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DEPARTMENT OF CHILDREN AND FAMILY SERVICES
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July 10, 2014

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

From: Philip L. Browning
Director

GUARDIANS OF LOVE FOSTER FAMILY AGENCY CONTRACT COMPLIANCE MONITORING REVIEW

The Department of Children and Family Services (DCFS) Out-of-Home Care Management Division (OHCMD) conducted a review of Guardians of Love Foster Family Agency (the FFA) in February 2014. The FFA has one licensed office in the Second Supervisorial District and one in San Bernardino County, and provides services to County of Los Angeles DCFS foster children and youth. According to the FFA's program statement, its mission is "to provide safe, nurturing, therapeutic certified family homes where children can receive protection from abuse, maltreatment, economic exploitation, malnutrition and/or any form of unsafe environment."

At the time of the review, the FFA supervised 182 DCFS placed children in 92 certified foster homes. The placed children's average length of placement was four months, and their average age was ten.

SUMMARY

During OHCMD's 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 9 of 11 sections of our Contract compliance review: Certified Foster Homes; 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; Discharged Children; and Personnel Records.

OHCMD noted deficiencies in the areas of: Licensure and Contract Requirements, related to Special Incident Reports (SIRs) not being reported in a timely manner and Community Care Licensing (CCL) having cited the FFA as a result deficiencies and findings; and Maintenance of Required Documentation and Service Delivery, related to Initial and Updated Needs and Services Plans (NSPs) and Quarterly Reports not being comprehensive, as they did not include all of the elements in accordance with the NSP template, the FFA's monthly contact with DCFS Children's Social Worker was not documented in the children's case file and the DCFS CSWs authorization to implement the NSPs could not be verified

Attached are the details of our review.

REVIEW OF REPORT

On March 24, 2014 the DCFS OHCMD Monitor, Gladys Hidayat, held an Exit Conference with the FFA's representative, Kinikki Fullerwood, Administrator. The FFA's representative: agreed with the review findings and recommendations; was receptive to implementing systemic changes to improve their 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. OHCMD will verify that these recommendations have been implemented and will provide technical assistance during our next visit to the FFA in August 2014.

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

PLB:EM:KR
RDS:gh

Attachments

c: William T Fujioka, Chief Executive Officer
John Naimo, Acting Auditor-Controller
Public Information Office
Audit Committee
Rev. Ralph Butler, Executive Director, Guardians of Love FFA
Kinikki Fullerwood, Administrator, Guardians of Love FFA
Lojuannah Hills, Regional Manager, Community Care Licensing

GUARDIANS OF LOVE FOSTER FAMILY AGENCY
CONTRACT PROGRAM COMPLIANCE MONITORING REVIEW-SUMMARY

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License Number: 366408570

	Contract Compliance Monitoring Review	**Findings: February 2014**
I	**Licensure/Contract Requirements** (7 Elements)	
	1. Timely Notification for Child's Relocation	1. Full Compliance
	2. Serious Incident Report Documentation and Cross Reporting	2. Need Improvement
	3. Runaway Procedures in Accordance with the Contract	3. Full Compliance
	4. Are there CCL Citations/OHCMD Safety Reports	4. Need Improvement
	5. If Applicable, FFA Ensures Complete Required Whole Foster Family Home (WFFH) Training	5. Not Applicable
	6. FFA Pays Certified Foster Parents (CFP) WFFH Required Payments	6. Not Applicable
	7. FFA Conducts an Assessment of CFP Prior to Placement of Two (2) or More Children	7. Full Compliance
II	**Certified Foster Homes (CFHs)** (12 Elements)	
	1. Home Study and Safety Inspection Conducted Prior to Certification	Full Compliance (ALL)
	2. Agency's Inquiry with OHCMD for Historical Information Prior to Certification	
	3. Timely Criminal Clearances (DOJ, FBI, CACI) Prior to Certification	
	4. Timely, Completed, Signed Criminal Background Statement	
	5. Health Screening & TB Test Prior to Certification	
	6. 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 CDL/Auto Insurance/Annual Vehicle Maintenance Documentation for CFPs and Designated Drivers, If Applicable Car Seat(s)	
	11. Criminal Clearances and Health Screening/CDL/CPR DOJ/FBI/CACI/Auto Insurance for Other Adults in the Home	
	12. FFA Assists CFPs in Providing Transportation Needs	

III	**Facility and Environment** (7 Elements) 1. Exterior/Grounds Well Maintained 2. Common Areas/Interior Well Maintained 3. Children's Bedrooms/Interior Well Maintained 4. Sufficient and Appropriate Educational Resources 5. Adequate Perishable and Non-Perishable Food 6. CFP Conduct Disaster Drills and Documentation Maintained 7. Money and Clothing Allowance Logs Maintained	Full Compliance (ALL)
IV	**Maintenance of Required Documentation/Service Delivery** (10 Elements) 1. Department of Children and Family Services (DCFS) Children's Social Worker (CSW) Authorization to Implement NSPs 2. NSPs Implemented and Discussed with CFPs 3. Children Progressing Towards Meeting NSP Goals 4. Develop Timely, Comprehensive Initial NSP with Child's Participation 5. Develop Timely, Comprehensive Updated NSPs with Child's Participation 6. Therapeutic Services Received 7. Recommended Assessments/Evaluations Implemented 8. DCFS CSWs Monthly Contacts Documented in Child's Case File 9. Develop Timely, Comprehensive Quarterly Reports 10. FFA Social Workers Conduct Required Visits	1. Need Improvement 2. Full Compliance 3. Full Compliance 4. Need Improvement 5. Need Improvement 6. Full Compliance 7. Full Compliance 8. Need Improvement 9. Need Improvement 10. Full Compliance
V	**Education and Workforce Readiness** (5 Elements) 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	Full Compliance (ALL)
VI	**Health and Medical Needs** (4 Elements) 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	Full Compliance (ALL)

VII	**Psychotropic Medication** (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** (10 Elements) 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 Medical, Dental and Psychiatric Care 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) 1. $50 Clothing Allowance in Accordance with FFA Program Statement 2. Ongoing Clothing Inventories of Adequate Quantity and Quality 3. Children's Involvement in 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/Assistance with Life Book/Photo Album	Full Compliance (ALL)
X	**Discharged Children** (3 Elements) 1. Completed Discharge Summary 2. Attempts to Stabilize Children's Placement 3. Child Completed High School (if applicable)	Full Compliance (ALL)

XI	**Personnel Records** (9 Elements) 1. Criminal Clearances (DOJ, FBI, 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 CDL 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 Exceed Total of 15 Children	Full Compliance (ALL)

GUARDIANS OF LOVE 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. This compliance report addresses findings noted during the February 2014 review. The purpose of this review was to assess Guardians of Love 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 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, 12 children were selected for the sample. The Out-of-Home Care Management Division (OHCMD) interviewed 9 children. Three children were not interviewed due to their young age; however, during the home visits, the children were observed to be comfortable in the certified foster homes and the certified foster parents were observed to be attuned to the needs of the children. OHCMD reviewed all 12 case files to assess the care and services they received. Additionally, five discharged children's files were also reviewed to assess the FFA's compliance with permanency efforts. At the time of the review, three placed children were prescribed psychotropic medication. We reviewed their case files to assess for timeliness of Psychotropic Medication Authorizations and to confirm the required documentation of psychiatric monitoring.

OHCMD reviewed five certified foster parent files and five staff files for compliance with Title 22 Regulations and County contract requirements. Interviews were conducted with four certified foster parents to assess the quality of care and supervision provided to the children.

CONTRACTUAL COMPLIANCE

OHCMD found the following two areas to be out of compliance.

Licensure/Contract Requirements

- A review of Serious Incident Reports (SIRs) revealed that the FFA did not consistently follow SIR reporting guidelines by failing to submit nine SIRs into the ITrack system in a timely manner.

- Community Care Licensing (CCL) cited the FFA as a result of deficiencies and findings during the investigations of CCL complaint. According to a CCL Complaint Investigation Report dated June 28, 2013, CCL substantiated a Personal Rights violation when it was discovered that a certified foster mother hit and grabbed a child by the collar/neck, resulting in the child sustaining scratches to the neck area.

- On November 6, 2013, CCL delivered to the certified foster parent an Accusation (Revocation of Certification Approval). Per Accusation, certificate of approval to operate a certified foster home was being revoked.

The FFA submitted a Plan of Correction (POC) to CCL, which included decertifying the foster parent, which resulted in foster children being removed from the home. This referral was investigated by Department of Children and Family Services (DCFS) Emergency Response Children's Social Worker (ER CSW) and determined the allegation of Physical Abuse to be inconclusive as there was insufficient evidence to determine whether child abuse/neglect occurred, as the child in question stated that his foster mother did not abuse him, but that she accidentally scratched his neck. However, Out-of-Home Care Investigation Section (OHCIS) had concerns regarding this certified foster mother based on a placed child's stating that the certified foster mother hits children with a belt and concerns raised by the FFA. OHCIS placed the certified foster home on "Indefinite Hold" and it will no longer be used as a placement resource for DCFS children. The FFA has decertified the home.

- According to a CCL Complaint Investigation Report dated August 1, 2013, CCL substantiated a Personal Rights Violation of a foster child. According to the report, the certified foster parent's adult son broke into the home and physically harmed the certified foster mother and her biological daughter. Further, the certified foster parent failed to report the incident to the FFA.

The FFA submitted a Plan of Correction (POC) to CCL, which included decertifying the foster parent, which resulted in the child being removed from the home. This referral was investigated by DCFS ER CSW. The allegation of General Neglect was deemed to be unfounded, as the placed child was not harmed during the incident. OHCMD placed the certified foster home on an "Indefinite Hold" and it will no longer be used as a placement resource for DCFS children.

- CCL cited the FFA as a result of deficiencies and findings during the investigations of a complaint. According to a CCL complaint dated October 18, 2013, CCL cited the FFA for violation of Criminal Record Clearance when it was discovered that a certified foster mother's adult niece was residing in the home without a criminal record clearance.

The FFA submitted a POC to CCL, which included proof that the certified foster mother's niece has been cleared and a signed affidavit from the certified foster mother stating that she will not have any adults living in her home without notifying the FFA and not being cleared.

- On December 18, 2013, CCL cited the FFA as a result of deficiencies and findings during the course of an investigation. According to the report, CCL cited the FFA for a Building and Grounds violation when it was discovered that the certified foster mother's daughter was visiting and sleeping in the same bed with the foster mother.

The FFA submitted a POC to CCL which included proof that the certified foster mother moved to a new residence with sufficient bedrooms to accommodate her daughter sleeping in her own bed.

- CCL cited the FFA as a result of deficiencies and findings during the investigations of a complaint. According to a CCL report dated February 18, 2014, a certified foster parent dropped two foster children off at the movie theater; however, the children did not enter the theater. During the unsupervised time, one of the children suffered a non life threatening gunshot wound to her left knee. Although the certified foster parent did not cause injury to the child, she allowed the foster children to leave the home without adult supervision the day after they returned home from being AWOLED for a number of days, whereby failing to provide appropriate supervision to children with a history of AWOL behavior.

The FFA submitted a Plan of Correction (POC) to CCL, which included placing the certified foster home on an "Indefinite Hold" pending decertification until the replacement of the current 18-year-old youth, who did not want to be replaced, is determined by the DCFS CSW. Additionally, the FFA was asked to provide documentation regarding the status of the 18-year-old youth and re-training of the certified foster parent on Supervision, Discipline Techniques and Reducing AWOL Risk. The FFA provided OHCMD with verification that the training occurred on February 27, 2014. DCFS ER CSW investigated this referral and substantiated the allegation of General Neglect, which resulted in all of the children being removed from the home with the exception of the 18-year-old youth who did not want to be replaced. OHCIS concurred with the ER CSW findings and placed the home on an "Indefinite Hold" and will no longer be used as a placement resource for DCFS children.

During the Exit Conference, the FFA Administrator stated that the FFA will address the findings and make improvement in areas with deficits. The FFA social worker staff and certified foster parents will be re-trained on SIRs reporting guidelines. Further, the FFA will continue monitoring certified foster homes closely and address concerns immediately. OHCMD received verification that the FFA re-trained certified foster parents on March 26, 2014, and social worker staff on April 23, 2014, on SIR reporting guidelines.

Recommendation

The FFA's management shall ensure:

1. All SIRs are reported via ITrack system in a timely manner to all required parties.

2. The FFA is in full compliance with Title 22 Regulations and free of CCL citations.

Maintenance of Required Documentation and Service Delivery

- Four Initial NSPs were not comprehensive as they did not include all of the elements in accordance with the NSP template. Specifically, the children's individual goals were not specific or measurable. Further, the NSPs had pre-typed dates on the signature page and therefore OHCMD could not verify the date the DCFS CSWs authorized implementation of the NSPs. Additionally one NSP was not developed timely.

- Two Updated NSPs were not comprehensive, as the methods described and the services provided to assist the children towards achieving the goals were not specific. Additionally, the goals were modified or removed without an explanation.

- For one child, the FFA's monthly contact with the DCFS CSWs was missing from the child's file.

- Two Quarterly Reports were not comprehensive, as they did not include detailed information on the children's overall progress, assistance and/or supportive services being provided by the FFA. Further, the Quarterly Reports were not sent to the DCFS CSWs timely.

During the Exit Conference, the FFA Administrator stated that FFA staff will receive ongoing training on the development of NSPs and the FFA will ensure that signatures are not pre-typed. Further, all NSPs will be reviewed by the FFA's Quality Assurance staff and supervising social workers to ensure all NSPs are developed in accordance with NSP template.

It should be noted that the FFA's representative attended the OHCMD's NSP training for providers on August 1, 2013, and was made aware of the NSP requirements. Some of the NSPs reviewed were developed subsequent to the training.

Recommendations

The FFA's management shall ensure:

3. The FFA social worker staff develops comprehensive Initial NSPs.

4. CSW's signatures authorizing implementation of the NSP are obtained in a timely manner.

5. Updated NSPs are comprehensive and completed in accordance with the NSP template, are child specific, measurable and goals include a timeframe.

6. CSWs are contacted monthly and documentation is maintained in the children's case files.

7. Children's Quarterly Reports are comprehensive and sent to their respective DCFS CSWs in a timely manner.

PRIOR YEAR FOLLOW-UP FROM DCFS OHCMD's FOSTER FAMILY AGENCY CONTRACT COMPLIANCE MONITORING REVIEW

The OHCMD's last compliance report dated August 20, 2013, identified seven recommendations.

Results

Based on OHCMD's follow-up, the FFA fully implemented 3 of 7 previous recommendations for which they were to ensure:

- Children's bedrooms meet Title 22 and County contract requirements.

- Certified foster parents' signatures indicating their agreement to participate in implementing the children's NSPs are obtained.

- FFA staff routinely monitors all school-age children's educational progress and maintain documentation in the children's files.

Based on OHCMD's follow-up, the FFA did not fully implemented 4 of 7 previous recommendations for which they were to ensure:

- All SIRs are reported in a timely manner to OHCMD and all appropriate parties.

- Children's Initial NSPs comply with County contract requirements and are comprehensive, including child specific, measurable and time specific goals.

- Children's Updated NSPs comply with County contract requirements and are comprehensive, including child specific, measurable and time specific goals.

- Children's Quarterly Reports are approved and signed by their respective DCFS CSWs in a timely manner.

At the Exit Conference, the FFA's Administrator expressed desire to remain in compliance with all Title 22 Regulations and Contract requirements. In efforts to ensure timely and comprehensive Initial and Updated NSPs, the FFA's Quality Assurance staff and supervising social workers will be retrained thoroughly in reviewing all submitted NSPs and will only approve those which met the NSP criteria. OHCMD will verify implementation of recommendations and will provide technical assistance during our next visit to the FFA in August 2014.

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.

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CORRECTIVE ACTION PLAN
AMENDMENT I

REQUESTING AGENCY:	**OUT OF HOME CARE MANAGEMENT DIVISION**
AUDIT YEAR:	**2013**
CAP DUE DATE:	**MAY 2, 2014**
AMENDMENT DATE:	**MAY 9, 2014**
CAP SUBMITTED TO:	**RHONDA DAVID SHIRLEY, OHCMD**
CAP SUBMITTED BY:	**KINIKKI FULLERWOOD, ADMINISTRATOR**

GOL FFA has amended its original CAP to address Community Care Licensing substantiated complaint reports in further detail.

OHCMD FINDINGS:

- **GOLFFA was not free of substantiated Community Care Licensing complaints' reports on safety and physical plant deficiencies since the last review.**

  The substantiation of five Community Care Licensing allegations was very disappointing to our agency because we continuously make every attempt to ensure the safety and well being of all children placed within our agency. This is evidenced by our 100% safety data during the previous monitoring period.

  GOL FFA once informed of the allegations, took appropriate action immediately based on the severity of the allegation. GOL subsequently decertified three of the certified homes and disciplinary action was taken in regards to the two remaining certified homes. Guardians of Love will continue to closely monitor and as needed, immediately address and resolve any concerns with our certified homes. In an effort to prevent substantiated allegations Guardians of Love trained all FCSWs on allegation indicators so that if there are any concerns the agency can take precautionary methods that may include unannounced visits, administrative reviews and additional training. Guardians of Love administration also meets with SFCWs weekly to discuss individual certified parent concerns and periodically reviews Case Visits, SIRs and allegation history to assess indicators and patterns.

Prepared By: _____ Date: 5/9/14
Kinikki Fullerwood
Administrator

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CORRECTIVE ACTION PLAN

REQUESTING AGENCY:	**OUT OF HOME CARE MANAGEMENT DIVISION**
AUDIT YEAR:	**2013**
CAP DUE DATE:	**MAY 2, 2014**
CAP SUBMITTED TO:	**RHONDA SHIRLEY DAVIS - OHCMD**
CAP SUBMITTED BY:	**KINIKKI FULLERWOOD, ADMINISTRATOR**

OVERVIEW

Guardians of Love, FFA (GOL FFA) has been providing foster care services since 1997. It is and has always been our desire to provide comprehensive services to all the children that we serve, while concurrently adhering to all the contractual requirements specified in our Department of Children and Family Services contract and CDSS Title 22 regulations.

During the performance evaluation monitoring conducted in February 2014 by OHCMD Monitor, Gladys Hidayat, deficiencies were noted that required correction. The following Corrective Action Plan details the deficiencies in their entirety and provides GOL FFAs Plan of Action which will ensure that all corrective actions are adhered to. The Administrator, Kinikki Fullerwood will be responsible for creating the CAP and ensuring its implementation. The Supervising Foster Care Social Workers, Terika Hameth and Sandro Villa will provide oversight to ensure ongoing compliance of items addressed within this Corrective Action Plan. While most corrective actions were resolved immediately, GOL FFA will fully implement the Corrective Action Plan no later than May 31, 2014.

DEFICIENCES:

LICENSURE/CONTRACT REQUIREMENTS

OHCMD FINDINGS:

- **GOLFFA did not always submit timely Special Incident Reports (SIRs) timely.**

  GOL FFA continues to stress the importance of SIR reporting to our agency staff and certified parents. GOL FFA assessed the entire SIR reporting process and has determined that training for all parties involved needed to be conducted. Certified parents (March 26, 2014) were retrained on reporting SIRs to their social workers within the appropriate timeframes, FCSWs were retrained on completing SIRs within the appropriate timeframes (April 23, 2014) and SFCSWs were retrained on approving and submitting SIRs within the appropriate timeframes (April 23, 2014). Additionally, SFCSWs were instructed to check I-Track daily to ensure that any SIRs submitted and saved are sent within the appropriate

timeframes. GOL FFA will continue to provide ongoing training to certified parents, FCSWs and SFCSWs as needed.

- **GOLFFA was not free of substantiated Community Care Licensing complaints' reports on safety and physical plant deficiencies since the last review.**

The substantiation of three Community Care Licensing allegations was very disappointing to our agency because we continuously make every attempt to ensure the safety and well being of all children placed within our agency. This is evidenced by our 100% safety data during the previous monitoring period. GOL FFA once informed of the allegations, took action immediately and subsequently decertified all three of the certified homes with substantiated allegations. Guardians of Love will continue to closely monitor and as needed, immediately address and resolve any concerns with our certified homes in an effort to prevent future substantiated allegations.

II. MAINTENANCE OF REQUIRED DOCUMENTATION AND SERVICE DELIVERY

OHCMD FINDINGS:

NEEDS AND SERVICES PLAN RELATED

- **FFA social worker did not develop timely, comprehensive, initial (NSPs) with the participation of the developmentally age-appropriate child (4 children).**
- **FFA social worker did not develop timely, comprehensive, updated (NSPs) with the participation of the developmentally age-appropriate child (2 children).**
- **County workers were not contacted monthly with the contacts appropriately documented in the case file (1 child).**
- **FFA social worker did not complete timely, comprehensive, quarterly reports and send to the county workers by the 10th business day following the end of each quarter from the date the child was placed (2 children).**

Guardians of Love continues to evaluate the Needs and Services Plan process and continues to change and alter our procedure to ensure the comprehensiveness and DCFS contract adherence of our NSPS. The monitor conducting the review indicated that GOL FFA had improved with the comprehensiveness of our reports but unfortunately found other NSP deficiencies. GOL evaluated the audit findings and concluded that the majority of the findings were attributed to one social worker. The individual social worker was retrained individually (April 18, 2014) and further disciplinary action was taken. GOL FFA also retrained our NSP coordinator and SFCSWs to ensure that they are reviewing all NSPs according the agency, CCL and DCFS standards.

Guardians of Love will continue to revise our NSP process to incorporate new DCFS guidelines, enhance service delivery and increase overall contract compliance. The NSP coordinator will continue to conduct NSP trainings and review/approve all NSPs prior to final approval by agency supervising foster care social workers.

Prepared By: _____ Date: 4/30/14
Kinikki Fullerwood
Administrator