



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

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December 29, 2020

To: Supervisor Hilda L. Solis, Chair
Supervisor Holly J. Mitchell
Supervisor Sheila Kuehl
Supervisor Janice Hahn
Supervisor Kathryn Barger

From: Bobby D. Cagle
Director

Cynthia McCoy Miller for

**WALDEN ENVIRONMENT DBA WALDEN FAMILY SERVICES
FOSTER FAMILY AGENCY 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 Walden Environment dba Walden Family Services Foster Family Agency (FFA) in April 2020. The Contractor has three offices: one in the Third Supervisorial District, one in San Diego County, and one in Riverside County. The Encino and Riverside County offices provide services to the County of Los Angeles DCFS placed children, children placed by other counties, and there were no Non-Minor Dependents at the time of the review.

Key Outcomes

NUMBER OF PRIORITY FINDINGS
PRIORITY 1 2
PRIORITY 2 9
PRIORITY 3 2

CAD conducted a virtual Contract Compliance Assessment review of the Contractor's compliance within the following applicable areas: General Contract Requirements; Resource Family Home (RFH) Requirements; Facility and Environment; Engagement and Teamwork; Needs and Service Plans; Permanency; Education and Independent Living Program Services; Health and Medical Needs; Personal Rights and Social/Emotional Well-Being; Personal Needs/Survival and Economic Well-Being; and Personnel Files.

The Contractor was in full compliance with 4 of 11 applicable areas of CAD's Contract Compliance Review: Educational and Independent Living Program Services; Health and Medical Needs; Personal Rights and Social/Emotional Well-Being; and Personnel Files.

For the purpose of this review, six DCFS placed children were selected for the sample. CAD reviewed the files of the six selected children to assess the level of care and services they received, all six children were pre-verbal. . An additional four discharged children's files were reviewed to assess the FFA's compliance with permanency efforts.

CAD reviewed four RFHs files and four staff files for compliance with Title 22 Regulations and County contract requirements. CAD also conducted telephonic interviews with staff and the Resource Family Parents (RFPs). To assess the quality of care and supervision provided to the placed children, DCFS conducted virtual site visits at the RFHs.

CAD noted findings in the areas of:

Priority 1

- Resource Family Home Requirements
 - Megan's Law searches were not individually conducted; and
 - Caregiver transporting children did not have a valid vehicle insurance.

Priority 2

- General Contract Requirements
 - Disaster drills were not conducted or documented; and
 - Special Incident Reports (SIRs) were not properly documented.
- Facility & Environment
 - Vehicles used to transport children were not well maintained and in good repair as the maintenance inspections were not conducted timely.
- Engagement & Teamwork
 - Children have not had Child and Family Team (CFTs) meetings and participants have not been identified; and
 - Children have not had CFTs; therefore, meetings and collaboration have not been documented; and
- Children have not had CFTs; therefore, Needs and Services Plans (NSPs) goals were not identified in the CFTs
- Permanency
 - Permanency transition services were not identified in the NSPs or CFTs; and
 - NSPs have not been documented if transition services were provided; and
 - NSPs have not been documented if transition plans were provided to each child upon initial entry.

Priority 3

- Needs and Services Plans
 - NSPs were not developed timely and were missing
- Personal Needs/Survival and Economic Well-Being
 - Children were not encouraged or supported in keeping a life-book.

On May 19, 2020, the DCFS CAD Children Services Administrator I and II and Out-of-Home Care Management Division Quality Assurance Specialist held a virtual exit conference with the Contractor's representatives.

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:amt

Attachments

c: Fesia Davenport, Acting Chief Executive Officer
Arlene Barrera, Auditor-Controller
Raymond Leyva, Interim Chief Probation Officer
Public Information Office
Audit Committee
Sue Evans, Chief Operations Officer, Walden Environment dba Walden Family Services
Kellee Coleman, Regional Manager, Community Care Licensing Division
Monique Marshall-Turner, Regional Manager, Community Care Licensing Division



LA County FFA Contract Monitoring Review CAP Addendum

Date: Submitted on July 20, 2020

Re: FFA Monitoring Review Field Exit Summary from May 19, 2020

The following Corrective Action Plan Addendum is being submitted by Walden Family Services for approval in response to the Foster Family Agency Monitoring Review Field Exit Summary which was reviewed in person with Walden administrative team on May 19, 2020.

Section I. General Contract Requirements

Area of Non-Compliance #4: The FFA ensured disaster drills were conducted and documented in the RFP's case files, occurring at a minimum of every six (6) months.

#4. There is no record of disaster drills were conducted at RFH #4, agency reported RFP's #4 have not been properly and timely documenting them and they will be instructed on completing them timely.

Cause of Non-Compliance: Protocol not followed

RFP did not appropriately document disaster drills on their monthly paperwork. WSW did not review paperwork appropriately and correct RFP.

CAP to correct this area: Training

Training: RFP will be retained by Walden Program Director on the requirements and documentation of emergency drills, this was completed on 6-24-2020. All WSW will be retrained on the requirements and documentation of emergency drills. This will be completed on 6-30-20.

Area Of Non-Compliance #6 b: Special Incident Reports (SIRs) are properly documented.

#6b. Properly cross – reported on the I-Track system: Child 2 (1-20-20) and Child 5 (11-14-19) had reportable incidents that were not submitted to the I-Track system.

Cause of Non-Compliance: Protocol not followed

Walden Social Workers did not follow established protocol in alerting supervisors when incidents occurred and drafting special incident reports.

CAP to correct this area: Training and Discipline

Training: All Walden direct care staff attended training on SIR reporting on April 17, 2020. All staff were trained on the expectations of licensing and the Los Angeles County contract Exhibit A in regards to reporting procedures. Policies reviewed included reporting timeliness, reportable incidents, and Walden's incident report processes. Staff will receive a review of this training on July 7, 2020 as a follow up and in review of review results.

Discipline: Any Walden Social Worker who fails to report a reportable incident will be retrained in the procedures and expectations, if the issue continues they will be placed on a Performance Improvement Plan. If the employee continues to not follow Walden policy in reporting of incidents action could be taken toward employee termination.

What Walden Quality Assurance Department will do to maintain compliance.

The Quality Assurance (QA) Department will include quarterly audits for compliance in the SIR reports. Audits will include timeliness, accuracy, completion, and submission. QA department will communicate deficiencies in reporting to Walden Program Director for disciplinary action. QA results will be used to explore process changes that can improve outcomes as well as identify staff performance issues.

Section II. Resource Family Home Requirements

Area Of Non-Compliance #7: The FFA conducted Megan's Law search on RFPs and other adults residing in the RFH.

#7 Megan's Law searches were not conducted individually for each RFP's and other adults residing in the RFHs. Agency reported that the Megan's Law searched were only conducted to the RFH's addresses.

Cause of Non-Compliance: Walden Recruiter did not follow established protocol in completing Megan's Law searches.

CAP to correct this area: Training and Discipline

Training: Walden Recruiter will be retrained by Walden Senior Recruiter on completion of Megan's Law searches. This retraining will be completed by June 30, 2020. Walden Recruiter will conduct all searches appropriately for all approved Resource Homes by July 15, 2020 and will continue to do so moving forward.

Discipline: Walden Recruiter will complete Megan's Law searches appropriately. Failure to do so will result in the employee being placed on a Performance Improvement Plan. If that is not successful further disciplinary action can be taken.

What Walden Quality Assurance Department will do to maintain compliance

The Quality Assurance (QA) Department will work with Walden Program Director to maintain adequate review of Megan's Law searches and contract compliance. Program Director will ensure all recruiting staff are trained in all recruiting procedures.

Area of Non-Compliance #11: Case files include copied of current and valid driver's licenses and proof of insurances for ALL adults identified to transport the children.

#11 RFPs #1 have their valid CDLs and vehicle insurance; however, the children's live-in alternative caregiver, who also transports the children, does not have valid vehicle insurance of proof of insurance on file.

Cause of Non-Compliance: Alternate care provider does not have her own vehicle and therefor does not have her own insurance policy. RFP allows alternate care provider to utilize the family car insolated situations to transport the children in the event the RFP are unavailable. Because of the rarity of these circumstances of transporting the children they allowed her to utilize the insurance coverage they carry on their car covering the car and not a specific driver.

CAP to correct this area: Resource Parent Agreement, Retraining on recruiting protocol

Resource Parent Agreement: Resource Parents have agreed to add alternate care provider to their insurance policy effective 6-18-20. A copy of the declaration of insurance page has been provided to Walden and will be provided to the reviewer with this document.

Retraining on Recruiting Protocol: Walden Recruiter will be retrained on the protocol and procedures for alternate care providers being approved to transport clients. Walden recruiter will utilize the forms indicated in the procedure to track and monitor those individuals approved to transport clients. Walden Recruiter will verify which alternates are approved to transport clients. This will be completed by July 31, 2020.

Section III. Facility & Environment

Area of Non-Compliance #13: Vehicles used to transport children were well maintained and in good repair.

#13 RFP's #1's vehicles used to transport DCFS children had a lapse in between vehicle inspections of 4 months on the Ford vehicle and 8 months on the Toyota. RFPs #4's Ford vehicle used to transport DCFS child had a lapse in between vehicle inspections of 10 months.

Cause of Non-Compliance: RFP notified Walden Recruiter of ownership and use of other vehicles during the time period of the lapse. Walden Recruiter failed to accurately document the non-operation of the vehicles in question.

CAP to correct this area: Change in procedure

Change in Procedure: Walden Social Worker will verify monthly on the home inspection form which cars are owned by the RFP. Any changes will be reported to the recruiting department. All vehicles owned by the RFP will be required to have vehicle inspection forms unless the vehicle is registered non-operational by the California Department of Motor vehicles.

What Walden Quality Assurance Department will do to maintain compliance

The Quality Assurance (QA) Department will assist Walden Program Director and Walden Senior Recruiter in the implementation of the use of the new documentation. QA will monitor the outcomes from new process and will modify those process as needed.

Section IV. Engagement & Teamwork

Area of Non-Compliance #20: CFT participants have been identified or the FFA has documented efforts to obtain the information.

#20 Children have not had CFT meetings nor does the agency have documented efforts of engagement or participation in CFT meetings and their collaboration.

Area of Non-Compliance #21: The FFA documented efforts to participate in the children's CFT meetings and collaboration.

#21 Children have not had CFT meetings nor does the agency have documented efforts of engagement or participation in CFT meetings and their collaboration

Area of Non-Compliance #22: The NSP goals reflected the child's CFT recommendations if shared with the FFA.

#22 Children have not had CFT meetings; therefore, their NSPs goals do not reflect the CFT recommendations.

Cause of Non-Compliance: Walden Social Worker failed to make regular requests to the DCFS worker to schedule CFTM. On the occasions that CFTMs were requested and denied, Walden Social Worker failed to appropriately document their communications with DCFS.

CAP to correct this area: Change in Protocol and Training

Change in Protocol: Walden Social Workers will request CFTM starting at placement of a client. They will attempt to schedule the meeting with their NSP meeting. Workers will continue to make requests for CFTMs monthly until a meeting is scheduled. Walden Program Director drafted Walden policy for Walden Social Worker to submit their written requests for CFTMs during the quarter to their supervisor when submitting their NSPs for review. Walden Social Worker will then submit these requests with the NSP to the CSW and CSWS when requesting signatures.

Training: Walden Social Workers and Social Work Supervisors were trained on this new procedure on June 2, 2020. Requests for CFTMs will be made for all LA county dependents by June 30, 2020.

What Walden Quality Assurance Department will do to maintain compliance

The QA department will assist Walden Program Director in the drafting of the content of NSPs policy addressing CFTM requests and documentation of those requests. They will also assist in the implementation of that policy. The QA department will assess the need for quarterly auditing of

requests for CFTMs. QA results will be used to explore process changes that can improve outcomes as well as identify staff performance issues

Section V. Needs and Services Plans

Area of Non-Compliance: #23 The NSPs were completed accurately and on time

#23a. Developed timely - Children #5 & #6 5-21-19 NSPs are missing. Agency was unable to provide copies for review.

Cause of Non-Compliance: The worker and supervisor responsible for this occurrence left Walden at the end of May and did not complete the appropriate documents before her exit.

CAP to correct this area: Training

Training: All Walden Social Workers and Supervisors completed training on June 2, 2020. During this training all staff were provided with the timelines required as well as the email addresses needed for submission to LA County offices.

#23b. Are comprehensive and accurate

#23c. Included Case Plans and Concurrent Case Plan

Cause of Non-Compliance: Over the past year Walden has hired and implemented training of a new supervisor and social workers. Gaps in their training will be addressed.

CAP to correct this area: Change in Policy and Training

Change in Policy: Walden Program Director and QA department drafted a new policy outlining and defining expected content in NSPs to ensure all areas have detailed information to meet the county contract. In the event that both Social Worker and Social Worker supervisor leave the agency with outstanding reports to be completed, the new staff will review case notes and previous records in order to draft the documents with the noted disclaimer that the information was provided from previous staff.

Training: All Walden Social Workers and Supervisors were trained on the new policy outlining NSP content. Training was completed on June 2, 2020.

What Walden Quality Assurance Department will do to maintain compliance

The Quality Assurance Department will assist in the training of new staff. They will provide support in the training of supervisors to review NSPs for the appropriate content and with the implementation of the new policy.

#23e. Signed by RFP's

#23g. Signed by CSW/DPO (or documented efforts to obtain signatures)

Cause of Non-Compliance: Walden Social Workers failed to obtain signatures for NSPs or failed to document their attempts to obtain these signatures.

CAP to correct this area: Training and Discipline

Training: Walden Social Workers were trained according to NSP timeline policy on April 17, 2020 on the documentation of NSP signatures and the requests to obtain these signatures.

Discipline: Walden Social Workers who continue to fail to document their attempts will be placed on a Performance Improvement Plan for correction.

What Walden Quality Assurance Department will do to maintain compliance

The Quality Assurance Department will continue to assist in the tracking NSP signatures through quarterly audits and provide the data to FFA staff for tracking and improvement.

Section VI. Permanency

Area of Non-Compliance #31: The FFA provided placement transitions and services identified in the NSP or CFT.

#31. Children's NSPs did not identify their placement transition services. Children have not had CFTs either to address permanency plans.

Area of Non-Compliance #32: Transition support Services are provided to ensure the successful transition to permanent home based care.

#32. Children's NSPs have not documented if transition support services are provided to ensure the successful transition to permanent home based care. Children have not had CFTs either.

Cause of Non-Compliance: Walden Social Worker failed to make regular requests to the DCFS worker to schedule CFTM. On the occasions that CFTMs were requested and denied, Walden Social Worker failed to appropriately document their communications with DCFS.

CAP to correct this area: Change in Protocol and Training

Change in Protocol: Walden Social Workers will request CFTM starting at placement of a client. They will attempt to schedule the meeting with their NSP meeting. Workers will continue to make requests for CFTMs monthly until a meeting is scheduled. Walden Program Director drafted Walden policy for Walden Social Worker to submit their written requests for CFTMs during the quarter to their supervisor when submitting their NSPs for review. Walden Social Worker will then submit these requests with the NSP to the CSW and CSWS when requesting signatures.

Training: Walden Social Workers and Social Work Supervisors were trained on this new procedure on June 2, 2020. Requests for CFTMs will be made for all LA county dependents by June 30, 2020.

Section X. Personal Needs/Survival and Economic Well-Being

Area of Non-Compliance: #63 The FFA ensures that children are encouraged and supported by the RFP's in keeping a life book.

#63. Child #4 has no life-book, per RFP who reported that had not kept a life book.

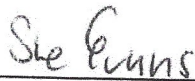
Cause of Non-Compliance: The RFP has created a wall in child's room and filled it with photos they have taken and obtained for child. They have not kept his memories in a book.

CAP to correct this area: Training

Training: All Walden Social Workers and RFP will be retrained regarding the structure and requirements for life books, ensuring that the books are portable and easily moved with child. This will be completed by July 14, 2020.



Nicole Stevens – Program Director



Sue Evans – Chief Operations Officer