County of Los Angeles
DEPARTMENT OF CHILDREN AND FAMILY SERVICES

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

PHILIP L. BROWNING
Director

Board of Supervisors
GLORIA MOLINA
First District
MARK RIDLEY-THOMAS
Second District
ZEV YAROSLAVSKY
Third District
DON KNABE
Fourth District
MICHAEL D. ANTONOVICH
Fifth District

June 26, 2012

To: Supervisor Zev Yaroslavsky, Chairman
Supervisor Gloria Molina
Supervisor Mark Ridley-Thomas
Supervisor Don Knabe
Supervisor Michael D. Antonovich

From: Philip L. Browning
Director

BOYS TOWN OF CALIFORNIA, INC., GROUP HOME CONTRACT COMPLIANCE MONITORING REVIEW

The Department of Children and Family Services (DCFS) Out-of-Home Care Management Division (OHCMD) conducted a review of Boys Town California, Inc., Group Home (Boys Town) in January 2012, at which time Boys Town had one 24-bed site with three DCFS placed children. Boys Town is licensed to serve a capacity of 24 children, male and female, ages eight through 17.

Boys Town is located in Orange County and provides services to DCFS foster children. According to Boys Town's program statement, its stated goal is "to help each child learn the skills and behaviors that are necessary for successful entry back into their family or to another placement within the community and ultimately, a successful entry into adulthood."

For the purpose of this review, all three placed DCFS children, one male and two females, were interviewed and their case files were reviewed. The placed children's average overall length of placement was 19 months, and their average age was 16. The file of one discharged child was reviewed to determine if the destination of placement was per her permanency plan and if the child was meeting her Needs and Services Plan (NSP) goals at the time of discharge. Five staff files were reviewed for compliance with Title 22 Regulations and County contract requirements.

Three children were prescribed psychotropic medication. We reviewed their case files to assess timeliness of Psychotropic Medication Authorizations (PMAs) and to confirm that documentation of psychiatric monitoring was maintained as required.

SCOPE OF REVIEW

The purpose of this review was to assess Boys Town's compliance with its County contract and State regulations. The visit included a review of Boys Town's program statement, administrative internal policies and procedures, three DCFS placed children's case files, one discharged child's case file and a random sampling of personnel files. A visit was made to the facility to assess the quality of care and supervision provided to children, and we conducted interviews with the children to assess the quality of 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

Overall, the children interviewed reported that they were provided with good care and appropriate services, were comfortable in their environment and were treated with respect and dignity. The direct care staff stated they had open communication with the placed children and did their very best to address the children's needs in a timely manner.

The deficiencies noted during the monitoring review included the following factors. Boys Town needed to complete the sign-in/sign-out logs properly and develop timely and comprehensive NSPs to include all the required information in accordance with the Group Home Contract. Further, Boys Town staff needed to obtain and/or document their efforts to obtain the DCFS Children Social Workers' (CSWs) authorizations to implement the NSPs. Additionally, it was determined that Boys Town needed to ensure more thorough documentation and ensure staff members have a valid California Driver's License (CDL), receive timely health-screenings and initial training per Boys Town program statement.

NOTABLE FINDINGS

The following are the notable findings of our review:

- The resident sign-in/sign-out log was not completed properly. The Program Director stated all staff members were trained by the facility manager by March 9, 2012, in the procedure for signing residents in and out of the facility, including mandatory staff signatures, dates/times out and in.

- Five of 10 reviewed NSPs did not contain the CSWs' signatures or were late in obtaining the DCFS CSWs' authorizations to implement the NSPs. The Program Director stated that all NSPs would be sent to the placement worker for approval in a timely manner. In the event that the approved NSP was not received from the CSW, there would be appropriate documentation demonstrating efforts to obtain approval timely.

- None of the 10 NSPs reviewed were comprehensive in that they did not include all the required elements in accordance with the NSP template. The NSPs did not include specific and measureable treatment goals as they related to Permanency, Life Skills, Mental Health, and Visitation. Some NSP quarterly sections lacked detailed information regarding the progress toward the identified treatment goals or the child's status was not updated. Additionally, the identified treatment goals needed to be broken down into smaller tasks in order to be accurately implemented and assessable for future evaluation.

  The Program Director stated that Boys Town staff attended the DCFS NSP training on January 10, 2012. Effective immediately, the Boys Town Social Worker will create more detailed and comprehensive reports.

- One staff member did not have a valid California Driver's License. Another staff member did not receive timely initial health-screenings, and her initial and/or on-going training records could not be located. The Program Director stated that Boys Town will correct this issue, and it will be further addressed in the Corrective Action Plan (CAP).

A detailed report of our findings is attached.

EXIT CONFERENCE

The following are highlights from the Exit Conference held January 27, 2012.

In attendance:

Lawren Ramos, Executive Director; Sarah Terry, Residential Program Director, and Jui-Ling Ho, Monitor, DCFS OHCMD.

Highlights:

Boys Town's Administration was in agreement with our findings and recommendations. The Executive Director stated he would ensure the deficiencies are corrected immediately and all staff members will receive timely health-screenings, have a valid CDL, and all training records are accurately entered into the data system.

Boys Town provided an approved written CAP addressing 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:LP:KR
EAH:PBG:jlh

Attachment

c: William T Fujioka, Chief Executive Officer
Wendy Watanabe, Auditor-Controller
Jerry E. Powers, Chief Probation Officer
Public Information Office
Audit Committee
Sybil Brand Commission
Robert Hartmann, President, Board of Directors, Boys Town California, Inc. Group Home
Lawren Ramos, Executive Director, Boys Town California, Inc. Group Home
Jean Chen, Regional Manager, Community Care Licensing
Lenora Scott, Regional Manager, Community Care Licensing
Robert Gomes, Regional Manager, Community Care Licensing, Orange County

BOYS TOWN CALIFORNIA, INC., GROUP HOME
CONTRACT COMPLIANCE MONITORING REVIEW - SUMMARY

20371 Flanagan Road
Trabuco, CA 92678
License Number: 306002598
Rate Classification Level: 11

	Contract Compliance Monitoring Review	Findings: January 2012
I	**Licensure/Contract Requirements** (9 Elements) 1. Timely Notification for Child's Relocation 2. Transportation 3. SIRs 4. Compliance with Licensed Capacity 5. Disaster Drills Conducted & Log Maintained 6. Runaway Procedures 7. Allowance Logs 8. CCL Citations/OHCMD Investigation Reports on Safety and Plant Deficiencies 9. Sign In/ Out Logs	 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. Needs Improvement
II	**Facility and Environment** (6 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	 Full Compliance (ALL)

III	**Maintenance of Required Documentation and Service Delivery** (13 Elements) 1. Child Population Consistent with Program Statement. 2. DCFS CSW Authorization to Implement NSPs 3. Children's Participation in the Development of NSPs 4. NSPs Implemented and Discussed with Staff 5. Progressing Toward Meeting the NSP Case Goals 6. Timely Initial NSPs 7. Comprehensive Initial NSPs 8. Therapeutic Services Received 9. Recommended Assessments/Evaluations Implemented 10. DCFS CSWs Monthly Contacts Documented 11. Maintaining Important Relationships 12. Timely Updated NSPs 13. Comprehensive Updated NSPs	1. Full Compliance 2. Needs Improvement 3. Full Compliance 4. Full Compliance 5. Full Compliance 6. Full Compliance 7. Needs Improvement 8. Full Compliance 9. Full Compliance 10. Full Compliance 11. Full Compliance 12. Needs Improvement 13. Needs Improvement
IV	**Educational and Emancipation Services** (8 Elements) 1. Timely Enrollment 2. Attend School As Required 3. Facilitate Educational Goals 4. Academic Performance and/or Attendance Increased 5. Current IEPs Maintained 6. Current Report Cards Maintained 7. Emancipation/Vocational Programs Provided 8. Facilitate ILP Emancipation Planning	Full Compliance (ALL)
V	**Health and Medical Needs** (6 Elements) 1. Initial Medical Exams Conducted 2. Initial Medical Exams Timely 3. Follow-up Medical Exams Timely 4. Initial Dental Exams Conducted 5. Initial Dental Exams Timely 6. Follow-Up Dental Exams Timely	Full Compliance (ALL)

VI	**Psychotropic Medications** (2 Elements) 1. Current Court Authorization for Administration of Psychotropic Medication 2. Current Psychiatric Evaluation Review	Full Compliance (ALL)
VII	**Personal Rights and Social/Emotional Well-Being** (15 Elements) 1. Children Informed of Home's Policies and Procedures 2. Children Feel Safe 3. Satisfaction with Meals and Snacks 4. Staff Treatment of Children with Respect and Dignity 5. Appropriate Rewards and Discipline System 6. Consequences Fair 7. Children Allowed Private Visits, Calls and Correspondence 8. Children Free to Attend Religious Service Activities 9. Reasonable Chores 10. Children Informed about Psychotropic Medication 11. Children Aware of Right to Refuse Psychotropic Medication 12. Children Free to Receive or Reject Voluntary Medical, Dental and Psychiatric Care 13. Participation in Recreational Activity Planning 14. Participation in Recreational Activities 15. Participation in Extra-Curricular, Enrichment and Social Activities	Full Compliance (ALL)
VIII	**Personal Needs/Survival and Economic Well-Being** (8 Elements) 1. $50 Clothing Allowance 2. Adequate Quantity of Clothing Inventory 3. Adequate Quality of Clothing Inventory 4. Involvement in Selection of Clothing 5. Provision of Personal Care Items 6. Minimum Monetary Allowances 7. Management of Allowance 8. Encouragement and Assistance with Life Book	Full Compliance (ALL)

IX	**Discharged Children** (3 Elements) 1. Discharge According to Permanency Plan 2. Make Progress Toward Meeting NSP goals 3. Stabilize Placement Prior to Removal	Full Compliance (ALL)
X	**Personnel Records (including Staff Qualifications, Staffing Ratios, Criminal Clearances and Training)** (14 Elements) 1. DOJ Timely Submitted 2. FBI Timely Submitted 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 GH Policies and Procedures 9. Initial Training Documentation 10. Child Abuse Training 11. CPR Training Documentation 12. First-Aid Training Documentation 13. On-going Training Documentation 14. Emergency Intervention Training Documentation	1. Full Compliance 2. Full Compliance 3. Full Compliance 4. Full Compliance 5. Full Compliance 6. Needs Improvement 7. Needs Improvement 8. Full Compliance 9. Needs Improvement 10. Full Compliance 11. Full Compliance 12. Full Compliance 13. Full Compliance 14. Full Compliance

BOYS TOWN OF CALIFORNIA, INC., GROUP HOME
CONTRACT COMPLIANCE MONITORING REVIEW

20371 Flanagan Road
Trabuco, CA 92678
License Number: 306002598
Rate Classification Level: 11

The following report is based on a "point in time" monitoring visit and addresses findings noted during the January 2012 monitoring review.

CONTRACTUAL COMPLIANCE

Based on our review, Boys Town of California, Inc., Group Home (Boys Town) was in full compliance with seven of 10 sections of our contract compliance review: Facility and Environment; Education and Workforce Readiness; Health and Medical Needs; Psychotropic Medication; Personal Rights and Social/Emotional Well-Being; Personal Needs/Survival and Economic Well-Being; and Discharged Children. The following report details the results of our review.

LICENSURE/CONTRACT REQUIREMENTS

Based on our review of three children's case files and/or documentation from the provider, Boys Town fully complied with eight of nine elements reviewed in the area of Licensure/Contract Requirements.

We noted that the resident sign-in/sign-out log was not properly completed. The Program Director stated all staff members were trained by their facility manager on March 9, 2012, as to the procedure for signing residents in and out of the facility, including mandatory staff signatures, dates/times in and out.

Recommendation:

Boys Town's management shall ensure:

1. The resident sign-in/sign-out log is always completed.

MAINTENANCE OF REQUIRED DOCUMENTATION AND SERVICE DELIVERY

Based on our review of three children's files and/or documentation from the provider, Boys Town fully complied with nine of 13 elements reviewed in the area of Maintenance of Required Documentation and Service Delivery.

We noted that five of 10 reviewed NSPs did not contain the Children Social Workers' (CSWs) signature or were late in obtaining the CSWs' authorizations to implement the Needs and Services Plans (NSPs). In addition, one of the 10 reviewed NSPs was not

timely, and none were comprehensive in that they did not include all the required elements in accordance with the NSP template. The NSPs did not include specific and measureable treatment goals as they related to Permanency, Life Skills, Mental Health, and Visitation. Some NSP quarterly sections lacked detailed information regarding the progress toward the identified treatment goals or did not update the child's status. Additionally, the identified treatment goals needed to be broken down into smaller tasks in order to be accurately implemented and assessable for future evaluation.

The Program Director stated all NSPs would be sent to the CSW for approval in a timely manner. In the event the approved NSP was not received from the CSW, there would be appropriate documentation demonstrating efforts to obtain the approval timely. She also stated that the Residential Consultant will begin completing NSPs five days prior to the end of the reporting period to ensure that NSPs were completed timely. Boys Town's representatives also attended the NSP training on January 10, 2012 to ensure NSPs are comprehensive.

Recommendations:

Boys Town's management shall ensure:

2. The Boys Town staff will obtain or document efforts to timely obtain the DCFS CSWs' authorizations to implement the NSP.

3. NSPs are developed timely.

4. Initial and Updated NSPs are comprehensive and include required information.

PERSONNEL RECORDS

Based on our review of five personnel files and/or documentation from the provider, Boys Town fully complied with 11 of 14 elements in the area of Personnel Records.

We noted that one staff member did not have a valid California Driver's License (CDL). Additionally, another staff member did not receive timely initial health screenings, and her initial training records could not be located.

Recommendations:

Boys Town's management shall ensure:

5. All staff members receive timely initial health-screenings.

6. All staff members have a valid CDL.

7. All staff members receive the required initial training.

FOLLOW-UP FROM OHCMD'S PRIOR MONITORING REVIEW

Objective

Determine the status of the recommendations reported in the prior monitoring review.

Verification

We verified whether the outstanding recommendations from our prior review were implemented. The report was issued June 10, 2011.

Results

The OHCMD's prior monitoring report contained four outstanding recommendations. Specifically, Boys Town was to ensure NSPs were comprehensive, including all required elements in accordance with the NSP template; all age-appropriate children are allowed to participate in extra-curricular, enrichment and social activities; all placed children are encouraged and assisted in creating and updating a life book and/or photo album; and all staff members receive the required initial training.

Based on our follow-up of these recommendations, Boys Town fully implemented two of four recommendations. Boys Town did not implement the recommendation by the Auditor-Controller (A-C) and the OHCMD regarding development of comprehensive NSPs with all required elements, and to ensure all staff members receive the required initial training. Corrective action was requested of Boys Town to further address the recommendations that were not implemented.

Recommendation:

Boys Town's management shall ensure:

10. Full implementation of the outstanding recommendations from OHCMD's prior monitoring report, which are noted in this report as Recommendations 4 and 7.

MOST RECENT FISCAL REVIEW CONDUCTED BY THE AUDITOR-CONTROLLER

A fiscal review of Boys Town has not been posted by the A-C.

California

03/07/12 – Addendum to CAP dated 2/27/12

[redacted]
County of Los Angeles
Department of Children and Family Services
Out of Home Care Management Division
9320 Telstar Ave., Suite 216
El Monte, CA 91731

Dear Ms. [redacted]

The following plan of correction is in response to your Contract Compliance Review to Boys Town California, Inc. programs in Trabuco Canyon. Below you will see your findings and our corrective action plan.

Corrective Action Plan (CAP):

I. Licensure/Contract Requirement:

Element #9 - Finding: Sign–in/Sign-Out Log was not always adequately completed. There was no sign-in/out log found for community pass.

POC: All staff will be trained by their Consultant by 3/9/12 as to the procedure for signing residents in and out of facility, including mandatory staff signatures, dates/times out and in. Once the training is completed a copy of the attendance sheet(s) will be sent to our monitor. If any of the staff misses the initial training, make-up training will be scheduled to ensure that all staff is re-trained. Beginning immediately Family Teachers and Assistant Family Teachers will be responsible for completing all sign in/out log sheets for each resident. The Residential Consultant for each home will review the log sheets for each resident each week in order to make sure there have not been any omissions. At consultation, the Residential Consultant will review the weekend entries by the Family Teachers/Assistant Family Teachers. When an omission/error/question occurs the facility manager will talk with the staff responsible in person or by phone in order to update/correct the log sheets. Program Director Sarah Terry will ensure that sign in/out Logs are adequately completed and maintained and that the corrective action plan remains implemented and is working as intended.

III. Maintenance of Required Documentation and Service Delivery:

Element #17 - Finding: Obtaining the DCFS CSW's authorization to implement the NSP's---3 of the 11 required NSPs were not obtained or were not documented efforts to obtain the DCFS CSW's authorization to implement the NSPs. One NSP was not applicable for this review due to this NSP is still within the time frame to obtain CSW's approval.

POC: Program Director, [redacted] reviewed with the program staff, the expectations of obtaining the CSW's signatures within 10 days of the due date of the NSP on 2/6/12. In addition on 2/6/12, it was reviewed, that should Boys Town California not be able to receive the CSW signature, that supporting documentation showing efforts to obtain this authorization from the CSW will be completed and on file. Upon completion of the NSP's Residential Consultants will email the completed NSP's to the Administrative Assistant. Immediately the Administrative Assistant will fax the NSP to the assigned Social Worker. The Residential Consultant will be responsible for calling the CSW and letting them know that the NSP is being faxed. The fax confirmation sheet will be kept and attached to the NSP until actual signature is obtained from the CSW. Residential Consultants will be required to document all efforts made to obtain the CSW signature and place those efforts in the youth's file. Both of these practices will be monitored by Program Director, [redacted] for on-going quality assurance.

Element #27 – Finding: NSP Not timely---One updated NSP not done timely.

POC: The NSP that was not done timely was completed on 1/5/12, the day following the monitoring visit by Out of Home Care Management Division. Program Director, [redacted] immediately on 1/4/12 reviewed with the Residential Consultants, that NSP's were due before the last day of the reporting period. Boys Town California had previously employed the practice of waiting to include information for the last day of the reporting period. After speaking during the exit interview, Boys Town California will now complete NSP 5 days prior to the reporting period ending. Should there be pertinent information that is discovered or should the youth exhibit any relevant behaviors on the last day of the reporting period, Boys Town California will write and submit an addendum to the NSP.

1. Needs and Service Plans will be due 5 days prior to the due date.
2. NSP must be reviewed by Residential Consultant, Program Director and client before final review.
3. Each Residential Consultant will be responsible to review their document for completion and accuracy before it is submitted for final review.
4. After review, if corrections are to be made, the Residential Consultant will have to resubmit the document by the end of the next business day.
5. Any late Needs and Service Plan will result in a verbal warning/counseling memo regarding late submission of documentation.
6. Subsequent late documentation will follow the appropriate progressive discipline.
7. Residential Consultants and all other contributors to the Needs and Service Plan Document are required to put these dates on their outlook reminder.
8. Program Director will also place due dates on the Outlook Calendar for oversight and confirmation of timely completion.

Element #22 and 28 – Finding: NSP Not Comprehensive---None of the 12 required NSPs were comprehensive due to the following reasons.

a. Some quarterly sections lacked detailed information regarding the progress toward the identified treatment goals.

b. The Quarterly section for the Permanency Case Plan Goal needs to include the detailed information regarding how the Agency worked with the placed child to achieve the permanency case goals and what efforts were made during the past three months regarding feasibility of the child's return to his home, placement in another facility, or move into Independent Living.

c. No detailed visitation plan was set up for all residents.

d. Not all Treatment Goals were specific, measurable, attainable, results oriented and time-limited.
e. Not all psychological or counseling information was documented in health section for residents.
f. The identified Treatment goals need to be broken down into small tasks in order to be accurately implemented and assessable for future evaluation.
g. One initial NSP included the quarterly updated information which should not be included.
h. Five NSPs had wrong updated NSP dates.
i. Not all NSPs included all the required elements in accordance with the NSP template.

POC:

1. Both Residential Consultants (authors of NSPs) attended and completed the LA County Needs and Service Plan Training on 1/10/12. This training addressed all of the above concerns.
2. When and NSP is due – Residential Consultant will give to Program Director for review 5 days prior to the 30 day or 90 day mark for review.
3. Program Director will use the NSP training provided by the county to ensure each section is completed correctly and is comprehensive for each future NSP.
4. On 3.6.12 – Program Director reviewed for the second time the Corrective Action Plan for Needs and Service Plans and will be implemented immediately.
5. Program Director will also fax next NSP that's due on 3/28/12 completed to [redacted] for review and feedback on progress of implementing the training and the feedback provided above.
6. Once feedback is provided by [redacted] Program Director will ensure that feedback is shared with the Residential Consultants and the feedback is implemented until [redacted] deems that the NSPs are comprehensive.

X. Personnel Records:

Element #78 - Finding: Not receiving in timely health screenings---Staff member, [redacted] initial health screening was not timely.

POC: Since the time of this incident, 6 years ago, an updated new-hire system has been created and implemented to address the above noted concern and ensure employees receive health screens in a timely manner. When a new employee is hired, the Site Support Specialist has them come in to obtain their form for their physical and health screen. Once the physical is complete the new employee must go get their TB Test read in three days. A confirmation of health screen completion is faxed over within 1 to 2 days following the completion of the TB test and drug screen. The Health Clinic is then responsible for mailing the completed Health Screen form to the Boys Town Office. Site Support Specialist then is responsible for filing this in the new employees file. If heatlh screens are not submitted in a timely manner the Site Support Specialist will be responsible for calling the Health Clinic to find out what happened. Until the Health Screen is confirmed completed that new employee will not work with the youth. Site Support Specialist will be responsible for ensuring that the new system that has been created is implemented and will do monthly audits to ensure that all employees are receiving timely health screenings.

Element #79 – Finding: Invalid CA Driver's License---Staff Member [redacted] did not have a valid CA driver's license in his file.

03/07/12 Addendum to CAP dated 02/27/12

POC: An appointment has been scheduled with the CA Department of Motor Vehicles and will be completed on 3.7.12 in order for [redacted] to obtain his CA Driver's License. [redacted] has completed his required eye exam and studied for the written test. Until the provisional CA Driver's License is issued [redacted] will not drive Boys Town Vehicles. Program Director [redacted] will ensure that the License is obtained and will fax a copy of the provisional license as soon as it is available. Once the hard copy of the license arrives a copy will be made and faxed to Out of Care Home Division as well.

Element #81 – Finding: Initial Training---Staff Member [redacted] initial training records could not be located.

POC: Since the time of this incident, 6 years ago, an updated new-hire system has been created and implemented to address the above noted concern and ensure that documentation of initial training records are stored electronically and within each employees record. When a new employee is hired, Site Support Specialist works with the Program Director to ensure that initial trainings are set up for the new employee before they begin work. Once the trainings are scheduled and completed the Site Support Specialist takes the training sign in sheets and enters the training in an electronic data base that now tracks all employees training hours. The Program Director is responsible for ensuring that the new employees are signed up and attending trainings that are provided upon their hire. The Site Support Specialist is responsible for ensuring that all trainings are documented and entered electronically to the training database.

Program Director and Site Support Specialist will implement the plan of correction for these findings. Oversight will be provided to them with random monitoring of this plan of correction. Should you require additional information, please contact me.

Sincerely,

[redacted]
Family Homes Program Director
Boys Town California, Inc.