PHILIP L. BROWNING
Director

County of Los Angeles
DEPARTMENT OF CHILDREN AND FAMILY SERVICES

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February 26, 2016

To: Supervisor Hilda L. Solis, Chair
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From: Philip L. Browning
Director

INNER CIRCLE FOSTER FAMILY AGENCY CONTRACT COMPLIANCE REVIEW

The Department of Children and Family Services (DCFS) Contracts Administration Division (CAD) conducted a review of Inner Circle Foster Family Agency (the FFA) in June 2015. The FFA has two licensed locations; one in the Third Supervisorial District; and another in the Fifth Supervisorial District. Both locations provide services to the County of Los Angeles DCFS placed children. According to the FFA's program statement, its mission is "to provide comprehensive community-based services to children & families for the purpose of preserving the family, preparing adolescents for emancipation, providing treatment foster care and strengthening the community."

At the time of the review, the FFA supervised 125 DCFS placed children in 74 certified foster homes. The placed children's average length of placement was five months and their average age was 10.

SUMMARY

During CAD's Contract Compliance 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. 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 10 of 11 sections of CAD's Contract Compliance Review: Certified Foster Homes; Facility and Environment; Maintenance of Required Documentation/Service Delivery; 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 Community Care Licensing (CCL) citations.

Attached are the details of our review.

REVIEW OF REPORT

On September 23, 2015, Theodore Howard, DCFS CAD, held an Exit Conference with FFA representative Sandro Villa, FFA Chief Executive Officer. DCFS staff included Adelina Arutyunyan, Out-of-Home Care Management Division.

The FFA representative was in agreement with the review findings and recommendations, was 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 report has been sent to the Auditor-Controller and CCL.

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

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

PLB:EM:LTI:th

Attachments

c: Sachi A. Hamai, Chief Executive Officer
John Naimo, Auditor-Controller
Public Information Office
Audit Committee
Victoria Fickett, Executive Director, Inner Circle Foster Family Agency
Lajuannah Hills, Regional Manager, Community Care Licensing Division
Lenora Scott, Regional Manager, Community Care Licensing Division

INNER CIRCLE FOSTER FAMILY AGENCY
CONTRACT COMPLIANCE REVIEW SUMMARY

7120 Hayvenhurst Ave. #204
Van Nuys, CA 91406
License Number: 191593257

1317 E. Palmdale Blvd. #18
Palmdale, CA 93550
License Number: 197602175

	Contract Compliance Review	**Findings: June 2015**
I	**Licensure/Contract Requirements** (7 Elements)	
	1. Timely Notification for Child's Relocation	1. Full Compliance
	2. Timely, Cross-Reported SIRs	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) 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. Full Compliance
II	**Certified Foster Homes (CFHs)** (12 Elements)	
	1. Home Study and Safety Inspection Conducted Prior to Certification	Full Compliance (All)
	2. Agency's Inquiry with OHCMD for Historical Information Prior to Certification	
	3. Timely Criminal Clearances (DOJ, FBI, CACI) Prior to Certification	
	4. Timely, Completed, Signed Criminal Background Statement	
	5. Health Screening & TB Test Prior to Certification	
	6. All Required Training Prior to Certification	
	7. Certificate of Approval on File/Including Capacity	
	8. Safety Inspections Completed At Least Every Six Months or Per Approved Program Statement	
	9. Completed Annual Training Hours for Re-certification and Current CPR/First-Aid/Water Safety Certificates	
	10. Current CDL/Auto Insurance/Annual Vehicle Maintenance Documentation for CFPs and Designated Drivers	
	11. Criminal Clearances and Health Screening/CDL/CPR/ DOJ/FBI/CACI/Auto Insurance for Other Adults in the Home	
	12. FFA Assists CFPs in Providing Transportation Needs	

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/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 Toward Meeting NSP Goals 4. FFA Social Workers Develop Timely, Comprehensive Initial NSP with Child's Participation 5. FFA Social Workers Develop Timely, Comprehensive Updated NSP with Child's Participation 6. Therapeutic Services Received 7. Recommended Assessment/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	Full Compliance (All)
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 Their 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 Choices 7. Children's Chores Reasonable 8. Children Informed About Their Medication and Right to Refuse Medication 9. Children Aware of Right to Refuse or Received 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 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 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 (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 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 Exceed a Total of 15 Children	Full Compliance (All)

INNER CIRCLE 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 June 2015 review. The purpose of this review was to assess Inner Circle 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 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, 12 placed children were selected for the sample. The Contract Administration Division (CAD) interviewed all the sampled children. All case files were reviewed to assess the care and services the children received. Additionally, three 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 medication. Their case files were reviewed to assess for timeliness of Psychotropic Medication Authorizations and to confirm the required documentation of psychiatric monitoring.

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

CONTRACTUAL COMPLIANCE

CAD found the following one area out of compliance.

Licensure/Contract Requirements

- Community Care Licensing (CCL) citation.

CCL cited the FFA as a result of deficiencies and findings on April 22, 2015. According to the report dated March 20, 2015, CCL substantiated a complaint against one CFP that allowed an individual convicted of a felony and on parole to live in her home. In January 2015, the FFA social worker conducted an unannounced visit to the home and found this individual in the home. The CFP denied the individual was living in her home and the FFA requested that the individual complete a criminal

background clearance. The FFA also required the CFP to sign a statement affirming that she would not allow individuals without appropriate fingerprint clearance around the placed foster children and that she would not allow the individual in question to have access to the placed children until the FFA confirmed his clearance results. The individual submitted his fingerprints for the clearance, but the FFA did not receive the clearances timely. The FFA social worker conducted unannounced visits to the home two or more times per month, but did not observe this person at the home. However, the FFA social worker found evidence that the individual was indeed living in the home and on March 20, 2015 the complaint was substantiated.

The FFA replaced the children in another certified home and placed this CFP on suspension. The FFA sent CCL a Notice of Decertification of this CFP on April 30, 2015. No further Plan of Correction was required. On May 8, 2015, Out-of-Home Care Investigations Section placed this home on an Indefinite Hold and determined that the CFP would no longer be used as a placement resource for DCFS supervised children.

Recommendation:

The FFA's management shall ensure that:

1. The FFA is in compliance with Title 22 regulations and free of CCL citations.

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

The CAD's last compliance report dated, October 31, 2014, identified five recommendations.

Results:

Based on CAD's follow-up, the FFA implemented 5 of 5 previous recommendations for which they were to ensure that:

- The signature of the County Children's Social Worker is obtained within the specified time frame, or that clear documentation of all attempts is maintained in the children's files.
- Each of the Needs and Services Plans (NSPs) shall be signed by the child indicating their participation in the development and acceptance of the same, or that clear documentation regarding the impediment which prevents child's signature.
- Initial and Updated NSPs are comprehensive.
- All required signatures on NSP include the date when the document was signed.
- Employees complete all required training and documentation of the training is maintained.

At the Exit Conference, the FFA representative expressed their desire to remain in compliance with Title 22 regulations and contract requirements. CAD will continue to assess implementation of the recommendations during our next review. The Out-of-Home Care Management Division will provide ongoing support and technical assistance prior to the next review.

October 25th, 2015

Ted Howard

Children Services Administrator I

Department of Children and Family Services

Contracts Administration Division

Dear Mr. Howard,

The following is the Monitoring Review Corrective Action Plan following your program review for 2015.

1. Is the agency free of substantiated Community Care Licensing complaints' reports on safety and physical plant deficiencies since the last review?

Inner Circle Foster Family Agency, Inc. had one substantiated CCL report during the year 2015. One of the certified foster parents had an adult staying at her home without knowledge of the agency. Inner Circle immediately decertified the home, with cause.

Inner Circle Foster Family Agency Social Workers conduct weekly foster home visits; at least two visits per month are unannounced visits. The administrator of Inner Circle FFA with the assistant of supervisors will ensure that social workers routinely, but at least once per month, conduct a home inspection, verify through interviews of foster parents and children who the frequent visitors are, and ensure that all adult frequent visitors have been cleared by the agency prior to being in the home and in contact with children.

Inner Circle will continue to work towards improving service delivery and compliance with all entities involved in the care of children.

Respectfully,

Victoria Fickett

Executive Director

Inner Circle Foster Care and Adoption Services
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