



BRANDON T. NICHOLS  
Director

JENNIE FERIA  
Chief Deputy Director

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

510 S. Vermont Avenue, Los Angeles, California 90020  
(213) 351-5602



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August 7, 2025

To: Supervisor Kathryn Barger, Chair  
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*Cynthia M. Miller for*  
From: Brandon T. Nichols  
Director

### FLORENCE CRITTENTON SERVICES OF ORANGE COUNTY TRANSITIONAL HOUSING PLACEMENT PROGRAM FOR NON-MINOR DEPENDENTS CONTRACT COMPLIANCE REVIEW

#### REVIEW OF REPORT

The Department of Children and Family Services (DCFS) Contract Compliance Division (CCD) conducted a virtual Contract Compliance Review of Florence Crittenton Services of Orange County Transitional Housing Placement Program for Non-Minor Dependents (THPP-NMD) (the Contractor) in March 2025. The Contractor has four licensed sites all located in Orange County. The sites provide services to the County of Los Angeles DCFS and Probation NMDs between the ages of 18-21 and their children, and NMDs in Orange County.

#### Key Outcomes

NUMBER OF PRIORITY FINDINGS
PRIORITY 1 19
PRIORITY 2 0
PRIORITY 3 2

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

The CCD conducted a virtual Contract Compliance Assessment review of the Contractor's compliance within the following applicable areas: Licensure and Certificate of Compliance; Personnel/Staffing; Contractor/Agency Reports; THPP-NMD Participants Record Folder/Case File; THPP-NMD Participant Training; Education and Employment; Medical and Dental; and Program Exit/Aftercare Follow Up and Tracking.

The Contractor was in full compliance with 5 of 8 applicable areas of the CCD's Contract Compliance Review: Licensure and Certificate of Compliance; Contractor/Agency Reports; THPP-NMD Participant Training; Education and Employment; and Medical and Dental.

For the purpose of this review, one DCFS NMD was selected for the sample. The CCD reviewed the records and files of the one selected NMD to assess the level of care and services they received. An additional one discharged NMD file was reviewed to assess the Contractor's compliance with permanency efforts. The CCD reviewed one staff file for compliance with Title 22 Regulations and County contract requirements.

The CCD noted findings in the areas of:

**Priority 1**

- Personnel/Staffing (16 Findings)
  - Staff did not complete the *Child Abuse Identification and Reporting* training.
  - One staff did not complete the *Characteristics of person 16-21 years of age placed in long-term foster care* training.
  - Staff did not complete the *AB 12/Extended Foster Care* training.
  - Staff did not complete the *Involving Law Enforcement* training.
  - Staff did not complete the *Cultural Competency and Sensitivity* training.
  - Staff did not complete the *Shared Core Practice Model* training.
  - Staff did not complete the *Trauma-Informed Care* training.
  - Staff did not complete the *Commercial Sexual Exploitation of Children (CSEC)* training.
  - Staff did not complete the *LBGTQ (Lesbian, Gay, Bi-Sexual, Transgender, Questioning) Youth* training.
  - Staff did not complete the *Medical Marijuana* training.
  - Staff did not complete the *Objectivity in case notes and Special Incident Report (SIR) documentation* training.
  - Staff did not complete the *General Guidelines of the Statement of Work* training.
  - The Contractor did not maintain documentation providing the Contract Program Monitor (CPM) with a signed statement on agency letterhead certifying all staff

- completed the required trainings, as outlined in the Statement of Work, within one year of commencing employment.
- The Contractor did not maintain documentation of providing the CPM with a signed statement on agency letterhead confirming each staff/volunteer met the qualifications (including education and experience) for each position and has received necessary training(s) and background clearances.
- The Contractor did not maintain documentation of certifying employees by submitting to the CPM on agency letterhead, verification of fingerprinting clearances, Child Abuse Index clearance and training prior to the staff (employee or volunteer) commencing work with the NMDs.
- The Contractor did not ensure that all staff having direct contact with the NMDs received 20 hours of annual training (in addition to CPR/First Aid).
- Record Folder/Case File (3 Findings)
  - Documentation did not support the Case Manager making daily contact with the NMD.
  - Written authorization from the Children's Social Worker/Deputy Probation Officer was not obtained prior to decreasing daily contact to no less than twice a week.
  - Face-to-face contact was not maintained weekly by the Case Manager.

### ***Priority 3***

- Program Exit/Aftercare Follow-Up and Tracking (2 Findings)
  - The Contractor did not complete and provide the THPP-NMD Participant Exit Assessment (A-31) to the CPM by the due date.
  - The Contractor did not complete and provide the THPP-NMD Participant Termination Report (A-20) and all accompanying documents to the CPM by the due date (within 21 business days after exit).

On January 16, 2025, DCFS' CCD Children Services Administrator team and Supportive Housing Division THPP-NMD County Program Manager held an exit conference with the Contractor's representative.

The Contractor's representative agreed with the review findings and recommendations, and was 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 deficiencies in this compliance report.

Each Supervisor  
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If you have any questions, your staff may contact me or Aldo Marin, Board Relations Manager, at (213) 371-6052.

BTN:CMM  
RW:DF:ms

#### Attachments

c: Fesia Davenport, Chief Executive Officer  
Oscar Valdez, Auditor-Controller  
Guillermo Viera Rosa, Chief Probation Officer  
Public Information Office  
Audit Committee  
Douglas Yost, Chief Executive Officer, Florence Crittenton Services of Orange County  
Kellee Coleman, Assist Program Administrator LA Region, CCLD  
Bernice Karnsrithong, Regional Manager, Community Care Licensing  
Monique Marshall-Turner, Regional Manager, Community Care Licensing  
Celeste M. Fitchett, MSW, CDSS Bureau Chief Fiscal & Performance Audits

## Corrective Action Plan for THPP NMD-LA

LA Regional Office

### B-2 Required Training-Staff, Interns, Volunteers

#### Standard:

#### Community Locations

Los Angeles County  
Orange County  
Riverside County

Agency ensured all staff, interns, and volunteer personnel completed required trainings (a minimum of 1-hour in the following areas, prior to or within 90 days of employment) and maintained documentation:

Crittenton Services established a training plan for staff serving the needs of the Transitional Housing Program for Non-Minor Dependents in Los Angeles County; however, due to human error, the training plan was not assigned in the Relias, the agency used training platform.

#### Corrective Action:

The following corrective action has been taken: all staff associated with the Transitional Housing Program for Non-Minor Dependents for Los Angeles County (THPP NMD-LA) are assigned trainings meeting the requirements for the identified courses through Relias, the online training application to which Crittenton is subscribed, as well as training during the onboarding process. The Program Manager will ensure that each staff member completes onboarding training via obtaining notification from Relias as to staff progress no less than once per month.

Course	Relevant Trainings
Child Abuse identification and reporting	Abuse Reporting Procedure & Onboarding
Characteristics of persons 16-21 years of age placed in long-term foster care	Addressing the Behavioral Health Needs of Transitional Age Youth
AB 12/Extended Foster Care	Onboarding Discussion
Involving Law Enforcement	Reducing Police Involvement
Cultural Competency and Sensitivity	Implicit Bias and Microaggressions; Cultural Competency (DMH)
Shared Core Practice Model	Integrated Core Practice Model
Trauma Informed Care	An Overview of Trauma Informed Care for Non-Clinical Staff; 3 Questions to Help Build Reparative Relationships in Trauma Informed Care
Commercial Sexual Exploitation of Children (CSEC)	Commercial Sexual Exploitation of Children Awareness
LGBTQ (Lesbian, Gay, Bi-Sexual, Transgender, Questioning) Youth	Creating LGBTQ Inclusive Spaces; HRC ACAF Introduction to LGBTQ Competency
Medical Marijuana	Marijuana and Cannabinoids: effects & potential Medicinal Uses
Objectivity in case notes and Special Incident Report (SIR) documentation	Onboarding process and Special Incident Report Procedure
General Guidelines of the Statement of Work	Onboarding Discussion and



Attached please find the transcript of the identified THP NMD LA Case Manager's trainings.

### **B-3 THPP-NMD Staff Annual Training**

#### Standard:

Contractor ensured that all THPP-NMD staff having direct contact with the THPP-NMD Participants, received 20 hours annual training (in addition to CPR/First Aid).

The training records provided indicate the employee only completed 10.5 hours of annual training.

#### Corrective Action:

Crittenton Services established a training plan for staff serving the needs of the Transitional Housing Program for Non-Minor Dependents in Los Angeles County; however, due to human error, the training plan was not assigned in the Relias, the agency used training platform. The following corrective action has been taken: all staff associated with the THPP-NMD-LA program are assigned trainings to meet the minimum 20 hours per year. The Program Manager will ensure that each staff member completes annual training requirements via obtaining notification from Relias as to staff progress no less than once per month.

Attached please find the transcript of the identified THP NMD LA Case Manager's trainings.

### **D-2 Case Management Contacts**

#### Standard:

Is there documentation to support the Case Manager made daily contact with the NMD (Upon initial placement-in person or via text, email, social media or telephone)

Was written authorization from the CSW/DPO obtained prior to decreasing daily contact to no less than twice a week?

Was face-to-face contact maintained weekly by the Case Manager?

#### Corrective Action:

Email communication with the CSW was discovered indicating that CSW was aware of the decreased contact with the identified Participant. The CSW did not respond to the email with an acknowledgement of agreement.

The Reduced Contact Request form has been updated to provide a signature of the CSW/DPO. A reduction in daily contact will not take place until the Case Manager obtains signature from the CSW/DPO. The Program Manager will ensure compliance via documentation on the Chart Audit tool as well as in Supervision Notes

Please see the attached documents: Reduced Contact Request form and THP Chart Audit (THPP- NMD LA).



## H. Program Exit

### Standard:

Did the Contractor complete and provide the THPP-NMD Participant Exit Assessment (A-31) to CPM by the due date?

Did the Contractor complete and provide the THPP-NMD Participant Termination Report (A-20) and all accompanying document to the CPM by the due date (within 21 business days after exit)?

Exit Assessment was signed 46 days after the exit date. The form completion date is not listed. The form was not submitted. Unable to confirm

### Corrective Action:

The Participant exited the program while in another country. The Case Manager had knowledge of this, but it was not written on the document nor was it documented in the Participant's record. This resulted in late submission of final documentation.

The Program Manager maintains a tracking tool to identify necessary documentation dates for the county. Due dates for documents are reviewed during weekly Supervision with the Case Manager. Vice President will review Program Manager's tracking tool each month for 3 consecutive months to ensure compliance.

*Audrey Fisher-Price*

Audrey Fisher-Price, LCSW  
VP of Community Based Programs  
06.05.25

