



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

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(213) 351-5602

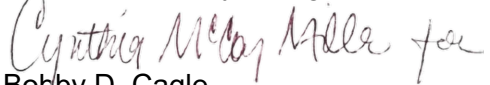
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June 4, 2021

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From:   
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**ASPIRANET**  
**INTENSIVE SERVICES FOSTER CARE FOSTER FAMILY AGENCY**  
**FOR CHILDREN WITH SERIOUS EMOTIONAL AND BEHAVIORAL NEEDS**  
**CONTRACT COMPLIANCE REVIEW**

**REVIEW OF REPORT**

The Department of Children and Family Services (DCFS) Contracts Administration Division (CAD) conducted a Contract Compliance Review of the Aspiranet Intensive Services Foster Care (ISFC) Foster Family Agency (FFA) for Children with Serious Emotional and Behavioral Needs (SEBN) (the Contractor) in October 2020. The Contractor has one office located in the First Supervisorial District. The office provides services to the County of Los Angeles DCFS placed children, Probation foster youth, and Non-Minor Dependents (NMDs).

**Key Outcomes**

NUMBER OF PRIORITY FINDINGS
PRIORITY 1 2
PRIORITY 2 5
PRIORITY 3 0

CAD conducted a virtual Contract Compliance review of the Contractor's compliance within the following applicable areas of their ISFC-FFA SEBN contract: General Contract Requirements;

*"To Enrich Lives Through Effective and Caring Service"*

Resource Family Home Requirements; Facility and Environment; Engagement and Teamwork; Needs and Services Plans; Safety; Permanency; Support Services; Personal Rights and Social/Emotional Well-Being; Discharge Planning; and Personnel Files.

The Contractor was in full compliance with 7 of 10 applicable areas of CAD's Contract Compliance Review: Resource Family Home Requirements; Facility and Environment; Safety; Permanency; Support Services; Personal Rights and Social/Emotional Well-Being; and Personnel Files. There were no children discharged from the ISFC program; therefore, the section "Discharge Planning" was not applicable.

For the purpose of this review, one DCFS placed youth's file was selected for the sample. CAD reviewed the file and virtually interviewed the youth to assess the level of care and services this youth received.

CAD reviewed one Resource Family Home (RFH) file and two staff files for compliance with Title 22 Regulations and County contract requirements. CAD also conducted virtual interviews with staff and the Resource Family Parents (RFP). To assess the quality of care and supervision provided to the placed children, DCFS also conducted virtual site visits at the Contractor's location and the RFHs.

CAD noted findings in the areas of:

#### Priority 1

- General Contract Requirements
  - Contractor did not maintain the required records or training plans as required.
  - Contractor did not provide the required staff.

#### Priority 2

- General Contract Requirements;
  - Contractor did not maintain a minimum of two ISFC homes.
- Engagement and Teamwork
  - Contractor did not ensure monthly Child and Family Team meetings were held.
  - Contractor did not ensure ISFC members held weekly meetings as required.
- Needs & Services Plans (NSPs)
  - Individualized NSPs were not comprehensive, complete and were not in compliance with all requirements.
  - Contractor did not establish, maintain, and document in the NSP or case file, a support plan for the ISFC RFP and respite caregiver.

On February 16, 2021, the DCFS CAD Children Services Administrators I and II and the Out-of-Home Care Management Division Quality Assurance Manager with the Bureau of Clinical Resources and Services held an exit conference with the Contractor's representatives.

Each Supervisor  
June 4, 2021  
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The Contractor's representatives agreed with the review findings and recommendations, and were receptive to implementing systemic changes to improve the Contractor's compliance with regulatory standards.

The Contractor provided the attached approved Corrective Action Plan addressing the noted findings in this compliance report.

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

BDC:KDR  
LTI:ra

#### Attachments

c: Fesia Davenport, Chief Executive Officer  
Arlene Barrera, Auditor-Controller  
Adolfo Gonzales, Chief Probation Officer  
Brandon Nichols, Chief Deputy Probation Officer, Juvenile Services  
Public Information Office  
Audit Committee  
Vernon Brown, Chief Executive Officer, Aspiranet  
Kellee Coleman, Regional Manager, Community Care Licensing Division  
Monique Marshall-Turner, Regional Manager, Community Care Licensing Division

April 9, 2021

ATTN: Victor Akinmurele

Department of Children and Family Services

Contract Compliance Section

3530 Wilshire Blvd., 4<sup>th</sup> Floor

Los Angeles, CA 90010

Dear Mr. Akinmurele,

Per the virtual exit conference that occurred on February 16, 2021, regarding Aspiranet's ISFC Contract Compliance Review Exit Summary, the following Corrective Action Plan Addendum is being submitted for your approval to supplant the CAP submitted March 18, 2021.

**Section I. General Contract Requirements**

**#1- The agency maintained continuous dedicated efforts recruiting ISFC RFPs and a minimum of two ISFCS homes.**

**#1b- The agency maintained a minimum of two ISFC homes.**

Finding: The agency did not maintain a minimum of two ISFC homes.

**Response:**

1. The following steps are taken as a marketing, recruiting, and training process. Aspiranet has implemented a social media campaign focusing on the recruitment of ISFC RFPs. This campaign is on Facebook. Sample materials are attached here as Aspiranet ISFC CAP Attachment. Included in this attachment is a summary of the number of clicks that these ads have generated. Our online database Options will track the inquiries that are brought in by this campaign to assess its effectiveness. Number of clicks, number of inquiries, level of qualification of inquiries, level of interest of inquiries are all tracked for recordkeeping and evaluation purposes.
2. The inquiries that result from our marketing campaign are contacted by a personal phone call from Recruiter. Recruiter attempts contact 3 times. If inquiry is unresponsive, Recruiter maintains contact information on file for a year in order to follow up on future interest. Recruiter screens inquiries to establish they meet basic requirements, and if so Recruiter sends an invitation to the next cycle of trainings with specific dates for the entire cycle.

**Aspiranet Los Angeles**

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310-535-1500  aspiranet.org

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3. Trainer makes a personal phone call to each person invited to training to continue to maintain applicant interest, and follows up with a phone call for any missed trainings.
4. All applicants in FFA training are introduced to ISFC and assessed for interest, as an additional step in recruiting ISFC parents. In addition to recruiting homes interested in ISFC specifically, Aspiranet will train two current FFA families to certify them for ISFC by the close of second quarter 2021.
5. Aspiranet will maintain at least 2 of these homes during the contract period in accordance with policy.

**Staff Responsible:** Program Director in consultation with Marketing Department, Recruiter, Trainer

**#6- The agency maintained detailed recordkeeping, including training plans, as required.**

**#6a- The agency maintained records as required, including but not limited to social worker progress notes and notes on services delivered by professional and paraprofessional staff in sufficient detail to permit an evaluation of services provided.**

**Finding:** The agency did not provide detailed notes or records on services delivered by team members outside Aspiranet.

**Response:**

1. Aspiranet will maintain progress notes, NSPs, weekly team meeting notes, CFT notes, and staff training plans in an on-site file. These documents and their due dates are tracked by Aspiranet's internal online database, Options. As a specific process for maintaining recordkeeping, each role has the following responsibility:
2. Program Director will contact Mental Health leadership at ChildNet, which provides the mental health services for Aspiranet's ISFC program, to request that copies of treatment documents be regularly shared with Aspiranet in real time. These documents will be shared weekly in the scheduled ISFC team meetings. This will ensure that services provided outside of Aspiranet will be included in our recordkeeping on an ongoing basis.
3. Program Director or Program Supervisor will train new staff and place training records in employee file. Program Director will audit files quarterly.
4. Social Workers will give completed records and documents to Program Supervisor for review 7 days before deadlines. Options will prompt this timeline by giving an online notification.
5. Program Supervisor will return documents to Social Workers as necessary for quality assurance modifications. Once finalized, Program Supervisor will give records and documents to Administrative Assistant.
6. Administrative Assistant will enter documents into Options. Following this, Administrative Assistant will place all documents in child's file.

**Staff Responsible:** Program Director, Program Supervisor, Therapist, Social Worker, Administrative Assistant



**#7- The agency provided the required staffing.**

**#7a- The agency provided the required staffing based on the child's (ISFC) medical necessity and in accordance with the contract requirements (limits on dual roles, ratio staff child).**

Finding: The agency did not provide the required staff through the review period, and the agency did not avoid ISFC staff taking multiple roles.

**Response:**

1. Upon future resignations, timeline will be that job posting will be placed the next business day after notice of resignation and DCFS ISFC team will be notified same day, then notified of new hire next business day after hire. Hiring will be completed within 2 months of previous staff resignation. As hiring is in process, a Social Worker program who is trained in IHSC duties will take over temporarily in order to avoid a gap in services and avoid ISFC staff performing multiple duties.
2. Aspiranet uses the following process in hiring new employees, Aspiranet HR posts jobs on Indeed and other online job boards. Aspiranet uses a comprehensive requisition and hiring database called Gr8People. Program Director reviews each resume that comes in, and if a seemingly qualified applicant is seen then Program Director passes this resume on to Program Supervisor for additional input. A phone screen may then be scheduled, during which Program Director verifies whether applicant meets basic requirements. If so, a phone interview is then conducted with Program Director. If applicant continues to appear to be a match for the role, an in person interview (virtual interview during the current public health emergency). Program Director may then make a job offer, and when job offer is accepted then HR immediately emails an onboarding packet to applicant. On first day of employment, Program Director begins training employee.
3. Hiring process will be expedited as priority in order to maintain compliance with ISFC contract requirements.

**Staff Responsible:** Program Director, Program Supervisor

**Section IV. Engagement and Teamwork**

**#22- The Child and Family team meetings took place as required.**

**#22b- CFT meetings were held at least once a month or more frequently if required.**

Finding: The agency did not hold CFTs at least once a month. Canceled CFTs were not made up within the month.

**Response:**

1. As primary case manager of the team, Aspiranet Social Worker will coordinate with team to hold CFTs at least once a month. The status of these CFTs will be reviewed in weekly supervision meetings with Program Director/Supervisor monthly. If for some reason meeting is canceled, the practice will be to reschedule within same month rather than waiting until the following month.

**Staff Responsible:** Social Worker, Program Director/Supervisor

**#23- The ISFC team meetings took place as required.**

**#23a- ISFC team members held face-to-face meetings, at a minimum once a week, to review, track, and adapt as necessary the plans for the child.**

**Finding:** The agency did not provide documentation of weekly team meetings.

**Response:**

1. Social Worker will arrange and document in progress notes weekly ISFC team meetings in the child's file, to be attended by IHSC, Social Worker, and mental health clinician. Program Director/Supervisor will review this documentation in supervision meetings on a monthly basis. As Aspiranet's DMH contract has finalized, new ISFC clients will be assigned to an Aspiranet mental health clinician on an ongoing basis to ensure more streamlined communication and ease of meeting this requirement.
2. Beginning the first week of placement of a child, Social Worker will schedule weekly ISFC team meetings to include Social Worker, Therapist, and IHSC, then document these meetings in child's file. Program Director/Supervisor will review these meetings in supervision monthly. As a plan to better address this deficiency, future clients will be assigned an internal Aspiranet Therapist rather than a Therapist from an outside provider.

**Staff Responsible:** Social Worker, Program Director/Supervisor

**Section V. Needs and Services Plans**

**#24- Individualized NSPs were comprehensive, complete, and in compliance with all requirements including being timely, trauma informed, culturally relevant and age and developmentally appropriate.**

**#24a- Individualized NSPs were comprehensive, complete, and in compliance with all requirements including timeliness, being trauma informed, culturally relevant and age and development appropriate.**

**Finding:** NSPs were not comprehensive.

**Response:**

1. Program Director has begun training all staff on NSP documentation, focusing on SMART goals, complete recording of all health related appointments, and monitoring of goals to ensure progress is reflected and new goals are developed as appropriate. The first training took place virtually on March 23, 2021, and is attached here with sign-in sheet as Aspiranet ISFC CAP Attachment 2. A follow-up training to reinforce this practice and allow for questions that may have arisen will take place April 20, 2021. Ongoing service planning will be included as a refresher on our training plan at least yearly. Program Supervisor will review each NSP 7 days prior to deadline in an individual meeting with each social worker and provide feedback and guidance as necessary. Program Director will audit files quarterly to



monitor thorough and complete NSP documentation as an added layer of quality assurance.

**Staff Responsible:** Program Director, Program Supervisor, Social Workers

**#24b- The child's clinical treatment plan, services, progress, and underlying needs were documented.**

**Finding:** The agency did not provide detailed documentation of clinical services provided by an outside agency.

1. Program Director will contact Mental Health leadership at ChildNet, which provides the mental health services for Aspiranet's ISFC program, to request that copies of treatment documents be regularly shared with Aspiranet in real time. These documents will be shared weekly in the scheduled ISFC team meetings.
2. Social Worker will participate in monthly coaching sessions with DMH staff for training on underlying needs. These monthly coaching sessions began in October and are continuing indefinitely.
3. Weekly team meetings with IHSC, Social Worker, and Therapist will include discussion of this component directly with clinician, and documented in progress notes.
4. For future clients, Therapist position will be in house in order to facilitate document sharing as required in contract.
5. IHSC will meet with child weekly or more often dependent on need, and use content of weekly team meetings to inform clinically appropriate interventions.

**Staff Responsible:** Program Director, Social Worker, Therapist, IHSC

**#27- The FFA ensured that, when applicable, appropriate respite care was provided.**

**#27a- The agency established, maintained, and documented in the NSP or case file a RFP Support Plan for the ISFC RFP and respite caregiver (including continuous opportunities for self-care and personal breaks individual and group support activities, training, ISFC RFP warm-line, phone or face-to-face communication systems to collect feedback at least 3 times a week).**

**Finding:** The agency did not provide documentation in NSPs or case file to verify this requirement.

**Response:**

1. As primary case manager on team, SW will lead development of an RFP Support Plan at the first CFT. This plan will be documented in CFT notes and in first NSP. NSP will be reviewed 7 days prior to deadline to ensure this has been done. An ISFC-trained respite home option will be included in this plan in order to ensure up to 2 weeks of respite available each year to each ISFC approved home. Aspiranet's Facebook marketing campaign will ensure that ISFC homes are identified and approved on an ongoing basis.



2. The resource parent support plan includes an emergency response system which is accessible 24 hours a day. This resource is supported by an on-call social worker who has access to back up assistance provided by a supervisor, manager or director. Resource families are instructed on how and when to access afterhours services. When in need of assistance, families contact the local Aspiranet office and select the emergency response option which will alert the on-call social worker. Based on the level of need, the on-call worker will offer telephone support and intervention or in-person response.
3. Bimonthly support groups using the Parent Café model will be offered to all ISFC homes, as a component of the RFP Support Plan. Parent Café is an evidence-based model of parenting support that has been found to be useful in parenting children with trauma backgrounds. More information on this model is attached here as Aspiranet ISFC CAP Attachment 3.

**Staff Responsible:** Social Worker, Program Director/Supervisor

**#27c- Respite plan was documented within the first 30 days of placement in the initial NSP or case file.**

Finding: The agency did not provide documentation in NSPs or case file to verify this requirement.

**Response:**

1. Social worker will document respite plan in the initial NSP or case file. This NSP will be reviewed by Program Director/Supervisor 7 days prior to deadline. Our online database Options will prompt this review at 7 days before deadline. This 7 day prompt provides an assurance that the deadline will be met appropriately.

**Staff Responsible:** Social worker, Program Director/Supervisor

**#27d- Respite plan was reviewed quarterly by the child's ISFC team and CFT and documented in the NSP or case file.**

Finding: The agency did not provide documentation in NSPs or case file to verify this requirement.

**Response:**

1. As no initial respite plan had been created, this quarterly review was not conducted. Social worker and ISFC team will review respite plan quarterly in CFT and document in CFT notes as well as the relevant NSP. Program Director/Supervisor will review NSP to ensure this has been properly documented. Any changes needed to respite plan will be further discussed by the team and, once finalized, documented in NSP.

**Staff Responsible:** Program Director/Supervisor, Social Worker, ISFC Team



Thank you for reviewing this Corrective Action Plan Addendum. I can be reached at [jmashburn@aspiranet.org](mailto:jmashburn@aspiranet.org), 562-631-9608, or you may call the main office at 310-535-1500 and your call will be appropriately directed from there. I look forward to your response.

Best,

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke, positioned above the printed name.

Jeffrey Mashburn, MSW  
Core Program Director, Aspiranet  
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