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July 10, 2014

To: Supervisor Don Knabe, Chairman
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From: Philip L. Browning
Director

ROSEMARY CHILDREN'S SERVICES FOSTER FAMILY AGENCY CONTRACT COMPLIANCE MONITORING REVIEW

The Department of Children and Family Services (DCFS) Out-of-Home Care Management Division (OHCMD) conducted a review of Rosemary Children's Services Foster Family Agency (the FFA) in November 2013. The FFA has two licensed offices; one located in the Fifth Supervisorial District; and one office in Riverside County and provides services to County of Los Angeles DCFS foster children and youth. According to the FFA's program statement, its mission is "to recruit, train and monitor Foster Family Agency, Intensive Treatment Foster Care (ITFC), and Whole Foster Family Home (WFFH) foster parents who can offer nurturing, supportive treatment environments to children ages birth to 17, and also to non-minor dependents."

At the time of the review, the FFA supervised 118 DCFS placed children in 58 certified foster homes. The placed children's average length of placement was nine months and their average age was seven years old.

SUMMARY

During our 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. However, two youths placed in the same certified foster home reported not being comfortable in their home environment. 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 5 of 11 sections of our program compliance review: Facility and Environment; Health and Medical Needs; Psychotropic Medication; Discharged Children; and Personnel Records.

OHCMD noted deficiencies in the following areas: Licensure/Contract Requirements, related to Community Care Licensing (CCL) citations and the FFA's failure to conduct assessments of certified foster parents prior to placing more than two children in a certified foster home; Certified Foster Homes, related to missing home study and safety inspections prior to initial certification, one certified foster parent did not complete the required annual training and untimely annual vehicle maintenance for one certified foster parent; Maintenance of Required Documentation and Service Delivery, related to the FFA's failure to obtain DCFS Children's Social Workers (CSWs) signatures authorizing implementation of a child's Needs and Services Plans (NSPs), children not progressing toward meeting their NSP goals, Updated NSPs were not comprehensive, as they did not include all of the elements in accordance with the NSP template and the FFAs monthly contact with DCFS CSWs was not documented; Education and Workforce Readiness, related to children's files missing a current copy of report cards and/or progress reports and documentation that the FFA provided assistance to three children with poor grades; Personal Rights and Social Emotional Well-Being, related to two youths residing in the same certified foster home having reported not feeling safe, not providing a variety of fresh food, and not being treated with respect and dignity by their certified foster parent; and Personal Needs/Survival and Economic Well-Being, related to inconsistencies in the amount of monthly clothing allowance provided.

Attached are the details of our review.

REVIEW OF REPORT

On February 28, 2014, the DCFS OHCMD Monitor, Gladys Hidayat, held an Exit Conference with the FFA representatives Greg Wessels, Executive Director, Erin Ellis, FFA Program Director, and Tracy Alvarez, Quality Improvement Director. 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 the recommendations have been implemented and will provide technical assistance during our next visit to the FFA in July 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:gh

Attachments

c: William T Fujioka, Chief Executive Officer
John Naimo, Acting Auditor-Controller
Public Information Office
Audit Committee
Greg Wessels, Executive Director, Rosemary Children's Services FFA
Erin Ellis, FFA Program Director, Rosemary Children's Services FFA
Lajuannah Hills, Regional Manager, Community Care Licensing

ROSEMARY CHILDREN'S SERVICES FOSTER FAMILY AGENCY
CONTRACT PROGRAM COMPLIANCE MONITORING REVIEW-SUMMARY

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Riverside, CA 92507
License Number: 336409997

	Contract Compliance Monitoring Review	Findings: November 2013
I	**Licensure/Contract Requirements** (7 Elements)	
	1. Timely Notification for Child's Relocation	1. Full Compliance
	2. Serious Incident Report Documentation and Cross Reporting	2. Full Compliance
	3. Runaway Procedures in Accordance with the Contract	3. Full Compliance
	4. Are there CCL Citations/OHCMD Safety Reports	4. Improvement Needed
	5. If Applicable, FFA Ensures Complete Required Whole Foster Family Home (WFFH) Training	5. Not Applicable
	6. FFA Pays Certified Foster Parents (CFP) WFFH Required Payments	6. Not Applicable
	7. FFA Conducts an Assessment of CFP Prior to Placement of Two (2) or More Children	7. Improvement Needed
II	**Certified Foster Homes (CFHs)** (12 Elements)	
	1. Home Study and Safety Inspection Prior to Certification	1. Improvement Needed
	2. Agency's Inquiry with OHCMD for Historical Information Prior to Certification	2. Full Compliance
	3. Timely Criminal Clearances (DOJ, FBI, CACI) Prior to Certification	3. Full Compliance
	4. Timely, Completed, Signed Criminal Background Statement	4. Full Compliance
	5. Health Screening & TB Test Prior to Certification	5. Full Compliance
	6. All Required Training Prior to Certification	6. Full Compliance
	7. Certificate of Approval on File/Including Capacity	7. Full Compliance
	8. Safety Inspections Completed At Least Every Six Months or Per Approved Program Statement	8. Full Compliance
	9. Completed Annual Training Hours for Re-certification and Current CPR/First-Aid/Water Safety Certificates	9. Improvement Needed
	10. Current CDL/Auto Insurance/Annual Vehicle Maintenance Documentation for CFPs and Designated Drivers, if Applicable Car Seat(s)	10. Improvement Needed
	11. Criminal Clearances and Health Screening/CDL/CPR/DOJ/FBI/CACI/Auto Insurance for Other Adults in the Home	11. Full Compliance
	12. FFA Assists CFPs in Providing Transportation Needs	12. Full Compliance

III	**Facility and Environment** (7 Elements) 1. Exterior/Grounds Well Maintained 2. Common Areas/Interior Well Maintained 3. Children's Bedrooms/Interior Well Maintained 4. Sufficient and Appropriate Educational Resources 5. Adequate Perishable and Non-Perishable Food 6. Disaster Drills Conducted and Documentation Maintained 7. Money and Clothing Allowance Logs Maintained	Full Compliance (All)
IV	**Maintenance of Required Documentation/Service Delivery** (10 Elements) 1. FFA Obtains or Documents Efforts to Obtain County Children's Social Worker's (CSW) Authorization to Implement NSPs 2. CFPs Participated in Development of the NSPs 3. Children Progressing Towards Meeting NSP Goals 4. FFA Social Workers Develop Timely, Comprehensive Initial NSP with Child's Participation 5. FFA Social Workers Develop Timely, Comprehensive Updated NSPs with Child's Participation 6. Therapeutic Services Received 7. Recommended Assessments/Evaluations Implemented 8. County Children's Social Workers Monthly Contacts Documented in Child's Case File 9. FFA Social Workers Develop Timely, Comprehensive Quarterly Reports 10. FFA Social Workers Conduct Required Visits	1. Improvement Needed 2. Full Compliance 3. Improvement Needed 4. Full Compliance 5. Improvement Needed 6. Full Compliance 7. Full Compliance 8. Improvement Needed 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 in Meeting Children's Educational Goals 3. Current Children's Report Cards/Progress Reports Maintained 4. Children's Academic Performance and/or Attendance Increased 5. FFA Facilitates Child's Participation in YDS or Equivalent Services and Vocational Programs	1. Full Compliance 2. Full Compliance 3. Improvement Needed 4. Improvement Needed 5. Full Compliance

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	Full Compliance (ALL)
VII	**Psychotropic Medications** (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 in the CFP Home 3. CFPs' Efforts to Provide Nutritious 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 of Their Choices 7. Children's Chores Reasonable 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	1. Full Compliance 2. Improvement Needed 3. Improvement Needed 4. Improvement Needed 5. Full Compliance 6. Full Compliance 7. Full Compliance 8. Full Compliance 9. Full Compliance 10. Full Compliance
IX	**Personal Needs/Survival and Economic Well-Being** (7 Elements) 1. $50 Clothing Allowance Provided in Accordance with FFA Program Statement 2. Ongoing Clothing Inventories of Adequate Quantity and Quality 3. Children's Involvement in Selection of Their Clothing 4. Provision of Sufficient Supply of Clean Towels and Personal Care Items Meeting Ethnic Needs 5. Minimum Weekly Monetary Allowances 6. Management of Allowance/Earnings 7. Encouragement/Assistance with Life Book/Photo Album	1. Improvement Needed 2. Full Compliance 3. Full Compliance 4. Full Compliance 5. Full Compliance 6. Full Compliance 7. Full Compliance

X	**Discharged Children** (3 Elements) 1. Completed Discharge Summary 2. Attempts to Stabilize Children's Placement 3. Child Completed High School (if applicable)	Full Compliance (ALL)
XI	**Personnel Records** (9 Elements) 1. Criminal Clearances (DOJ, FBI, CACI) Signed and Submitted Timely 2. Timely, Completed, Signed Criminal Background Statement 3. FFA Social Workers Met Education/Experience Requirements 4. Timely Employee Health Screening/TB Clearances 5. Valid CDL and Auto Insurance 6. FFA Employees Signed Copies of FFA Policies and Procedures 7. FFA Employees All Required Training and Documentation Maintained 8. FFA Social Workers Have Appropriate Caseload Ratio 9. FFA Maintained Written Declarations for Part-Time Contracted FFA Social Workers That Caseloads Not Exceed Total of 15 Children	Full Compliance (ALL)

ROSEMARY CHILDREN'S SERVICES FOSTER FAMILY AGENCY
CONTRACT COMPLIANCE MONITORING REVIEW
FISCAL YEAR 2013-2014

SCOPE OF REVIEW

The following report is based on a "point in time" monitoring visit. The compliance report addresses findings noted during the November 2013 review. The purpose of this review was to assess Rosemary Children's Services Foster Family 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, 12 children were selected for the sample. The Out-of-Home Care Management Division (OHCMD) interviewed 11 children, as one child was not interviewed due to the child's young age. The child was observed to be well cared for in a safe and nurturing home environment. OHCMD reviewed all 12 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, two children were prescribed psychotropic medications. We reviewed their case files to assess for timeliness of Psychotropic Medication Authorizations and to confirm the required documentation of psychiatric monitoring.

OHCMD reviewed five certified foster parent files and five staff files for compliance with Title 22 Regulations and County contract requirements. Interviews were conducted with five certified foster parents to assess the quality of care and supervision provided to the children.

CONTRACTUAL COMPLIANCE

OHCMD found the following six 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 a CCL complaint. According to a CCL complaint investigation report dated April 23, 2013, CCL substantiated Neglect/Lack of Supervision when it was discovered that the certified foster parents failed to provide a foster youth with transportation from the

train station back to the certified foster home when the youth had no other means of transportation. Further, the certified foster parent failed to report the incident immediately to the FFA.

Since the FFA had already decertified the foster home for failure to meet agency standards, no Plan of Correction (POC) was required by CCL. This referral was investigated by Department of Children and Family Services, Emergency Response Children's Social Worker (ER CSW) and the allegations of general neglect were deemed inconclusive. Out-of-Home Care Investigations Section (OHCIS) investigated this referral and although the allegations were deemed inconclusive, the FFA decertified the foster home for failure to comply with agency policy/procedures and insufficient supervision of placed children, which resulted in the placed children being removed. OHCIS placed the certified foster home on an Indefinite Hold and it will no longer be used as a placement resource for DCFS children.

- On April 15, 2013, CCL cited the FFA as a result of deficiencies and findings during the investigations of CCL complaint of Physical Plant violation. According to the report dated June 12, 2013, during CCL's Analyst visit to a certified foster home, it was observed that the floor heater in the living room hallway did not have a cover.

CCL requested a POC, which required the heater not to be used until a cover was in place. The FFA provided CCL with verification that the deficiency had been corrected. The POC was approved by CCL on June 12, 2013.

- On December 23, 2013, CCL cited the FFA as a result of deficiencies and findings during the investigations of CCL complaint of Building & Grounds violation. According to the report dated December 23, 2013, during CCL's Analyst visit to a certified foster home, it was observed that a plastic bottle of bleach was found in the cabinet under the sink of the bathroom being used for children.

The cabinet had a safety lock, however, it was broken. The Plan of Correction (POC) required the cleaning solutions be inaccessible to small children. The FFA provided CCL with verification that the deficiency had been corrected. The POC was approved by CCL on January 2, 2014.

- The FFA failed to follow contractual requirements by placing more than two children in a certified foster home prior to conducting an assessment, which would justify the certified foster parent's ability to provide quality care and meet the needs of additional placed children.

Recommendations

The FFA's management shall ensure that:

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

2. An assessment of the certified foster parent's ability to provide quality care for more than two children is conducted prior to placing additional child(ren) in a certified foster home.

Certified Foster Homes

- For 1 of 5 certified foster parents in the sample that was certified in 2002 OHCMD found no documentation in the certified foster parent's case file indicating that a safety inspection was conducted prior to initial certification. Further, the certified foster parent's Home Study was signed three days after the date of certification.

- One certified foster parent did not complete the minimum 15 hours of annual training. Only 12 hours were completed timely; the additional training hours required were completed approximately 2 ½ months late.

- One certified foster parent's Vehicle Maintenance Safety check was untimely. The safety check was completed approximately 7 months after the due date.

Recommendations

The FFA's management shall:

3. Ensure all Home Studies and Safety Inspections are conducted prior to certification.

4. Ensure all certified foster parents complete the minimum 15 hours of annual training.

5. Ensure all certified foster parent's Annual Vehicle Maintenance Safety check is timely.

During the Exit Conference, the FFA's representative stated that the FFA will monitor certified foster parents' files to ensure all required documents are obtained timely and that annual training requirements are met in accordance with the County contract. The FFA Director will now review and approve all home studies and safety inspections prior to certifying any new foster parents and no foster parent will be certified unless all necessary documents are obtained.

Maintenance of Required Documentation and Service Delivery

- For five of twelve children cases reviewed, the FFA did not obtain or document efforts to obtain the DCFS CSW's signatures authorizing implementation of the Needs and Services Plan (NSP) timely.

- Two children were not progressing toward meeting their NSP goals and their NSPs did not include specific tasks/services to be provided to assist the children in achieving their goals.

- Seven children's Updated NSP goals were not comprehensive, as they did not include all of the elements in accordance with the NSP template, specifically, goals were not specific and measurable. Further, the methods described and the services provided to assist the children towards achieving the goals were not specific.

- For two children, the FFA's monthly contact with their DCFS CSWs was missing from the children's files.

It should be noted that the FFA's representative attended the OHCMD's NSP training for providers on August 1, 2013, and was made aware of the NSP requirements. Some of the NSPs reviewed were developed subsequent to the training.

During the Exit Conference, the FFA's representative stated that all FFA social worker staff will be retrained on developing NSPs and requirements as specified in the County contract and Title 22. OHCMD received verification that the FFA social work staff was retrained on monthly contact with DCFS CSWs on January 29, 2014, and on developing NSPs, County contracts and Title 22 on March 25, 2014.

Recommendations

The FFA's management shall ensure:

6. CSW's signatures authorizing implementation of the Needs and Services Plan (NSP) are obtained in a timely manner.

7. Children are assisted in meeting their NSP goals and all efforts by the FFA are documented in the children's case files.

8. Children's NSP are comprehensive and completed in accordance with the NSP template.

9. CSWs are contacted monthly and documentation is maintained in the children's case files.

Education and Workforce Readiness

- For one child, OHCMD did not find a copy of a current report card/progress report in the child's case file.

- For three children who were doing poorly in school, there was no documentation indicating services were being provided by their respective certified foster parents or the FFA to assist them in increasing their academic performance.

The FFA representative stated that two of the children refused services. The FFA representative stated that the FFA will ensure that all educational services provided are documented in the NSP and in the children's case files.

Recommendations

The FFA's management shall ensure:

10. Children's report cards/progress reports are obtained timely and maintained in the children's case files.

11. Children's educational needs are closely monitored and children are provided with necessary services to assist them in increase academic performance.

Personal Rights and Social Emotional Well-Being

In one certified foster home:

- Two youths placed reported not feeling safe when they returned home from school because their certified foster parent was not home, which resulted in them waiting outside of the home for more than two hours.

The youth also reported that they would occasionally go to the neighbor's house until the certified foster mother returned home. Further, when the certified foster parent had errands to run, one youth reported she was dropped at the library for seven hours.

- The two youths also reported that their certified foster parent did not treat them with respect and dignity, as she talked behind their back and made inappropriate comments about them and their family.

- Additionally, the two youth reported that in general, the certified foster parent provides nutritious meals and snacks; however, there was no variety of food in the home and no fresh fruit juice. Further, the youth reported the certified foster parent has a set kitchen hours and after a certain time, they were not allowed to prepare food.

During the Exit Interview, the FFA Director stated that the certified foster parent denied that the children were left outside the home for a long time. The FFA supervisor re-trained all social work staff on conducting interviews that focus on assessing the children to determine if personal rights are being violated and if the children's safety is at risk. Further, the certified foster mother received training on Inappropriate Discipline and Personal Rights on February 25, 2014.

Recommendations:

The FFA's management shall ensure:

12. All certified foster home have an alternative plan for the care and supervision of children when the certified foster parent is not home.

13. Children are being treated with respect and dignity.

14. All certified foster home provides children with nutritious meals and snacks.

Personal Needs/Survival and Economic Well-Being

- For the two youths mentioned above, monthly clothing allowances were not consistent and did not always meet the required amount in accordance with the contract.

It was noted that the certified foster parent did not always provide the youth with a minimum of $50 clothing allowance as required. The FFA representative stated that the FFA social work staff will be retrained on monitoring the children's monthly clothing allowance.

Due to the concerns expressed by the two youths, a Child Protective Hotline Referral was generated on January 7, 2014, alleging general neglect of placed children by certified foster parent. DCFS ER CSW determined the allegation as unfounded; however, the FFA decertified the foster home for insufficient supervision, jeopardizing health, safety or well-being of placed children. OHCIS placed the home on an "Indefinite Hold" and it will no longer be used as a placement resource for DCFS children.

Recommendation

The FFA's management shall:

15. Ensure children's clothing allowance is in accordance with County contract requirements.

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

The OHCMD's last compliance report dated August 29, 2013, identified nine recommendations.

Results

Based on OHCMD follow–up, the FFA fully implemented 4 of 9 previous recommendations for which they were to ensure that:

- All certified foster parents obtain health screening and TB test prior to certification and recertification.
- All certified foster parents are trained to participate in the development and implementation of the placed children's NSPs.
- All placed children's Initial NSPs are comprehensive and follow the County contract requirements.
- Consequences received by a foster child should be in accordance with the child's Bill of Rights and meet the requirements of Title 22 regulations and approved by the child's CSW.

Based on OHCMD follow–up, the FFA did not fully implement 5 of 9 previous recommendations for which they were to ensure that:

- All FFA certified homes are in compliance with CCL regulations regarding children's safety/physical plant and other Licensure/ Contract Requirements.
- Ensure all certified foster parents completed the minimum of 15 hours of annual training.
- Ensure the FFA social workers monitor children's NSPs closely and ensure specific and necessary assistance is provided to assist the children in achieving their goals.
- Ensure all placed children's Updated NSPs are comprehensive and follow all County contract requirements.

- Ensure all placed children are provided with a variety of social activities and are given the opportunities to participate in extra-curricular activities and enrichment.

At the Exit Conference, the FFA's representatives expressed their desire to remain in compliance with all Title 22 Regulations and Contract requirements. The FFA Director and Quality Improvement Director have re-trained all FFA social work staff on Title 22 Regulations, Agency and DCFS policies. OHCMD will verify implementation of recommendations and will provide technical assistance during our next visit to the FFA in July 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.

Rosemary Children's Services
CARING FOR THE CHILD
TEACHING THE TEEN
FOSTERING THE FAMILY

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March 26, 2014
County of Los Angeles
Department of Children and Family Services
Out of Home Care Management Division
9320 Telstar Ave., Suite 216
El Monte, CA 91731
Attn: Rhonda David-Shirley

To: Ms. Rhonda David-Shirley
From: Erin Ellis, Foster Care Director, Rosemary Children's Services
Subject: Corrective Action Plan for the Performance Compliance Review of Rosemary Children's Services Foster Family Agency for 2013

Licensure/Contract Requirements

- **Rosemary Children's Services (RCS) FFA received 3 CCL citations for safety and physical plant deficiencies. RCS FFA has submitted the approved Plans of Correction to CCL.**

RCS Response: One of the citations was for a safety issue that occurred in April 2012 of substantiated neglect/lack of supervision of an 18 year old youth by the CFP. RCS had involuntarily decertified the home due to the incident in April 2012, as soon as the youth had been removed from the foster home. It is unknown why CCL did not investigate the issue until December 2012. The other two citations were for physical plant deficiencies, and in both cases the deficiencies were corrected and the proof of this was submitted and cleared by CCL. RCS will continue to conduct bimonthly home inspections of the Certified Foster Homes and train the foster parents on Title 22 regulations in order to ensure that we make every effort to be free of physical plant deficiencies and substantiated investigations.

- **RCS FFA did not consistently conduct an assessment of the Certified Foster Parent (CFP)'s home prior to placing more than two children in the home.**

RCS Response: It is the assigned RCS Foster Care Social Worker's (FCSW) responsibility to assess the CFP's home prior to placing more than two children. This is done using the Justification for Additional Placements form. The Foster Care Director, Erin Ellis, reviewed this with the FFA staff at the All Staff Meeting on March 25, 2014 (see attached agenda and forms). This review covered: how to complete the form, where the form is filed, ensuring that all of the dates and children's names are entered, and that the assessment should be detailed and clear. Additionally, the Supervising Foster Care Social Worker (SFCSW), Mary Ann Holmes, and Foster Care Director, Erin Ellis will be monitoring to ensure compliance.

Certified Foster Homes:

- **One CFP who was certified in 2002 had no documentation in her case files indicating that a safety inspection was conducted prior to the initial certification of the home. Further the Homestudy date was signed three days after her certification date. Since the certification occurred in 2002 and the certifying staff no longer works at the FFA, no information of the missing document can be obtained.**

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Child Welfare League of America
Foster Family-Based Treatment Association
Learning Disabilities Association
United Way

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RCS Response: As noted on the Performance Compliance Review Summary the foster parent who did not have the safety inspection in their file and their Homestudy was signed 3 days after their certification date, was certified in 2002. There is a contact note from 2005 indicating that the safety inspection was missing from the file. It is unknown if the form had been misplaced over time, or if it was not completed prior to certification. This Foster Care Director has been with Rosemary Children's Services for over 9 years, and as long as I have been working here it has been our policy that prior to certifying any new foster parents they must have an approved safety inspection and their Homestudy must have been completed and approved. Prior to certifying all families this Foster Care Director, Erin Ellis, reviews the complete file and if any of the required documents are missing the family is not certified until it is obtained/completed.

- **One CFP only completed 12 of the required minimum of 15 hours of annual training.**

RCS Response: RCS offers several options for how foster parents can obtain their 15 hours of annual training per year. A monthly foster parent support group/training is offered at each FFA office location, whereby the foster parents can obtain two hours of recertification training hours. Also, at the monthly FFA All Staff Meetings the Foster Care Director, Erin Ellis, provides the Foster Care Social Workers (FCSWs) with materials on specific topics in order for them to provide a mandatory one hour, in home training with each foster parent. The FCSWs also provide the foster parents with websites where they can do online training as well as dates and times of outside trainings offered in the community. The FCSWs are responsible for ensuring that the foster parents on their caseloads are obtaining 15 hours of training prior to their recertification date. At the All Staff meeting on March 25, 2014 the Foster Care Director, Erin Ellis, reviewed this with all of the FFA Staff (see attached agenda). Additionally, in order to monitor that the families are in compliance with completing their hours prior to their recertification date the Foster Care Director implemented a new requirement that on the 5th of every month the FCSWs are to email the Foster Care Director regarding when their CFPs recertification date is and how many training hours they currently have. If the recertification date is coming up and the foster parents are short on hours the FCSW will develop a plan to ensure the hours are completed before the recertification date.

- **One CFP's annual vehicle maintenance was not timely.**

RCS Response: The FCSW assigned to the home had been requesting the completed vehicle inspection from the Foster Parent. RCS has implemented a new Foster Parent Non-Compliance Protocol (see attached form) to address when foster parents are not compliant with agency policy and procedures whereby progressive actions will be taken including letters to the foster home, meetings with supervisors, placement holds and possibly decertification. At the FFA All Staff Meeting on March 25, 2014 the Foster Care Director, Erin Ellis, provided the FCSWs with the foster parent Monthly Training, which is on Foster Parent Requirements. The training consists of the: Certified Foster Family Requirements form, Foster Parent Non-Compliance Protocol, Monthly Clothing Expenditures Policy and Caretaker Regulations (see attached forms). The FCSWs will be conducting the trainings with their foster parents during

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their home visits. This training will be completed by April 15th, and the proof will be kept in the foster parent's agency file.

- **In one certified foster home, the designated caretaker's TB test was not timely obtained. Further the CFP's 18 year old son who is living in the home did not have a TB clearance. In another certified home the CFP's significant other who resides in the home also had untimely TB clearance.**

RCS Response: RCS requires that all adults that reside in the foster home and all back up caretaker's have TB clearances on file at the agency. The 18 year old son referenced in the Performance Compliance Review Summary did not turn 18 until after the time that the review occurred. RCS does have a copy of the son's TB clearance and this has been sent over to the OHC Monitor, Gladys Hidayat. At the time of certification the RCS Resource Family Recruiter, Liset Flores, is responsible for ensuring that these are received and in the file prior to certification of the home. As part of the pre-certification the CFP's sign the Caretaker Regulations form that clearly states that all back up caretaker's must submit a current TB test. After certification it is the Foster Parent's responsibility to inform their FCSW of any adult that moves into the home, biological child that turns 18 in the home, and any new caretaker for the home. The Foster Parents are required to obtain livescan clearances for these new adults and they are to submit a current TB test to the FCSW. The FCSW is responsible for ensuring that these new adults obtain the livescan clearances and that they submit the TB tests in a timely manner, and the FCSW is responsible for filing this in the agency FP file. At the All Staff Meeting on March 25, 2014 the Foster Care Director, Erin Ellis, reviewed this with the FFA staff and provided the FCSWs with the foster parent Monthly Training, which is on Foster Parent Requirements. The training covers that in order for FPs to be in compliance with agency policies all adults that live in the home and back up caretakers must have clearances and TB tests on file at the agency. The training consists of the: Certified Foster Family Requirements form, Foster Parent Non-Compliance Protocol, Monthly Clothing Expenditures Policy and Caretaker Regulations (see attached forms). The FCSWs will be conducting the trainings with their foster parents during their home visits. This training will be completed by April 15th, and the proof will be kept in the foster parent's agency file.

<u>Maintenance of Required Documentation and Service Delivery</u>

- **Five children's Needs and Services Plans (NSPs) did not have their respective Children's Social Worker (CSW)'s authorization for their implementations and efforts to obtain the CSWs signatures were not properly documented.**

RCS Response: The administrative assistants for each office mail out the foster children's Initial/NSPs and Quarterly/NSPs to the assigned CSW upon completion of the report. Along with the report they send a letter requesting that the CSW review and sign the signature page in order for RCS to begin implementing the NSP and to return the signature page in the Self Addressed Stamped Envelope that is provided. The administrative assistants place a copy of this letter in the Foster Child's file and log it on the Needs and Services Plan Log Form in the file. The FCSW assigned to the case is responsible for

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following up with the CSW via email, phone and fax to ensure that they return the signed NSP signature page in a timely manner. The FCSWs are to document these follow up attempts in the Foster Child's file on the Needs and Services Plan log form in the file, as well as putting copies of the emails, fax confirmation pages and contact notes documenting these requests in the file. At the FFA All Staff Meeting on March 25, 2014 the RCS Quality Improvement Director, Tracy Alvarez, along with the Foster Care Director, Erin Ellis, retrained all of the FFA staff, including FCSWs and Supervisors, on "Quarterly Report/Needs and Services Plans" (see attached power point). This training covered that it is the FCSWs responsibility to ensure that the CSW signature is obtained and that they are required to follow up with the CSW and document their follow ups at least three times within the quarter, preferably weekly until obtained. In order to help the FCSWs to track which CSW signatures they have and have not received the Foster Care Director, Erin Ellis, created the NSP CSW Tracking form (see attached form), which was distributed to the FCSWs at the All Staff Meeting on March 25, 2014. The FCSWs were instructed to start using the form immediately.

- **Two children were not progressing toward meeting their NSP goals.**
- **Updated NSPs for seven children were not specific and measurable.**

RCS Response: At the FFA All Staff Meeting on March 25, 2014 the RCS Quality Improvement Director, Tracy Alvarez, retrained all of the FFA staff, including FCSWs and Supervisors, on "Quarterly Report/Needs and Services Plans (see attached power point). This training covered SMART goals and ensuring that if the foster child is not progressing toward meeting their goals the goals should be modified in order to make them reachable. It was also discussed that the FCSW should be referring the foster children to alternative services if needed to assist the foster child in completing their goals, particularly in regards to educational and psychological goals. The FCSWs will ensure that as they are creating the NSPs with the help of the foster parents and foster children that the goals are specific and measurable. Additionally, when reviewing the NSPs for approval the SFCSW, Mary Ann Holmes, and Foster Care Director, Erin Ellis, will review the goals and if the foster child is not progressing towards meeting a goal or the goal is not specific enough or measurable the FCSWs will be asked to expand on the progress of the goal section and/or to rewrite the goals prior to the report being approved.

- **Two youth's CSWs were not consistently contacted by the FFA Social Worker.**

RCS Response: The FCSWs are required to contact the CSWs for the children on their caseload at least once a month, and they are to document these contacts in the contact notes section of the foster child's file and in the Quarterly Reports. At the FFA All Staff Meeting on January 29, 2014 the FFA Director, Erin Ellis, retrained all of the FFA staff on Contact Notes and Documentation, including CSW contact requirements and documentation (see attached agenda and form).

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Education and Workforce Readiness

- **One child's current copy of report card/progress report was not updated.**

RCS Response: The FCSWs are responsible for obtaining current copies of the foster children's report cards and filing them in the foster child's file. This was reviewed with all of the FFA Staff at the FFA All Staff Meeting on March 25, 2014 by the Foster Care Director, Erin Ellis (see attached agenda).

- **Two children and one youth had poor grades and there were no documentations indicating the type of assistance provided by their respective CFPs/FCSWs to improve their grades.**

RCS Response: The FCSWs are responsible for monitoring their foster children's educational progress and for ensuring that any needed educational services are obtained. The FCSWs are to assist the FPs in requesting and obtaining tutoring, SSTs, IEPS, Behavior 504 plans, and any other needed educational support a foster child needs. The foster child's academic concerns and achievements are to be addressed in the Quarterly/NSP Report. The FCSWs should be documenting the FPs and the FCSWs assistance and involvement in school related activities and meeting including specific dates in the Quarterly/NSP report. This should also be documented in the weekly contact notes. This was reviewed by the Foster Care Director, Erin Ellis, and the Quality Improvement Director, Tracy Alvarez with the FFA staff at the FFA All Staff Meeting on March 25, 2014 (see attached agenda and powerpoint presentation).

Personal Rights and Social/Emotional Well-Being

- **Two youth reported they did not feel safe when they returned home and had to wait outside when their CFP was not home.**
  Two youth reported that their CFP did not treat them with respect and dignity as she talked behind their back and made inappropriate comments about them and their family.
  Two youth reported that in general their CFP provides nutritious meals and snacks, however there was no variety of food in the home and no fresh fruit juice. Further, the youth reported the CFP has a set kitchen hours and after a certain period of time they were not allowed to prepare food.

RCS Response: The reports noted above were all made by the same two youth in one particular foster home. The allegations are being investigated by DCFS, and the results of the investigation have not yet been received by RCS. However, RCS staff and the Foster Mother have verbally been told that the allegations were determined to be Unfounded. The SFCSW, Mary Ann Holmes, met with the FM on March 10, 2014 and the FM denied the allegations. She stated that it is very rare that the foster children return to the foster home without her, and also that there is always food available for the foster children. The foster children had not reported any of these allegations to their FCSW during her weekly visits. At the FFA All Staff Meeting on February 25, 2014 the Supervising Foster Care Social Worker, Mary Ann Holmes, trained all of the FFA staff on Conducting Well Child Interviews (see attached agenda and training materials). This training focused on assessing for personal rights

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violations and threats to the children's safety. It helped the FCSWs to conduct better weekly home visits in order to ensure that if there are concerns in the foster home the FCSWs are able to elicit this information from the foster children. The monthly FP training that was assigned at that meeting was on Inappropriate Discipline and Personal Rights The FCSW, Crystal Rawlins, conducted this training with the Foster Mother on February 25, 2014 (a copy of the assigned FP training materials is attached)

Personal Needs/Survival and Economic Well-Being

- **Two youths' monthly clothing allowances were not always in accordance with the County contract/FFAs Program Statement.**

RCS Response: RCS requires that FPs spend a minimum of $50 per month on clothing and the original receipts are to be submitted to the FCSW on a monthly basis. The FCSWs are responsible for ensuring that the FPs have spent enough money each month on clothing for the foster children, and that the receipts are obtained and filed in the foster child's file. This was reviewed at the FFA All Staff Meeting on March 25, 2014 by the Foster Care Director, Erin Ellis. This is also part of foster parent Monthly Training, which is on Foster Parent Requirements. The training consists of the: Certified Foster Family Requirements form, Foster Parent Non-Compliance Protocol, Monthly Clothing Expenditures Policy and Caretaker Regulations (see attached forms). The FCSWs will be conducting the trainings with their foster parents during their home visits. This training will be completed by April 15th, and the proof will be kept in the foster parent's agency file.

The Foster Care Director, Erin Ellis, will be responsible for ensuring that this CAP is fully implemented. If you have any questions, please feel free to contact me at (626) 533-9802.

Sincerely,

Erin Ellis, MA

Erin Ellis, MA
Foster Care Director