County of Los Angeles
DEPARTMENT OF CHILDREN AND FAMILY SERVICES
425 Shatto Place, Los Angeles, California 90020
(213) 351-5602

PHILIP L. BROWNING
Director

BRANDON NICHOLS
Chief Deputy Director

Board of Supervisors
HILDA L. SOLIS
First District
MARK RIDLEY-THOMAS
Second District
SHEILA KUEHL
Third District
DON KNABE
Fourth District
MICHAEL D. ANTONOVICH
Fifth District

April 22, 2016

To: Supervisor Hilda L. Solis, Chair
Supervisor Mark Ridley-Thomas
Supervisor Sheila Kuehl
Supervisor Don Knabe
Supervisor Michael Antonovich

From: Philip L. Browning
Director

MCKINLEY CHILDREN'S CENTER GROUP HOME CONTRACT COMPLIANCE MONITORING REVIEW

The Department of Children and Family Services (DCFS) Contracts Administration Division (CAD) conducted a Contract Compliance Review of McKinley Children's Center (the Group Home) in June 2015. The Group Home has one site located in the Fifth Supervisorial District and provides services to the County of Los Angeles DCFS placed children as well as children placed through San Bernardino County and Riverside County. According to the Group Home's Program Statement, its stated purpose is to "provide services to children who exhibit behavioral, social, and emotional difficulties."

The Group Home has an 88-bed site and is licensed to serve a capacity of 28 boys, ages eight through 19. At the time of the review, the Group Home served 20 DCFS placed children. The placed children's average length of placement was three months and their average age was 15.

SUMMARY

During CAD's Contract Compliance Review, the interviewed children generally reported: feeling safe at the Group Home, being provided with appropriate care and services, being comfortable in their environment and being treated with respect and dignity.

The Group Home was in full compliance with 8 of 10 areas of CAD's Contract Compliance Review: Facility and Environment; Maintenance of Required Documentation and Service Delivery; Education and Workforce Readiness; Health and Medical Needs; Psychotropic Medication; 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; and Personal Rights and Social/Emotional Well-Being, related to children reporting that the rewards and discipline system was unfair.

Attached are the details of CAD's review.

REVIEW OF REPORT

On June 29, 2015, Maria Rosas, DCFS CAD held an exit conference with the Group Home's representatives: Anil Vadaparty, Chief Executive Officer and Mario Gallegos, Chief Quality Officer. The Group Home representatives agreed with the review findings and recommendations, were receptive to implementing systemic changes to improve compliance with regulatory standards and agreed to address the noted deficiencies in the Corrective Action Plan (CAP).

A copy of this compliance report has been sent to the Auditor-Controller and CCL.

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

The prior compliance report dated August 4, 2015, noted that the Group Home had resumed accepting referrals from DCFS after the "Do Not Use" status was lifted by the Out-of-Home Care Management Division. Furthermore, it was also noted that CCL issued an Accusation Notification to the Group Home for various violations and the parties were undergoing settlement discussions.

A follow-up to that report noted that CCL and the Group Home reached a Stipulation Agreement on August 21, 2015, to reduce the Group Home's licensed capacity from 44 to 28 boys to avoid a license revocation for a period of three years. After successful completion of two years of probation, the Group Home will be eligible to apply for an early termination of the remaining probationary period. Other terms and conditions of the Stipulation are in the Stipulation Agreement.

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

PLB:KR:LTI:mr

Attachments

c: Sachi A. Hamai, Chief Executive Officer
John Naimo, Auditor-Controller
Calvin C. Remington, Interim Chief Probation Officer
Public Information Office
Audit Committee
Sybil Brand Commission
Anil Vadaparty, Chief Executive Officer
Lajuannah Hills, Regional Manager, Community Care Licensing
Lenora Scott, Regional Manager, Community Care Licensing

MCKINLEY CHILDREN'S CENTER
GROUP HOME CONTRACT COMPLIANCE REVIEW SUMMARY
License Number: 191502075

	Contract Compliance Review	Findings: June 2015
I	**Licensure/Contract Requirements** (9 Elements) 1. Timely Notification for Child's Relocation 2. Transportation Needs Met 3. Vehicle Maintained In Good Repair 4. Timely, Cross-Reported SIRs 5. Disaster Drills Conducted & Logs Maintained 6. Runaway Procedures 7. Comprehensive Monetary and Clothing Allowance Logs Maintained 8. Detailed Sign-In/Out Logs for Placed Children 9. CCL Complaints on Safety/Plant Deficiencies	1. Full Compliance 2. Full Compliance 3. Full Compliance 4. Full Compliance 5. Full Compliance 6. Full Compliance 7. Full Compliance 8. Full Compliance 9. Improvement Needed
II	**Facility and Environment** (5 Elements) 1. Exterior Well Maintained 2. Common Areas Well Maintained 3. Children's Bedrooms Well Maintained 4. Sufficient Recreational Equipment/Educational Resources 5. Adequate Perishable and Non-Perishable Food	Full Compliance (All)
III	**Maintenance of Required Documentation and Service Delivery** (10 Elements) 1. Child Population Consistent with Capacity and Program Statement 2. DCFS Children's Social Worker's Authorization to Implement NSPs 3. NSPs Implemented and Discussed with Staff 4. Children Progressing Toward Meeting NSP Case Goals 5. Therapeutic Services Received 6. Recommended Assessment/Evaluations Implemented 7. DCFS Children's Social Worker's Monthly Contacts Documented 8. Children Assisted in Maintaining Important Relationships 9. Development of Timely, Comprehensive Initial NSPs with Child's Participation 10. Development of Timely, Comprehensive, Updated NSPs with Child's Participation	Full Compliance (All)

IV	**Education and Workforce Readiness** (5 Elements) 1. Children Enrolled in School Within Three School Days 2. Group Home Ensured Children Attended School and Facilitated in Meeting Their Educational Goals 3. Current Report Cards/Progress Reports Maintained 4. Children's Academic Performance and/or Attendance Increased 5. Group Home Encouraged Children's Participation in YDS or Equivalent Services and Vocational Programs	Full Compliance (All)
V	**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)
VI	**Psychotropic Medication** (2 Elements) 1. Current Court Authorization for Administration of Psychotropic Medication 2. Current Psychiatric Evaluation Review	Full Compliance (All)
VII	**Personal Rights and Social/Emotional Well-Being** (13 Elements) 1. Children Informed of Group Home's Policies and Procedures 2. Children Feel Safe 3. Appropriate Staffing and Supervision 4. Group Home's Efforts to provide Nutritious Meals and Snacks 5. Staff Treat Children with Respect and Dignity 6. Appropriate Rewards and Discipline System 7. Children Allowed Private Visits, Calls and Correspondence 8. Children Free to Attend or Not Attend Religious Services/Activities 9. Children's Reasonable Chores 10. Children Informed About Their Medication and Right to Refuse Medication 11. Children Free to Receive or Reject Voluntary Medical, Dental and Psychiatric Care 12. Children Given Opportunities to Plan Activities in Extracurricular, Enrichment and Social Activities (Group Home, School, Community)	1. Full Compliance 2. Full Compliance 3. Full Compliance 4. Full Compliance 5. Full Compliance 6. Improvement Needed 7. Full Compliance 8. Full Compliance 9. Full Compliance 10. Full Compliance 11. Full Compliance 12. Full Compliance

	13. Children Given Opportunities to Participate in Extracurricular, Enrichment and Social Activities (Group Home, School, Community)	13. Full Compliance
VIII	**Personal Needs/Survival and Economic Well-Being** (7 Elements) 1. $50 Clothing Allowance 2. Adequate Quantity and Quality of Clothing Inventory 3. Children Involved in the Selection of Their Clothing 4. Provision of Clean Towels and Adequate Ethnic Personal Care Items 5. Minimum Monetary Allowances 6. Management of Allowance/Earnings 7. Encouragement and Assistance with a Life Book/Photo Album	Full Compliance (All)
IX	**Discharged Children** (3 Elements) 1. Children Discharged According to Permanency Plan 2. Children Made Progress Toward NSP Goals 3. Attempts to Stabilize Children's Placement	Full Compliance (All)
X	**Personnel Records** (7 Elements) 1. Federal Bureau of Investigation (FBI),California Department of Justice (DOJ), and Child Abuse Central Index (CACIs) Submitted Timely 2. Signed Criminal Background Statement Timely 3. Education/Experience Requirement 4. Employee Health Screening/TB Clearances Timely 5. Valid Driver's License 6. Signed Copies of Group Home Policies and Procedures 7. All Required Training	Full Compliance (All)

MCKINLEY CHILDREN'S CENTER GROUP HOME
CONTRACT COMPLIANCE REVIEW
FISCAL YEAR 2014-2015

SCOPE OF REVIEW

The following report is based on a "point in time" review. This compliance report addresses findings noted during the June 2015 review. The purpose of this review was to assess McKinley Children's Center Group Home's (The Group Home's) compliance with its County contract and State regulations and included a review of the Group Home's Program Statement as well as internal administrative policies and procedures. The compliance review covered the following 10 areas:

- Licensure/Contract Requirements,
- Facility and Environment,
- Maintenance of Required Documentation and 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.

For the purpose of this review, five placed children were selected for the sample. The Contracts Administration Division (CAD) interviewed each child and reviewed their case files to assess the care and services they received. No discharged children's files were reviewed and assessed as no children were discharged since the Group Home re-opened in January 2015. At the time of the review, all of the children selected for the sample 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 five staff files for compliance with Title 22 Regulations and County contract requirements and conducted site visits to assess the provision of quality care and supervision.

CONTRACTUAL COMPLIANCE

CAD found the following areas to be out of compliance:

Licensure/Contract Requirements

- Community Care Licensing (CCL) citation.

CCL cited the Group Home on September 18, 2015, as a result of a compliant received on August 31, 2015. CCL determined that excess medications were not being logged for 2015 and had been destroyed. One nurse was not aware of the procedures for destroying excess medications. CCL substantiated four violations of health related services and plan of operation regulations. The Group Home appealed these findings and the outcome remains pending. The DCFS Child Protection Hotline was notified of this concern on August 28, 2015 and deferred the investigation to CCL.

Recommendation:

The Group Home's management shall ensure that:

1. The Group Home is in compliance with Title 22 Regulations and free of CCL citations.

Personal Rights and Social/Emotional Well-Being

- Two children interviewed stated that the discipline system was unfair because children on level A were rewarded disproportionately higher than other levels.

The Group Home management was made aware of the concerns and stated that the new system for rewards was in the process of being reviewed by CCL and would be fully implemented once approved.

Recommendation:

The Group Home's management shall ensure that:

2. A fair rewards and discipline system is maintained.

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

The CAD's last compliance report dated August 4, 2015, identified 13 recommendations.

Results:

Based on CAD's follow-up, the Group Home fully implemented 11 of the 13 recommendations for which they were to ensure that:

- Vehicles used to transport placed children are maintained in good repair.
- SIRs are timely in accordance with SIR reporting guidelines.
- Common areas are well maintained.
- Children's bedrooms are well maintained.
- All children feel safe at the Group Home.
- The Group Home documents efforts to provide sufficient meals and snacks.
- Staff treats all children with respect and dignity.
- All children are allowed private phone calls.
- There is provision of clean towels and adequate ethnic personal care items.

- Children are encouraged and assisted with the development of a Life Book/Photo Album.

- Group Home staff complete all required training.

Based on results of the current review, two recommendations were not implemented:

- The Group Home is in compliance with Title 22 Regulations and County contract requirements.

- The Group Home has an appropriate rewards and discipline system.

Recommendation:

3. The outstanding recommendations from the 2013-2014 report dated August 4, 2015, which are noted in this report as recommendation numbers 1 and 2 are fully implemented.

At the exit conference held on November 6, 2015, the Group Home representatives expressed their desire to remain in compliance with all Title 22 Regulations and County contract requirements. CAD will continue to assess implementation of the recommendations during the next Contract Compliance Review. The Out-of Home Care Management Division will provide ongoing support and technical assistance prior to the next review.

McKINLEY
CHILDREN'S
CENTER

Chief Executive Officer
Anil Vadaparty

Accredited by:

Accrediting Commission for Schools
533 Airport Blvd., Suite 200
Burlingame, CA 94010
Phone: (650) 696-1060

International Association of Continuing Education and Training

Member Agency:
Association of Community Human Service Agencies

Child Welfare League of America

November 13, 2015

Maria Rosas, CSA I
Contract Services Bureau Contracts Administration Division
Contract Compliance
3530 Wilshire Boulevard, 4th Floor - # 54
Los Angeles, California 90010

RE: Corrective Action Plan (CAP) for Group Home Monitoring Review

Dear Maria,

Thank you for holding the Exit Conference for the Group Home Monitoring Review with us on November 6, 2015. As always, we appreciate the collaborative approach in reviewing our program. We are proud of the work that our team has done, and please know that we will continue to identify ways to establish McKinley as a premier provider of group home services. We also appreciate your acknowledgement of the positive changes that have been made.

With regards to the 65 areas of compliance that were reviewed, there were 2 areas for which this CAP was requested:

(A) **Standard:** Licensure/Contract Requirements. "Is the group home free of any substantiated Community Care Licensing Complaints on safety and/or physical plant deficiencies since the last review?"

Finding: "CCL substantiated one complaint regarding medication destruction not being in accordance with CCL regulation."

McKinley Response/CAP: This citation has been cleared by CCL. We would like to note that McKinley appealed this citation because, in our belief, we substantially complied with Title 22 regulations regarding medication disposal. Nonetheless, we will continue to ensure compliance by implementing the following immediately:

(1) Trained Health Services staff will immediately log all medications slated for disposal, in accordance with Title 22 guidelines. Medications slated for disposal will be removed from active medications and stored separately, in accordance with Title 22 standards for medication storage.

(2) At no less than monthly intervals, the medications slated for destruction will be destroyed, and properly documented, by trained Health Services staff.
(3) On a monthly basis, the Group Home Administrator (or properly trained designee) will review the medication destruction log to ensure that proper protocols have been followed.

(B) **Standard:** Personal Rights and Social/Emotional Well-Being. "Is a fair rewards and discipline system in place?"

Finding: "One FC stated that the discipline/reward system in not fair and only A level is rewarded. Another child made similar comments about level A boys being rewarded disproportionately more than those on other levels."

McKinley Response/CAP: This finding was based on interviews with children in which 2 children replied as indicated above. While we believe that the discipline/reward system is fair and the rewards for positive behaviors are properly acknowledged, we will continually review our policies with the children to avoid any misunderstandings. Also, we will be implementing a new Points and Levels system in all of our units. This system was included in a new Program Statement submitted to CCL last year, and can now be implemented because we recently received approval of the Program Statement from CCL. In this system, children can earn daily points for the wake up/morning routine, school day, chores and room cleanliness, program participation, respect towards peers, following staff directions, evening transition, and their individualized goal. Daily points are awarded by the child care staff in a positive, strength-based, interactive manner with the children so that the children can understand why they were scored in a certain way and what they can do to improve. The scores are then tabulated weekly and will determine their level and corresponding privileges. The Unit Managers and Group Home Administrator will be responsible for reviewing the implementation and quality control of the Points and Level system. We anticipate full implementation on or before December 1, 2015. As noted, this plan will be discussed with all children, and reinforced as indicated.

Once again, thank you for collaborating with us to evaluate and increase the effectiveness of our services. We look forward to continuing to serve the children of Los Angeles County.

Sincerely,

Anil Vadaparty,
Chief Executive Officer

CC: Ira Kruskol, *Chief Programs Officer*