



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

425 Shatto Place, Los Angeles, California 90020
(213) 351-5602

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Director

BRANDON NICHOLS
Chief Deputy Director

October 12, 2016

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From: Philip L. Browning
Director

TRINITY YOUTH SERVICES FOSTER FAMILY AGENCY FISCAL ASSESSMENT AND CONTRACT COMPLIANCE REVIEW

The Department of Children and Family Services (DCFS) Contracts Administration Division (CAD) conducted a Fiscal Compliance Assessment and Contract Compliance Review of the Trinity Youth Services Foster Family Agency (the FFA) in September 2015. The FFA has five offices, one located in the First Supervisorial District, one located in the Fourth Supervisorial District, one located in the Fifth Supervisorial District, and two offices located in San Bernardino County. All offices provide services to the County of Los Angeles DCFS placed children as well as to children placed by other counties. According to the FFA's Program Statement, its stated purpose is "to provide children with an appropriate family match and give the families support and training to ensure that placement will be beneficial in meeting the children's needs."

At the time of the review, the FFA supervised 158 DCFS placed children in 101 Certified Foster Homes (CFHs). The placed children's average length of placement was seven months and their average age was nine.

SUMMARY

CAD conducted a Fiscal Compliance Assessment which included an agency-wide review of the FFA's financial records such as, financial statements, bank statements, check register, and personnel files to determine their compliance with the terms, conditions, and requirements of the FFA Contract, the Auditor-Controller Contract Accounting and Administration Handbook (A-C Handbook) and other applicable federal, State and County regulations and guidelines.

The FFA was in full compliance with 4 of 5 applicable areas of the Fiscal Compliance Assessment: Financial Overview; Loans, Advances and Investments; Board of Directors and Business Influence; and Payroll and Personnel. CAD identified a potential internal control weakness in the area of: Cash/Expenditures, related to outstanding checks that were not resolved timely.

During CAD's Contract Compliance Review, the interviewed children generally reported: feeling safe in the FFA CFHs; having been provided with good care and appropriate services; and being comfortable

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in their placement environment. One child reported not being treated with respect and dignity. The Certified Foster Parents (CFPs) reported being 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 6 of 11 applicable areas of CAD's Contract Compliance Review: Certified Foster Homes; Health and Medical Needs; Psychotropic Medication; 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 (SIRs) not submitted timely or appropriately cross-reported and a Community Care Licensing (CCL) citation; Facility and Environment, related to a CFH not maintaining the exterior of the home, having expired food and CFPs not having comprehensive monetary allowance logs; Maintenance of Required Documentation and Service Delivery, related to the FFA not obtaining the DCFS Children's Social Worker's (CSW's) authorization to implement Needs and Services Plans (NSPs), a child not progressing towards meeting the NSP goals, the FFA not developing comprehensive Updated NSPs, and the FFA not documenting the monthly contacts with the DCFS CSWs; Education and Workforce Readiness, related to the FFA not ensuring two children were enrolled in school within three days, and not maintaining current copies of the children's report cards; and Personal Rights and Social/Emotional Well-Being, related to one child reporting not being treated with respect and dignity.

Attached are the details of CAD's review.

REVIEW OF REPORT

On September 30, 2015, Molly Sun, DCFS CAD, held the fiscal exit conference with the FFA's representatives: Cher Ofstedahl, Chief Administration Officer, and Linh Trieu, Controller. On October 30, 2015, Leticia Foster, DCFS CAD, and Kirk Barrow, DCFS Out-of-Home Care Management Division, held the compliance exit conference with the FFA's representative Jackie Jakob, Foster Care and Adoptions Director. The FFA representatives were in agreement with the review findings and recommendations; were receptive to implementing systemic changes to improve compliance with regulatory standards; and agreed to address the noted deficiencies in a Corrective Action Plan (CAP).

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

The FFA provided the attached approved CAP addressing the recommendations noted in this compliance report. The OHCMD will provide ongoing technical support prior to the next review.

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

PLB:KR
LTI:lf

Attachments

c: Sachi A. Hamai, Chief Executive Officer
John Naimo, Auditor-Controller
Public Information Office
Audit Committee
John Neiber, Chief Executive Officer, Trinity Youth Services
Lenora Scott, Regional Manager, Community Care Licensing Division
Lajuannah Hills, Regional Manager, Community Care Licensing Division

**TRINITY YOUTH SERVICES
FISCAL COMPLIANCE ASSESSMENT REVIEW
REVIEW PERIOD 2015-2016**

SCOPE OF REVIEW

The Fiscal Compliance Assessment included a review of the Trinity Youth Services (the FFA's) financial records for the period of July 1, 2013 through June 30, 2014, and April 1, 2015 through August 31, 2015. The Contracts Administration Division (CAD) reviewed financial statements, bank statements, check register, and personnel files to determine the FFA's compliance with the terms, conditions, and requirements of the FFA Contract, the Auditor-Controller Contract Accounting and Administration Handbook (A-C Handbook) and other applicable federal, State and County regulations and guidelines.

The Fiscal Compliance Assessment review focused on five key areas of internal controls:

- Financial Overview,
- Loans, Advances and Investments,
- Board of Directors and Business Influence,
- Cash/Expenditures, and
- Payroll and Personnel.

The FFA was in full compliance with 4 of 5 applicable areas of the Fiscal Compliance Assessment: Financial Overview; Loans, Advances and Investments; Board of Directors and Business Influence; and Payroll and Personnel.

FISCAL COMPLIANCE

CAD found one potential internal control weakness:

Cash/Expenditures

- Outstanding checks over six months were not resolved timely.

At the end of the month, the FFA's Senior Accountant will identify all checks that have been outstanding over three months and contact the payees. If the payee confirms non-receipt of the check, a stop payment will be placed on the original check and a new check will be issued.

Recommendation:

The FFA's management shall ensure that:

1. Outstanding checks are resolved timely.

PRIOR YEAR FISCAL COMPLIANCE ASSESSMENT FOLLOW UP

CAD conducted a Fiscal Compliance Assessment of the FFA in County Fiscal Year (FY) 2014-2015. The assessment resulted in three recommendations. CAD verified that the recommendations have been implemented by the FFA.

NEXT FISCAL COMPLIANCE ASSESSMENT

The next Fiscal Compliance Assessment of the FFA will be conducted in County FY 2016-2017.

**TRINITY YOUTH SERVICES FOSTER FAMILY AGENCY
CONTRACT COMPLIANCE REVIEW SUMMARY**

**1520 W. Cameron Ave., Suite 151
West Covina, CA 91760
License Number: 197805193**

**4201 Long Beach Blvd., Suite 421
Long Beach, CA 90807
License Number: 197805095**

**514 Commerce Avenue,
Palmdale, CA 93551
License Number: 197805093**

**15500 W. Sand Street, Suite 4
Victorville, CA 92392
License Number: 366425464**

**9540 Center Ave., #130
Rancho Cucamonga, CA 91730
License Number: 366426133**

	Contract Compliance Review	Findings: December 2015
I	<p><u>Licensure/Contract Requirements</u> (7 Elements)</p> <ol style="list-style-type: none"> 1. Timely Notification for Child's Relocation 2. Timely, Cross-Reported Special Incidents Reports (SIRs) 3. Runaway Procedures in Accordance with the Contract 4. Are There Community Care License (CCL) Citations / Out of Home Care Management Division (OHCMD) Safety Reports 5. If Applicable, Foster Family Agency (FFA) Ensures Complete Required Whole Foster Family Home (WFFH) Training 6. FFA Pays Certified Foster Parents (CFPs) Whole Foster Family Home Payments 7. FFA Conducts an Assessment of CFP Prior to Placement of Two or More Children 	<ol style="list-style-type: none"> 1. Full Compliance 2. Improvement Needed 3. Full Compliance 4. Improvement Needed 5. Not Applicable 6. Not Applicable 7. Not Applicable
II	<p><u>Certified Foster Homes</u> (12 Elements)</p> <ol style="list-style-type: none"> 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 from Federal Bureau of Investigation (FBI), California Department of Justice (DOJ), Child Abuse Central Index (CACI), Prior to Certification 4. Timely, Completed, Signed Criminal Background Statement 5. Health Screening and Tuberculosis (TB) Test Prior to Certification 6. All Required Training Prior to Certification 	<p align="center">Full Compliance (All)</p>

TRINITY YOUTH SERVICES CONTRACT COMPLIANCE REVIEW
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	<ol style="list-style-type: none"> 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/Auto Insurance/Annual Vehicle Maintenance Documentation for CFPs and Designated Drivers 11. Criminal Clearances and Health Screening/Driver's License/CPR/FBI/ DOJ/CACI/Auto Insurance for Other Adults in the Home 12. FFA Assists CFPs in Providing Transportation Needs 	
<p>III</p>	<p><u>Facility and Environment</u> (7 Elements)</p> <ol style="list-style-type: none"> 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 	<ol style="list-style-type: none"> 1. Improvement Needed 2. Full Compliance 3. Full Compliance 4. Full Compliance 5. Improvement Needed 6. Full Compliance 7. Improvement Needed
<p>IV</p>	<p><u>Maintenance of Required Documentation and Service Delivery</u> (10 Elements)</p> <ol style="list-style-type: none"> 1. FFA Obtains or Documents Efforts to Obtain DCFS Children's Social Worker's (CSW's) Authorization to Implement Needs and Services Plans (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 the Child's Participation 	<ol style="list-style-type: none"> 1. Improvement Needed 2. Full Compliance 3. Improvement Needed 4. Full Compliance

TRINITY YOUTH SERVICES CONTRACT COMPLIANCE REVIEW

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	<ol style="list-style-type: none"> 5. FFA Social Workers Develop Timely, Comprehensive Updated NSPs with Child's Participation 6. Therapeutic Services Received 7. Recommended Assessment/Evaluations Implemented 8. DCFS CSW's Monthly Contacts Documented in the Child's Case File 9. FFA Social Workers Develop Timely, Comprehensive Quarterly Reports 10. FFA Social Workers Conduct Required Visits 	<ol style="list-style-type: none"> 5. Improvement Needed 6. Full Compliance 7. Full Compliance 8. Improvement Needed 9. Not Applicable 10. Full Compliance
V	<p><u>Education and Workforce Readiness</u> (5 Elements)</p> <ol style="list-style-type: none"> 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 	<ol style="list-style-type: none"> 1. Improvement Needed 2. Full Compliance 3. Improvement Needed 4. Full Compliance 5. Not Applicable
VI	<p><u>Health and Medical Needs</u> (4 Elements)</p> <ol style="list-style-type: none"> 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 	<p>Full Compliance (All)</p>
VII	<p><u>Psychotropic Medication</u> (2 Elements)</p> <ol style="list-style-type: none"> 1. Current Court Authorization for Administration of Psychotropic Medication 2. Current Psychiatric Evaluation Review 	<p>Full Compliance (All)</p>

<p>VIII</p>	<p><u>Personal Rights and Social/Emotional Well-Being</u> (10 Elements)</p> <ol style="list-style-type: none"> 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 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 at the CFH, School and Community 	<ol style="list-style-type: none"> 1. Full Compliance 2. Full Compliance 3. Full Compliance 4. Improvement Needed 5. Full Compliance 6. Full Compliance 7. Full Compliance 8. Full Compliance 9. Full Compliance 10. Full Compliance
<p>IX</p>	<p><u>Personal Needs/Survival and Economic Well-Being</u> (7 Elements)</p> <ol style="list-style-type: none"> 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 and Assistance with a Life Book or Photo Album 	<p>Full Compliance (All)</p>

TRINITY YOUTH SERVICES CONTRACT COMPLIANCE REVIEW
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X	<u>Discharged Children</u> (3 Elements) 1. Completed Discharge Summary 2. Attempts to Stabilize Children's Placement 3. Child Completed High School (if applicable)	Full Compliance (All)
XI	<u>Personnel Records</u> (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 to Exceed a Total of 15 Children	Full Compliance (All)

**TRINITY YOUTH SERVICES FOSTER FAMILY
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 September 2015 review. The purpose of this review was to assess the Trinity Youth 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, 12 placed children were selected for the sample. The Contracts Administration Division (CAD) interviewed 11 of the children, as one child was either pre-verbal or 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 the Certified Foster Parents (CFPs) were observed to be responsive to the children's needs. CAD reviewed 12 case files to assess the level of 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 placed children were prescribed psychotropic medication. These children's case files were reviewed to assess for timeliness of Psychotropic Medication Authorizations and to confirm the required documentation of psychiatric monitoring.

CAD reviewed seven CFP files and five staff files for compliance with Title 22 Regulations and County contract requirements. Site visits were conducted to the FFA and the CFHs to assess the quality of care and supervision provided to the placed children.

CONTRACTUAL COMPLIANCE

CAD found the following five areas out of compliance:

Licensure/Contract Requirements

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

Three of the fourteen SIRs reviewed were not submitted timely and not cross-reported per SIR Reporting Guidelines. One was not appropriately cross-reported to the Out-of-Home Care Management Division (OHCMD) and two were not cross-reported to Community Care Licensing (CCL).

During the exit conference, the FFA's representative acknowledged the oversight in the timeliness and cross-reporting of SIRs and stated that the FFA directors and staff will be retrained on SIR Reporting Guidelines.

- CCL citation.

CCL cited the FFA on May 13, 2015, for a complaint investigation received by CCL on November 17, 2014. CCL issued the citation for a Personal Rights violation regarding a foster parent inflicting corporal punishment to a five year old child that was observed with marks on the buttocks. A Plan of Correction (POC) was requested, and the FFA reported the CFP was decertified on December 19, 2014. CCL cleared the POC on May 14, 2015. An investigation was completed by an Emergency Response Children's Social Worker (ER CSW), which concluded the allegations of physical abuse as inconclusive. On March 12, 2015, the Out-of-Home Care Investigations Section (OHCIS) placed the home on an Indefinite Hold.

Recommendations:

The FFA's management shall ensure that:

1. SIRs are submitted timely and cross-reported.
2. The FFA is in full compliance with Title 22 Regulations and free of CCL citations.

Facility and Environment

- Exterior and grounds of the CFH were not well maintained.

The backyard of CFH #1 had exposed bricks and debris. The CFP stated that the backyard gate was damaged by the City. After the site visit, the FFA provided CAD with documentation of the subsequent fence repair.

TRINITY YOUTH SERVICES CONTRACT COMPLIANCE REVIEW
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During the exit conference, the FFA's representative stated that they would provide additional training to all CFPs and to the FFA staff responsible for conducting home inspections.

- Adequate perishable and non-perishable food not maintained.

CFH #1 had expired canned goods in the pantry and expired food in the refrigerator. The CFP discarded the expired food at the time of the review.

During the exit conference, the FFA's representative stated that the FFA would provide additional training to all CFPs and to the FFA staff responsible for conducting home inspections.

- Comprehensive clothing and monetary allowance logs not maintained.

CFP #1 did not have clothing allowance logs for September 2014, July 2015, and August 2015.

CFP #2 did not have monetary allowance logs for October 3, 2014, December 31, 2014, and July 31, 2015.

During the exit conference, the FFA's representative stated that they will provide training to their staff and provide CAD with documentation of the monthly clothing allowance logs and weekly monetary allowance logs.

Recommendations:

The FFA's management shall ensure that:

3. Exterior and grounds of the CFHs are well maintained.
4. Adequate perishable and non-perishable food is maintained.
5. Monetary and clothing allowance logs are maintained.

Maintenance of Required Documentation and Service Delivery

- The FFA did not obtain or document efforts to obtain the DCFS Children's Social Workers' (CSWs') authorization to implement the Needs and Services Plans (NSPs).

For 22 of 30 NSPs reviewed, the FFA did not obtain, obtained late and/or documented late attempts to obtain the DCFS CSWs' signatures authorizing implementation of the NSPs.

- One child did not progress toward meeting the NSP goals.

One child's NSP did not have any documentation of the progress or lack of progress in meeting the NSP goals. The NSP noted that the FFA Social Worker changed the projected completion date of the child's goals, with no documentation of the reason.

- The FFA Social Workers did not develop comprehensive Updated NSPs.

For 9 of 21 Updated NSPs reviewed, were not comprehensive. The NSP goals were changed from one NSP to the next, the school enrollment date was different for the same child on three different NSPs, and the NSPs were missing information regarding the dates that the child was seen by the therapist.

- DCFS Social Workers were not contacted monthly or no documentation of the monthly contacts were in the children's case files.

Two children did not have documentation of monthly contacts with the DCFS CSWs in their case files. One child was missing the documentation for February 2015 and another child was missing documentation for October 2014 and November 2014.

During the exit conference, the FFA's representative stated that they would provide additional training on the development of NSPs to their staff including the Directors and Social Workers.

Recommendations:

The FFA's management shall ensure that:

6. The FFA obtains or documents efforts to obtain the DCFS CSWs' authorization to implement the NSP.
7. Children progress towards meeting their NSP goals.
8. FFA Social Workers develop comprehensive Updated NSPs.
9. FFA Social Workers contact DCFS CSWs monthly.

Education and Workforce Readiness

- Children not enrolled in school within three days.

Two children were not enrolled in school within three days of placement. The children were placed on May 7, 2015, and enrolled on May 21, 2015.

- Current report cards/progress reports not maintained.

The FFA did not maintain current copies of a child's report card in the case file. The child had been placed with the CFP for more than a year and only one report card was in the file.

During the exit conference, the FFA Administrator stated that they will provide training to their staff regarding timely school enrollment and the importance of maintaining current school records in order to monitor education needs and progress.

Recommendation:

The FFA's management shall ensure that:

10. Children are enrolled in school within three days of placement.
11. Current report cards/progress reports are maintained.

Personal Rights and Social/Emotional Well-Being

- Child not treated with respect and dignity.

One child reported not being treated with respect and dignity by the CFP's children.

During the exit conference, the FFA's representative stated the CFPs would be trained on the importance of treating children with respect and dignity.

Recommendation:

The FFA's management shall ensure that:

12. Children are treated with respect and dignity.

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

CAD's last compliance report dated September 30, 2015 (review conducted in September 2014), identified 11 recommendations.

Results:

Based on the results of this review, the FFA fully implemented 6 of 11 previous recommendations for which they were to ensure that:

- Common areas are well maintained.
- Children's bedrooms are well maintained.
- All CFPs participate in the development of NSPs.
- FFA Social Workers develop timely, comprehensive Initial NSPs with the child's participation.
- FFA Social Workers develop timely, comprehensive Quarterly Reports.
- Encouragement and assistance with a Life Book or Photo Album is provided to all children.

The FFA did not implement 5 of 11 recommendations for which they were to ensure that:

- Exterior grounds are well maintained.
- Adequate perishable and non-perishable food is maintained.
- FFA obtains or documents efforts to obtain DCFS CSWs' authorization to implement NSPs.
- Children are progressing towards meeting NSP goals.
- FFA Social Workers develop timely, comprehensive Updated NSPs with the child's participation.

Recommendation:

13. The outstanding recommendations from the prior report noted in this report as Recommendation Numbers 3, 4, 6, 7 and 8 are fully implemented.

TRINITY YOUTH SERVICES CONTRACT COMPLIANCE REVIEW
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At the exit conference, the FFA representatives expressed their desire to remain in compliance with Title 22 Regulations and contract requirements, and were in agreement with the review findings and recommendations. The FFA will consult with the OHCMD for additional support and technical assistance, and CAD will continue to assess implementation of the recommendations during the next review.



Los Angeles County
Department of Children and Family Services
RE: Response to Fiscal Compliance Assessment

October 23, 2015

Molly,

On behalf of Trinity Youth Services, I again want to thank you and your team for the opportunity to collaboratively and mutually strive to strengthen our processes and improve the contract compliance and oversight relationship.

During the Exit Summary and Request for Corrective Action Plan meeting held on September 30, 2015, Trinity Youth Services was presented with one fiscal item needing response:

- **Agency outstanding checks over six months old are not resolved timely.**

Effective October 1, 2015; at month end, all checks that have been outstanding for over three months will be identified by Senior Accountant. We will contact the payee. If the payee states that they have never received the check or lost the check and would like it reissued, a stop payment will be placed on the original check and a new check will be issued.

*This procedure does not apply to payroll checks.

If you have any questions regarding our responses, please do not hesitate to call. Again, thank you for the opportunity to work together to improve the quality of services to children in placement.

Sincerely,

A handwritten signature in blue ink, appearing to read "Cher Distadahl", is written over a circular stamp or watermark.

Cher Distadahl,
Chief Administrative Officer
Trinity Youth Services



Mission Office

Foster Care • Residential Services

November 30, 2015 (Revised December 22, 2015)

Leticia Foster, CSAI
Contracts Compliance Section
Contracts Administration Division
3530 Wilshire Blvd, 4th floor
Los Angeles, CA 90010

Re: Revised FFA Monitoring Review Field Exit Summary.

Dear Leticia,

Trinity Youth Services (TYS) is in receipt of the Summary referenced above, created following the contract compliance review of our agency, which was conducted by the Contracts Administration Division for 2015. We would like to thank you for your professionalism and support during the program review of our Foster Care Program.

TYS has reviewed the above referenced report and submits the following Corrective Action Plan (CAP) to address the recommendations noted. TYS Directors were trained on 12/8/15. TYS staff will be training throughout December 2015. TYS foster parents will be trained by their social workers.

TYS's Directors shall ensure that:

1. All Special Incident Reports (SIRs) are submitted on time and cross-reported appropriately.
 - All TYS Directors, Supervisors, and Social Workers will be retrained on SIR reporting and cross-reporting.
2. CCI complaint was substantiated.
 - All TYS Directors, Supervisors, and Social Workers were trained regarding allegations and appropriate discipline.
 - Foster parents were trained on personal rights and appropriate discipline.
3. Foster parents' homes' exterior and the grounds of the home are well maintained.
 - All TYS Directors, Supervisors, and Social Workers will be retrained on conducting home inspections.
 - Foster parents will receive training keeping their home exteriors and grounds well maintained.
 - All active foster homes will receive a home inspection by 12/31/15.
4. Foster parents adhere to products "use or freeze by", "best by", "sell by", or expiration dates.
 - All TYS Directors, Supervisors, and Social Workers will be retrained on conducting home inspections.

- Foster parents will receive training on ensuring that can goods and food are not expired.
 - All active foster homes will receive a home inspection by 12/31/15.
5. Foster parents are maintaining comprehensive monetary and clothing allowance logs.
 - All TYS Directors, Supervisors, and Social Workers will be retrained on reviewing weekly allowance and monthly clothing logs.
 - Foster parents will receive training on how to comprehensively complete weekly allowance and clothing logs.
 6. TYS Social Workers shall obtain or document efforts to obtain CSW's authorization to implement the NSP.
 - All TYS Directors, Supervisors, and Social Workers will be trained regarding ensuring that they request CSW's signatures at least 3 times within the 5 day grace period after report is due. Efforts shall be documented on the NSP. Social Workers will attach copy of cover letter sent to CSWs to the copy of NSP, when NSP is mailed. Social Workers will attach copy of fax confirmation to copy of NSP when NSP is faxed. Social workers will attach copy of email if report is emailed.
 7. All TYS Social Workers document children's progress towards meeting NSP case goals.
 - All TYS Directors, Supervisors, and Social Workers will be trained regarding developing SMART goals and ensuring that progress or lack of progress is well documented on NSPs.
 - Social Workers, will discuss NSP and goals with foster parents and foster children. Any progress both positive and negative will be addressed with FPs and FC. This will be documented in child case notes.
 - At the time an NSP needs to be updated, Social Worker, FP, and FC will meet to discuss current goals and future goals. All will participate in the development of the new goals.
 8. All TYS Social Workers shall develop timely, comprehensive, initial and updated NSPs with the participation of the developmentally age-appropriate child.
 - Directors/Supervising Social Workers will review reports due report with their social worker during weekly supervision.
 - Social Workers will ensure that children participate in the development of their NSP and children 6 and up sign them.
 - Social workers will send out NSPs to CSWs within 5 days of report's due date.
 9. All TYS Social Workers contact CSWs on a monthly basis and appropriately document in the case file.
 - All TYS Directors, Supervisors, and Social Workers will be trained regarding contacting the CSW and properly documenting those contacts.
 10. All school aged children are enrolled in school within three school days after placement.
 - All TYS Directors, Supervisors and Social Workers will be retrained on enrolling school aged children within 3 school days of placement.
 - Foster parents will receive training regarding school enrollment protocol.
 11. All TYS Social Workers obtain current copies of children's report cards or progress reports and file them accordingly.
 - All TYS Directors, Supervisors and Social Workers will be retrained on requesting report cards and or progress reports on a quarterly basis from foster parents or school.

- Foster parents will receive training on providing TYS Social Workers with copies of school report cards and or progress reports when they are received from school.
12. All children are treated with respect and dignity.
- All TYS Directors, Supervisors, and Social Workers will be retrained on foster children personal rights.
 - Foster parents will receive training on foster children's personal rights.
 - Foster parents will receive a personal rights flyer to be posted in their home.

Thank you for taking the time to evaluate our Foster Care Program. Your compliance review has provided us with valuable feedback to improve our program. Please contact me if you have any questions or further suggestions.

Sincerely,



Jackie Jakob, MSW
Foster Care & Adoptions Director

Cc. John Neuber, CEO
Cher Ofstedahl, CAO
Fr John Alexandres, Program Services ED
Kirk Barrow, OHCMD Monitor