County of Los Angeles
DEPARTMENT OF CHILDREN AND FAMILY SERVICES

425 Shatto Place, Los Angeles, California 90020
(213) 351-5602

PHILIP L. BROWNING
Director

FESIA A. DAVENPORT
Chief Deputy Director

Board of Supervisors
GLORIA MOLINA
First District
MARK RIDLEY-THOMAS
Second District
ZEV YAROSLAVSKY
Third District
DON KNABE
Fourth District
MICHAEL D. ANTONOVICH
Fifth District

November 13, 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

CONCEPT 7 FOSTER FAMILY AGENCY CONTRACT COMPLIANCE MONITORING REVIEW

The Department of Children and Family Services (DCFS) Out-of-Home Care Management Division (OHCMD) conducted a review of Concept 7 Foster Family Agency (the FFA) in September 2013. The FFA has one licensed office located in the First Supervisorial District; one office in Riverside County; and one office in Orange County. The FFA provides services to County of Los Angeles DCFS foster children and youth. According to the FFA's program statement, its mission is "to provide foster homes for children in need of out-of-home care by training and certifying acceptable foster parents in the counties of Los Angeles, Orange, Riverside, San Bernardino and San Diego; to provide social work services and on-going education and training to foster parents. In addition, to design a treatment program for each foster child that focuses on family reunification. When family reunification is not possible, FFA agency works with the County authorities to develop an alternative treatment/placement program."

At the time of the review, the FFA supervised 203 DCFS placed children in 113 certified foster homes. The placed children's average length of placement was seven months, and their average age was nine.

SUMMARY

During OHCMD's 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 3 of 11 sections of our Contract compliance review: Education and Workforce Readiness; Psychotropic Medication; and Discharged Children.

OHCMD noted deficiencies in the areas of Licensure/Contract Requirements, related to Community Care Licensing (CCL) citing the FFA as a result of deficiencies and findings; Certified Foster Homes, related to expired CPR and First-Aid certificates, a foster parent allowing a neighbor to transport a placed child home from school on a daily basis, and a certified foster parent did not have automobile insurance for over ten months; Facility and Environment, related to a certified foster home not having ventilation, sufficient and appropriate selection of reading materials for placed children and disaster drills not being conducted; Maintenance of Required Documentation and Service Delivery, related to certified foster parents not being familiar with Needs and Services Plans (NSPs), and Initial NSPs and Quarterly Reports not being comprehensive; Health and Medical Needs, related to untimely follow-up medical exams and initial and follow-up dental exams; Personal Rights and Social/Emotional Well-Being, related to children not being provided with recreational activities; Personal Needs/Survival and Economic Well-Being, related to children not having life books or photo albums; and Personnel Records, related to part-time FFA social workers not having a declaration on file indicating that their caseload will not exceed a total of 15 children.

Attached are the details of our review.

REVIEW OF REPORT

On November 5, 2013, the DCFS OHCMD Monitor, Darío Villamarín, held an Exit Conference with the FFA representatives, John Peel, Executive Director, Ana Zimmer, Administrator of the Commerce Office, Seana Aylen, Administrator of the Ontario Office, and Susana Cortez, Interim Administrator of the Orange Office. The FFA's representatives: 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 CCL.

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

OHCMD conducted a follow-up visit to the FFA on February 25, 2014 and determined that the FFA had implemented all 13 of the recommendations for the findings listed above.

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

PLB:EM:KR
RDS:dv

Attachments

c: William T Fujioka, Chief Executive Officer
John Naimo, Auditor-Controller
Public Information Office
Audit Committee
John Peel, Executive Director, Concept 7 FFA
Lajuannah Hills Regional Manager, Community Care Licensing

CONCEPT 7 FOSTER FAMILY AGENCY
CONTRACT COMPLIANCE MONITORING REVIEW SUMMARY

5675 Telegraph Road, St. 260	2990 Inland Empire, St. 100	625 N. Main Street
Commerce, CA 90040	Ontario, CA 91764	Orange, CA 92868
License Number: 197805297	License Number: 336412280	License Number: 306004156

	Contract Compliance Monitoring Review	Findings: September 2013
I	**Licensure/Contract Requirements** (7 Elements)	
	1. Timely Notification for Child's Relocation	1. Full Compliance
	2. Serious Incident Report Documentation and Cross Reporting	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 Homes (WFFH) Training	5. Not Applicable
	6. FFA Pays Certified Foster Parents (CFP) WFFH Required 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	1. Full Compliance
	2. Agency's Inquiry with OHCMD for Historical Information Prior to Certification	2. Full Compliance
	3. Timely Criminal Clearances (DOJ, FBI, 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 Completed At Least Every Six Months or Per Approved Program Statement	8. Full Compliance
	9. Completed Annual Training Hours for Re-certification and Current CPR/First-Aid/Water Safety Certificates	9. Improvement Needed
	10. Current CDL/Auto Insurance/Annual Vehicle Maintenance Documentation for CFPs and Designated Drivers, if Applicable Car Seat(s)	10. Improvement Needed
	11. Criminal Clearances and Health Screening/CDL/CPR DOJ/FBI/CACI/Auto Insurance for Other Adults in the Home	11. Full Compliance
	12. FFA Assists CFPs in Providing Transportation Needs	12. Full Compliance

III	**Facility and Environment** (7 Elements)	
	1. Exterior/Grounds Well Maintained	1. Full Compliance
	2. Common Areas/Interior Well Maintained	2. Improvement Needed
	3. Children's Bedrooms/Interior Well Maintained	3. Full Compliance
	4. Sufficient and Appropriate Educational Resources	4. Improvement Needed
	5. Adequate Perishable and Non-Perishable Food	5. Full Compliance
	6. CFP Conduct Disaster Drills and Documentation Maintained	6. Improvement Needed
	7. Money and Clothing Allowance Logs Maintained	7. Full Compliance
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	1. Full Compliance
	2. CFPs Participated in Development of NSPs	2. Improvement Needed
	3. Children Progressing Towards Meeting NSP Goals	3. Full Compliance
	4. FFA Social Workers Develop Timely, Comprehensive Initial NSP with Child's Participation	4. Improvement Needed
	5. FFA Social Workers Develop Timely, Comprehensive Updated NSPs with Child's Participation	5. Full Compliance
	6. Therapeutic Services Received	6. Full Compliance
	7. Recommended Assessments/Evaluations Implemented	7. Full Compliance
	8. County Children's Social Workers Monthly Contacts Documented in Child's Case File	8. Full Compliance
	9. FFA Social Workers Develop Timely, Comprehensive Quarterly Reports	9. Improvement Needed
	10. FFA Social Workers Conduct Required Visits	10. Full Compliance
V	**Education and Workforce Readiness** (5 Elements)	
	1. Children Enrolled in School Within Three School Days	Full Compliance (ALL)
	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	

VI	**Health and Medical Needs** (4 Elements)	
	1. Initial Medical Exams Conducted Timely	1. Full Compliance
	2. Follow-up Medical Exams Conducted Timely	2. Improvement Needed
	3. Initial Dental Exams Conducted Timely	3. Improvement Needed
	4. Follow-Up Dental Exams Conducted Timely	4. Improvement Needed
VII	**Psychotropic Medications** (2 Elements)	
	1. Current Court Authorization for Administration of Psychotropic Medication	Full Compliance (ALL)
	2. Current Psychiatric Evaluation Review	
VIII	**Personal Rights and Social Emotional Well-Being** (10 Elements)	
	1. Children Informed of Agency's Policies and Procedures	1. Full Compliance
	2. Children Feel Safe in the CFP Home	2. Improvement Needed
	3. CFPs' Efforts to Provide Nutritious Meals and Snacks	3. Full Compliance
	4. CFPs Treat Children with Respect and Dignity	4. Improvement Needed
	5. Children Allowed Private Visits, Calls and to Receive Correspondence	5. Full Compliance
	6. Children Free to Attend or Not Attend Religious Services/Activities of Their Choice	6. Full Compliance
	7. Children's Chores Reasonable	7. Full Compliance
	8. Children Informed About Their Medication and Right to Refuse Medication	8. Full Compliance
	9. Children Aware of Right to Refuse or Receive Medical, Dental and Psychiatric Care	9. Full Compliance
	10. Children Given Opportunities to Participate in Extra-Curricular Activities, Enrichment and Social Activities	10. Improvement Needed
IX	**Personal Needs/Survival and Economic Well-Being** (7 Elements)	
	1. $50 Clothing Allowance in Accordance with FFA Program Statement	1. Full Compliance
	2. Ongoing Clothing Inventories of Adequate Quantity and Quality	2. Full Compliance
	3. Children's Involvement in Selection of Their Clothing	3. Full Compliance
	4. Provision of Sufficient Supply of Clean Towels and Personal Care Items Meeting Ethnic Needs	4. Full Compliance
	5. Minimum weekly Monetary Allowances	5. Full Compliance
	6. Management of Allowance/Earnings	6. Full Compliance
	7. Encouragement/Assistance with Life Book/Photo Album	7. Improvement Needed

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. Full Compliance 8. Full Compliance 9. Improvement Needed

CONCEPT 7 FOSTER FAMILY AGENCY
CONTRACT COMPLIANCE MONITORING REVIEW
FISCAL YEAR 2013-2014

SCOPE OF REVIEW

The following report is based on a "point in time" monitoring visit. This compliance report addresses findings noted during the September 2013 monitoring review. The purpose of this review was to assess Concept 7 Foster Family Agency (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 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, 12 children were selected for the sample. Out-of-Home Care Management Division (OHCMD) interviewed 9 children. However, 3 children were not interviewed; 2 due to their young age; and 1 child reunified with the biological family. During the home visits, the children were observed to be comfortable in the certified foster homes and the certified foster parents were observed to be attuned to the needs of the children. OHCMD reviewed all 12 case files to assess the care and services they received. Additionally, 4 discharged children's files were reviewed to assess the FFA's compliance with permanency efforts. At the time of the review, 12 placed children were prescribed psychotropic medication. We reviewed 10 case files to assess for timeliness of Psychotropic Medication Authorizations and to confirm the required documentation of psychiatric monitoring.

OHCMD reviewed 5 certified foster parent files and 5 staff files for compliance with Title 22 Regulations and County contract requirements. Interviews were conducted with 5 certified foster parents to assess the quality of care and supervision provided to children.

CONTRACTUAL COMPLIANCE

OHCMD found the following eight areas to be out of compliance.

Licensure/Contract Requirements

- Community Care Licensing (CCL) cited the FFA as a result of deficiencies and findings related to the FFA failing to notify CCL of an Administrative change within ten working days as required by Title 22. The FFA submitted a Plan of Correction (POC) to CCL, which was approved on February 22, 2013. OHCMD conducted a follow-up visit to the FFA on February 25, 2014 and found the recommendation was implemented.

Recommendation

The FFA's management shall ensure that:

1. The FFA is in full compliance with Title 22 Regulations, free of CCL's citations.

Certified Foster Homes

A total of five certified foster homes were reviewed and the following deficiencies were noted for two of the five homes:

- In certified foster home #1, the foster parent's CPR and First-Aid certificates expired on December 10, 2012. OHCMD brought this issue to the attention of the FFA and requested documentation that the certified foster parent provides the FFA and OHCMD with copies of the renewed certificates. Prior to the Exit Conference, the FFA presented OHCMD with the requested documentation.

During the Exit Conference, the FFA representatives stated that for CPR and First-Aid certificates issue, the FFA now has a system in place of sending certified foster parent's letters reminding them to submit requested documentation. OHCMD conducted a follow-up visit to the FFA on February 25, 2014 and found the recommendation was implemented.

- In certified foster home #1, the certified foster parent allowed a neighbor to transport one of the placed children from school to the certified foster home on a daily basis. However, the certified foster parent did not notify the FFA of this transportation arrangement. OHCMD brought this issue to the attention of the FFA. The FFA administrator confirmed that they were not aware of this arrangement. Further, the third party driver was not cleared, and it is unknown if he/she had a valid California Driver's License and/or car insurance.

The FFA representatives stated that the FFA's Social Worker reported that the third party only transported the placed child occasionally. OHCMD instructed the FFA that the third party driver must be cleared by OHCMD and must provide proof of having a valid driver's license and automobile insurance. The FFA conducted a reassessment of this certified foster home and decided to decertify the home. The children were replaced. OHCMD placed this home on an Indefinite Hold and it will no longer be used as a placement resource for DCFS children. OHCMD conducted a follow-up visit to the FFA on February 25, 2014 and found the recommendation was implemented.

- In certified foster home #2, the certified foster parent did not have automobile insurance for over ten months. OHCMD brought this issue to the attention of the FFA the following day. The FFA provided OHCMD with an affidavit from the certified foster parent stating she does not transport the placed children. The placed children are transported by her mother who does have automobile insurance. OHCMD monitor was provided with a copy of the designated driver's automobile insurance and appropriate clearances were on file for the driver, as she previously resided in the home.

During the Exit conference, the FFA representatives stated letters are mailed to all certified foster parents reminding them to submit proof of automobile insurance before the expiration date. However, a response from this particular certified foster parent was not received. The FFA representative stated that they are trying to develop a better tracking system, especially for certified foster parents who are unresponsive. Further, the FFA will conduct a reassessment of the certified foster parents and if no improvement is noted, they will be at risk of being decertified. OHCMD conducted a follow-up visit to the FFA on February 25, 2014 and found the recommendation was implemented.

Recommendations

The FFA's management shall ensure that:

2. Certified foster parents have current CPR and First-Aid certificates at all times.

3. Certified foster parents disclose to the FFA if a third party is transporting the placed children and that the third party is criminally cleared, and provides a copy of a valid California driver's license and automobile insurance.

4. That certified foster parents have automobile insurance at all times.

Facility and Environment

- In certified home #1, there was no ventilation. The certified foster parent stated that when the home gets hot, she opens the doors and the windows for ventilation. OHCMD conducted a follow-up visit to the FFA on February 25, 2014 and found the recommendation was implemented.

- In certified home #1, there were no reading materials and educational resources for the placed children. OHCMD conducted a follow-up visit to the FFA on February 25, 2014 and found the recommendation was implemented.

- In certified home #1, the certified foster parent stated they had not conducted disaster drills for over a year. However, the FFA's records document that disaster drills were conducted on a quarterly basis. According to the FFA Social Worker, the certified foster parent reported conducting disaster drills every three months. OHCMD conducted a follow-up visit to the FFA on February 25, 2014 and found the recommendation was implemented.

Recommendations

The FFA's management shall ensure that:

5. Interior and grounds are well maintained, specifically that certified foster homes have ventilation.
6. Certified foster homes have reading materials and educational resources for all placed children.

7. Certified foster parents conduct disaster drills on a quarterly basis.

Maintenance of Required Documentation and Service Delivery

- In certified home #1, the certified foster parent was not familiar with Needs and Services Plans (NSPs). The home was decertified by the FFA. OHCMD conducted a follow-up visit to the FFA on February 25, 2014 and found the recommendation was implemented.

- For two children, the initial NSPs were not comprehensive, as the goals were not specific and measurable. The initial NSPs did not indicate the plan and method to achieve the goals, including services to be provided and person(s) responsible. OHCMD conducted a follow-up visit to the FFA on February 25, 2014 and found the recommendation was implemented.

- For one child, the Quarterly Report was not comprehensive. Specifically, the child had hygiene issues and a goal was not developed on how this would be addressed. OHCMD conducted a follow-up visit to the FFA on February 25, 2014 and found the recommendation was implemented.

It should be noted that the FFA representatives attended the OHCMD NSP Training for providers on January 23, 2012 and were made aware of the NSP requirements. The NSPs reviewed were developed subsequent to the NSP Training. OHCMD provided an additional NSP training for providers on August 1, 2013; a representative from the FFA did not attend the training.

Recommendations

The FFA's management shall ensure that:

8. Certified foster parents are familiar with NSPs.

9. FFA Social Workers develop comprehensive Initial NSPs and Quarterly Reports with goals that are specific, time limited and measurable.

Health and Medical Needs

- For one child, the required medical follow-up, initial, and follow-up dental examinations were conducted one month late.

Recommendation

The FFA's management shall ensure that:

10. Medical follow-up, initial and follow-up dental examinations are conducted timely.

During the Exit conference, the FFA representatives stated that they would review the child's file and an explanation to OHCMD would be provided. However, the FFA did not provide an explanation. OHCMD conducted a follow-up visit to the FFA on February 25, 2014 and found the recommendation was implemented.

Personal Rights and Social/Emotional Well-Being

- In Home #1, the placed children were not provided with recreational activities.

Recommendation

The FFA's management shall ensure that:

11. Children are provided with recreational activities. OHCMD conducted a follow-up visit to the FFA on February 25, 2014 and found the recommendation was implemented.

Personal Needs/Survival and Economic Well-Being

- In Home #1, children were not provided life books or photo albums. OHCMD conducted a follow-up visit to the FFA on February 25, 2014 and found the recommendation was implemented.

Recommendation

The FFA's management shall ensure that:

12. All children have a life book or photo album.

Personnel Records

- The files of two part-time FFA Social Workers did not have a written declaration that as a part-time employee, their caseload will not exceed a total of 15 children. OHCMD conducted a follow-up visit to the FFA on February 25, 2014 and found the recommendation was implemented.

Recommendation

The FFA's management shall ensure that:

13. Written declarations for part-time contract Social Workers are on file to confirm that their caseload will not exceed 15 children.

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

The OHCMD's last compliance report dated April 25, 2013, identified 11 recommendations.

Results

Based on OHCMD follow-up, the FFA fully implemented 9 of 11 previous recommendations for which they were to ensure that:

- Specific, individualized assessments are developed when placing more than two children in a certified foster home.
- Home studies are dated to determine their timeliness.
- Home studies are conducted prior to re-certification.
- OHCMD is contacted for historical abuse information regarding prospective certified foster parents prior to certification.
- All certified foster homes have lights in the children's bedrooms.
- The FFA social workers make sure that when a recommendation on a deficiency is made or brought to the attention of the certified foster parents, the recommendation is implemented.
- Report cards are in all children's files.
- Children are free to attend religious services and/or that an alternative plan is in place if children choose not to attend services.
- CPR and First-Aid certificates for employees are timely.

Based on OHCMD follow-up, the FFA did not fully implement 2 of 11 previous recommendations for which they were to ensure that:

- All certified foster parents are familiar with the NSPs.
- All children have a life book or photo album.

Recommendations

The FFA administration shall ensure that:

14. The outstanding recommendations for the April 25, 2013 monitoring report, which are noted in this report as Recommendations 8 and 12, are fully implemented.

At the Exit Conference, the FFA Administration expressed their desire to remain in compliance with all Title 22 Regulations and Contract requirements. In an effort to ensure all certified foster homes are in compliance with Title 22 Regulations, the FFA provided training to staff on Title 22 Regulations. Additionally, in efforts to develop comprehensive initial and updated NSPs, the FFA re-trained their social work staff. Lastly, in efforts to ensure that the FFA Administrators do not carry a caseload beyond what is allowed by Title 22 regulations, the FFA Director of Programs and Operations will be tasked with ensuring that cases are never held or transferred to an FFA Administrator.

Based on the OHCMD follow-up visit to the FFA on February 25, 2014 the FFA fully implemented all 13 recommendations of the contract compliance report.

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

A fiscal review of Concept 7 FFA has not been posted by the A-C.

Concept 7
Family Support & Treatment Centers

December 2, 2013

Dario Villamarin, CSA I
Our of Home Care management Division
9320 Telstar Avenue, Suite #216
El Monte, CA 91731

Dear Dario,

We express our appreciation for your guidance during this FFA Monitoring Review process. We thank you for meeting with us and reviewing the FFA Monitoring Review Field Exit Summary, and as acknowledge during this meeting most of the management team present, this was a first experience and it has been a positive learning one.

Below please find Concept7's plan on addressing the findings noted:

I. **Licensure/Contract Requirements (Item #4)**
C7 will be in full compliance with Title 22 Regulations, free of CCL's citations.

The C7 Site Administrators will meet once a month to address staff composition changes and report to CCL within 10 days of action. In an effort to remain in full compliance with Title 22 Regulations, the purpose for these monthly Site Administrators' meeting include to address and closely monitor the pending relocation of the C7 Commerce office to Whittier and obtain all the clearances and distribute notifications in a timely manner, address issues that may arise regarding CFP's changes/relocations, applicants' pending certifications, review of the re-certifications or de-certifications of current CFP, and address other FFA issues and concerns.

II. **Certified Foster Homes (Items 16,18)**
The Certified Foster Parents (CFP) will have current CPR and First-aid certificates and Auto Insurance at all times. The CFP will disclose to the FFA when a designated driver is transporting the placed children, and that the designated driver must be criminally cleared, and provide C7 a copy of their valid California driver's license and car insurance.

In order to ensure the above, Concept7 will fully implement Foster Track by December 2013. The Office Administrator/ Assistants will incorporate CPR/First Aid and other documentation expiration dates into the Foster Track system to generate notifications and reminders of when documentation will be expiring, such as First Aid/CPR Certificates, Auto Insurance, Identification or Valid CA Driver's License, DMV Print-out,

and the record of CFP Training Hours. The Office Administrators/Assistant will access notification reports three months in advance for the C7SW to inform the CFP in person.

The C7SW will implement the Quarterly Social Work Quality Assurance Review in each CFH. The findings and notification of soon to expire documentation will be communicated to the CFP in person and in writing, allowing the CFP time to comply within a timely manner. (Please see the attached Quarterly Social Worker Quality Assurance Review Form)

C7 conducted training for all Foster/Adoptive parents and all agency foster care staff regarding the findings noted in the FFA Monitoring Review for 2013. The foster care staff conducted one-on-one training for each certified foster parents during the weeks of 11/18/13 and 11/25/13. The training for the foster care staff took place on 11/19/13 for the C7 Ontario office, on 11/20/13 for the C7 Commerce office and 11/21/13 for the C7 Orange office. The trainings were conducted by the Site Administrator in each office. A checklist was reviewed and signed by all certified foster parents and the foster care staff. (See attached training checklists for each group)

The CFPs were informed that decertification remains a possibility, as per C7's discretion, after 30 days of non-compliance with requested documentation. The Decertification or Non-certification Criteria was amended and it highlights the documentation to be kept current and the consequence for failing to maintain required documentation. (Please see Item H on the attached Decertification or Non-certification Criteria form)

In order to prevent this from happening again, the CFPs were especially stressed to notify C7 immediately whenever they planned to rely on a designated driver. CFPs were reminded that designated drivers and other adults caring for the children on a regular basis must be criminally and child abuse cleared and that they must provide a copy of a valid California Driver's license and proof of car insurance. In addition, a revised Home Inspection Tool was modified to specifically identify who the designated drivers are and to ensure that they have been cleared by C7.

The C7SW and the Office Administrator/Assistants will monitor that the CFPs have valid car insurance at all times.

The C7 Executive Committee decertified the foster home that presented issues of concern in these areas. C7 Decertified this foster parent as of 12/02/13, and the two minor that were in placement where replaced in two separate homes within C7 FFA.

III. **Facility and Environment (Items 21, 23, 25)**

The Interior and grounds of the certified homes will be well maintained and have an appropriate selection of reading material. Disaster drills record will be posted on a visible place in the home and they will be conducted monthly.

Concept7 revised its home inspection tool to ensure that the items noted on the all agency findings are being implemented and monitored accordingly. The revised home inspection tool requires that sufficient and quality reading material be maintained in the home at all times.

To ensure the disaster drills are performed monthly, the C7SW will record the dates disaster drills were performed and the dates will be reflected on the quarterly home inspection tool. The C7SW will observe and initial the observation of a disaster drill being performed in the foster home on a quarterly basis.

In order to assess that a home is maintained at a safe and comfortable temperature, the revised home inspection tool now requires that appropriate and safe portable air fans be available when the home is not equipped with central air. (See attached revised form)

Concept7 conducted a training for all FFA staff and all certified foster parents regarding all the findings noted in the FFA Monitoring Review to ensure everyone is aware and in compliance with DCFS requirements. The training was conducted during the weeks of 11/18/13 and 11/22/13. A checklist was reviewed and signed by all certified foster parents and the foster care staff. (See attached training checklists)

IV. **Maintenance of Required Documentation and Service Delivery (27,28, 30, 35)**

The Certified Foster Parents are familiar with NSPs; C7SW will develop comprehensive Initial NSPs and Quarterly Reports that are child specific with measurable goals and ensures the participation of CFP and age appropriate children.

The foster care staff was retrained regarding the development of comprehensive NSPs to include the participation of the CFP and the age appropriate child. The area of developing child specific goals that are measurable, achievable, realistic and timely (SMART) was an important part of this hands on C7SW training. The training was conducted on 11/18/13 for the staff in Ontario, on 11/20/13 for the staff in Commerce and 11/21/13 for the staff in Orange. A checklist was reviewed and signed by the foster care staff.

V. **Health and Medical Needs (Items 43, 44, 45)**

Medical follow-up, initial and follow-up dental examinations will be conducted in a timely manner. With the implementation of the Foster Track system by December 2013, C7 will generate a month in advance, notification reports with follow-up requirements for medical and dental follow ups for each child as per C7SW Caseload. The FFA worker and supervisor will know a month in advance when medical/dental follow-ups are due. The FFA worker will remind the CFP when to schedule initial and medical/dental follow ups. If initial and/or medical/dental appointments are not conducted timely for reasons involving complications with Medi-Cal the FFA worker will document such information in the FC's file. If the required medical/dental follow ups are not scheduled as required the assigned FFA worker will be formally counseled.

VIII. Personal Rights and Social/Emotional Well-Being (Item 57)

The children will be provided with recreational activities outside the home that are age appropriate.

The CFPs and the foster care staff were re-trained regarding the Reasonable and Prudent Parent Standard intended to assist caregivers in normalizing the life of a "child." The training highlighted the child was entitled to participate in age-appropriate extracurricular, enrichment and social activities. The C7SW will document in the child's file whenever a FC does not want to participate in extracurricular, enrichment and social activities. The training for the foster care staff was conducted during the weeks of 11/18/13 and 11/25/13. A training checklist was reviewed and signed by all foster parents and the foster care staff. (See attached training sheets)

IX. Personal Needs/Survival, and Economic Well-Being (Item 64)

All children will have a life book or photo albums.

The CFPs were retrained regarding foster children possessing a life book or a photo album with developed photograph of themselves. The C7SW will ensure that all children possess a life book or a photo album containing photographs of their memorable and significant events. This area will be assessed on a quarterly basis during the required home inspections. The CFPs were retrained in this area to ensure that they are aware and in compliance with DCFS requirements. The training was conducted during the weeks of 11/18/2013 and 11/25/2013. A training checklist was reviewed and signed by all foster parents and all foster care staff. (See attached training sheets)

XI. Personnel Records (Item 76)

The FFA maintains written declarations for part-time contract social workers' caseloads not to exceed 15 children.

C7HR maintains original personnel files in the Corporate Office and each satellite office maintains shadow files. The C7 satellite offices have incorporated a checklist identifying

the forms required in shadow files from Corporate. This checklist will ensure the satellite office shadow files contain the written declarations for part-time contract social workers.

This is our recommended Corrective Action Plan for the deficiencies noted during the recent Los Angeles County Monitoring Review of 2013. C7FFA will focus on continuing to make sure that all staff and certified families are aware and in compliance with DCFS requirements. We thank you for your support and guidance during this process. If I can be of further assistance please do not hesitate to call me at (323) 838-9566.

Sincerely,

Ana R. Zimmer, MS
C7 Commerce Office
Regional Director

CC: John Peel, Executive Director
Gabriela Vidaurreta, Site Administrator
Seana Aylen, Interim Site Administrator & Adoptions
Susana Cortez, Director of Education & Recruitment
Cristina Freyre, Human Resources