



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

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November 22, 2016

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

From: Philip L. Browning
Director

MCKINLEY CHILDREN'S CENTER DBA MCKINLEY BOYS HOME FOSTER FAMILY AGENCY CONTRACT COMPLIANCE REVIEW

The Department of Children and Family Services (DCFS) Contracts Administration Division (CAD) conducted a Contract Compliance Review of the McKinley Children's Center dba McKinley Boys Home Foster Family Agency (the FFA) in February 2016. The FFA has three offices. Two offices are located in the Fifth Supervisorial District and one is located in Riverside County. The FFA provides services to the County of Los Angeles DCFS placed children and to children placed by other counties. According to the FFA's Program Statement, its stated purpose is "to provide foster care and treatment for abused and neglected children while re-unification services with their families are being explored and/or completed."

At the time of the review, the FFA supervised 228 DCFS placed children in 101 Certified Foster Homes (CFHs). The placed children's average length of placement was nine months and their average age was nine.

SUMMARY

During CAD's Contract Compliance Review, the interviewed children generally reported: feeling safe in the FFA CFHs; being provided with good care and appropriate services; being comfortable in their placement environment; and 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 8 of 11 applicable areas of CAD's Contract Compliance Review: Maintenance of Required Documentation and Service Delivery; Education and Workforce Readiness; Health and Medical Needs; Psychotropic Medication; Personal Rights

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and Social/Emotional Well-Being; Personal Needs/Survival and Economic Well-Being; Discharged Children and Personnel Records.

CAD noted deficiencies in the areas of: Licensure/Contract Requirements, related to Special Incident Reports (SIRs) were not appropriately cross-reported, and Community Care Licensing (CCL) citations; Certified Foster Homes, related to the FFA not having documentation of the CFPs annual vehicle maintenance; and Facility and Environment, related to common areas not being well maintained.

Attached are the details of CAD's review.

REVIEW OF REPORT

On April 21, 2016, Patricia Kirkpatrick, DCFS CAD, and Aiyana Rios, DCFS Out-of-Home Care Management Division (OHCMD), held an exit conference with the FFA representatives: Julissa Castillo, Chief Program Officer for FFA and Adoptions; and Sharon Moreno, Acting Administrator. The FFA's representatives agreed with the review findings and recommendations; were receptive to implementing systemic changes to improve the FFA's compliance with regulatory standards; and 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 provided technical assistance to the FFA on May 25, 2016, to assist the FFA in implementing their CAP.

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

PLB:KR
LTI:pk

Attachments

c: Sachi A. Hamai, Chief Executive Officer
John Naimo, Auditor-Controller
Public Information Office
Audit Committee
Anil Vadaparty, Chief Executive Officer, McKinley Children's Center
Lajuannah Hills, Regional Manager, Community Care Licensing Division
Lenora Scott, Regional Manager, Community Care Licensing Division

**MCKINLEY CHILDREN'S CENTER DBA
MCKINLEY BOYS HOME FOSTER FAMILY AGENCY
CONTRACT COMPLIANCE REVIEW SUMMARY**

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Suite 202
San Dimas, CA 91773
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40015 Sierra Highway
Suite B-150
Palmdale, CA 93550
License Number: 197806417

3590 Central Avenue
Suites 204 and 206
Riverside, CA 92506
License Number: 336423828

	Contract Compliance Review	Findings: February 2016
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 SIRs 3. Runaway Procedures in Accordance with the Contract 4. Are there CCL Citations/OHCMD Safety Reports 5. If Applicable, FFA Ensures Complete Required Whole Foster Family Home Training 6. FFA Pays Certified Foster Parents (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. Full Compliance
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 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 & Tuberculosis (TB) Test Prior to Certification 6. All Required Training Prior to Certification 7. Certificate of Approval on File/Including Capacity 8. Safety Inspection Completed At Least Every Six Months or Per Approved Program Statement 9. Completed Annual Training Hours for Re-certification and Current CPR/First-Aid/Water Safety Certificates 10. Current Driver's License/Auto Insurance/Annual Vehicle Maintenance Documentation for CFPs and Designated Drivers 	<ol style="list-style-type: none"> 1. Full Compliance 2. Full Compliance 3. Full Compliance 4. Full Compliance 5. Full Compliance 6. Full Compliance 7. Full Compliance 8. Full Compliance 9. Full Compliance 10. Improvement Needed 11. Full Compliance

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	<ol style="list-style-type: none"> 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 	<ol style="list-style-type: none"> 12. Full Compliance
III	<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. Full Compliance 2. Improvement Needed 3. Full Compliance 4. Full Compliance 5. Full Compliance 6. Full Compliance 7. Full Compliance
IV	<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 5. FFA Social Workers Develop Timely, Comprehensive Updated NSPs with the Child's Participation 6. Therapeutic Services Received 7. Recommended Assessments/Evaluations Implemented 8. DCFS Children's Social Worker's Monthly Contacts Documented in Child's Case File 9. FFA Social Workers Develop Timely, Comprehensive Quarterly Reports 10. FFA Social Workers Conduct Required Visits 	<p>Full Compliance (All)</p>

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<p>V</p>	<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 	<p>Full Compliance (All)</p>
<p>VI</p>	<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>
<p>VII</p>	<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 	<p>Full Compliance (All)</p>

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IX	<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 	Full Compliance (All)
X	<p><u>Discharged Children</u> (3 Elements)</p> <ol style="list-style-type: none"> 1. Completed Discharge Summary 2. Attempts to Stabilize Children's Placement 3. Child Completed High School (if applicable) 	Full Compliance (All)
XI	<p><u>Personnel Records</u> (9 Elements)</p> <ol style="list-style-type: none"> 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)

**MCKINLEY CHILDREN'S CENTER DBA
MCKINLEY BOYS HOME 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 February 2016 review. The purpose of this review was to assess the McKinley Children's Center dba McKinley Boys Home Foster Family Agency's (the FFA's) compliance with the 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 all 12 children. 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, 15 placed children were prescribed psychotropic medication. Two case files were reviewed to assess for timeliness of Psychotropic Medication Authorizations and to confirm the required documentation of psychiatric monitoring.

CAD reviewed five CFP files and four 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 three areas out of compliance:

Licensure/Contract Requirements

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

MCKINLEY CHILDREN'S CENTER DBA MCKINLEY BOYS HOME FOSTER FAMILY
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CAD reviewed 11 SIRs and two were not appropriately cross-reported to the Department of Children and Family Services (DCFS) Out-of-Home Care Management Division (OHCMD).

- Community Care Licensing (CCL) citations.

On April 24, 2015, CCL cited the FFA on April 24, 2015, as a result of deficiencies and findings noted when the CFP did not timely report a Special Incident to the FFA. The incident occurred on April 18, 2015, and the CFP reported it to the FFA on April 21, 2015. A Plan of Correction (POC) was requested by CCL, which included requiring the FFA to retrain the CFP on SIR guidelines and reporting procedures. The FFA was to verbally explain the importance of timely reporting and provide a copy of the written confirmation to CCL. The FFA will also obtain signed documentation of all that were involved in the training, including copies of the documentation and the training materials. The POC was due on May 4, 2015, and cleared by CCL on July 31, 2015.

An investigation was completed by a DCFS Emergency Response (ER) Children's Social Worker (CSW), and the allegation of general neglect was inconclusive. The Out-of-Home Care Investigation Section (OHCIS) conducted an investigation and noted this CFP was overwhelmed and not able to appropriately care for all of the children in the home. In addition to the training required, by CCL, OHCIS requested a Corrective Action Plan (CAP), requiring the FFA to reduce the capacity of this CFP for six months to three children and to re-access this CFPs ability to care for the children placed with the home, including those children with Individualized Education Plans. The FFA was to assist the CFP in obtaining a cover for the washer and dryer. The CAP was due to OHCIS on December 3, 2015, and was approved on December 7, 2015.

CCL cited the FFA on May 6, 2015, as a result of deficiencies and findings at a CFH for reporting requirements and personal rights violations. On January 12, 2015, a child who was no longer placed at the CFH made an allegation of sexual abuse by the Certified Foster Father (CFF), as well as allegations that the CFF would get drunk in front of the children, and that the Certified Foster Parents (CFPs) would fight in front of the children. This home had previously been decertified by the FFA on June 7, 2014, and OHCIS had previously placed this home on an indefinite hold in June 2014, due to a prior referral. CCL accepted the FFA's prior decertification of this home as the POC. A referral was made to a DCFS Emergency Response (ER) Children's Social Worker (CSW). The DCFS ER CSW was unable to locate the former CFPs and determined that an investigation could not be completed, and the referral was closed.

CCL cited the FFA on November 5, 2015, for a child's bedroom having a door that led into the garage. The door was unlocked and was used to access the garage. The garage has another door to the backyard. A POC was requested by CCL that required the FFA to ensure the garage was not accessible from this bedroom. CCL cleared the POC on November 12, 2015. No referral or investigation to the CPHL or to OHCIS were required.

CCL cited the FFA on December 17, 2015, during a Case Management Visit it made on December 8, 2015, for the adopted adult son of the CFP living in the CFH on weekends for approximately three months, without completing the Live Scan and criminal clearance. CCL requested a POC that required the adult to complete the Live Scan and Criminal clearance. This was completed on December 10, 2015. The adult son was associated to the CFH on December 11, 2015, and CCL cleared the POC with no further action was required.

Recommendations:

The FFA's management shall ensure that:

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

Certified Foster Homes

- Current annual vehicle maintenance documentation not available.

Three CFPs did not have current annual vehicle maintenance documentation.

Recommendation:

The FFA's management shall ensure that:

3. Current annual vehicle maintenance documentation is provided.

Facility and Environment

- Common areas not well maintained.

During CAD's site visit, one CFH had knives, rubbing alcohol, vitamins and medication that was not properly stored. The CFP immediately removed the items so that they were inaccessible to the children.

Recommendation:

The FFA's management shall ensure that:

4. Common areas are well maintained.

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

CAD's last compliance report dated February 9, 2016 (review conducted in March 2015), identified six recommendations.

Results:

Based on the results of this review, the FFA fully implemented 4 of 6 previous recommendations for which the FFA was to ensure that:

- Children's bedrooms/interior are well maintained.
- FFA Social Workers develop timely Initial Needs and Services Plans (NSPs) with the child's participation.
- FFA Social Workers develop timely Updated NSPs with the child's participation.
- Initial medical exams are conducted timely.

Based on the results of the current review, the FFA did not implement 2 of 6 recommendations for which the FFA was to ensure that:

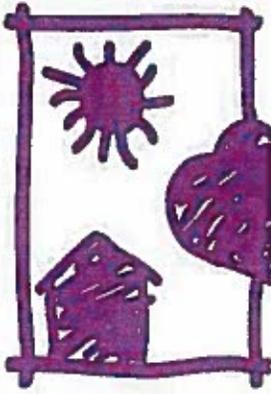
- The FFA is in full compliance with Title 22 Regulations and free of CCL citations.
- Common areas are well maintained.

Recommendation:

The FFA's management shall ensure that:

5. The outstanding recommendations from the prior report noted in this report as Recommendations Number 2 and 4 are fully implemented.

At the exit conference, the FFA representatives stated their desire to remain in compliance with Title 22 Regulations and contractual requirements and reiterated that the FFA will implement procedures to strive towards greater compliance. The FFA will continue to consult with the OHCMD for additional support and technical assistance, and CAD will assess implementation of the recommendations during the next review period.



**McKINLEY
CHILDREN'S
CENTER**

**Chief Executive
Officer**

Anil Vadaparty

Accredited by:



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Child Welfare League of

America

November 15, 2016

Patricia Kirkpatrick, Contract Compliance Reviewer
Department of Children and Family Services
Out of Home Care Management Division
9320 Telstar Avenue
El Monte, California 91731

**RE: Amended November 2016
FFA Contract Compliance Review Findings (April 2016)**

Dear Ms. Kirkpatrick,

Thank you for your review of our FFA program. I greatly appreciate the feedback and collaboration. In reviewing the findings sent to me on April 21, 2016, please see my response below. Attached to this letter you will find some substantiating documents for your consideration in amending the findings.

FINDING: LICENSURE/CONTRACT REQUIREMENTS

Are Special Incident Reports (SIRs) appropriately documented and cross-reported? (SAFETY)

Two of the twelve SIRs reviewed were not cross-reported to Out-of-Home Care Management Division (OHCMD).

RESPONSE: There are only 2 SIRs that were not properly cross-reported. Please note that the lack of cross-reporting was an error and the staff responsible has been counseled.

FINDING: LICENSURE/CONTRACT REQUIREMENTS

Is the agency free of substantiated Community Care Licensing complaints' reports on safety and physical plant deficiencies since the last review? (SAFETY)

There were four Community Care Licensing citations resulting in substantiated findings involving three families.

RESPONSE: There were two foster families responsible for these substantiations for which corrective action plans were submitted and approved. The third family was decertified for non-compliance.

FINDING: CERTIFIED FOSTER HOMES

Do the certified foster parents and/or designated drivers have a valid California driver's license, auto insurance, annual documentation of vehicle maintenance, and if applicable, car seat(s)? (SAFETY)

Three families did not provide documentation of annual vehicle maintenance, and the Certified Foster Parents conduct their own vehicle inspections. Additional Certified Mechanic documentation will be asked of foster parents for routine vehicle inspections.

RESPONSE: In an email correspondence dated May 20, 2016, you kindly clarified that the County contract requires the FFA to obtain documentation to show that the foster parents provide records to ensure that their vehicle safe to operate. Thus, effective immediately, we will be requiring foster parents to obtain a vehicle safety inspection by a certified mechanic annually and to provide us with the documentation.

FINDING: FACILITY HOME ENVIRONMENT

Are common areas/interior well maintained? (Clean/sanitary; neat; adequate furniture and lighting; home-like environment, no safety hazards) (SAFETY)

One Certified Foster Home had nail polish in stored in an unlocked hall closet, rubbing alcohol in a bathroom cabinet, a large bag with Medicines/vitamins in an unlocked bottom kitchen cabinet, two knives placed on the drain board. A container (similar to a flower vase) with approximately 20 large knives was located in a top unlocked cabinet above the refrigerator. CFP immediately removed the knives from the cabinet and placed the knives in the garage (locked).

RESPONSE: Please note that our staff have conducted regular home visits to check for compliance and during those visits, no concerns were noted. McKinley staff will continue to conduct regular visits, including 2 random (unannounced) visits per year. The deficiencies observed by the reviewer have been acknowledged and corrected during the visit.

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Please feel free to contact me if you have any questions. Thank you for your attention to this matter. I greatly appreciate your input and collaboration in improving our services.

Sincerely,



Julissa Castillo,
Chief Program Officer for FFA and Adoptions

CC: Anil Vadaparty, *Chief Executive Officer*