County of Los Angeles
DEPARTMENT OF CHILDREN AND FAMILY SERVICES

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August 20, 2013

To: Supervisor Mark Ridley-Thomas, Chairman
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Supervisor Don Knabe
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 January 2013. 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 167 DCFS placed children in 72 certified foster homes. The placed children's average length of placement was 13 months, and their average age was nine.

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 7 of 11 sections of our program compliance review: Certified Foster Homes; 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 (SIR) not being reported in a timely manner; Facility and Environment, related to a missing closet door in one of the children's bedroom; Maintenance of Required Documentation and Service Delivery, related to Needs and Services Plans not being comprehensive and not having the DCFS Children's Social Workers approval; and Educational and Workforce Readiness, related to one child missing a current report card.

Attached are the details of our review.

REVIEW OF REPORT

On March 14, 2013, 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 Community Care Licensing.

The FFA provided the attached approved CAP addressing the recommendations noted in this compliance report. OHCMD will confirm that these recommendations have been implemented during our next monitoring review.

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

PLB:EM:KR
RDS:NF:gh

Attachments

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

GUARDIANS OF LOVE FOSTER FAMILY AGENCY
CONTRACT COMPLIANCE MONITORING REVIEW
FISCAL YEAR 2012-2013

SCOPE OF REVIEW

The following report is based on a "point in time" monitoring visit. This compliance report addresses findings noted during the January 2013 review. The purpose of this review was to assess Guardians of Love Foster Family Agency (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. Out-of-Home Care Management Division (OHCMD) reviewed all 12 case files and interviewed 11 children to assess the care and services they received. One child was too young to be interviewed, however was observed to be in good health. Additionally, five discharged children's files were also reviewed to assess the FFA's compliance with permanency efforts. At the time of the review, six 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 were reviewed 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 children.

CONTRACTUAL COMPLIANCE

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

Licensure/Contract Requirements

- Special Incident Reports (SIRs) were not submitted via I-Track in a timely manner and not consistently cross reported to all required parties. During the Exit Conference, the

FFA Administrator stated the FFA staff will be retained on SIR reporting guidelines to ensure that SIRs are submitted in accordance with reporting guidelines.

Recommendation

The FFA's management shall ensure:

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

Facility and Environment

- In one certified foster home, there was no closet door in one of the children's bedroom and their clothing was placed on the closet floor. The certified foster parent reported that the children had broken the closet door on more than one occasion and she decided to take the door out. The FFA Administrator stated she was not aware of the missing closet door and the deficiency was not reported by the assigned FFA social worker who is no longer employed by the FFA. Upon becoming aware of the deficiency, the FFA Administrator immediately requested the certified foster parent install a closet door and sent proof to OHCMD that the deficiency had been corrected prior to the Exit Conference.

Recommendation:

The FFA's management shall ensure:

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

Maintenance of Required Documentation and Service Delivery

- Two children's updated Needs and Services Plans (NSPs) did not have their certified foster parent's signatures indicating an agreement to participate in implementing the children's NSPs.

- Two children's initial NSPs were not comprehensive as they did not include all the required elements in accordance with the NSP template. Further, the NSP goals were not specific and measurable.

- Two children's updated NSPs were not comprehensive as they did not include all the required elements in accordance with the NSP template. Further, the NSP goals were not specific and measurable.

- One child's school problems were not addressed in the Quarterly Report. Further, the Quarterly Reports were not signed by the children's respective DCFS CSWs in a timely manner and there was no documentation in the child's case files indicating the dates the reports were sent to the DCFS CSWs.

The FFA Administrator stated that the FFA will continue to provide on-going NSP/Quarterly Report development training to the FFA social workers and supervisors. Further, all certified foster parents will be retrained on their role in implementing the NSPs.

It should be noted that a FFA representative attended the OHCMD NSP Training for providers on January 23, 2012 and was made aware of the NSP requirements. Additionally, the reviewed NSPs were developed subsequent to the training.

Recommendations

The FFA's management shall ensure:

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

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

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

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

EDUCATION AND WORKFORCE READINESS

- For one child, a current copy of the child's report card was missing from the child's file. The FFA Administrator provided OHCMD with the copy of the report card prior to the Exit Conference. During the Exit Conference, the FFA Administrator stated that the FFA would ensure all children's educational records are current.

Recommendation

The FFA's management shall ensure that:

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

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

The OHCMD's last compliance report dated August 13, 2012 identified nine recommendations.

Results

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

1. Children's NSPs progress is monitored closely and necessary supports are given to assist them in meeting their NSPs goals.

2. School-aged children's school attendance is monitored closely.

3. School-aged children's educational progress is monitored closely and necessary educational services/supports are provided.

4. All children are encouraged and assisted in creating and updating photo albums/Life Books.

Results

Based on our follow-up, the FFA did not fully implement five of nine previous recommendations for which they were to ensure:

1. All SIRs are reported to OHCMD and all appropriate parties timely.

2. Compliance with CCL regulations regarding physical plant deficiencies.

3. Children's initial NSPs are comprehensive.

4. Children's updated NSPs are timely.

5. Children's updated NSPs are comprehensive, including child specific, measurable, and time-framed goals.

Since these recommendations were not implemented, OHCMD is requesting a CAP to address what steps the FFA will take differently to ensure contract compliance.

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.

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

3756 Santa Rosalia Drive #312/315
Los Angeles, CA 90008
License Number: 197805376

1900 Commerce Center East # 209
San Bernardino, CA 92408
License Number: 366408570

	Contract Compliance Monitoring Review	**Findings: January 2013**
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. Improvement Needed
	3. Runaway Procedures	3. Full Compliance
	4. Are there CCL Citations/OHCMD Safety Reports	4. Full Compliance
	5. If Applicable, FFA Ensures Complete Required Whole Foster Family Home Training	5. Not Applicable
	6. FFA Pays Certified Foster Parents Whole Foster Family Home Payments	6. Not Applicable
	7. Assessment of Certified Foster Parent (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 Prior to Certification	Full Compliance (ALL)
	2. Contact with References/Including Check with OHCMD	
	3. Timely DOJ, FBI, CACI	
	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 Every Six Months or Per Approved Program Statement	
	9. Completed 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	
	11. Other Adults in the Home: Health Screening/CDL/CPR DOJ/FBI/CACI/Auto Insurance	
	12. FFA Assists CFPs with Transportation Needs	

III	**Facility and Environment** (7 Elements) 1. Exterior/Grounds Well Maintained 2. Common Areas Maintained 3. Children's Bedrooms/Interior Maintained 4. Sufficient Educational Resources 5. Adequate Perishable and Non-Perishable Food 6. Disaster Drills Conducted and Documentation Maintained 7. Allowance Logs Maintained	1. Full Compliance 2. Full Compliance 3. Improvement Needed 4. Full Compliance 5. Full Compliance 6. Full Compliance 7. Full Compliance
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. Full Compliance 2. Improvement Needed 3. Full Compliance 4. Improvement Needed 5. Improvement Needed 6. Full Compliance 7. Full Compliance 8. Full Compliance 9. Improvement Needed 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 Children's Educational Goals Met 3. Children's Academic Performance and/or Attendance Increased 4. Current Report Cards Maintained 5. FFA Facilitates Child's Participation in YDS/Equivalent/Vocational Programs	1. Full Compliance 2. Full Compliance 3. Full Compliance 4. Improvement Needed 5. Full Compliance
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 3. CFPs' Efforts to Provide 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 7. Reasonable Chores 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. Clothing Allowance in Accordance with FFA Program Statement ($50 Minimum if After November 1, 2012) 2. Ongoing Clothing Inventories of Adequate Quantity and Quality 3. Children's Involvement in Selection of Clothing 4. Provision of Sufficient Supply of Clean Towels and Personal Care Items Meeting Ethnic Needs 5. Minimum Monetary Allowances 6. Management of Allowance/Earnings 7. Encouragement/Assistance with Life Book	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. DOJ, FBI, CACI Submitted Timely 2. Timely, Completed, Signed Criminal Background Statement 3. Education/Experience Requirements 4. Employee Health Screening/TB Timely 5. Valid CDL and Auto Insurance 6. Signed Copies of FFA Policies and Procedures 7. Staff Completed All Required Training and Documentation Maintained 8. FFA Social Workers Have Appropriate Caseload Ratio 9. Written Declarations for Contract FFA Social Workers That Caseloads Not Exceed Total of 15 Children	Full Compliance (ALL)

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CORRECTIVE ACTION PLAN

REQUESTING AGENCY:	**OUT OF HOME CARE MANAGEMENT DIVISION**
AUDIT YEAR:	**2012**
CAP DUE DATE:	**APRIL 24, 2013**
CAP SUBMITTED TO:	**NESTOR FIGUEROA, OUT OF HOME CARE MANAGER**
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 January 30, 2013 – February 22, 2013 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 FFA's 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 implemented immediately, GOLFFA will fully implement the Corrective Action Plan no later than July 22, 2013.

DEFICIENCES:

LICENSURE/CONTRACT REQUIREMENTS

OHCMD FINDINGS:

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

  GOL FFA continuously stresses the importance of SIR reporting to our agency staff and certified parents. GOL FFA consistently provides on-going SIR training during certified parent and social worker trainings. As a result, we have continued to make significant progress in this area. GOL FFA will also conduct a complete SIR training refresher during our Social Worker Retreat on July 16, 2013.

FACILITY & ENVIRONMENT

OHCMD FINDINGS:

- **During a visit to one home, it was noted that the children's closet had no doors and their clothing was found on the closet floor.**

  As indicated in the performance compliance review summary, the deficiency was corrected during the review period. It is the agencies policy to conduct monthly home inspections in an attempt to ensure that our certified homes remain in compliance with Title 22 regulatory guidelines. Guardians of Love will continue to conduct home inspections as specified in our program statement and in adherence with Title 22 regulations and our county contract.

II. MAINTENANCE OF REQUIRED DOCUMENTATION AND SERVICE DELIVERY

OHCMD FINDINGS:

NEEDS AND SERVICES PLAN RELATED

- **Two children's NSPs did not have their Certified Foster Parents signatures indicating her agreement to participate in implementing the children's NSPs.**
- **Initial NSPs for two children were not specific and measurable.**
- **Updated NSPs for two children were not specific and measurable.**
- **All Quarterly Reports were comprehensive although one child's school problems were not addressed in one report; Quarterly Reports were not signed by the children's respective CSWs timely and there were no proof indicating the dates they were sent to the CSWs.**

Guardians of Love will continue to work diligently to provide comprehensive NSPs. Guardians of Love, FFA continuously revises our NSP process and procedures to streamline practices, incorporate new DCFS guidelines, enhance service delivery and increase overall contract compliance. This is evidenced by the performance compliance review summary which stated that all the Needs and Services Plans reviewed were comprehensive.

In an effort to achieve cohesive NSP comprehensiveness regardless of the specific social worker, office location or supervising social worker; GOL has revised our NSP quality assurance process. GOL has employed an NSP coordinator to conduct NSP trainings and to review and approve all Needs and Services Plans prior to final approval by agency supervising foster care social workers. The NSP coordinator has been trained extensively on the agencies NSP process and meets the Community Care Licensing Title 22 (Division 6 - Chapter 8.8) supervising foster care social worker education and experience requirements.

Guardians of Love will continue to provide initial and on-going NSP training. All NSP trainings conducted utilize the internal NSP Resource Manual which incorporates agency, DCFS contract and Community Care Licensing requirements.

On July 16, 2013 GOL FFA will conduct an NSP training to specifically address the deficiencies noted during our monitoring review. Individual advisory has already been conducted for the specific social workers responsible for the aforementioned deficiencies.

III. EDUCATION AND WORKFORCE READINESS

OHCMD FINDINGS:

- **One child did not have a current copy of his educational record.**

Guardians of Love will ensure that all educational records are current and filed in the child's case file.

Prepared By: _____ Date: 4/24/13

Kinikki Fullenwood
Administrator