County of Los Angeles
DEPARTMENT OF CHILDREN AND FAMILY SERVICES
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March 22, 2016

To: Supervisor Hilda L. Solis, Chair
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Supervisor Don Knabe
Supervisor Michael D. Antonovich

From: Philip L. Browning
Director

SENECA FAMILY OF AGENCIES FOSTER FAMILY AGENCY CONTRACT COMPLIANCE REVIEW

The Department of Children and Family Services (DCFS) Contracts Administration Division (CAD) conducted a Contract Compliance Review of Seneca Family of Agencies (the FFA) in December 2014. The FFA has three licensed offices; one located in Orange County, one located in San Bernardino County and one located in Monterey County. At the time of the review, the Orange County office was the only office providing services to the County of Los Angeles DCFS placed children. According to the FFA's program statement, its stated mission is "to provide adoption, guardianship, or emancipation from foster care with connection to one or more adults."

At the time of the review, the FFA supervised 32 DCFS placed children in 13 Certified Foster Homes (CFHs). The placed children's average length of placement was seven months and their average age was 8.

SUMMARY

During CAD's Contract Compliance Review, the interviewed children generally reported: feeling safe in the FFA's CFHs; having been provided with good care and appropriate services; being comfortable in their environment; and treated with respect and dignity. The certified foster parents (CFPs) reported they were supported by the FFA in their efforts to provide care, supervision and service delivery to the children placed in their homes.

The FFA was in full compliance with 8 of 11 areas of the Contract Compliance Review: Facility and Environment; Education 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.

CAD noted deficiencies in the areas of: Licensure/Contract Requirements, related to Special Incident Reports (SIRs) not being submitted timely and appropriately cross-reported; CFHs, related

to the FFA not completing safety inspections at least every six months; Maintenance of Required Documentation and Service Delivery, related to initial and updated NSPs not being completed timely and quarterly reports not being completed timely.

Attached are the details of CAD's review.

REVIEW OF REPORT

On January 29, 2015 Patricia Kirkpatrick, DCFS CAD and Jui-Ling Ho, Out-of-Home Care Management Division (OHCMD) held an Exit Conference with the FFA's representatives: Sherie Dechter, Program Director and Kimberly Nguyen, Case Assistant. The FFA representatives were in agreement with the review findings, were receptive to implementing systemic changes to improve compliance with regulatory standards and agreed to address the noted deficiencies in a Corrective Action Plan (CAP).

A copy of this report has been sent to the Auditor-Controller and Community Care Licensing.

The FFA provided the attached approved Compliance CAP addressing the recommendations noted in this report.

CAD conducted a follow-up visit on May 4, 2015 to verify implementation of the CAP. The OHCMD will provide technical assistance prior to the next Contract Compliance Review.

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

PLB:EM:LTI:pk

Attachments

c: Sachi A. Hamai, Chief Executive Officer
John Naimo, Auditor-Controller
Public Information Office
Audit Committee
Katherine West, Executive Director and Chief Operating Officer, Seneca Family of Agencies
Lenora Scott, Regional Manager, Community Care Licensing Division
Lajuannah Hills, Regional Manager, Community Care Licensing Division

SENECA FAMILY OF AGENCIES FOSTER FAMILY AGENCY
CONTRACT COMPLIANCE REVIEW SUMMARY

18302 Irvine Blvd., Suite 300
Tustin, CA 92780
License Number: 306004366

414 Tennessee St., Suite Y
Redlands, CA 92373
License Number: 366424299

124 River Road
Salinas, CA 93908
License Number: 275202276

	Contract Compliance Review	Findings: December 2014
I	**Licensure/Contract Requirements** (7 Elements)	
	1. Timely Notification of Child's Relocation	1. Full Compliance
	2. Timely, Cross-Reported SIRs	2. Improvement Needed
	3. Runaway Procedures in Accordance with the Contract	3. Full Compliance
	4. Are there CCL Citations/OHCMD Safety Reports	4. Full Compliance
	5. If applicable, FFA Ensures Complete Required Whole Foster Family Home Training	5. Full Compliance
	6. FFA Pays Certified Foster Parents (CFP) Whole Foster Family Home Payments	6. Not Applicable
	7. FFA Conducts an Assessment of CFP Prior to Placement of Two (2) or More Children	7. Not Applicable
II	**Certified Foster Homes (CFHs)** (12 Elements)	
	1. Home Study and Safety Inspection Conducted Prior to Certification	1. Full Compliance
	2. Agency's Inquiry with OHCMD for Historical Information Prior to Certification	2. Full Compliance
	3. Timely Criminal Clearances (FBI, DOJ, 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 Inspection Every Six Months or Per Approved Program Statement	8. Improvement Needed
	9. Completed Annual Training Hours for Recertification and Current CPR/First-Aid/Water Safety Certificates	9. Full Compliance
	10. Current CDL/Auto Insurance/Annual Vehicle Maintenance Documentation for CFPs and Designated Drivers	10. Full Compliance
	11. Criminal Clearances and Health Screening CDL/CPR/FBI/DOJ/CACI/Auto Insurance for Other	11. Full Compliance

	Adults in the Home 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 Well Maintained 3. Children's Bedrooms/Interior Well Maintained 4. Sufficient and Appropriate Educational Resources 5. Adequate Perishable and Non-Perishable Food 6. CFP Conducted Disaster Drills and Documentation Maintained 7. Money and Clothing Allowance Logs Maintained	Full Compliance (All)
IV	**Maintenance of Required Documentation and Service Delivery** (10 Elements) 1. FFA Obtains or Documents Efforts to Obtain County Children's Social Worker's (CSW's) 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 NSPs 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 Worker's 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. Full Compliance 2. Full Compliance 3. Full Compliance 4. Improvement Needed 5. Improvement Needed 6. Full Compliance 7. Full Compliance 8. Full Compliance 9. Improvement Needed 10. Full Compliance
V	**Educational 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	Full Compliance (All)

VI	**Health and Medical Needs** (4 Elements) 1. Initial Medical Exams Conducted Timely 2. Follow-up Medical Exams Conducted Timely 3. Initial Dental Exams Conducted Timely 4. Follow-up Dental Exams Conducted Timely	Full Compliance (All)
VII	**Psychotropic Medication** (2 Elements) 1. Current Court Authorization for Administration of Psychotropic Medication 2. Current Psychiatric Evaluation Review	Full Compliance (All)
VIII	**Personal Rights and Social/Emotional Well-Being** (10 Elements) 1. Children Informed of Agency's Policies and Procedures 2. Children Feel Safe 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 Choice 7. Children's Chores Reasonable 8. Children Informed About Their Medication and Their Right to Refuse Medication 9. Children Aware of Right to Refuse or Receive Medical, Dental and Psychiatric Care 10. Children Given Opportunities to Participate in Extra-Curricular Activities, Enrichment and Social Activities	Full Compliance (All)
IX	**Personal Needs/Survival and Economic Well-Being** (7 Elements) 1. Clothing Allowance Provided in Accordance with FFA Program Statement 2. Ongoing Clothing Inventories of Adequate Quantity and Quality 3. Children Involved in the Selection of Their Clothing 4. Provision of Sufficient Supply of Towels and Personal Care Items Meeting Ethnic Needs 5. Minimum Weekly Monetary Allowances 6. Management of Allowance/Earnings 7. Encouragement/ Assistance with Life Book or Photo Album	Full Compliance (All)

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 (FBI, DOJ, 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 Completed 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 Caseloads Not to Exceed a Total of 15 Children	Full Compliance (All)

SENECA FAMILY OF AGENCIES FOSTER FAMILY AGENCY
CONTRACT COMPLIANCE REVIEW
FISCAL YEAR 2014-2015

SCOPE OF REVIEW

The following report is based on a "point in time" visit. This compliance report addresses findings noted during the December 2014 review. The purpose of this review was to assess Seneca Family of Agencies Foster Family Agency's (the FFA's) compliance with its County contract and State regulations and included a review of the FFA's program statement as well as internal administrative policies and procedures. The compliance 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 the purpose of this review, six placed children were selected for the sample. The Contracts Administration Division (CAD) interviewed five children, as one child was too young to be interviewed. All six case files were reviewed to assess the care and services the children received. Additionally, four discharged children's files were reviewed to assess the FFA's compliance with permanency efforts. At the time of the review, one placed child was prescribed psychotropic medication. The child's case file was reviewed to assess for timeliness of Psychotropic Medication Authorization and to confirm the required documentation of psychiatric monitoring.

CAD reviewed six Certified Foster Parent (CFP) files and five staff files for compliance with Title 22 regulations and County contract requirements. Interviews were conducted with six CFPs to assess the quality of care and supervision provided to the children.

CONTRACTUAL COMPLIANCE

CAD found the following three areas out of compliance:

Licensure/Contract Requirements

- Special Incident Reports (SIRs) were not submitted timely and not appropriately cross-reported.

The FFA did not submit 11 SIRs timely via the I-Track database and did not appropriately cross-report 11 SIRs to the Out-of-Home Care Management Division (OHCMD).

During the Exit Conference, the FFA representatives stated that the FFA had been experiencing difficulty accessing the I-Track database and they were working with OHCMD to resolve the issue.

CAD conducted a follow-up visit on May 4, 2015 and was provided with copies of I-Track printouts showing that the FFA is now able to access the I-Track database. The FFA representative stated that they are now submitting all SIRs through the I-Track database and cross-reporting to OHCMD as required. On May 6, 2015, CAD obtained confirmation from OHCMD that the FFA has been timely submitting and appropriately cross-reporting their SIRs.

Recommendation:

The FFA's management shall ensure that:

1. All SIRs are submitted timely and appropriately cross-reported in accordance with the SIR reporting guidelines for FFAs.

Certified Foster Homes

- Safety inspections were not completed at least every six months.

The FFA completes a safety inspection prior to initial certification, then once a year at the time of re-certification. The FFA was completing safety inspections of their Certified Foster Homes (CFHs) annually, but not at six month intervals as required in the FFA contract.

During the Exit Conference, the FFA representatives stated that they would ensure that the FFA's social workers complete safety inspections of all their CFHs every six months.

CAD conducted a follow-up visit on May 4, 2015 and verified that the FFA has implemented a new tracking system in their database to ensure that safety inspections of all their CFHs are completed every six months.

Recommendation:

The FFA's management shall ensure that:

2. Safety inspections of all CFHs are completed at least every six months.

Maintenance of Required Documentation/Service Delivery

- FFA social workers did not develop timely initial Needs and Services Plans (NSPs) with child's participation.

Three children's initial NSPs were not completed timely. One child's NSP with a due date of April 14, 2014, was not completed until May 8, 2014; another child's initial NSP due March 13, 2014, was not completed until April 7, 2014; and a third child's initial NSP due July 6, 2014, was not completed until July 14, 2014.

- FFA social workers did not develop timely updated NSPs with child's participation.

Two children's updated NSPs were not completed timely. One child's updated NSP due June 14, 2014, was not completed until August 25, 2014; and another child's updated NSP due August 3, 2014, was not completed until August 26, 2014.

- FFA social workers did not develop timely, comprehensive quarterly reports.

Two children's quarterly reports were not completed timely. One child's quarterly report due June 14, 2014, was not completed until August 25, 2014; and another child's quarterly report due August 3, 2014, was not completed until August 26, 2014.

During the Exit Conference, the FFA representatives stated that the FFA social workers will work with the CFPs, children and County Children's Social Workers (CSWs) to ensure that all initial NSPs, updated NSPs and quarterly reports are completed timely. Additionally, the FFA will require that FFA social workers submit completed NSPs to their supervisors at least one week prior to the due date to further ensure full compliance.

CAD conducted a follow-up visit on May 4, 2015 and reviewed two children's initial and updated NSPs and quarterly reports. It was noted that the NSPs and quarterly reports that were completed subsequent to the Exit Conference were completed timely.

Recommendations:

The FFA's management shall ensure that:

3. FFA social workers develop timely initial NSPs with the child's participation.

4. FFA social workers develop timely updated NSPs with the child's participation.

5. FFA social workers develop timely, comprehensive quarterly reports.

PRIOR YEAR FOLLOW-UP FROM DCFS OHCMD'S FFA CONTRACT COMPLIANCE REVIEW

The OHCMD's last compliance report dated December 11, 2013, identified three recommendations.

Results:

Based on the results of this review, the FFA successfully implemented 3 of 3 recommendations, for which they were to ensure that:

- OHCMD is contacted for historical abuse/neglect background information regarding prospective CFPs prior to certification and documentation will be maintained in the CFPs' files.

- All CFP's criminal background statements are signed prior to certification.

- All placed children/youth are enrolled in school within three school days of placement.

At the Exit Conference, the FFA representatives expressed their desire to remain in compliance with Title 22 regulations and Contract requirements.

On May 4, 2015, CAD conducted a follow-up visit to ensure implementation of the new protocol and verified that the FFA had implemented 5 of 5 recommendations noted in this report. CAD will continue to assess for implementation of the recommendations during the next review. OHCMD will provide ongoing support and technical assistance prior to the next review.

KINSHIP CENTER®
A Member of Seneca Family of Agencies
18302 Irvine Blvd., Suite 300, Tustin, CA 92780 | 714-979-2365 | www.kinshipcenter.org

April 13, 2015

Patricia Kirkpatrick
Contract Administration Division
Contract Compliance

Dear Ms. Kirkpatrick:

Please find below the amended (CAP) corrective action plan you requested regarding the following items:

2. Are Special Incident Reports (SIRs) appropriately documented and cross-reported? (Saftey):

Immediately - Kinship Center has corrected the problem regarding access to the LA County itrack system. Previously submitted SIRs dated from April 2014 to current have now been cross-reported to OHCMD.

15. Were safety inspections completed at least every six months or per the timelines approved in the agency's Program Statement? (Safety):

Immediately - Kinship Center social workers are completing a full safety inspection of all certified foster homes every 6 months. The documents are in the file.

30. Did the FFA social worker develop timely, comprehensive, initial (NSPs) with the participation of the developmentally age-appropriate child? (Well-being)

Immediately - Kinship Center Social Workers work with the foster parents, age-appropriate children and make contact with the CSW's to develop comprehensive initial NSPs that are turned in to the supervisor for signature a week before the due date and then mailed/emailed to the county worker for signature.

31. Did the FFA social worker develop timely, comprehensive, updated (NSPs) with the participation of the developmentally age-appropriate child? (Well-being)

Immediately - Kinship Center Social Workers work with the foster parents, age-appropriate children and make contact with the CSW's to develop comprehensive updated NSPs that are turned in to the supervisor for signature a week before the due date and then mailed/emailed to the county worker for signature.

35. Does the FFA social worker complete timely, comprehensive, quarterly reports? (to County worker by 10th business days following the end of each quarter for the date the child was placed) (Well-being)

Immediately – Kinship Center internal timelines for Quarterly reports are now updated. Kinship Center social workers provide the County worker with the quarterly report no later than the 10th business day following the end of each quarter for the date the child was placed.

Thank you for your input to our program. We appreciate your assistance in keeping us on track. We look forward to continuing our partnership with Los Angeles DCFS to serve the children of Los Angeles County. Please let us know if there is additional information that you require.

Sincerely,

Sherie Dechter, LCSW
Adoption Program Director