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

March 15, 2013

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

From: Philip L. Browning
Director

ORANGE COUNTY CHILDREN'S FOUNDATION 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 Orange County Children's Foundation Group Home (Orange County Children's Foundation) in November 2012. Orange County Children's Foundation has one site in the Second Supervisorial District; one site in the Fourth Supervisorial District; and one site located in Orange County and provides services to Los Angeles County DCFS foster children and youth, as well as children from other counties. According to Orange County Children's Foundation's program statement, its purpose is to "increase the likelihood that those residents who remain in the program until their 18th birthday will demonstrate a measurable increase in academic and social adaptive skills and a decrease in maladaptive behaviors to enable them to adjust successfully as adults."

Orange County Children's Foundation has three six-bed sites and is licensed to serve a capacity of 18 males, ages seven through 18. At the time of review, Orange County Children's Foundation served 16 placed DCFS children. The placed children's overall average length of placement was 10 months, and their average age was 16.

SUMMARY

During our review, the interviewed children generally reported feeling safe at Orange County Children's Foundation; having been provided with good care and appropriate services; being comfortable in their environment and treated with respect and dignity.

Orange County Children's Foundation was in full compliance with nine of 10 areas of our Contract compliance review: Licensure/Contract Requirements; 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.

We noted a deficiency in the area of Documentation of Services Delivery. Orange County Children's Foundation needed to develop comprehensive initial and updated Needs and Services Plans (NSP). We instructed Orange County Children's Foundation supervisory staff to enhance monitoring and provide training to eliminate documentation issues.

Attached are the details of our review.

REVIEW OF REPORT

On December 19, 2012, the DCFS OHCMD Monitor, Edward Preer, held an Exit Conference with Orange County Children's Foundation staff, Rachel Suit, Assistant Executive Director; Irene Yohn, Assistant Executive Director; Todd Cutchlow, Administrator; Mike Yanes, Facility Manager; Diana Zamudio, Facility Manager; Deborah Bell, Facility Manager; Eduardo Santillan, Facility Manager; Shanna Ornellas, Therapist; Vivian Patencia, Therapist; and Kristal Green, Therapist. Orange County Children's Foundation representatives agreed with the review findings and recommendations; were receptive to implementing systemic changes to improve their compliance with regulatory standards; and to address the noted deficiencies in a Corrective Action Plan (CAP).

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

Orange County Children's Foundation provided the attached approved CAP addressing the recommendations noted in this compliance report.

We will assess for implementation of recommendations 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:PBG:ep

Attachments

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
Pamela Cutchlow, Executive Director, Orange County Children's Foundation Group Home
Rosalie Gutierrez, Regional Manager, Community Care Licensing
Lenora Scott, Regional Manager, Community Care Licensing
Robert Gomez, Regional Manager, Community Care Licensing

ORANGE COUNTY CHILDREN'S FOUNDATION GROUP HOME
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 addressed findings noted during the November 2012 review.

The purpose of this review was to assess Orange County Children's Foundation's compliance with its County contract and State regulations and included a review of Orange County Children's Foundation's program statement, as well as internal administrative policies and procedures. The monitoring review covered the following 10 areas:

- Licensure/Contract Requirements
- 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
- Personnel Records

For the purpose of this review, five placed children were selected for the sample. We interviewed each child and reviewed their case files to assess the care and services they received. Additionally, three discharged children's files were reviewed to assess Orange County Children's Foundation's compliance with permanency efforts. At the time of the review, three of the five sampled children were prescribed psychotropic medication. We reviewed their case files to assess for timeliness of Psychotropic Medication Authorizations (PMAs) and to confirm the required documentation of psychiatric monitoring.

We reviewed three staff files for compliance with Title 22 Regulations and County contract requirements, and conducted site visits to assess the provision of quality of care and supervision.

CONTRACTUAL COMPLIANCE

We found the following area out of compliance.

Maintenance of Required Documentation and Service Delivery

In January 2012, Orange County Children's Foundation's representatives attended OHCMD's NSP training. It was noted that two of five initial NSPs and the 14 updated NSPs reviewed were developed after the OHCMD NSP training.

All NSPs were developed timely. However, none of the five initial NSPs and none of the 14 updated NSPs were comprehensive.

- Some of the initial NSPs did not address the child's Permanency Plan goal and they did not identify the child's individual goals. Some of the NSPs did not provide detailed information in the Education section, did not address the child's and group home's participation in school related activities, and did not explain the child's California High School Exit Examination status. Some of the NSPs did not explain the group home's efforts to provide the children with Life Skills. Some of the NSPs did not explain why there was no parental involvement with the child and did not explain why there was no parental involvement in the child's treatment program.

- Some of the initial issues were also of concern in the updated NSPs. Some of the updated NSPs did not describe the child's involvement with others important in his life and did not provide a recommendation regarding the feasibility of the child returning home, placement in another facility or move into independent living. Some of the NSPs did not describe transportation arrangements for the youth to participate in Independent Living Program. In addition, some of the NSPs did not address the group home's contact with the CSW over three months and the goal completion dates were beyond 90 days.

Orange County Children's Foundation representatives agreed that all required elements were not included in the NSPs, and they will take corrective actions to ensure the development of comprehensive NSPs.

The Monitor reviewed the NSP training template with the Orange County Children's Foundation representatives. Orange County Children's Foundation will enhance monitoring of the NSPs. The group home facility managers and therapist will meet monthly to ensure all the NSP's required elements are addressed. Denita Trowel, the Group Home Administrator will review and sign off on all the NSPs. Rachel Suit, Assistant Executive Director; and Irene Yohn, Assistant Executive Director; will review a sample of the NSPs, monthly.

Recommendations

Orange County Children's Foundation's management shall ensure that:

1. Comprehensive initial NSPs are developed and include all required elements in accordance with the NSP template.

2. Comprehensive updated NSPs are developed and include all required elements in accordance with the NSP template.

PRIOR YEAR FOLLOW-UP FROM DCFS OHCMD's GROUP HOME CONTRACT COMPLIANCE MONITORING REVIEW

The OHCMD's last compliance report, dated June 18, 2012, identified six recommendations.

Results

Based on our follow-up, Orange County Children's Foundation did not fully implement three of six previous recommendations for which they were to ensure that:

- They develop comprehensive initial NSPs.
- They develop comprehensive updated NSPs.
- Monthly contact with CSWs is appropriately documented
- They develop an appropriate rewards and discipline system.
- Behavioral consequences are fair for all placed children.
- Full implementation of the outstanding recommendations for the 2011-2012 monitoring report as initial and updated NSPs were not comprehensive.

Orange County Children's Foundation did not implement recommendations of being in compliance with the development of comprehensive initial and updated NSPs.

Recommendations

Orange County Children's Foundation's management shall ensure that:

3. It fully implements the July 12, 2012, outstanding recommendations from the 2011-2012 fiscal year monitoring review, which are noted in this report as Recommendations 1, 2, and 3.

MOST RECENT FISCAL REVIEW CONDUCTED BY THE AUDITOR-CONTROLLER

A current fiscal review of Orange County Children's Foundation has not been posted by the Auditor-Controller.

ORANGE COUNTY CHILDREN'S FOUNDATION GROUP HOME
CONTRACT COMPLIANCE MONITORING REVIEW SUMMARY

Orange County Children's Foundation
1808 Stanley Ave.
Plancentia, CA 92870
License # 306000534
Rate Classification Level: 11

Harbor City
2407 Marbella Ave.
Carson, CA 90745
License # 19820017
Rate Classification Level: 11

Emancipation Institute
1691 Gramercy Ave.
Torrance, CA 90501
License # 198205893
Rate Classification Level: 11

	Contract Compliance Monitoring Review	**Findings: November 2012**
I	**Licensure/Contract Requirements** (9 Elements) 1. Timely Notification for Child's Relocation 2. Transportation Needs Met 3. Vehicle Maintained In Good Repair 4. Timely, Cross-Reported SIRs 5. Disaster Drills Conducted & Logs Maintained 6. Runaway Procedures 7. Comprehensive Monetary and Clothing Allowance Logs Maintained 8. Detailed Sign In/Out Logs for Placed Children 9. CCL Complaints on Safety/Plant Deficiencies	Full Compliance (ALL)
II	**Facility and Environment** (5 Elements) 1. Exterior Well Maintained 2. Common Areas Maintained 3. Children's Bedrooms 4. Sufficient Recreational Equipment/Educational Resources 5. Adequate Perishable and Non-Perishable Foods	Full Compliance (ALL)
III	**Maintenance of Required Documentation and Service Delivery** (10 Elements) 1. Child Population Consistent with Capacity and Program Statement 2. County Worker's Authorization to Implement NSPs 3. NSPs Implemented and Discussed with Staff 4. Children Progressing Toward Meeting NSP Case Goals 5. Therapeutic Services Received	1. Full Compliance 2. Full Compliance 3. Full Compliance 4. Full Compliance 5. Full Compliance

	6. Recommended Assessment/Evaluations Implemented 7. County Workers Monthly Contacts Documented 8. Children Assisted in Maintaining Important Relationships 9. Development of Timely, Comprehensive Initial NSPs with Child's Participation 10. Development of Timely, Comprehensive, Updated NSPs with Child's Participation	6. Full Compliance 7. Full Compliance 8. Full Compliance 9. Improvement Needed 10. Improvement Needed
IV	**Educational and Workforce Readiness** (5 Elements) 1. Children Enrolled in School Within Three School Days 2. GH Ensured Children Attended School and Facilitated in Meeting Their Educational Goals 3. Current Report Cards Maintained 4. Children's Academic or Attendance Increased 5. GH Encouraged Children's Participation in YDS/ Vocational Programs	Full Compliance (ALL)
V	**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)
VI	**Psychotropic Medication** (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** (13 Elements) 1. Children Informed of Group Home's Policies and Procedures 2. Children Feel Safe 3. Appropriate Staffing and Supervision 4. GH's efforts to provide Meals and Snacks? 5. Staff Treat Children with Respect and Dignity 6. Appropriate Rewards and Discipline System 7. Children Allowed Private Visits, Calls and Correspondence	Full Compliance (ALL)

	8. Children Free to Attend or not Attend Religious Services/Activities 9. Reasonable Chores 10. Children Informed About Their Medication and Right to Refuse Medication 11. Children Free to Receive or Reject Voluntary Medical, Dental and Psychiatric Care 12. Children Given Opportunities to Plan Activities in Extra-Curricular, Enrichment and Social Activities (GH, School, Community) 13. Children Given Opportunities to Participate in Extra-Curricular, Enrichment and Social Activities (GH, School, Community)	
VIII	**Personal Needs/Survival and Economic Well-Being** (7 Elements) 1. $50 Clothing Allowance 2. Adequate Quantity and Quality of Clothing Inventory 3. Children's Involved in Selection of Their Clothing 4. Provision of Clean Towels and Adequate Ethnic Personal Care Items 5. Minimum Monetary Allowances 6. Management of Allowance/Earnings 7. Encouragement and Assistance with Life Book	Full Compliance (ALL)
IX	**Discharged Children** (3 Elements) 1. Children Discharged According to Permanency Plan 2. Children Made Progress Toward NSP Goals 3. Attempts to Stabilize Children's Placement	Full Compliance (ALL)
X	**Personnel Records** (7 Elements) 1. DOJ, FBI, and CACIs Submitted Timely 2. Signed Criminal Background Statement Timely 3. Education/Experience Requirement 4. Employee Health Screening/TB Clearances Timely 5. Valid Driver's License 6. Signed Copies of Group Home Policies and Procedures 7. All Required Training	Full Compliance (ALL)

Orange County Children's Foundation, Inc.
Harbor City Children's Foundation, Inc.
Emancipation Institute

January 23, 2013

Department of Children and Family Services
9320 Telstar Avenue, Suite 216
El Monte, California 91731

ATTN: Ms. Patricia Bolanos-Gonzalez, CSA II

Subject: Corrective Action Plan for Orange County Children's Foundation, Inc.

In response to the Group Home Contract Compliance Review findings, our Agency's Corrective Action Plan (CAP) included the following:

OHCMD FINDINGS:
III MAINTENANCE OF REQUIRED DOCUMENTATION AND SERVICE DELIVERY

23. The treatment team did not develop comprehensive initial Needs and Service Plans (NSP)

- **The initial NSP did not include the Permanency Plan goal:**
- **The goals were not identified:**
- **The goals were not identified:**
- **The Education Section was incomplete:**
- **The NSP did not explain why there was no parental involvement with the child:**
- **The Life Skills section was incomplete:**

CORRECTIVE ACTION PLAN

On December 19, 2012 Mr. Edward Preer, OHCMD Monitor met with our three GH Therapist, Administrators and Managers to Review his findings of our agency. At that time he conducted a NSP Training and was able to address the many issues our Therapists were having with the NSP's.

Orange County Children's Foundation, Inc., developed a Check System Policy for all Needs and Service Plans (NSP). This involves the Group Home Therapist, the Site Manager and/or the Site Administrator and an outside Consultant (Denita Trowel who holds an Administrator Certificate and has 9 + years in the group home industry).
Seven days prior to the due date of any NSP the GH Therapist will meet with the Manager/Administrator and review each section of the NSP, confirming ALL RERQUIRED

Mailing Address: P.O. Box 6803 Fullerton, CA 92834 Telephone Numbers: Placentia (714) 986-9451 Carson (310) 834-1198 Torrance (310) 320-0195

ELEMENTS WERE INCLUDED. After any necessary adjustments are complete the NSP will be emailed to the Consultant. At that time the Consultant will review the NSP making sure all sections are properly complete, confirm dates and review for any errors. If the Consultant has questions or requires clarification she will contact the OHCMD Monitor directly.
Upon the Consultants approval of the NSP, it will be returned to the GH Therapist for signatures and delivered to the necessary personnel before the due date.
A signature page has been developed documenting the meeting date and when the Consultant approved the NSP.

Group Home Management /Staff have ongoing contact with school personnel (Teachers, Counselors, Administration, etc...) almost on a daily basis, documentation regarding activities, school behavior, problems, school official concerns about the child's health, academic abilities, social skills and other issues of concern will be clearly documented in the GH Education Binder. The Therapist will have access to the Education Binder and will be able to obtain the information so the above areas will be addressed in Educational section of the NSP.

24. The treatment team did not develop comprehensive updated Needs and Service Plans (NSP)

- **The recommendation regarding the feasibility of the child to return home for placement in another facility or to move into independent living was not addressed:**
- **The Educational Section was incomplete; participation in school related activities by child and GH staff was not documented; school behavior problems, school officials' concerns about the child's health, academic abilities, social skills and other issues of concern related to school matters were not addressed:**
- **The group home did not address contact with the CSW over three months:**
- **NSP did not describe transportation arrangements for youth to participate in ILP:**
- **The NSP did not include the Permanency Plan goal**
- **The goals were not identified:**
- **The NSP did not describe involvement of the child with others who are important to the child.**
- **The NSP did not address participation of family and others in the child's treatment program.**
- **The goal completion dates were beyond 90 days**

CORRECTIVE ACTION PLAN

On December 19, 2012 Mr. Edward Preer, OHCMD Monitor met with our three GH Therapist, Administrators and Managers to Review his findings of our agency. At that time he conducted a NSP Training and was able to address the many issues our Therapists were having with the NSP's.

Orange County Children's Foundation, Inc., developed a Check System Policy for all Needs and Service Plans (NSP). This involves the Group Home Therapist, the Site Manager and/or the Site Administrator and an outside Consultant (Denita Trowel who holds an Administrator Certificate and has 9 + years in the group home industry).
Seven days prior to the due date of any NSP the GH Therapist will meet with the Manager/Administrator and review each section of the NSP. Confirming ALL RERQUIRED ELEMENTS WERE INCLUDED. After any necessary adjustments are complete the NSP will be emailed to the Consultant. At that time the Consultant will review the NSP making sure all sections are properly complete, confirm dates and review for any errors. If the Consultant has questions or requires clarification she will contact the OHCMD Monitor directly.
Upon the Consultants approval of the NSP, it will be returned to the GH Therapist for signatures and delivered to the necessary personnel before the due date. The Therapist will have access to the Education Binder and will be able to obtain the information so the above areas will be addressed in Educational section of the NSP.
A signature page has been developed documenting the meeting date and when the Consultant approved the NSP.

Group Home Management /Staff have ongoing contact with school personnel (Teachers, Counselors, Administration, etc...) almost on a daily basis, documentation regarding activities, school behavior, problems, school official concerns about the child's health, academic abilities, social skills and other issues of concern will be clearly documented in the GH Education Binder. The Therapist will have access to the Education Binder and will be able to obtain the information so the above areas will be addressed in Educational section of the NSP.

All Management and Staff have been re-trained in the CSW Contact Log policy. Dates, times and pertinent information about CSW contact is clearly documented and maintained. To ensure compliance, a weekly log check has been enacted and conducted by the site Administrator and/or appointed Manager.

The ILP Log Book will clearly document when the child attended ILP and their means of transportation

If you have any questions or require further clarification, please don't hesitate to contact me directly at 714-213-1428 or via email at ireneyohn@hotmail.com.

Sincerely,

Irene Yohn
Assistant Executive Director/Administrator

cc: Pamela Cutchlow, Executive Director