiatric Care</li> <li>10. Children Given Opportunities to Participate in Extracurricular Activities, Enrichment and Social Activities</li> </ol>	<p>Full Compliance (All)</p>
<p><b>IX</b></p>	<p><b><u>Personal Needs/Survival and Economic Well-Being</u></b> (7 Elements)</p> <ol style="list-style-type: none"> <li>1. Clothing Allowance Provided in Accordance with FFA Program Statement</li> <li>2. Ongoing Clothing Inventories of Adequate Quantity and Quality</li> <li>3. Children's Involvement in Selection of Their Clothing</li> <li>4. Provision of Sufficient Supply of Towels and Personal Care Items Meeting Ethnic Needs</li> <li>5. Minimum Weekly Monetary Allowances</li> <li>6. Management of Allowance/Earnings</li> <li>7. Encouragement/ Assistance with a Life Book or Photo Album</li> </ol>	<ol style="list-style-type: none"> <li>1. Full Compliance</li> <li>2. Full Compliance</li> <li>3. Full Compliance</li> <li>4. Full Compliance</li> <li>5. Full Compliance</li> <li>6. Full Compliance</li> <li>7. Improvement Needed</li> </ol>

ROSEMARY CHILDREN'S SERVICES FOSTER FAMILY AGENCY CONTRACT REVIEW  
 PAGE 4

<p><b>X</b></p>	<p><b><u>Discharged Children</u></b> (3 Elements)</p> <ol style="list-style-type: none"> <li>1. Completed Discharge Summary</li> <li>2. Attempts to Stabilize Children's Placement</li> <li>3. Child Completed High School (if applicable)</li> </ol>	<p>Full Compliance (All)</p>
<p><b>XI</b></p>	<p><b><u>Personnel Records</u></b> (9 Elements)</p> <ol style="list-style-type: none"> <li>1. Criminal Clearances (FBI, DOJ, CACI) Signed and Submitted Timely</li> <li>2. Timely, Completed, Signed Criminal Background Statement</li> <li>3. FFA Social Workers Met Education/Experience Requirements</li> <li>4. Timely Employee Health Screening/TB Clearances</li> <li>5. Valid Driver's License and Auto Insurance</li> <li>6. FFA Employees Signed Copies of FFA Policies and Procedures</li> <li>7. FFA Employees Completed all Required Training and Documentation Maintained</li> <li>8. FFA Social Workers Have Appropriate Caseload Ratio</li> <li>9. FFA Maintained Written Declarations for Part-Time Contracted FFA Social Workers Caseloads Not Exceed Total of 15 Children</li> </ol>	<p>Full Compliance (All)</p>

**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

ROSEMARY CHILDREN'S SERVICES FOSTER FAMILY AGENCY CONTRACT REVIEW  
PAGE 2

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.



**Rosemary Children's Services**

CARING FOR THE CHILD

TEACHING THE TEEN

FOSTERING THE FAMILY

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Human Service Agencies

California Association  
of Private Specialized  
Education and Services

Child Welfare  
League of America

Foster Family-Based  
Treatment Association

Learning Disabilities Association  
United Way

www.rosemarychildren.org

December 29, 2015  
County of Los Angeles  
Contracts Administration Division  
3530 Wilshire Blvd. 4th Floor  
Los Angeles, CA 90010  
Attn: Amy Kim

To: Ms. Amy Kim

From: Erin Ellis, Foster Care Director, Rosemary Children's Services  
Subject: Corrective Action Plan for the Contracts Administration Division  
(CAD) Contract Compliance Monitoring Review of Rosemary Children's  
Services Foster Family Agency for 2015

**Licensure/Contract Requirements**

- **Rosemary Children's Services (RCS) FFA received 4 substantiated Community Care Licensing (CCL) citations during the rating period.**

**RCS Response:** One of the citations was a Substantiated children's records and care and supervision allegation involving the foster parents not having a copy of the foster child's immunization records and not assisting the child with their personal hygiene needs. RCS completed the Plan of Correction (POC) that involved ensuring that the foster parent maintained the immunization records at the certified foster home. RCS also provided training to the foster parents on ensuring the children are sent to school in clean clothes and on assisting the foster children with their personal hygiene needs. The POC was approved and cleared by the due date.

The second citation was a Substantiated allegation of personal rights-FM told the child to leave the home, was verbally abusive to foster child, and grabbed foster child and neglect/lack of supervision-foster mother was unaware of foster child's whereabouts. RCS involuntarily decertified the foster home at the time the incident occurred due to the foster parent not adhering to agency expectations, the proof of this was given to the Licensing Program Analyst (LPA) and the POC was approved at the time the deficiency was cited.

The third citation was for a Substantiated allegation of lack of supervision. RCS completed the POC that involved providing the foster parents with additional training on meeting the children's care and supervision needs including ensuring that areas that have been observed as problematic are addressed, such as children's potential for self-harm. The POC was completed and approved by the due date.

The last citation was for a Substantiated personal rights violation that the foster mother prevented the child from having access to the refrigerator. At the time of the incident RCS had retrained the foster parents on Children's Personal Rights, Discipline Policy and De-Escalation Skills. The proof of this was provided to the LPA at the time the deficiency was cited and thus it was cleared.

RCS will continue to train our foster parents on agency expectations and Title 22 regulations in order to ensure that we make every effort to be free of substantiated investigations

### Certified Foster Homes

- **One of the foster parent's vehicle registration was expired at the time of the home visit.**

**RCS Response:** RCS requires that Certified Foster Parents (CFP) follow state laws regarding vehicles, including having current auto insurance and valid registration. Although the CFH was found to be out of compliance with this regulation at the time of the home visit, as indicated in the Review Field Exit Summary Report the foster parents did pay the vehicle registration and the proof of this and the valid vehicle registration was submitted to CAD the day after their visit to the foster home.

The RCS Foster Care Social Worker (FCSW) assigned to each foster home is responsible for ensuring that the CFPs adhere to the RCS certified foster family requirements including maintaining current vehicle documentation. In order to clarify what is expected regarding CFPs vehicles the Vehicle Agreement form which is signed prior to certification was revised to include carrying evidence of current vehicle registration in their vehicles (see attached form). This was also added to the Certified Foster Family Requirements form (see attached form). At the FFA All Staff Meeting on December 9, 2015 the Foster Care Director reviewed and provided the FCSWs with the foster parent Monthly Training, which is on Foster Parent Requirements. The training consists of: the revised Certified Foster Family Requirements form, Foster Parent Non-Compliance Protocol, Monthly Clothing Expenditures Policy, Allowance Regulations, revised Vehicle Agreement and Caretaker Regulations (see attached forms). The FCSWs will be conducting the trainings with their foster parents during their home visits. This training will be completed during the month of December 2015, and the proof will be kept in the foster parent's agency file.

### Facility and Environment:

- **Two of the CFHs did not adhere to the product expiration dates.**

**RCS Response:** RCS requires that CFPs adhere to product expiration dates per Title XXII regulations. It is the RCS FCSWs responsibility to conduct bi-monthly home inspections that includes checking all fresh perishable and non-perishable food in the CFH.

In order to ensure that the CFPs understand the requirement to discard all food products that have reached their expiration dates the Certified Foster Family Requirements form has been revised in the Building and Grounds Compliance section, to include a section that specifies that they are to ensure "that there is no expired food of any kind in the home-*including canned foods, packages food, drink packets, soup mixes, fresh food, frozen food, drinks, etc.*" (see attached form). At the FFA All Staff Meeting on December 9, 2015 the Foster Care Director reviewed and provided the FCSWs with the foster parent Monthly Training, which is on Foster Parent Requirements. The training consists of: the revised Certified Foster Family Requirements form, Foster Parent Non-Compliance Protocol, Monthly Clothing Expenditures Policy, Allowance Regulations, revised Vehicle Agreement and Caretaker Regulations (see attached forms). The FCSWs will be conducting the trainings with their foster parents during their home visits. This training will be completed during

the month of December 2015, and the proof will be kept in the foster parent's agency file.

- **Three of the children received their allowance monthly, rather than weekly, and the children are too young to sign for their allowance and no one signed on their behalf.**

**RCS Response:** RCS requires that all foster parents provide the children with their allowance weekly. The three children identified in the review as receiving their allowance monthly all reside in the same foster home, and are all under the age of 4 and thus too young to sign for receiving their allowance. The foster mother had been documenting giving them their allowance all at once each month rather than broken up weekly. The FCSW has informed the foster mother that regardless of the age of the child the allowance must be given weekly. As the children are too young to sign the FCSW should be verifying that the allowance was given weekly and should sign on the child's behalf.

In order to clarify allowance regulations with the foster parents they were all being retrained on them including the requirement that allowance must be given weekly. At the FFA All Staff Meeting on December 9, 2015 the Foster Care Director reviewed and provided the FCSWs with the foster parent Monthly Training, which is on Foster Parent Requirements. The training consists of: the Certified Foster Family Requirements form, Foster Parent Non-Compliance Protocol, Monthly Clothing Expenditures Policy, Allowance Regulations, revised Vehicle Agreement and Caretaker Regulations (see attached forms). The FCSWs will be conducting the trainings with their foster parents during their home visits. This training will be completed during the month of December 2015, and the proof will be kept in the foster parent's agency file.

#### **Maintenance of Required Documentation and Service Delivery**

- **The FFA did not consistently obtain or document efforts to obtain the County worker's authorization to implement the NSP.**

**RCS Response:** The administrative assistant in each FFA office mail out the Initial Report/NSPs and Quarterly Report/NSPs to the County Social Workers (CSW) upon completion. Along with the report they send a letter requesting that the CSW review and sign the signature page in order for RCS to begin implementing the NSP and to return the signature page in the Self Addressed Stamped Envelope that is provided. The administrative assistants place a copy of this letter in the Foster Child's file. The RCS FCSW assigned to the case is responsible for following up with the CSW via email, phone and fax to ensure that they sign and return the NSP signature page authorizing for the NSP to be implemented. They are to email the report to the CSW by the due date and to continue to follow up with the CSW until the signature is obtained. The documentation of their efforts to obtain the CSW signature is to be filed in the foster child's file in front of each Initial and Quarterly/NSP report.

In order to clarify these expectations to the RCS FFA staff, including the FCSWs, a formal Quarterly/Needs and Services Plan Report Policy was established in October 2015 and reviewed with the FFA staff. This policy was revised on December 18, 2015 to include that: the FCSW must email the CSW the report either a few days before or on the due date, that within 5 calendar days of the due date the FCSW is required to make at least 3 attempts to obtain

the CSW's signature and they should include the CSW's supervisor on the 2<sup>nd</sup> and 3<sup>rd</sup> attempts, and that all these emails must be attached to the report in the file (see attached). At the FFA All Staff Meeting on January 6, 2016 the Foster Care Director will present and review the revised Quarterly/Needs and Services Plan Report Policy with all FFA staff.

- **The FFA Social Workers did not develop timely initial and updated NSPs with the participation of the developmentally age-appropriate child as they did not consistently obtain the Foster Parent and Foster Child's signatures on the NSPs within 5 days. Also, one child's Initial NSP was not comprehensive.**

**RCS Response:** The RCS FCSWs are required to include the foster parents and all age-appropriate children in the development of the initial and updated NSPs. During their weekly visits the FCSWs discuss the progress towards the NSP goals with the foster parents and foster children. The FCSWs elicit feedback from the foster parents and foster children regarding developing the goals and the what the service plan is to meet the goal. The RCS FCSWs are required to have the foster parent and age-appropriate foster child's sign and date the NSP signature page within 5 days of the report due date, as proof of when they were given the NSP. All of the Initial and Quarterly NSP Reports must be comprehensive and accurate. During the CAD review it was noted that one of the reports did not have a correct Case Plan Goal and one of the Outcome Goals was missing a start date and projected completion date. The Supervisor that reviews the report is responsible for reviewing the report thoroughly for comprehensiveness and ensuring that the report is complete prior to signing it for approval.

Obtaining the foster parent and age-appropriate foster child's signatures is also part of the formal Quarterly/Needs and Services Plan Report Policy that was established in October 2015 and reviewed with the FFA staff. In order to further clarify the expectation this policy was revised on December 18, 2015 to include that the foster parent and foster child must sign and date the NSP signature page within 5 calendar days of the report due date (see attached). At the FFA All Staff Meeting on January 6, 2016 the Foster Care Director will present and review the revised Quarterly/Needs and Services Plan Report Policy with all FFA staff. The Foster Care Director will also retrain the FCSWs and Supervisors at the FFA All Staff Meeting on January 6, 2016 regarding thoroughly and accurately completing the Initial and Quarterly/NSP reports including ensuring that all NSP goals start, modified and completion dates are correct and reviewing the Case Plan and Concurrent Case Plan goals with the CSWs prior to completion of the reports.

#### **Personal Needs/Survival and Economic Well-Being**

- **One of the children did not have a lifebook or photo album**

**RCS Response:** As part of the RCS intake process all foster children are given a blank lifebook at the time of placement. The FCSWs encourage the foster parents and foster children to work on the lifebooks together or to develop a photo album or scrapbook in order to help preserve the foster child's memories.

In order to help the foster parents to understand the importance of lifebooks/photo albums for children of all ages and to retrain them on the requirement that they must be working on them from the time of placement all foster parents will be retrained on Lifebooks. At the FFA All Staff Meeting on January 6, 2016 the Foster Care Director will review the training with the FFA staff and copies of the training will be given to the FCSWs to conduct with their foster parents during January 2016 (see attached). The FCSWs will be conducting the trainings with their foster parents during their home visits, and the proof will be kept in the foster parent's agency file.

The Foster Care Director will be responsible for ensuring that this CAP is fully implemented. If you have any questions, please feel free to contact me at (626) 403-2277.

Sincerely,



Erin Ellis, MA  
Foster Care Director