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April 10, 2012

To: Supervisor Zev Yaroslavsky, Chairman
Supervisor Gloria Molina
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Supervisor Don Knabe
Supervisor Michael D. Antonovich

From: Philip L. Browning
Director

CONCEPT 7 FOSTER FAMILY AGENCY CONTRACT COMPLIANCE MONITORING REVIEW

The Out-of-Home Care Management Division (OHCMD) conducted a review of the Concept 7 Foster Family Agency (FFA) in June 2011, at which time it had 187 placed DCFS children in 86 homes.

The Concept 7 FFA is located in the 1st Supervisorial District and provides services to the Los Angeles County Department of Children and Family Services' (DCFS) foster children. According to the Concept 7 FFA's program statement, its goal is "to provide foster homes for children in need of out-of-home care by training and certifying acceptable foster parents in the counties of Los Angeles, Orange, Riverside, San Bernardino and San Diego; to provide social work services and on-going education and training to foster parents. Also, to design a treatment program for each foster child that focuses on family reunification. When family reunification is not possible, Concept 7 FFA works with the County authorities to develop an alternative treatment/placement program." Concept 7 FFA is licensed to serve children ages zero through 17.

For the purpose of this review, 12 children's files were selected for a review, ten placed children were interviewed as two of the children were non-verbal. The placed children's average length of placement was four months, and the average age was ten. Four discharged children's files were reviewed, five certified foster parents' files were reviewed and five staff files were reviewed for compliance with the Title 22 regulations and the contract requirements.

Twenty placed children were on psychotropic medication, ten files were reviewed to assess the timeliness of the psychotropic authorizations and to confirm that the documentation of psychiatric monitoring was maintained as required.

SCOPE OF REVIEW

The purpose of this review was to assess the Concept 7 FFA's compliance with the contract and State regulations. The visit included a review of the Agency's program statement, administrative internal policies and procedures, 12 placed children's case files, five certified foster parents' files, ten children's case files on psychotropic medication and five personnel files. Visits were made to the certified homes to assess the quality of care and supervision provided to children. Five certified foster parents were interviewed, and ten placed children were interviewed to assess the care and services they were receiving.

A copy of this report has been sent to the Auditor-Controller (A-C) and Community Care Licensing (CCL).

SUMMARY

The Concept 7 FFA was in substantial compliance with the contract, program statement, and regulatory standards. Based on our review, the few deficiencies revealed included the need for more thorough documentation. Routine monitoring of the files by a supervisory staff would decrease or eliminate documentation issues found in the files. Overall, Concept 7 FFA is providing care and services to the placed children and support to the certified foster parents, which is evident in the relationships formed with the children, foster parents, and the Agency.

The children interviewed indicated that they were provided with good care and appropriate services, were comfortable in their environment and were treated with respect and dignity. In fact, one child stated that he had never been treated so well in his whole life until now under the care of his certified foster mother.

The deficiencies noted during the monitoring review were related to minor physical plant deficiencies, which did not pose any safety risks; Needs and Services Plans (NSP) documentation issues and monthly contact by an Agency social worker with the DCFS Children's Social Worker (CSW) as is required by the contract.

Concept 7 FFA was receptive to implementing some systemic changes to improve compliance with regulations and the contract. The Administrator agreed to address noted deficiencies in a Corrective Action Plan (CAP).

NOTABLE FINDINGS

The following are the notable findings of our review:

- Of the five certified foster homes visited, one home did not have sufficient dining seating to accommodate everyone residing in the home. The Agency representatives were in agreement and stated that they will ensure that all the homes are appropriately furnished; this will be monitored as part of the Agency's home inspections. Additionally, the Concept 7 FFA retrained all the certified foster parents regarding this finding.

- Of the 12 foster children's files reviewed, three initial NSPs did not have the DCFS CSW's signature authorizing the implementation of the NSP. The Agency representatives were in agreement with this finding and stated Concept 7 FFA staff members were retrained regarding NSPs. Specifically, the Agency Social Workers will obtain DCFS CSWs' authorization of the NSPs and will document all attempts to receive the NSPs.

- Of the ten placed children interviewed, two children stated that they did not participate in the development of their NSPs. The Agency representatives stated that they would check the FFA Social Workers' contact notes to verify if their social worker discussed the goals with the placed children and will address the issue in the Corrective Action Plan (CAP). The Agency representatives stated that their Social Workers were retrained regarding the participation of age-appropriate children in the development of the NSPs.

- Of the five certified foster parents' files reviewed, two did not sign the NSPs indicating their participation in developing the NSPs. The Agency representatives were in agreement with this finding and retrained their Social Workers regarding the participation of certified foster parents in the development of NSPs.

- Of the 12 foster children's files reviewed, some NSPs were not comprehensive and repetitive with information from the previous NSPs. In one section of a NSP, the Concept 7 FFA Social Worker stated that a child was getting into trouble at school and on the verge of being kicked out for instigating problems with other children. However, in the Education section of the NSP, the Social Worker indicated that there were no problems as to the child's school behavior, school discipline and school suspensions. For this same child, the NSP indicated that the child was enrolled in school within three days of the date of placement; however, the contact notes indicated that the child was enrolled 11 days after the day of placement. The Agency representatives were in agreement with this finding and staff members were retrained to complete comprehensive NSPs.

- All FFA staff were trained in January 2012 on NSP concerns. The training focused on developing timely comprehensive NSPs, participation of treatment teams, including the child/youth and placement worker, and developing "SMART" goals, SMART standing for Specific, Measurable, Attainable, Results-oriented and Time-limited.

- Of the 12 foster children's files reviewed, one child was not enrolled in school within three days of placement. The Concept 7 FFA representatives were in agreement with this finding and stated that certified foster parents were retrained regarding school enrollment requirements and Supervising Social Workers/Trainers will monitor that enrollment dates are consistent with case notes on file.

- One Concept 7 FFA Social Worker did not contact the DCFS CSWs monthly to update the placed child's progress as per the contract. The Agency representatives were in agreement with this finding and stated that Concept 7 FFA Social Workers were retrained regarding appropriate documentation of contacts with DCFS CSWs.

The detailed report of our findings is attached.

EXIT CONFERENCE

The following are highlights from the Exit Conference held July 13, 2011.

In attendance:

John Peel, Executive Director and Jackie Jakob, Program Director of Concept 7 FFA; and Darío Villamarín, Monitor, DCFS OHCMD.

Highlights:

The Executive Director and the Program Director were in agreement with our findings and recommendations. They indicated that the Agency would make the necessary corrections and address the findings presented.

The Concept 7 FFA submitted a timely approved written CAP, which addressed each recommendation noted in this compliance report. The approved CAP is attached.

We will assess for full implementation of the recommendations during our next monitoring review.

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

PLB:RS:KR:
EAH:NF:dv

Attachments

c: William T Fujioka, Chief Executive Officer
Wendy Watanabe, Auditor-Controller
Public Information Office
Audit Committee
John Peel, Executive Director, Concept 7 FFA
Jean Chen, Regional Manager, Community Care Licensing

CONCEPT 7 FOSTER FAMILY AGENCY
CONTRACT COMPLIANCE MONITORING REVIEW - SUMMARY

5675 Telegraph Road
Commerce, CA 90040
License Number: 197805297

	Contract Compliance Monitoring Review	Findings: June 2011
I	**Licensure/Contract Requirements** (6 Elements) 1. Timely Notification for Child's Relocation 2. Special Incident Reports Documented and Cross-Reported 3. Runaway Procedures 4. Community Care Licensing Citations, Out-of-Home Care Management Division Reports on Safety and Physical Deficiencies 5. If Applicable, FFA Ensures Complete Required Whole Foster Family Home Training 6. FFA pays Certified Foster Parents Whole Foster Family Home Payments	Full Compliance (ALL)
II	**Certified Foster Homes** (13 Elements) 1. Home Study Prior to Certification 2. Contact with References/Including Check with OHCMD 3. Safety Inspection Prior to Certification 4. Timely DOJ, FBI, CACI 5. Health Screening Prior to Certification 6. Required Training Prior to Certification 7. Current Certificate of Approval on File Including Capacity 8. Home Inspection/Evaluations for Re-certification 9. Completed Training Hours for Re-certification 10. CPR/First Aid/Water Safety Certificates 11. CA Driver's License/Auto Insurance 12. Other Adults: DOJ/FBI/CACI 13. Transportation	Full Compliance (ALL)

III	**Facility and Environment** (8 Elements) 1. Exterior Well Maintained 2. Common Areas Maintained 3. Children's Bedrooms/Interior Maintained 4. Sufficient Recreational Equipment 5. Sufficient Educational Resources 6. Adequate Perishable and Non Perishable Food 7. Disaster Drills Conducted 8. Allowance Logs	1. Full Compliance 2. Needs Improvement 3. Full Compliance 4. Full Compliance 5. Full Compliance 6. Full Compliance 7. Full Compliance 8. Full Compliance
IV	**Maintenance of Required Documentation and Service Delivery** (11 Elements) 1. DCFS CSW Authorization to Implement NSPs 2. Children's Participation in the Development of NSPs 3. NSPs Implemented and Discussed with Foster Parents 4. Children's Progress Towards Meeting Goals 5. Timely Developed Initial NSPs with Child 6. Timely Comprehensive Initial NSPs with Child 7. Therapeutic Services Received 8. Recommended Assessments/Evaluations Implemented 9. DCFS CSWs Monthly Contacts Documented 10. Timely Developed Updated NSPs with Child 11. Timely Comprehensive Updated NSPs with Child	1. Needs Improvement 2. Needs Improvement 3. Needs Improvement 4. Full Compliance 5. Full Compliance 6. Full Compliance 7. Full Compliance 8. Full Compliance 9. Needs Improvement 10. Full Compliance 11. Full Compliance
V	**Education and Workforce Readiness** (7 Elements) 1. Child Enroll in School Within Three Days 2. Child Attends School as Required 3. Agency Facilitates Child's Educational Goals 4. Child's Academic and/or Attendance Increase 5. Current Individual Education Plans Maintained 6. Current Report Cards Maintained 7. Agency Facilitates Child's Participation in YDS/Equivalent/Vocational Program	1. Needs Improvement 2. Full Compliance 3. Full Compliance 4. Full Compliance 5. Full Compliance 6. Full Compliance 7. Full Compliance

VI	**Health and Medical Needs** (6 Elements) 1. Initial Medical Examinations Conducted 2. Initial Medical Examinations Timely 3. Follow-up Medical Examinations Timely 4. Initial Dental Examinations Conducted 5. Initial Dental Examination Timely 6. Follow-up Dental Examinations Timely	Full Compliance (ALL)
VII	**Psychotropic Medications** (2 Elements) 1. Current Court Authorization for Administration of Psychotropic Medication 2. Current Psychiatric Evaluation Review	Full Compliance (ALL)
VIII	**Personal Rights and Social/Emotional Well-Being** (13 Elements) 1. Children Informed of Foster Home's Policies and Procedures 2. Children Feel Safe 3. Satisfaction with Meals and Snacks 4. Foster Parents Treatment of Children with Respect and Dignity 5. Appropriate Rewards and Discipline System 6. Children Allowed Private Visits, Calls, and Correspondence 7. Children Free to Attend Religious Services/Activities 8. Reasonable Chores 9. Children Informed About Psychotropic Medication 10. Children Aware of Right to Refuse Psychotropic Medication 11. Children Informed About Voluntary Refusal of Medical, Dental Psychiatric Care 12. Children Participation in At-Home, School, Community Activities 13. Children Participation in Extra-Curricular Activities	Full Compliance (ALL)
IX	**Personal Needs/Survival and Economic Well-being** (8 Elements) 1. $50 Clothing Allowance 2. Ongoing Clothing Inventories of Adequate Quantity 3. Ongoing Clothing Inventories of Adequate Quality 4. Involvement in Selection of Clothing 5. Provision of Personal Care Items 6. Minimum Monetary Allowances 7. Management of Allowance	Full Compliance (ALL)

	8. Encouragement and Assistance with Life Book	
X	**Discharge Children** (3 Elements) 1. Stabilization of Placement Prior to Discharge 2. Discharge Summary Completed 3. Child Completed High School	 1. Full Compliance 2. Full Compliance 3. Not Applicable
XI	**Personnel Records** (14 Elements) 1. DOJ Timely Submitted 2. FBI Timely Submitted (After January 1, 2008) 3. CACIs Timely Submitted 4. Signed Criminal Background Statement Timely 5. Education/Experience Requirement 6. Employee Health-Screening Timely 7. Valid Driver's License 8. Signed Copies of FFA Policies and Procedures 9. Initial Training Documentation 10. One-hour Training of Child Abuse Reporting 11. CPR Training Documentation 12. First-Aid Training Documentation 13. Ongoing Training Documentation 14. Social Workers Appropriate Case Ratio	 Full Compliance (ALL)

CONCEPT 7 FOSTER FAMILY AGENCY
CONTRACT COMPLIANCE MONITORING REVIEW

5675 Telegraph Road, Suite 260
Commerce, CA 91731
License Number: 197805297

The following report is based on a "point in time" monitoring visit. This compliance report addresses findings noted during the June 2011 monitoring review.

CONTRACTUAL COMPLIANCE

Based on the results of the compliance review, the Concept 7 FFA was in substantial compliance with the contract. We reviewed 12 currently placed children's files, four discharged children's files, five certified foster parents' files, five staff files, and/or documentation from the provider. The Agency was in full compliance with eight of 11 sections of our Contract Review: Licensure/Contract Requirements; Certified Foster Homes; Health and Medical Needs; Psychotropic Medications; Personal Rights and Social/Emotional Well-Being; Personal Needs/Survival and Economic Well-Being; Discharged Children; and Personnel Records. The following report details the results of our review.

FACILITY AND ENVIRONMENT

Based on our review of the five certified foster parents' case files and/or documentation from the provider, the Concept 7 FFA was in full compliance with five of six elements reviewed in the area of Facility and Environment.

In one home the dining set was a banquette seating arrangement with one office chair; there was insufficient seating to accommodate everyone residing in the certified foster home. The Agency's representatives were in agreement and stated that they will ensure all homes are appropriately furnished; this will be monitored as part of the Agency's home inspections. Additionally, the Agency retrained all certified foster parents regarding this finding.

Recommendation:

The Concept 7 FFA's management shall ensure that:

1. Dining sets have sufficient seating to accommodate all people residing in the certified foster home.

MAINTENANCE OF REQUIRED DOCUMENTATION AND SERVICE DELIVERY

Based on our review of 12 children's case files and/or documentation from the provider, Concept 7 FFA was in full compliance with four of eight elements reviewed in the area of Program Services.

Three initial NSPs did not have the DCFS CSWs' signature authorizing the implementation of the NSPs. Two of ten children interviewed stated that they did not remember participating in the development of NSPs. One of these two children stated that he is asked to sign papers, but sometimes he does not know what he is signing.

Two updated NSPs did not have the certified foster parents' signature indicating participation in developing the NSPs. Additionally, the Concept 7 FFA Social Worker did not contact the DCFS CSW monthly to update the placed children's progress as per the contract. Lastly, NSPs were not comprehensive and included the same information as previous NSPs.

In one section of a NSP, a Concept 7 FFA Social Worker stated that a child was getting into trouble at school and on the verge of being kicked out for instigating problems with other children. However, in the Education section of the NSP, the Agency's Social Worker indicated that there were no problems as to the child's school behavior, school discipline and school suspensions.

The Agency representatives were in agreement with the finding and stated that the Concept 7 FFA Social Workers were retrained regarding NSPs, including DCFS CSWs authorization of the NSPs, participation of age-appropriate children and certified foster parents in the development of the NSPs; NSPs are comprehensive and Agency Social Workers were retrained regarding appropriate documentation of contacts with DCFS CSWs.

Lastly, an Agency social worker did not contact the DCFS CSW monthly to update the placed children's progress as per the contract.

Recommendations:

The Concept 7 FFA's management shall ensure that:

2. NSPs are signed by the DCFS CSWs authorizing implementation of the Plans.

3. Age-appropriate children participate in the development of the initial NSPs.

4. Updated NSPs are signed by the certified foster parents and/or document the Agency's efforts to demonstrate certified foster parents participation in developing NSPs.

5. Social Workers conduct monthly contact with the DCFS CSWs to update the children's progress as per the contract.

6. NSPs are comprehensive.

EDUCATION AND WORKFORCE READINESS

One initial NSP indicated the child was enrolled in school within three school days of placement; however, the contact notes indicated the child was enrolled 11 days after placement. The Agency representatives stated all certified foster parents were retrained regarding the school enrollment requirement and that the Supervising Social Workers/Trainers will monitor that enrollment dates are consistent with case notes on file.

Recommendation:

The Concept 7 FFA's management shall ensure that:

7. Children are enrolled in school within three school days of placement and documentation is appropriately maintained.

PRIOR YEAR FOLLOW-UP FROM THE AUDITOR-CONTROLLER'S (A-C's) CONTRACT REVIEW REPORT

Objective

Determine the status of the recommendations reported in the A-C's last monitoring review.

Verification

We verified whether the outstanding recommendations from the last A-C's last monitoring report issued August 19, 2009 were implemented.

Results

The A-C's prior monitoring report contained six findings. Specifically, Concept 7 FFA was to ensure foster parents conducted and documented disaster drills at least every six months; criminal and child abuse clearances were conducted for all the adults that reside in foster homes; foster home assessments were completed for homes where more than two children were placed; children taking psychotropic medication have a current court authorization for the administration of the medication; tutoring services were arranged to improve the children's basic skills when necessary; and NSPs contained all the required information and are approved by the DCFS social worker.

Based on our follow-up of these recommendations, the Concept 7 FFA fully implemented five of six recommendations from the A-C's August 19, 2009 report. However, the Agency did not implement the recommendation regarding development of comprehensive NSPs as noted in recommendation six of this report. Further corrective action was requested to address this finding.

Recommendation:

The Concept 7 FFA's management shall ensure that:

8. They fully implement the outstanding recommendation from the A-C's August 19, 2009 which is also noted as recommendation 6 in this report.

MOST RECENT FISCAL REVIEW CONDUCTED BY THE AUDITOR-CONTROLLER

A fiscal review of Concept 7 FFA has not been posted by the A-C.

Concept 7
Family Support & Treatment Centers

July 26, 2011

Dario Villamarin, CSA I
Out of Home Care Management Division
9320 Telstar Avenue, #216
El Monte, CA 91731

Dear Dario,

Thank you for meeting with us and reviewing the FFA Monitoring Review Field Exit Summary. Below you will find Concept 7's plan on addressing the findings noted.

Facility and Environment (21)
One of our foster homes was using an office chair as a dining chair and was not equipped to accommodate the number of family members at the dinner table. The family purchased extra seating to accommodate all family members. (Please see attached photographs.)

Concept 7 will ensure that all certified homes are appropriately furnished. This will be monitored as a part of our home inspections. Concept 7 will also offer a training for all certified parents regarding all findings noted in the FFA Monitoring Review to ensure that all parents are aware and in compliance with DCFS requirements. The trainings will be conducted on 8/6/11 in English and on 8/20/11 in Spanish. A training checklist will be reviewed and signed by all foster parents and foster care staff. (See attached training sheets.)

Maintenance of Required Documentation and Service Delivery (28, 29, 30, 36, 38)
Concept 7 foster care staff will be retrained regarding the Needs and Service Plans. NSPs will be developed with the participation of age appropriate children and the foster parents. Concept 7 Social Workers will obtain CSWs authorization for the NSP, and will document attempts to receive them. The NSPs will be comprehensive. Concept 7 foster care staff will be retrained. The trainings will be conducted at the next scheduled staff meetings scheduled for 7/26/11 (Orange), 7/27/11 (Commerce), and 8/4/11 (Ontario).

Two of the NSPs reviewed, the Concept 7 Social Worker noted that they contact the CSW twice per month. Upon review of the case notes, twice a month contact was not consistent. There were monthly contacts noted. In order to ensure this doesn't occur again, the foster care staff will be retrained regarding CSW contact and proper documentation at the staff meetings scheduled above.

In addition to the refresher training on the NSP requirements, Supervising Social Workers/Trainers will also review both NSPs to ensure that dates are indicated for

contacts and that those dates correspond with case notes in the client files. Supervising Social Workers/Trainers will also audit case notes on a monthly basis noting if the CSW contact requirements are met. Concept 7 will also be implementing Peer Review, where every other week social workers will review other social worker files for these items.

Education and Workforce Readiness (39)

Foster/Adoptive parents are expected to enroll their foster/adoptive children in an appropriate educational program as indicated by the county and Concept 7 Social Worker within 3 business days of placement. Concept 7 will ensure that all certified parents are retrained regarding the school enrollment requirements. If there are reasons why enrollment was delayed, they will be well documented. Training review with families and staff will also address this. Supervising Social Workers/Trainers will also monitor that enrollment dates are consistent with case notes on file.

If I can be of assistance please do not hesitate to call me at (323) 838-9566.

Sincerely,

Jackie Jakob, MSW
Foster Family Agency Director

Concept 7
Family Support & Treatment Centers

Foster Family Agency Monitoring Review 2011

☐ Concept 7 Staff, _____ I certify that I have received additional information and refresher training on the following foster care topics by a Concept 7 Supervising Social Worker/Trainer or FFA Director.		Trainee Initials	Trainer Initials
1.	Monitor Certified Foster Parents for compliance with Title 22, Chapter 2 Sections 80087 and 80088, and Chapter 4, Sections 83087, 83087.1, 83087.2, and 83088, to provide: (1) a home and yards that are safe, well-maintained, and appropriately furnished; (2) age appropriate environment; (3) a bedroom, or sufficient space in a shared bedroom, with a comfortable mattress in good condition and adequate space to store clothing and personal items; (4) an appropriate and well-lit space for studying; (5) acceptable housekeeping; and (6) safety gates and latches as applicable. (SOW)		
2.	Concept 7 Social Worker will obtain the DCFS CSW's authorization or document efforts to obtain their implementation of the Needs and Services Plans.		
3.	Concept 7 Social Worker will ensure that age-appropriate children participate in the development of the Needs and Services Plans. (NSP)		
4.	Concept 7 Social Worker will ensure that certified foster/adoptive parents participate in the development of the Needs and Services Plans. (NSP)		
5.	Concept 7 Social Workers will contact CSWs monthly (minimum) and appropriately document contacts.		
6.	Concept 7 Social Workers will develop comprehensive updated Needs and Service Plans (NSP).		
7.	Foster/Adoptive parents are expected to enroll their foster/adoptive children in an appropriate educational program as indicated by the county and Concept 7 Social Worker within 3 business days of placement.		

_____ _____ _____
Trainee signature Date Time Reviewed

_____ _____
Trainer signature Date

_____
Trainer print name

7/25/11

Concept 7
Family Support & Treatment Centers

Foster Family Agency Monitoring Review 2011

☐ Foster Parents(s)_____ I certify that I have received additional information and refresher training on the following foster care topics by a Concept 7 Social Worker.		Trainee Initials	Trainer Initials
1.	Monitor Certified Foster Parents for compliance with Title 22, Chapter 2 Sections 80087 and 80088, and Chapter 4, Sections 83087, 83087.1, 83087.2, and 83088, to provide: (1) a home and yards that are safe, well-maintained, and appropriately furnished; (2) age appropriate environment; (3) a bedroom, or sufficient space in a shared bedroom, with a comfortable mattress in good condition and adequate space to store clothing and personal items; (4) an appropriate and well-lit space for studying; (5) acceptable housekeeping; and (6) safety gates and latches as applicable.		
2.	Concept 7 Social Worker will ensure that age-appropriate children participate in the development of the Needs and Services Plans. (NSP)		
3.	Concept 7 Social Worker will ensure that certified foster/adoptive parents participate in the development of the Needs and Services Plans. (NSP)		
4.	Foster/Adoptive parents are expected to enroll their foster/adoptive children in an appropriate educational program as indicated by the county and Concept 7 Social Worker within 3 business days of placement.		

_____ _____ _____
Trainee signature Date Time Reviewed

_____ _____
Trainer signature Date

_____
Trainer print name

7/25/11