PHILIP L. BROWNING
Director

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

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August 4, 2015

To: Supervisor Michael D. Antonovich, Mayor
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From: Philip L. Browning
Director

**CALIFORNIA INSTITUTE OF HEALTH AND SOCIAL SERVICES DBA CHILDREN'S WAY FOSTER FAMILY AGENCY CONTRACT COMPLIANCE MONITORING REVIEW**

The Department of Children and Family Services (DCFS) Contract Administration Division (CAD) conducted a review in March 2014 of California Institute of Health and Social Services dba Children's Way Foster Family Agency (The FFA). The FFA has one licensed office in the Second Supervisorial District, one in the Fifth Supervisorial District and one in San Bernardino County. Both offices provide services to County of Los Angeles DCFS foster children. According to the FFA's program statement, its mission is "to provide a range of services to placed children, including therapeutic treatment, educational/recreational support, emancipation services and behavioral support."

At the time of the review, the FFA supervised 118 DCFS placed children in 44 Certified Foster Homes. The placed children's average length of placement was 7 months and their average age was 13.

## SUMMARY

During CAD's Contract Compliance review, the interviewed children generally reported feeling safe at the FFA, having been provided with good care and appropriate services, being comfortable in their environment and treated with respect and dignity. The Certified Foster Parents reported they were 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 the 11 sections of our Contract Compliance review: Licensure/Contract; 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.

CAD noted deficiencies in the areas of: Certified Foster Homes, related to missing criminal clearances, health screening/for other adults in the home; Facility and Environment, related to common areas not well maintained and lack of adequate perishable and non-perishable food and; Maintenance of Required Documentation/Service Delivery, related to FFA social workers not developing timely, comprehensive initial Needs and Services Plans with child's participation.

On August 12, 2014 and August 13, 2014, CAD conducted follow-up visits to verify the FFA's implementation of the Compliance Corrective Action Plan (CAP). During the visits, six additional children were interviewed to assess the on-going overall safety of the children in the FFA. All children reported feeling safe and no concerns were reported.

## REVIEW OF REPORT

On November 4, 2014, Theodore Howard, DCFS CAD, held an Exit Conference with FFA representatives Colleen Anderson, Executive Director; Kayla Wright, Regional Administrator; Carol Guillard, Operations Manager; Cynthia Marshall, Program Administrator; Carsha Brooks, Supervising Social Worker and Erika Huerta, Certification Manager. The FFA's representatives agreed with the review findings and recommendations; were receptive to implementing systemic changes to improve their compliance with regulatory standards; and agreed to address the noted deficiencies in the CAP.

A copy of this Compliance Report has been sent to the Auditor-Controller and Community Care Licensing.

The FFA provided the attached approved CAP addressing the recommendations noted in this Compliance Report.

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

PLB:EM
LTI:th

Attachments

c: Sachi A. Hamai, Interim Chief Executive Officer
John Naimo, Auditor-Controller
Public Information Office
Audit Committee
Colleen Anderson, Executive Director, California Institute of Health and Social Services dba Children's Way
Lajuannah Hills, Regional Manager, Community Care Licensing Division
Lenora Scott, Regional Manager, Community Care Licensing Division

**CALIFORNIA INSTITUTE OF HEALTH AND SOCIAL SERVICES DBA CHILDREN'S WAY**
**FOSTER FAMILY AGENCY CONTRACT COMPLIANCE MONITORING REVIEW SUMMARY**

**8929 S. Sepulveda Blvd.**
**Suite 200**
**Los Angeles, CA 90045**
**License Number: 198201990**

**315 W. Pondera St.**
**Lancaster, CA 93534**
**License Number: 199801357**

**1802 Commerce Center West**
**Suite D**
**San Bernardino, CA 92408**
**License Number: 366407264**

| | **Contract Compliance Monitoring Review** | **Findings: March 2014** |
|---|---|---|
| I | **Licensure/Contract Requirements** (7 Elements)<br><br>1. Timely Notification for Child's Relocation<br>2. Timely, Cross-Reported SIRs<br>3. Runaway Procedures in Accordance with the Contract<br>4. Are there CCL Citations/OHCMD Safety Reports<br>5. If applicable, FFA ensures Complete Required Whole Foster Family Home (WFFH) Training<br>6. FFA Pays Certified Foster Parents (CFP) Whole Foster Family Home Payments<br>7. FFA conducts an Assessment of CFP Prior to Placement of Two (2) or more children | Full Compliance (All) |
| II | **Certified Foster Homes** (12 Elements)<br><br>1. Home Study and Safety Inspection Conducted Prior to Certification<br>2. The Agency's Inquiry with OHCMD for Historical Information Prior to Certification<br>3. Timely Criminal Clearances (DOJ, FBI, CACI) prior to Certification<br>4. Timely, Completed, Signed Criminal Background Statement<br>5. Health Screening & TB test Prior to Certification<br>6. All Required Training Prior to Certification<br>7. Certificate of Approval on File/Including Capacity<br>8. Safety Inspection Completed At Least Every Six Months or Per-Approved Program Statement<br>9. Completed Annual Training Hours for Re-certification and Current CPR/First-Aid/Water Safety Certificates<br>10. Current CDL/Auto Insurance/Annual Vehicle Maintenance Documentation for CFPs and Designated Drivers, if applicable car seat(s)<br>11. Criminal Clearances and Health Screening/CDL/CPR/DOJ/FBI/CACI/Auto Insurance for Other Adults in the Home<br>12. FFA Assists CFPs in Providing Transportation Needs | 1. Full Compliance<br>2. Full Compliance<br>3. Full Compliance<br>4. Full Compliance<br>5. Full Compliance<br>6. Full Compliance<br>7. Full Compliance<br>8. Full Compliance<br>9. Full Compliance<br>10. Full Compliance<br>11. Improvement Needed<br>12. Full Compliance |

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| III | **Facility and Environment** (7 Elements) | |
| | 1. Exterior/Grounds Well Maintained | 1. Full Compliance |
| | 2. Common Areas Well Maintained | 2. Improvement Needed |
| | 3. Children's Bedrooms/Interior Well Maintained | 3. Full Compliance |
| | 4. Sufficient and Appropriate Educational Resources | 4. Full Compliance |
| | 5. Adequate Perishable and Non-Perishable Foods | 5. Improvement Needed |
| | 6. CFPs Conducted Disaster Drills and Documentation Maintained | 6. Full Compliance |
| | 7. Money and Clothing Allowance Logs Maintained | 7. Full Compliance |
| IV | **Maintenance of Required Documentation and Service Delivery** (10 Elements) | |
| | 1. FFA Obtains or Documents Efforts to Obtain County Children's Social Worker's (CSW) Authorization to Implement NSPs | 1. Full Compliance |
| | 2. CFPs Participated in Development of the NSPs | 2. Full Compliance |
| | 3. Children Progressing Toward Meeting NSP Goals | 3. Full Compliance |
| | 4. FFA Social Workers Develop Timely, Comprehensive Initial NSPs with Child's Participation | 4. Improvement Needed |
| | 5. FFA Social Workers Develop Timely, Comprehensive Updated NSPs with Child's Participation | 5. Full Compliance |
| | 6. Therapeutic Services Received | 6. Full Compliance |
| | 7. Recommended Assessment/Evaluations Implemented | 7. Full Compliance |
| | 8. County Children's Social Workers Monthly Contacts Documented in Child's Case File | 8. Full Compliance |
| | 9. FFA Social Workers Develop Timely, Comprehensive Quarterly Reports | 9. Full Compliance |
| | 10. FFA Social Workers Conduct Required Visits | 10. Full Compliance |
| V | **Educational and Workforce Readiness** (5 Elements) | |
| | 1. Children Enrolled in School Within Three School Days | Full Compliance (All) |
| | 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 | |

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| VI | **Health and Medical Needs** (4 Elements)<br><br>1. Initial Medical Exams Conducted Timely<br>2. Follow-Up Medical Exams Conducted Timely<br>3. Initial Dental Exams Conducted Timely<br>4. Follow-Up Dental Exams Conducted Timely | Full Compliance (All) |
| VII | **Psychotropic Medication** (2 Elements)<br><br>1. Current Court Authorization for Administration of Psychotropic Medication<br>2. Current Psychiatric Evaluation Review | Full Compliance (All) |
| VIII | **Personal Rights and Social/Emotional Well-Being** (10 Elements)<br><br>1. Children Informed of Agency's Policies and Procedures<br>2. Children Feel Safe in the CFP Home<br>3. CFPs' Efforts to Provide Nutritious Meals and Snacks<br>4. CFPs Treat Children with Respect and Dignity<br>5. Children Allowed Private Visits, Calls and to Receive Correspondence<br>6. Children Free to Attend or Not Attend Religious Services/Activities of Their Choice<br>7. Children's Chores Reasonable<br>8. Children Informed About Their Medication and Right to Refuse Medication<br>9. Children Aware of Right to Refuse or Receive Medical, Dental and Psychiatric Care<br>10. Children Given Opportunities to Participate in Extra-Curricular Activities, Enrichment and Social Activities | Full Compliance (All) |
| IX | **Personal Needs/Survival and Economic Well-Being** (7 Elements)<br><br>1. $50 Clothing Allowance Provided in Accordance with FFA Program Statement<br>2. On-going Clothing Inventories of Adequate Quantity and Quality<br>3. Children's Involvement in Selection of Their Clothing<br>4. Provision of Sufficient Supply of Clean Towels | Full Compliance (All) |

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|---|---|---|
| | Personal Care Items Meeting Ethnic Needs<br>5. Minimum Weekly Monetary Allowances<br>6. Management of Allowance/Earnings<br>7. Encouragement and Assistance with Life Book/Photo Album | |
| X | **Discharged Children** (3 Elements)<br><br>1. Completed Discharge Summary<br>2. Attempts to Stabilize Children's Placement<br>3. Child Completed High School (if applicable) | Full Compliance (All) |
| XI | **Personnel Records** (9 Elements)<br><br>1. Criminal Clearances (DOJ, FBI, and CACI) Signed and Submitted Timely<br>2. Timely, Completed, Signed Criminal Background Statement<br>3. FFA Social Workers Met Education/Experience Requirements<br>4. Timely Employee Health Screening/TB Clearances<br>5. Valid CDL and Auto Insurance<br>6. FFA Employees Signed Copies of FFA Policies and Procedures<br>7. FFA Employees Completed All Required Training and Documentation Maintained<br>8. FFA Social Workers Have Appropriate Caseload Ratio<br>9. FFA Maintained Written Declarations for Part-Time Contracted FFA Social Workers Caseloads Not Exceed Total of 15 Children | Full Compliance (All) |

# CALIFORNIA INSTITUTE OF HEALTH AND SOCIAL SERVICES
# DBA CHILDREN'S WAY FOSTER FAMILY AGENCY
# CONTRACT COMPLIANCE MONITORING REVIEW
# FISCAL YEAR 2013-2014

## SCOPE OF REVIEW

The following report is based on a "point in time" monitoring visit. The compliance report addresses findings noted during the March 2014 review. The purpose of this review was to assess California Institute of Health and Social Services dba Children's Way Foster Family Agency (The FFA). The FFA compliance with the County contract and State regulations and included a review of the FFA's program statement, as well as administrative internal policies and procedures.

The monitoring review covered the following 11 areas:

- Licensure/Contract Requirements,
- Certified Foster Homes,
- Facility and Environment,
- Maintenance of Required Documentation and Service Delivery,
- Educational 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 purposes of this review, seven County of Los Angeles DCFS placed children were selected for the sample. The Contract Administration Division (CAD) interviewed each child and reviewed their case files to assess the care and services they received. Additionally, four discharged children's files were reviewed to assess the FFA's compliance with permanency efforts. At the time of the review, seven placed children were prescribed psychotropic medication. The case files were reviewed to assess for timeliness of Psychotropic Medication Authorizations (PMAs) and to confirm the required documentation of psychiatric monitoring.

CAD reviewed seven Certified Foster Parent (CFP) files and five staff files for compliance with Title 22 Regulations and County contract requirements. Interviews were conducted with four CFPs to assess the quality of care and supervision provided to children.

## CONTRACTUAL COMPLIANCE

CAD found the following three areas out of compliance:

### Certified Foster Homes

- Criminal clearances and health screenings for other adults in the home were not completed.

During the review of one CFP home, the files indicated that the CFP's 32 year-old son lives in the home. No criminal or medical clearances for this person were in the FFA's files. The FFA's file on

this CFP indicated that the son was in the process of requesting an exemption from Community Care Licensing (CCL) to live in the home. However, there was no record the exemption was approved. The FFA representatives stated that they were unaware that the son was living in the home. The FFA representatives stated that it was confirmed during its monthly walk through that the CFP's son was not living in the home. The FFA representatives stated during their private meetings with the placed children, they would inquire to see if there were any frequent visitors, overnight guests, and other adults living in the home.

On August 13, 2014, CAD conducted a follow-up visit to this home, interviewed the placed children and there was no indication of the adult son living in the home.

**Recommendation:**

The FFA's management shall ensure that:

1. All criminal clearances and health screenings for other adults in the home are completed.

**Facility and Environment**

- Common areas were not well maintained.

During the review, CAD noted in a Certified Foster Home (CFH) with household chemicals, cleaning supplies and knives were not locked or stored safely. This was brought to the immediate attention of the CFP, who secured the chemicals, cleaning supplies and knives. This was also discussed with the FFA's Administrator who confirmed that the CFP received additional training on March 20, 2014 and April 29, 2014.

On August 13, 2014, CAD conducted a follow-up visit to this CFH. All cleaning supplies, chemicals, and knives were properly stored and secured and not assessable by the children.

- Adequate perishable and non-perishable food not maintained.

CAD noted in one CFH, there were several boxes of expired macaroni and cheese. This was brought to the CFP's immediate attention, and the food was thrown away. This was also discussed with the FFA Administrator who confirmed that the CFP received training on March 25, 2014 and April 29, 2014.

On August 13, 2014, CAD conducted a follow-up visit to this CFH and no expired food was found.

**Recommendations:**

The FFA's management shall ensure that:

2. Common areas are well maintained.

3. Adequate perishable and non-perishable food are maintained.

**Maintenance of Required Documentation/Service Delivery**

- FFA social workers develop timely, comprehensive, initial Needs Service Plans (NSPs) with child's participation.

A review of seven initial NSPs revealed that one child's initial NSP did not contain her signature. This was brought to the attention of the FFA Administrator who confirmed that the FFA Social Worker would meet with the child to obtain her signature on the NSP. At the Exit Conference, the FFA representatives confirmed that they met with the FFA Social Workers and Supervisory staff on May 5, 2014, and provided training on the NSP procedures.

On August 12, 2014, CAD conducted a follow-up visit to the FFA. CAD reviewed two initial NSPs and found they had all the required signatures, in addition to being completed timely and comprehensive.

**Recommendation:**

The FFA's management shall ensure that:

4. FFA social workers develop timely, comprehensive initial NSPs with child's participation.

**PRIOR YEAR FOLLOW-UP FROM DCFS OUT-OF-HOME CARE MANAGEMENT DIVISION (OHCMD)'s FOSTER FAMILY AGENCY CONTRACT COMPLIANCE MONITORING REVIEW**

The OHCMD's last compliance report dated September 12, 2013, identified eight recommendations.

**Results**

Based on CAD's review, the FFA fully implemented 7 of the 8 previous recommendations:

- Establish an oversight plan to ensure all FFA certified foster homes comply with CCL regulations regarding Licensure/Contract Requirements.
- Children's NSP's are approved and signed by their respective CSWs in a timely manner and the FFA's attempts to obtain their signatures are documented in the children's case files.
- Children's progress towards meeting the NSP goals is documented.
- Children's updated NSPs follow County contract requirements of which they are specific, measurable, achievable, relevant and time-limited.
- Children's Quarterly Reports are completed, updated and reflective of the children's actual current progress during the specific quarters.
- Children's annual medical examinations are conducted in a timely manner.
- All children are provided a Life Book/Photo Album by certified foster parents and encouraged and assisted in updating a Life Book/Photo Album.

The FFA did not implement one prior recommendation which was to ensure that:

- Children's initial NSPs follow County contract requirements of which they are specific, measurable, achievable, relevant and time-limited.

**Recommendation:**

5. The outstanding recommendation from the monitoring report dated September 12, 2013, which is noted in this report as recommendation 4 is fully implemented.

During the Exit Conference, held on November 14, 2014, the FFA representatives expressed their desire to remain in compliance with Title 22 regulations and Contract requirements and were in agreement with the findings and recommendations. On August 12, 2014 and August 13, 2014, CAD conducted follow-up visits to the FFA and to the CFHs to ensure implementation of immediate corrective action to resolve the findings. The OHCMD will provide on-going technical assistance and CAD will verify continued implementation of the recommendations at the next compliance monitoring review.

## MOST RECENT FISCAL REVIEW CONDUCTED BY THE AUDITOR-CONTROLLER (A-C)

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

CELEBRATING 20 YEARS OF SERVICE
CIHSS
CALIFORNIA INSTITUTE OF HEALTH & SOCIAL SERVICES, INC.

**Children's Way Foster Family/Adoptions Agency**
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May 30, 2014

Department of Children and Family Services
Contracts & Administration Division
3530 Wilshire Blvd, 4th Floor
Los Angeles, CA 90020
Attn: Theodore Howard

**Re: DCFS/OHC Audit**

On May 02, 2014, Children's Way Foster Family Agency received the findings and recommendations related to the DCFS/OHC audit that was conduct[redacted] 11, 2014. The following Corrective Action Plan addressed the following issues, as identified:

**CERTIFIED FOSTER HOMES**

1. [redacted] Foster Home- Interview with children indicated that foster mother's 32 year-old son lives in home (no criminal or medical clearances for this person found in files).
   a. Children's Way FFA (CWFFA) is submitting supporting documentation indicating on several occurrences CWFFA staff questioned certified foster parent (CFP) [redacted] about her adult son living in the home. On each of those occurrences, CFP [redacted] told CWFFA staff her adult son was not living in the Certified Foster Home (CFH). On a monthly basis, CFP [redacted] signed the monthly walkthrough packet acknowledging that there are no adults living in the home. While visiting the home weekly, the FCSW did not have any indication that the biological son was living in the home. (See attachments enclosed).

   b. The CFP was given a Certified Parent Handbookand an acknowledgement form to sign on 10/17/09 which states in section 3 of the Policies and Procedures about "House Guests" (frequent visitors). (See attachments enclosed).

   c. CFP, [redacted] attended the monthly In Service Training on 3/20/2014. During this In Service Training the following topics were covered to support further training of Title 22 Rules & Regulations: (See attachments enclosed)
      1. Policies and Procedures-Audit Updates & Review

2. CFH Binders & CFP Handbooks

d. Children's Way FFA will continue to provide in-service training to Certified Foster Parents on the importance of obtaining fingerprint clearances for frequent visitors and adults living in the home. FCSW's will continue to use the monthly walkthrough packet as a tool to question Certified Foster Parents if there are any changes in the home. Foster Care Social Workers will continue to conduct weekly home visits and meet with children in private to discuss any unusual changes, frequent visitors or adults living in the home. FCSW's will continue to receive weekly training on Title 22 Rules and Regulations, and the importance of conducting a thorough walkthrough to detect any changes, issues or concerns in their assigned Certified Homes.

**FACILITY AND ENVIRONMENT**

1. [redacted] Foster Home- Reviewer found household chemicals, cleaning supplies and knives not locked-up or otherwise stored safely.

   a. CFP, [redacted] attended the monthly In Service on 3/20/2014. During this In Service the following topics were covered to support further training of Title 22 Rules & Regulations: (See attachments enclosed)

      1. Policies and Procedures-Audit Updates & Review
      2. CFH Binders & CFP Handbooks

   b. FCSW, [redacted] met with CFP, [redacted] on 4/29/14 to review the outcome of the Foster Home Inspection/Audit Exit Summary. During the meeting, FCSW verified the following items were corrected through a follow up home inspection of the Certified Foster Home. In addition, FCSW provided a re-training with CFP, [redacted] on:

      1. General Licensing Requirements-Title 22 Rules & Regulations (see attachments enclosed).
      2. The importance of safety within the home and complying with Title 22 Rules & Regulations (see attachments enclosed).

   c. Children's Way FFA will continue to provide in-service training to Certified Foster Parents on Title 22 Rules & Regulations and emphasizing the importance of keeping household chemicals, cleaning supplies and knives locked up and stored safely. FCSW's will continue to use the monthly walkthrough packet as a tool to inspect the Certified Foster Homes. FCSW's will continue to receive weekly training on Title 22 Rules and Regulations, and the importance of conducting a thorough walkthrough to detect any changes, issues or concerns in their assigned Certified Homes.

2. [redacted] Foster Home- Reviewer found boxes of macaroni & cheese that were past expiration date.

   a. FCSW, [redacted] met with CFP, [redacted] on 3/25/14 to train CFP on the monthly In Service topics for March. During this training the following topics were covered to support further training of Title 22 Rules & Regulations: (see attachments enclosed).

      1. Policies and Procedures-Audit Updates & Review
      2. CFH Binders & CFP Handbooks

b. FCSW, [redacted] met with CFP, [redacted] on 4/29/14 to review the outcome of the Foster Home Inspection/Audit Exit Summary. During the meeting, FCSW verified the following items were corrected through a follow up home inspection of the Certified Foster Home. In addition, FCSW provided a re-training with CFP, [redacted] on:

1. Certified Foster Parent Responsibilities (see attachments enclosed)
2. The importance of discarding contaminated or spoiled food within the home and complying with Title 22 regulations (see attachments enclosed)

c. Children's Way FFA will continue to provide in-service training to Certified Foster Parents on Title 22 Rules & Regulations and emphasizing the importance of discarding contaminated or spoiled food within the home. FCSW's will continue to use the monthly walkthrough packet as a tool to inspect the Certified Foster Homes. FCSW's will continue to receive weekly training on Title 22 Rules and Regulations, and the importance of conducting a thorough walkthrough to detect any changes, issues or concerns in their assigned Certified Homes.

**MAINTENANCE OF REQUIRED DOCUMENTATION AND SERVICE DELIVERY**

1. No child's signature noted on either initial or follow-up NSPs.
   a. FCSW met with the child to request her signature on the initial NSP (06/06/13), quarterly report (08/06/13) and quarterly report (11/06/13). (see attachments enclosed)

   b. Children's Way FFA held a meeting on May 05, 2014 with all the social workers and supervisory staff to re-train the staff on the NSP procedures. (see attachments enclosed)

Thank you for your consideration in this matter. If you have any questions, please contact me directly at (310) 645-5227 ext. 30.

Sincerely,

Colleen Anderson

Colleen Anderson
Executive Director
California Institute of Health and Social Services, Inc.
dba Children's Way Foster Family Agency