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May 24, 2016

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

From: Philip L. Browning
Director

SENECA FAMILY OF AGENCIES FOSTER FAMILY AGENCY FISCAL COMPLIANCE ASSESSMENT AND CONTRACT COMPLIANCE REVIEW

The Department of Children and Family Services (DCFS) Contracts Administration Division (CAD) conducted a Fiscal Compliance Assessment and a Contract Compliance Review of Seneca Family of Agencies Foster Family Agency (the FFA) in January 2016. The FFA has two offices, one located in Orange County, and one located in San Bernardino County and provides services to the County of Los Angeles DCFS placed children and children from other counties. According to the FFA's Program Statement, its stated purpose 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 30 DCFS placed children in 18 Certified Foster Homes (CFHs). The placed children's average length of placement was 19 months and their average age was 6.

SUMMARY

CAD conducted a Fiscal Compliance Assessment which included an agency-wide review of the FFA's financial records: such as financial statements, bank statements, check register, and personnel files to determine their compliance with the terms, conditions and requirements of the Foster Family Agency Contract, the Auditor-Controller Contract Accounting and Administration Handbook (A-C Handbook) and other applicable federal, State and County regulations and guidelines.

The FFA was in full compliance with all areas of the Fiscal Compliance Assessment: Financial Overview; Loans, Advances and Investments; Board of Directors and Business Influence; Cash/Expenditures; and Payroll and Personnel.

During CAD's Contract Compliance Review, the interviewed children generally reported: feeling safe at the FFA CFHs, having been provided with good care and appropriate services, being comfortable in their placement environment, and treated with respect and dignity. The Certified Foster Parents (CFPs)

reported that 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 8 of 11 areas of CAD's 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 a Community Care Licensing (CCL) citation; Certified Foster Homes, related to expired cardiopulmonary resuscitation (CPR) First Aid certificates for CFPs; and Maintenance of Required Documentation and Service Delivery, related to the FFA not obtaining the DCFS Children's Social Worker's (CSW's) authorization to implement the Needs and Services Plans (NSPs).

Attached are the details of CAD's review.

REVIEW OF REPORT

On February 22, 2016, Matthew St. John, DCFS CAD, and Mary Espinoza, DCFS Out-of-Home Care Management Division (OHCMD), held an exit conference with the FFA representatives: Sherie Dechter, Program Director, and Kimberly Nguyen, Senior Health Information Specialist. On March 15, 2015, Yvonne Kang, DCFS CAD, held a Fiscal exit conference with the FFA representative, Brian Shillcock, Assistant Director of Finance. There were no fiscal findings. The FFA's representatives agreed with the review findings and recommendations; were receptive to implementing systemic changes to improve the FFA's 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 Compliance CAP, addressing the recommendations noted in this Compliance report. OHCMD provided technical assistance to the FFA on February 22, 2016, to assist in the implementation of their new protocol.

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

PLB:KR:LTI:ms

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
FISCAL COMPLIANCE ASSESSMENT REVIEW
FISCAL YEAR 2015-2016

SCOPE OF REVIEW

The Fiscal Compliance Assessment included a review of Seneca Family of Agencies Foster Family Agency's (the FFA's) financial records for the period of July 1, 2014 through December 31, 2015. The Contracts Administration Division (CAD) reviewed financial records such as financial statements, bank statements, check register, and personnel files to determine the FFA's compliance with the terms, conditions and requirements of the Foster Family Agency Contract, the Auditor-Controller Contract Accounting and Administration Handbook (A-C Handbook) and other applicable federal State and County regulations and guidelines.

The on-site Fiscal Compliance Assessment review focused on 5 key areas of internal controls:

- Financial Overview,
- Loans, Advances and Investments,
- Board of Directors and Business Influence,
- Cash/Expenditures, and
- Payroll and Personnel.

The FFA was in full compliance with all areas of the Fiscal Compliance Assessment: Financial Overview; Loans, Advances and Investments; Board of Directors and Business Influence; Cash/Expenditures; and Payroll and Personnel.

FISCAL COMPLIANCE

No deficiencies noted.

PRIOR YEAR FISCAL COMPLIANCE ASSESSMENT FOLLOW-UP

CAD conducted a Fiscal Compliance Assessment of the FFA in Fiscal Year (FY) 2014-2015. The assessment resulted in two recommendations. CAD verified that the FFA implemented both recommendations.

NEXT FISCAL COMPLIANCE ASSESSMENT

The next Fiscal Compliance Assessment of the FFA will be conducted in the County FY 2016-2017.

SENECA FAMILY OF AGENCIES FOSTER FAMILY AGENCY
CONTRACT COMPLIANCE REVIEW SUMMARY

233 South Quintana Drive
Anaheim Hills, CA, 92807

License Number: 306004366

414 Tennessee Street, Suite Y
Redlands, CA 92373

License Number: 366424299

	Contract Compliance Review	Findings: January 2016
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 Training	5. Full Compliance
	6. FFA Pays Certified Foster Parents (CFP) Whole Foster Family Home Payments	6. Full Compliance
	7. FFA Conducts an Assessment of CFP Prior to Placement of Two (2) or More Children	7. Full Compliance
II	**Certified Foster Homes** (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 Federal Bureau of Investigation (FBI) California Department of Justice (DOJ), Child Abuse Central Index (CACI) Prior to Certification	3. Full Compliance 4. Full Compliance
	4. Timely, Completed, Signed Criminal Background Statement	5. Full Compliance 6. Full Compliance
	5. Health Screening & TB Test Prior to Certification	7. Full Compliance
	6. All Required Training Prior to Certification	8. Full Compliance
	7. Certificate of Approval on File/Including Capacity	
	8. Safety Inspection Completed At Least Every Six Months or Per Approved Program Statement	9. Improvement needed
	9. Completed Annual Training Hours for Re-certification and Current CPR/First-Aid/Water Safety Certificates	10. Full Compliance
	10. Current Driver's License/Auto Insurance/Annual Vehicle Maintenance Documentation for CFPs and Designated Drivers	11. Full Compliance
	11. Criminal Clearances and Health Screening/CDL/CPR/FBI/DOJ/CACI/Auto Insurance for Other Adults in the Home	12. Full Compliance
	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 and Service Delivery** (10 Elements) 1. FFA Obtains or Documents Efforts to Obtain DCFS Children's Social Worker's (CSW's) Authorization to Implement NSPs 2. CFPs Participated in the 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. DCFS 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. Improvement Needed 2. Full Compliance 3. Full Compliance 4. Full Compliance 5. Full Compliance 6. Full Compliance 7. Full Compliance 8. Full Compliance 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	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 are Reasonable 8. Children Informed About Their Medication and 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 Extracurricular 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 and Assistance with a 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 Driver's License 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 2015-2016

SCOPE OF REVIEW

The following report is based on a "point in time" review. This compliance report addresses findings noted during the January 2016 review. The purpose of this review was to assess Seneca Family of Agencies 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 compliance review covered the following 11 areas:

- Licensure/Contract Requirements,
- Certified Foster Homes,
- 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 purposes of this review, 6 placed children were selected for the sample. The Contracts Administration Division (CAD) interviewed 2 of 6 children, as 3 children were too young to be interviewed, and one 4-year-old child had a significant speech impediment. During the home visits, the children were observed to be comfortable and well cared for in the Certified Foster Homes (CFHs) and their Certified Foster Parents (CFPs) were observed to be responsive to the children's needs. CAD reviewed 6 case files to assess the level of care and services the children received. Additionally, 4 discharged children's files were reviewed to assess the FFA's compliance with permanency efforts. At the time of the review, 1 placed child was prescribed psychotropic medication. The child's case file was reviewed to assess for timeliness of Psychotropic Medication Authorizations and required documentation of psychiatric monitoring.

CAD reviewed 5 CFP files and 5 staff files for compliance with Title 22 Regulations and County contract requirements. Site visits were conducted to the FFA and the CFHs to assess the quality of care and supervision provided to the placed children.

CONTRACTUAL COMPLIANCE

CAD found the following 3 areas out of compliance:

Licensure/Contract Requirements

- Community Care Licensing (CCL) citation.

CCL cited the FFA for a Personal Rights Violation on October 29, 2015. This was in response to a complaint received by CCL on August 21, 2015. CCL requested a Plan of Correction (POC). The CFPs were requested to complete an eight-week course specializing in children who experience trauma and its effect on the brain. CCL cleared the required POC on November 5, 2015. An investigation was completed by a Department of Children and Family Services (DCFS) Emergency Response (ER) Children's Social Worker (CSW) and allegations of physical abuse and general neglect were unfounded.

Recommendation:

The FFA's management shall ensure that:

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

Certified Foster Homes

- Current cardiopulmonary resuscitation (CPR) First-Aid certificates were not obtained.

The CPR/First-Aid certificates for CFPs in one CFH expired in October 2015. CAD immediately notified the FFA and the CFPs were recertified on January 15, 2016.

Recommendation:

The FFA's management shall ensure that:

2. Current CPR/First-Aid certificates are maintained for CFPs.

Maintenance of Required Documentation and Service Delivery

- The FFA did not obtain the DCFS CSW's authorization to implement Needs and Services Plans (NSPs).

Two of 24 NSPs reviewed were not authorized by the DCFS CSW. The efforts listed to obtain the DCFS CSW's signatures on the NSPs were not within the mandated timeframe of 3 attempts within 5 days. The FFA's documented attempts ranged from a week to a month apart.

Recommendation:

The FFA's management shall ensure that:

3. The FFA obtains or documents efforts to obtain DCFS CSW's authorization to implement NSPs.

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

CAD's last compliance report dated March 22, 2016, identified 5 recommendations.

Results:

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

- All Special Incident Reports (SIRs) are submitted timely and appropriately cross-reported in accordance with the SIR reporting guidelines for FFAs.
- Safety inspections of all CFHs are completed at least every 6 months.
- FFA social workers develop timely, Initial NSPs with the child's participation.
- FFA social workers develop timely, Updated NSPs with the child's participation.
- FFA social workers develop timely, comprehensive quarterly reports.

At the exit conference, the FFA representatives stated their desire to remain in compliance with Title 22 Regulations and contractual requirements and reiterated that the FFA will implement procedures to strive towards greater compliance. The FFA will continue to consult with the Out-of-Home Care Management Division for additional support and technical assistance and CAD will assess implementation of the recommendations during the next review.