County of Los Angeles
DEPARTMENT OF CHILDREN AND FAMILY SERVICES
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(213) 351-5602

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October 31, 2014

To: Supervisor Don Knabe, Chairman
Supervisor Gloria Molina
Supervisor Mark Ridley-Thomas
Supervisor Zev Yaroslavsky
Supervisor Michael D. Antonovich

From: Philip L. Browning
Director

INNER CIRCLE FOSTER CARE AND ADOPTION SERVICES FOSTER FAMILY AGENCY CONTRACT NUMBER 07-021-035 COMPLIANCE MONITORING REVIEW

The Department of Children and Family Services (DCFS) Contracts Administration Division (CAD) conducted a review of Inner Circle Foster Care and Adoptions Services Foster Family Agency (the FFA) in April 2014. The FFA has one licensed office in the Third Supervisorial District and one licensed office in the Fifth Supervisorial District, which provides services to County of Los Angeles DCFS foster children and youth. 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 57 DCFS placed children in 51 certified foster homes. Of the children selected for review, the average length of placement was 8 months, and their average age was 10 years old.

SUMMARY

During CAD's review, the interviewed children generally reported: feeling safe at the FFA home; 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 9 of 11 sections of our program compliance review: Licensure/Contract Requirements; Certified Foster Homes; 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 and Discharged Children.

CAD noted deficiencies in the areas of: Maintenance of Required Documentation and Service Delivery, related to several children's NSPs either having missing or late CSW signatures, missing signature of the child, goals that were not specific and measurable and one NSP was not dated by the child or foster parent; and Personnel Records, related to a lack of documentation of required on-going training for Social Work staff.

REVIEW OF REPORT

On July 11, 2014, DCFS CAD Contract Compliance Administrators, Theodore Howard and Leticia Foster, held an Exit Conference with the FFA's Chief Executive Officer, Sandro Villa. The FFA representative 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 Community Care Licensing Division.

The FFA provided the attached approved CAP addressing the recommendations noted in this compliance report. CAD will verify that these recommendations have been implemented during our next monitoring review in May, 2015. The Out-of-Home Care Management Division will provide on-going 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
DLF:AB:th

Attachments

c: William T Fujioka, Chief Executive Officer
John Naimo, Auditor-Controller
Public Information Office
Audit Committee
Sandro Villa, Chief Executive Officer, Inner Circle FFA
Lajuannah Hills, Regional Manager, Community Care Licensing Division

INNER CIRCLE FOSTER CARE AND ADOPTION SERVICES
FOSTER FAMILY AGENCY
CONTRACT COMPLIANCE MONITORING REVIEW SUMMARY

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Van Nuys, CA 91406
License No. 191593257

1317 E. Palmdale Blvd., Suite 18
Palmdale, CA 93550
License No. 197602175

	Contract Compliance Monitoring Review	Findings: April 2014
I	**Licensure/Contract Requirements** (7 Elements) 1. Timely Notification for Child's Relocation 2. Serious Incident Report Documentation and Cross Reporting 3. Runaway Procedures in Accordance with the Contract 4. Are there CCL Citations/OHCMD Safety Reports 5. If Applicable, FFA Ensures Complete Required Whole Foster Family Home (WFFH) Training 6. FFA Pays Certified Foster Parents (CFP) WFFH Required Supplemental Payments 7. FFA Conducts an Assessment of CFP Prior to Placement of Two (2) or More Children	Full Compliance (All)
II	**Certified Foster Homes (CFHs)** (12 Elements) 1. Home Study and Safety Inspection Conducted Prior to Certification 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, if Applicable Car Seat(s) 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	Full Compliance (All)

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. 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 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 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. Full Compliance 4. Improvement Needed 5. Improvement Needed 6. Full Compliance 7. Full Compliance 8. Full Compliance 9. Improvement Needed 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 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. $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	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 Total of 15 Children	1. Full Compliance 2. Full Compliance 3. Full Compliance 4. Full Compliance 5. Full Compliance 6. Full Compliance 7. Improvement Needed 8. Full Compliance 9. Full Compliance

INNER CIRCLE FOSTER FAMILY AGENCY
CONTRACT COMPLIANCE MONITORING REVIEW
April 2014

SCOPE OF REVIEW

The following report is based on a "point in time" monitoring visit. The compliance report addresses findings noted during the April 2014 review. The purpose of this review was to assess Inner Circle Foster Care and Adoptions Services Foster Family Agency's (the FFA) 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, ten children were selected for the sample. The CAD interviewed nine children, as one child had been discharged from the foster home and returned to the Home of Parent prior to the interview. All ten case files were reviewed to assess the care and services they received. Additionally, four discharged children's files were reviewed to assess the FFA's compliance with permanency efforts. At the time of the review, two placed children were prescribed psychotropic medication. We reviewed their case files to assess for timeliness of Psychotropic Medication Authorizations and to confirm the required documentation of psychiatric monitoring.

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

CONTRACTUAL COMPLIANCE

CAD found the following two areas to be out of compliance.

Maintenance of Required Documentation and Service Delivery

- The files of two children contained NSPs that did not have a signature of the DCFS CSW or clear documentation of efforts to obtain the same. Two other children had NSPs that were signed late by the DCFS CSW. Another child had an NSP that did not contain her signature signifying her approval (the child was 8 years old at the time). One child had an

NSP that contained proper signatures, but was not dated as required to verify the appropriate timeframe.

During the Exit Conference, the FFA Administrator offered documentation of fax transmittal cover sheets that he stated showed good-faith efforts by the agency to obtain signatures from the case-carrying CSW. Upon inspection, Contract Compliance Administrator Theodore Howard rejected these documents because the transmittals were dated after the signature due date, and the follow-ups were done approximately 30 days apart. A showing of good faith-effort should have included follow-ups within seven days of each other, given the importance of having the CSW's signature of approval on the NSP. The FFA Administrator stated that he would implement internal training and procedural changes to make certain these issues do not occur in the future.

Recommendation

The FFA's management shall ensure that:

1. The signature of the County CSW is obtained within the specified time frame, or that clear documentation of all attempts is maintained in the children's files.

2. Each NSP 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.

3. Initial and Updated NSPs are Comprehensive are developed

4. All required signatures on NSP include the date when the document was signed.

Personnel Records

- The agency had no clear record of agency staff receiving required on-going training throughout the period of June 2013 – May 2014.

During the Exit Conference, the FFA Administrator stated that he would implement internal procedural changes to make certain that all specified documentation is up-to-date in staff files. He also agreed that, prior to being appointed Aviva's FFA Director; the agency did not do an adequate job of documenting the on-going training being received by Social Work staff. He showed the reviewers an example of what he had already done to rectify this situation in the future.

Recommendation

The FFA's management shall ensure that:

5. Employees complete all required training and documentation of the training is maintained.

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

The Out-of Home Care Management Division's (OHCMD) last compliance report dated August 1, 2013, identified 10 recommendations.

Results

Based on the results of this review, it appears that the FFA successfully implemented 9 of 10 previous recommendations. The successfully completed recommendations are as follows:

- Certified foster parents have the required health screenings in accordance with Title 22 regulations and said documentation is maintained in the certified foster parent files.
- Certified foster parent have annual documentation of vehicle maintenance and documentation maintained in the certified foster parent files.
- Placed children are progressing towards meeting the NSP goals and evidence is maintained in the children's files.
- FFA staff develops comprehensive NSPs and documentation is maintained in the children's files.
- Recommendations from assessments/evaluation are implemented and documented in the children's files.
- FFA social work staff contacts the DCFS CSWs at least monthly and documentation of contacts is maintained in the children's files.
- Placed children have initial medical examinations within the required timeframe and documentation is maintained in the children's files.
- Placed children have an adequate supply of clothing in accordance with the Contract required clothing standard and documentation is maintained in the children's files.
- FFA social work staff have timely health screenings in accordance with Title 22 regulations and documentation is maintained in the corresponding personnel file.

Recommendation

Based on the results of this review, the FFA did not successfully implement the following recommendation from last year:

- The FFA obtains or documents efforts to obtain the DCFS CSW's authorization to implement the NSP and maintain these documents in the children's files.

The Group Home's management shall ensure that:

6. The outstanding recommendations from the 2012-2013 monitoring report, which is noted in this report as Recommendation 1 is fully implemented.

MOST RECENT FISCAL REVIEW CONDUCTED BY THE AUDITOR-CONTROLLER (A-C)

A review made of the Auditor-Controller's website in July 2014 indicates that their last fiscal review concerning Inner Circle FFA was completed on July 11, 2011, for the period of January 1 through December 31, 2008. The A-C identified in its review, $6,147 in unallowable costs, and $369 in unsupported/inadequately supported costs. All unallowed and unsupported costs were subsequently repaid by the FFA to the County.

Where children thrive and families are strengthened.

April 26, 2013

Cori Shaffer, CSA I
DCFS OHCIS
9320 Telstar Ave., Ste. 216
El Monte, CA. 91731

Re: CAP Request from Compliance Review 2012/2013 – **Amended Version**

Dear Cori:

In response to your Request, we are submitting the following items to address the Corrective Action Plan:

- Copy of Sign-in sheet from Inner Circle's Certification meeting on April 2, 2013:
  - Discussed with the team to reinforce Title 22 regulations that when families transfer certification from another agency, they must provide a health screening and TB test within one year prior to the new certification date.

  (Please note correction: The CFP was certified in October 2010 and provided health screening in March 2011, not November 2011 as stated in your CAP letter).

- Copy of updated Vehicle Agreement requiring that CFPs provide this agency with documentation of annual vehicle inspections at certification and annually at recertification.

- Copy of Sign-in sheet from Inner Circle's in-service training on April 2, 2013 to address the following CAP Items:
  - Signature on NSP – to verify that CSW is in agreement with quarterly goals for child(ren).
    - Oversight procedure – Social Workers will fill out the last page of N&S report, Addendum, documenting requested signature from CSW. Social workers will turn in these sheets to their Supervisors. Supervisors will initial the Addendum and turn back into social workers to file in the child(ren)'s files. New protocol will be discussed and implemented at the next staff meeting, 4/30/13.
  - Detailed NSP goals – to document follow up and child(ren)'s progress toward quarterly goals.

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www.fosterfamily.org • E-mail: innercircle@fosterfamily.org

- Comprehensive NSP goals - to reflect child's comprehensive needs and services, including educational and therapeutic information.
  - Oversight procedure –Supervisors will initial each child's identified needs in the margins of the quarterly report narrative and double-check that each need has a corresponding goal in the N & S plan. Supervisors will ask social workers to correct each quarterly as needed before signing off. New protocol will be discussed and implemented at the next staff meeting, 4/30/13.

- Documentation of follow up for assessments requested for child(ren).

- Documentation of CSW monthly contact.

- Re-training on Initial Exam protocol and documentation.
  - Oversight procedure –Supervisors will have each social worker bring child(ren)'s files to each supervision meeting. Supervisors will check file for documentation of each medical exam, ensuring that exams are conducted in a timely manner and documented properly. New protocol will be discussed and implemented at the next staff meeting, 4/30/13.

- Re-training on Clothing Log protocol and documentation.

- Signed statement from HR team:

  - This agency understands and will reinforce hiring protocol that all new hires will provide an initial health screening and TB test prior to working with clients.
    - Oversight procedure – The face-sheets in the files for all new employees will be initialed by both HR personnel prior to new employee working with clients. New protocol will be discussed and implemented at the next staff meeting, 4/30/13.

In addition, this agency understands and agrees to continue to reinforce these ongoing compliance requirements.

Feel free to contact me for any further information at 818-988-6300 x202 or jillr@fosterfamily.org.

Sincerely,

Jill Rosenberg, MSW
Foster Care and Adoption Program Supervisor