County of Los Angeles
DEPARTMENT OF CHILDREN AND FAMILY SERVICES

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July 3, 2014

To: Supervisor Don Knabe, Chairman
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Supervisor Michael D. Antonovich

From: Philip L. Browning
Director

SOUTHERN CALIFORNIA FOSTER FAMILY & ADOPTION AGENCY CONTRACT COMPLIANCE MONITORING REVIEW

The Department of Children and Family Services (DCFS) Out-of-Home Care Management Division (OHCMD) conducted a review of Southern California Foster Family & Adoption Agency (the FFA) in January 2014. The FFA has one licensed office located in the First Supervisorial District 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 foster and adoptive families who offer stable, secure and nurturing environments to children who are dependents of the court until they are reunited with their birth families, are adopted or become independent."

At the time of the review, the FFA supervised 67 DCFS placed children in 42 certified foster homes. The placed children's average length of placement was 11 months and their average age was 7.

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 8 of 11 sections of our program compliance review: Certified Foster Homes; Facility and Environment; Education and Workforce Readiness; 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/Contract Requirements, related to a Community Care Licensing (CCL) citation, as a result of deficiencies and findings during the course of CCL's investigation of a complaint; Maintenance of Required Documentation and Service Delivery, related to Updated Needs and Services Plans (NSPs) being untimely; and Health and Medical Needs, related to two children's initial dental examinations not being conducted within 30 days of placement.

Attached are the details of our review.

REVIEW OF REPORT

On April 2, 2014, the DCFS OHCMD Monitor, Kong Ng held an Exit Conference with the FFA representatives, Sylvia Fogelman, Executive Director, Robyn Harrod, Senior Director of Programs, and Kimberly Sutton, FFA Supervising Social Worker. 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 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 June 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:kn

Attachments

c: William T Fujioka, Chief Executive Officer
John Naimo, Acting Auditor-Controller
Public Information Office
Audit Committee
Sylvia Fogelman, President and CEO, Southern California FFA
Lajuannah Hills, Regional Manager, Community Care Licensing

SOUTHERN CALIFORNIA FOSTER FAMILY & ADOPTION AGENCY
CONTRACT PROGRAM COMPLIANCE MONITORING REVIEW-SUMMARY

155 North Occidental Blvd.
Los Angeles, CA 90026
License: 191500291

	Contract Compliance Monitoring Review	**Findings: January 2014**
I	**Licensure/Contract Requirements** (7 Elements) 1. Timely Notification for Child's Relocation 2. Serious Incident Report Documentation and Cross Reporting 3. Runaway Procedures 4. Are there CCL Citations/OHCMD Safety Reports 5. If Applicable, FFA Ensures Complete Required Whole Foster Family Home Training 6. FFA Pays Certified Foster Parents Whole Foster Family Home Payments 7. Assessment of Certified Foster Parent (CFP) Prior to Placement of Two (2) or More Children	1. Full Compliance 2. Full Compliance 3. Full Compliance 4. Improvement Needed 5. Not Applicable 6. Not Applicable 7. Full Compliance
II	**Certified Foster Homes (CFHs)** (12 Elements) 1. Home Study and Safety Inspection Prior to Certification 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	Full Compliance (ALL)

III	**Facility and Environment** (7 Elements) 1. Exterior/Grounds Well Maintained 2. Common Areas Well Maintained 3. Children's Bedrooms/Interior Well Maintained 4. Sufficient Educational Resources 5. Adequate Perishable and Non-Perishable Food 6. Disaster Drills Conducted and Documentation Maintained 7. 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's (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 CSW's 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. Full Compliance 3. Full Compliance 4. Full Compliance 5. Improvement Needed 6. Full Compliance 7. Full Compliance 8. Full Compliance 9. Full Compliance 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	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	1. Full Compliance 2. Full Compliance 3. Improvement Needed 4. Not Applicable
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/Photo	Full Compliance (ALL)

	Album	
X	**Discharged Children** (3 Elements) 1. Completed Discharge Summary 2. Attempts to Stabilize Children's Placement 3. Child Completed High School (if applicable)	 1. Full Compliance 2. Full Compliance 3. Not Applicable
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)

SOUTHERN CALIFORNIA FOSTER FAMILY & ADOPTION 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 January 2014 review. The purpose of this review was to assess the Southern California Foster Family & Adoption 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, ten children were selected for the sample. Out-of-Home Care Management Division (OHCMD) interviewed six children. Three children were not interviewed due to their young age and one child did not want to be interviewed. 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. We reviewed all ten case files to assess the care and services they received. Additionally, five discharged children's files were reviewed to assess the FFA's compliance with permanency efforts. At the time of the review, one placed child was prescribed psychotropic medication. We reviewed the child's case file to assess for timeliness of Psychotropic Medication Authorizations and to confirm the required documentation of psychiatric monitoring.

OHCMD reviewed four certified foster parent files and three 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 three areas to be out of compliance.

Licensure/Contract Requirements

- Community Care Licensing (CCL) cited the FFA, as a result of deficiencies and findings during the investigation of CCL complaints. According to a CCL complaint investigation report dated February 24, 2014, CCL cited the FFA for Personal Rights violation when it was

determined that certified foster parent posted the placed children's pictures on the certified foster parent's family personal blog.

A Plan of Correction (POC) was requested by CCL, which required that the certified foster parent have to delete all posted placed children's pictures from the family's personal blog.

During the exit interview, the FFA administrative staff stated that all placed children's pictures were deleted from the certified foster parent's family personal blog and the FFA also informed the certified foster parent that no pictures or comments regarding foster care placed children are to be posted on any social media accounts. The FFA provided OHCMD with verification that FFA staff, prospective certified foster parents and certified foster parents were retrained on Title 22 Regulations, the FFA's and DCFS policies related to placed children's personal rights on February 19, 2014, March 14, 2014 and April 4, 2014.

Recommendations

The FFA's management shall ensure that:

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

Maintenance of Required Documentation and Service Delivery

- Three Updated NSPs reviewed were not completed within 90 days of placement. The three Updated NSPs were completed on average, five days late.

During the exit conference the FFA representative stated that the FFA had an understanding that there is a grace period of 10 business days after the due date for all NSPs. OHCMD explained to the FFA that there is no grace period. It should be noted that the FFA's representatives attended the OHCMD's NSP training for providers in August 2013, and were made aware of the NSP requirements. The NSPs reviewed were developed subsequent to the training.

Recommendations

The FFA's management shall ensure that:

2. Updated NSPs are completed timely.

Health And Medical Needs

Two children's initial dental examinations were not conducted within 30 days of placement. One child's exam was 84 days late and the other child's exam was 107 days late. The FFA representative did not present a valid reason for the delays.

Recommendation

The FFA's management shall ensure that:

3. All initial dental examinations are completed within 30 days from the date of placement.

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

The OHCMD's last compliance report dated June 18, 2013, identified 10 recommendations.

Results

Based on OHCMD follow-up, the FFA fully implemented all 10 previous recommendations for which they were to ensure that:

- Compliance with CCL regulations regarding child safety and Licensure/Contract Requirements.
- Prior to certification of a foster home, the FFA will submit an inquiry to OHCMD for historical information of abuse/neglect.
- All certified foster parents have timely health screenings and TB tests required by Title 22 regulations.
- All certified foster parents complete the required initial training and will be documented in their file.
- All certified foster parents have the required current car insurance in their names on file.
- The grounds and exteriors of all certified foster homes are well maintained and the FFA staff routinely inspects and monitors the homes for ongoing compliance.
- All placed children's bedrooms are well maintained.
- The FFA staff documents the specific goals of all placed children in the NSPs.
- Timely, comprehensive Initial NSPs.
- All age-appropriate placed children are enrolled in school within three days of placement.

At the Exit Conference, the FFA representatives expressed their desire to remain in compliance with all Title 22 Regulations and Contract requirements. In an effort to ensure that the FFA is free of CCL citations, the FFA re-trained their social work staff and prospective certified foster parents on Title 22 regulations and county policies related to children's personal rights, including not posting children's pictures on the internet on February 19, 2014. The FFA will re-train certified foster parents on Title 22 regulations and county policies on June 7, 2014. OHCMD will verify that these recommendations have been implemented and will provide technical assistance during our next visit to the FFA in June 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.

5-19-14

Southern California Foster Family and Adoption Agency
License # 191500291

Southern California Foster Family and Adoption Agency (SCFFAA) thanks you for conducting the DCFS Monitoring Review for calendar year 2013. SCFFAA hereby submits its response to the findings identified during the review visit.

Substantiated allegations:
In 2013, SCFFAA had one substantiated personal rights violation, complaint date 9-24-13. A photograph of a foster child, taken from behind so that the child's face was not visible, along with a blog post that did not include the child's name, any identifying information, was reported to DCFS as a violation of the child's confidentiality. In the foster parent's judgment, the photo and posting was done in such a way to conceal the child's identify, as the blog's focus was about the family as a whole and parenting. The photo and blog were immediately removed from the internet. On 2-19-14, staff were trained not to post any photos or references to foster children in order to protect their confidentiality. Staff was instructed to remind foster parents of this requirement at their next home visit. All prospective foster parents attend a 3 hour training regarding agency, county, and CCL requirements including the prohibition of posting photos or information about placed youth on social media sites, blogs, etc. The most recent training occurred on 3-6-14. SCFFAA regularly offers continuing education hours to certified foster parents on various topics including agency, county, and CCL requirements. Recent training dates include 2-1-14 and 5-3-14. CCL required only the removal of the photo and blog post in question, which was done immediately.

Did the FFA social worker develop timely, comprehensive, updated NSP's with the participation of the developmentally age-appropriate child?
In one case, updated Needs and Service Plans were completed up to 4 days past the conclusion of the reporting period. In the past, SCFFAA along with other FFA's operated with the understanding that there was a 10 day grace period to complete Updated Needs and Service Plans. This contract requirement has been clarified; we now understand that all NSP reports are due on the final day of the reporting period, with no grace period allowed. The new contract addendum that took effect May 1,2014 further clarifies the timeline for completing all NSP reports. On 4-2-14, SCFFAA staff have been trained that NSP updates are to be completed and signed on the day due, with no grace period permitted.

Are initial dental examinations conducted timely?

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FFA Lic. No. 191500291
Adoption Lic. No. 197602099

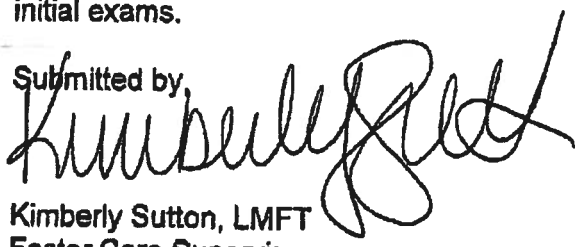
In two cases, the children's initial dental exams were delayed beyond the 30 days of placement.

For one child, the initial dental exam was delayed, because the child was placed in the Antelope Valley, where health resources are historically difficult to secure in a timely manner. This was reported to the CSW, who verbally and in writing waived the 30 day requirement for the initial dental exam. An email from the CSW reads, *"I did not give you a set date or time that I need those appointments to be completed. I know that our providers up h ere in the Antelope Valley are hard to schedule and slow to respond, so I left the time frame open"*. The initial dental exam occurred at the first available appointment. (The initial exam revealed no decay or treatment required aside from a routine cleaning.)

For the other child, the initial dental exam occurred two months past the due date, an exam that revealed no decay or treatment required aside from a routine cleaning.. The child was placed with SCFFAA on a temporary basis to allow time for a family who could provide permanency to be identified. He came into care under extremely traumatic circumstances; in fact both parents were incarcerated on felony charges of child abuse. At the time of placement, the CSW indicated that birth mother reportedly took both boys to the dentist recently, but could only produce documentation for one of them. SCFFAA soon identified a family who could provide the child and his brother with permanency and proceeded to develop and implement a transition plan which included a series of meetings and visits. Once the boys were placed with a family who wished to adopt them, the outstanding dental visit was completed. Again, the CSW indicated that the delay was acceptable and waived the 30 day requirement.

In the past, it was understood that a CSW held the authority to waive the 30 day requirement for an initial medical or dental, We now understand this is not the case. SCFFAA will ensure that all placed children have their initial dental examinations within 30 days exam unless the initial DCFS 561 form provided at the time of intake states otherwise . All prospective foster parents attend a 3 hour training where DCFS and CHDP timelines are reviewed, including due dates for initial medical and dental exams. The most recent training occurred on 3-6-14. On 2-19-14, FFA staff have been informed that DCFS CSW's do not have the authority to waive 30 day due dates for initial exams.

Submitted by,



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