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DEPARTMENT OF CHILDREN AND FAMILY SERVICES

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July 27, 2017

To: Supervisor Mark Ridley-Thomas, Chairman  
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From: *for* *Cynthia McCoy Miller*  
Brandon T. Nichols  
Acting Director

**ROSEMARY CHILDREN'S SERVICES FOSTER FAMILY AGENCY CONTRACT COMPLIANCE REVIEW**

The Department of Children and Family Services (DCFS) Contracts Administration Division (CAD) conducted a Contract Compliance Review of the Rosemary Children's Services Foster Family Agency (the FFA) in October 2016. The FFA has two offices: one in the Fifth Supervisorial District; and one in Riverside County. Both offices provide services to the County of Los Angeles DCFS placed children, Probation foster youth, and children placed from other counties. According to the FFA's Program Statement, its stated purpose is "to recruit, train, and monitor Foster Family Agency, Intensive Treatment Foster Care (ITFC), and Whole Foster Family Home (WFFH) foster parents who can offer nurturing, supportive treatment environments to children ages birth to 17, and also to Non-Minor Dependents."

At the time of the review, the FFA supervised 103 DCFS placed children in 55 Certified Foster Homes (CFHs). The children's average length of placement was 11 months and their average age was eight.

**SUMMARY**

During CAD's Contract Compliance Review, the interviewed children generally reported: feeling safe in the FFA CFHs; having been provided with good care and appropriate services; being comfortable in their placement environment; and being treated with respect. The Certified Foster Parents (CFPs) reported being supported by the FFA staff in their efforts to provide care and supervision to the children placed in their homes.

Each Supervisor  
July 27, 2017  
Page 2

The FFA was in full compliance with 7 of 11 applicable areas of CAD's Contract Compliance Review: Certified Foster Homes; Education and Workforce Readiness; Health and Medical Needs; 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 Special Incident Reports (SIRs) that were not submitted timely or appropriately cross-reported, and Community Care Licensing Division (CCLD) citations; Facility and Environment, related to common quarters not being well maintained, and money and clothing allowance logs not being maintained; Maintenance of Required Documentation and Service Delivery, related to the FFA Social Workers not developing a timely Updated Needs and Services Plan (NSP); and Psychotropic Medication, related to the FFA not obtaining current court authorization for administration of psychotropic medication.

### REVIEW OF REPORT

On December 6, 2016, Beatriz Meza and Ali Bhatti, DCFS CAD, and Gladys Hidayat, DCFS Out-of-Home Care Management Division (OHCMD), held an exit conference with the FFA representatives: Jana Trew, Regional Director, and Erin Ellis, Foster Care Director. The FFA 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).

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

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

BTN:KR  
LTI:bm

#### Attachments

c: Sachi A. Hamai, Chief Executive Officer  
John Naimo, Auditor-Controller  
Terri L. McDonald, Chief Probation Officer  
Sheila Mitchell, Assistant Chief Probation Officer, Juvenile Services  
Public Information Office  
Audit Committee  
Jana Trew, Regional Director, Rosemary Children's Services  
Lajuannah Hills, Regional Manager, Community Care Licensing Division  
Lenora Scott, Regional Manager, Community Care Licensing Division

**ROSEMARY CHILDREN'S SERVICES FOSTER FAMILY AGENCY  
CONTRACT COMPLIANCE REVIEW SUMMARY**

License Number: 197806415

License Number: 336427392

	<b>Contract Compliance Review</b>	<b>Findings: October 2016</b>
<b>I</b>	<p><b><u>Licensure/Contract Requirements</u> (7 Elements)</b></p> <ol style="list-style-type: none"> <li>1. Timely notification for child's relocation.</li> <li>2. Timely, cross-reported Special Incident Reports (SIRs).</li> <li>3. Runaway procedures.</li> <li>4. Community Care Licensing Division (CCLD) citations/Out-of-Home Care Management Division (OHCMD) safety reports.</li> <li>5. FFA ensures complete required Whole Foster Family Home (WFFH) training.</li> <li>6. FFA pays Certified Foster Parents (CFPs) WFFH payments.</li> <li>7. FFA conducted an assessment of CFPs prior to placement of two or more children.</li> </ol>	<ol style="list-style-type: none"> <li>1. Full Compliance</li> <li>2. Improvement Needed</li> <li>3. Full Compliance</li> <li>4. Improvement Needed</li> <li>5. Full Compliance</li> <li>6. Full Compliance</li> <li>7. Full Compliance</li> </ol>
<b>II</b>	<p><b><u>Certified Foster Homes</u> (12 Elements)</b></p> <ol style="list-style-type: none"> <li>1. Home study and safety inspection conducted prior to certification.</li> <li>2. FFA's inquiry with OHCMD for historical information prior to certification.</li> <li>3. Timely criminal clearances from the Federal Bureau of Investigation (FBI), California Department of Justice (DOJ), and Child Abuse Central Index (CACI), prior to certification.</li> <li>4. Timely, completed, and signed criminal background statement.</li> <li>5. Health screening &amp; tuberculosis (TB) test prior to certification.</li> <li>6. All required training prior to certification.</li> <li>7. Certificate of approval on file including capacity.</li> <li>8. Safety inspection completed at least every six months or per approved Program Statement.</li> <li>9. Completed annual training hours for Re-certification and current Cardiopulmonary Resuscitation (CPR)/First-Aid/Water safety certificates.</li> </ol>	<p align="center">Full Compliance (All)</p>

ROSEMARY CHILDREN'S SERVICES FOSTER FAMILY AGENCY CONTRACT  
COMPLIANCE REVIEW

PAGE 2

	<ol style="list-style-type: none"> <li>10. Current California Driver's License (CDL), auto insurance and annual vehicle maintenance documentation for CFPs and designated drivers.</li> <li>11. Criminal clearances from the FBI, DOJ and CACI; health screening and TB test; auto insurance and current CDL for other adults in the home.</li> <li>12. FFA assists CFPs in providing transportation needs.</li> </ol>	
<p><b>III</b></p>	<p><b><u>Facility and Environment</u> (7 Elements)</b></p> <ol style="list-style-type: none"> <li>1. Exterior grounds well maintained.</li> <li>2. Common quarters well maintained.</li> <li>3. Children's bedrooms well maintained.</li> <li>4. Sufficient recreational equipment and educational resources (e.g. computer).</li> <li>5. Adequate perishable and non-perishable food.</li> <li>6. CFP conducted disaster drills and documentation maintained.</li> <li>7. Money and clothing allowance logs maintained.</li> </ol>	<ol style="list-style-type: none"> <li>1. Full Compliance</li> <li>2. Improvement Needed</li> <li>3. Full Compliance</li> <li>4. Full Compliance</li> <li>5. Full Compliance</li> <li>6. Full Compliance</li> <li>7. Improvement Needed</li> </ol>
<p><b>IV</b></p>	<p><b><u>Maintenance of Required Documentation and Service Delivery</u> (9 Elements)</b></p> <ol style="list-style-type: none"> <li>1. FFA obtained or documented efforts to obtain DCFS Children's Social Worker's (CSW's) authorization to implement Needs and Services Plans (NSPs).</li> <li>2. CFPs participated in development of the NSPs.</li> <li>3. Children progressed towards meeting NSP goals.</li> <li>4. FFA Social Workers developed timely, comprehensive Initial NSPs with the child's participation.</li> <li>5. FFA Social Workers developed timely, comprehensive Updated NSPs with the child's participation.</li> <li>6. Therapeutic services received.</li> <li>7. Recommended assessment/evaluations implemented.</li> <li>8. DCFS CSW's monthly contacts documented.</li> <li>9. FFA Social Workers conducted required visits.</li> </ol>	<ol style="list-style-type: none"> <li>1. Full Compliance</li> <li>2. Full Compliance</li> <li>3. Full Compliance</li> <li>4. Full Compliance</li> <li>5. Improvement Needed</li> <li>6. Full Compliance</li> <li>7. Full Compliance</li> <li>8. Full Compliance</li> <li>9. Full Compliance</li> </ol>

ROSEMARY CHILDREN'S SERVICES FOSTER FAMILY AGENCY CONTRACT  
 COMPLIANCE REVIEW  
 PAGE 3

<p><b>V</b></p>	<p><b><u>Education and Workforce Readiness</u></b> (5 Elements)</p> <ol style="list-style-type: none"> <li>1. Children enrolled in school within three school days.</li> <li>2. Children attended school as required and FFA facilitated in meeting the children's educational goals.</li> <li>3. Children's report cards/progress reports maintained.</li> <li>4. Children's academic performance and/or attendance increased.</li> <li>5. FFA facilitated the children's participation in Youth Development Services (YDS) or equivalent services and vocational programs.</li> </ol>	<p>Full Compliance (All)</p>
<p><b>VI</b></p>	<p><b><u>Health and Medical Needs</u></b> (4 Elements)</p> <ol style="list-style-type: none"> <li>1. Initial medical exams conducted timely.</li> <li>2. Required follow-up medical exams conducted timely.</li> <li>3. Initial dental exams conducted timely.</li> <li>4. Required follow-up dental exams conducted timely.</li> </ol>	<p>Full Compliance (All)</p>
<p><b>VII</b></p>	<p><b><u>Psychotropic Medication</u></b> (2 Elements)</p> <ol style="list-style-type: none"> <li>1. Current court authorization for administration of psychotropic medication.</li> <li>2. Current psychiatric evaluation.</li> </ol>	<ol style="list-style-type: none"> <li>1. Improvement Needed</li> <li>2. Full Compliance</li> </ol>

<p><b>VIII</b></p>	<p><b><u>Personal Rights and Social/Emotional Well-Being</u></b>          (10 Elements)</p> <ol style="list-style-type: none"> <li>1. Children informed of FFA's policies and procedures.</li> <li>2. Children feel safe in the Certified Foster Home (CFH).</li> <li>3. CFPs' efforts to provide nutritious meals and snacks.</li> <li>4. CFPs treat children with respect.</li> <li>5. Children allowed private visits, calls and to receive correspondence.</li> <li>6. Children free to attend or not attend religious services/activities of their choice.</li> <li>7. Children's chores are reasonable.</li> <li>8. Children informed about their medication and right to refuse medication.</li> <li>9. Children aware of right to refuse or receive voluntary medical, dental and psychiatric care.</li> <li>10. Children given opportunities to participate in extracurricular, enrichment and social activities in the CFH, school and community.</li> </ol>	<p>Full Compliance (All)</p>
<p><b>IX</b></p>	<p><b><u>Personal Needs/Survival and Economic Well-Being</u></b>          (7 Elements)</p> <ol style="list-style-type: none"> <li>1. Clothing allowance provided in accordance with FFA Program Statement.</li> <li>2. Adequate quantity and quality of clothing inventory.</li> <li>3. Children involved in the selection of their clothing.</li> <li>4. Routine provision of all personal care items that meet ethnic needs including towels and toiletries.</li> <li>5. Minimum monetary allowances.</li> <li>6. Management of allowance/earnings.</li> <li>7. Encouragement and assistance with a Life Book.</li> </ol>	<p>Full Compliance (All)</p>
<p><b>X</b></p>	<p><b><u>Discharged Children</u></b> (3 Elements)</p> <ol style="list-style-type: none"> <li>1. Completed discharge summary.</li> <li>2. Attempts to stabilize children's placement.</li> <li>3. Child completed high school (if applicable)</li> </ol>	<p>Full Compliance (All)</p>

<b>XI</b>	<b><u>Personnel Records</u></b> (9 Elements) <ol style="list-style-type: none"><li>1. Timely criminal clearances from the FBI, DOJ and CACI.</li><li>2. Timely, completed and signed criminal background statement.</li><li>3. FFA Social Workers met education/experience requirements.</li><li>4. Timely employee health screening and TB clearances.</li><li>5. Valid CDL and auto insurance.</li><li>6. FFA employees signed copies of FFA policies and procedures.</li><li>7. FFA employees completed all required training and documentation maintained.</li><li>8. FFA Social Workers have appropriate caseload ratio.</li><li>9. FFA maintained written declarations for part-time contracted FFA Social Workers caseloads not to exceed a total of 15 children.</li></ol>	Full Compliance (All)
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**ROSEMARY CHILDREN'S SERVICES FOSTER FAMILY AGENCY  
CONTRACT COMPLIANCE REVIEW  
FISCAL YEAR 2016-2017**

**SCOPE OF REVIEW**

The following report is based on a "point in time" review. This compliance report addresses findings noted during the October 2016 review. The purpose of this review was to assess the FFA's compliance with its County contract. The 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 the purpose of this review, 12 placed children were selected for the sample. CAD interviewed nine children, as three children were pre-verbal. CAD reviewed the 12 children's files to assess the level of care and services they received. During the home visits, the children were observed to be comfortable and well cared for in the CFHs and the CFPs were observed to be responsive to the children's needs. 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. These children's files were reviewed to assess for timeliness of Psychotropic Medication Authorization and the required documentation of psychiatric monitoring.

CAD reviewed seven CFP files and five 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 four areas out of compliance:

**Licensure/Contract Requirements**

- SIRs were not submitted timely or appropriately cross-reported.



ROSEMARY CHILDREN'S SERVICES FOSTER FAMILY AGENCY CONTRACT  
COMPLIANCE REVIEW  
PAGE 2

CAD noted that 1 of 13 SIRs reviewed was not submitted timely into the I-Track system for an incident on July 24, 2016 that was submitted on July 26, 2016, and 2 of 13 SIRs were not cross-reported to CCLD.

- CCLD citations.

CCLD cited the Foster Family Agency on October 21, 2015, during a case management visit for a safety violation related to the FFA not obtaining Criminal Record Clearance for the CFPs and their adult son prior to certification. CCLD reviewed the Personnel History Information files and determined that the CFPs and their adult son had an inactive status on their Personnel History Information report, dating back to December 20, 2007. A Plan of Correction (POC) was requested to have the FFA ensure that all three adults are live-scanned for the purpose of obtaining a Criminal Record Clearance. CCLD cleared the POC on November 3, 2015. Neither the DCFS Emergency Response (ER) Children's Social Worker (CSW) nor Out-Of-Home Care Investigations Section (OHCIS) completed an investigation.

CCLD cited the FFA on December 4, 2015, for a Personal Rights violation regarding a complaint that placed children were unwillingly forced to attend church. CCLD interviewed all parties and determined that the children were forced to attend church because the CFP did not have a suitable backup plan for when children do not wish to attend church. A POC was requested to have the CFPs and backup care provider retrained on personal rights and to include spot checks to ensure the children's rights would not be violated. CCLD cleared the POC on December 11, 2015. The DCFS ER CSW and the OHCIS did not complete an investigation.

CCLD cited the FFA on July 22, 2016, during a case management visit for a reporting requirements violation relating to the FFA's failure to report an incident to CCLD as required by the Title 22 Regulations. A POC was required to have the FFA provide Special Incident Report Training to all staff. CCLD cleared the POC on August 3, 2016. The DCFS ER CSW and the OHCIS did not complete an investigation.

**Recommendations:**

The FFA's management shall ensure that:

1. SIRs are submitted timely and appropriately cross-reported.
2. The FFA is in full compliance with Title 22 Regulations and free of CCLD citations.

**Facility and Environment**

- Common quarters were not well maintained.

ROSEMARY CHILDREN'S SERVICES FOSTER FAMILY AGENCY CONTRACT  
COMPLIANCE REVIEW  
PAGE 3

Several knives were found in an unlocked kitchen drawer in a CFH. CAD immediately had the CFPs place the knives in a locked cabinet and out of the placed child's reach.

On January 11, 2017, the FFA held a staff training to discuss FFA Social Worker's responsibility to ensure the CFHs adhere to Title 22 Regulations, specifically to ensure that the FFA Social Workers check every drawer and cabinet when inspecting the CFHs.

- Appropriate monetary and clothing allowance logs were not maintained.

Six of twelve children did not have appropriate clothing allowance logs. The purchased clothing receipts were copied with the dates omitted and attached to logs that did not match the timeframe of the clothing logs.

Two of twelve children did not have appropriate monetary allowance logs. In two instances, the CFPs did not distribute allowances on a weekly basis. Two other children did not sign the receipts of their clothing or weekly allowances.

On January 11, 2017, the FFA held staff training to discuss monthly clothing and weekly allowance expenditure regulations. The FFA provided a Foster Parent Monthly Training packet to cover the monthly Clothing Expenditures Policy, Allowance Regulations and updated Monthly Tasks Forms. The FFA will maintain proof of the staff training in the CFP files.

**Recommendations:**

The FFA's management shall ensure that:

3. Common quarters are well maintained.
4. Appropriate monetary and clothing allowance logs are maintained.

**Maintenance of Required Documentation and Service Delivery**

- FFA Social Workers did not develop a timely Updated NSP.

At the time of the review, one child's NSP was not on file. The FFA representatives were unaware that an Updated NSP with a due date of December 24, 2015, was missing, and they were unclear as to why the NSP was not on file. The staff were unable to locate the NSP at that time but on October 17, 2016, the FFA did provide a NSP for that time period.

On January 11, 2017, the FFA held a staff training to ensure that all FFA Social Workers understand and adhere to the FFA policy regarding the completion of NSPs, including filing the completed NSPs in the children's files in a timely manner.

**Recommendation:**

The FFA's management shall ensure that:

5. FFA Social Workers develop timely Updated NSPs.

**Psychotropic Medication**

- Current court authorization for administration of psychotropic medication was not obtained.

A child received psychotropic medication prior to court authorization being granted. The FFA representatives stated that they were informed by the child's psychiatrist that the Prescribing Physician's Statement [Form JV-220(A)] would be submitted on an emergency basis and instructed the FFA staff that the child should begin the medication immediately. It was later discovered that the court did not receive the documentation from the psychiatrist. However, the psychiatrist did eventually submit the JV-220(A) and it was subsequently approved by the court.

On January 11, 2017, the FFA Foster Care Director held a staff training to review the applicable policy, specifically to ensure that the FFA Social Workers understand that children are not to start any new psychotropic medication until the appropriate documentation has been submitted to the court and the required court authorization for medication administration is complete and on file.

**Recommendation:**

The FFA's management shall ensure that:

6. Current court authorization for administration of psychotropic medication is obtained.

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

CAD's last compliance report dated June 20, 2016 (review conducted in October 2015), identified seven recommendations.

**Results:**

Based on the results of the current review, the FFA fully implemented 5 of 7 recommendations for which the FFA was to ensure that:

- CFPs maintain valid vehicle registration.
- CFHs adhere to food product expiration dates.

ROSEMARY CHILDREN'S SERVICES FOSTER FAMILY AGENCY CONTRACT  
COMPLIANCE REVIEW

PAGE 5

- FFA obtains and documents efforts to obtain the DCFS CSW's authorization to implement the NSPs.
- FFA Social Workers develop timely, comprehensive Initial NSPs.
- Encouragement/assistance with a Life Book or Photo Album is provided to all children.

Based on the results of the current review, the FFA did not implement 2 of 7 recommendations for which the FFA was to ensure that:

- The FFA is in full compliance with Title 22 Regulations and free of CCLD citations.
- Appropriate and comprehensive monetary allowance logs are maintained.

**Recommendation:**

The FFA's management shall ensure that:

7. The outstanding recommendations from the prior report noted in this report as recommendation numbers 1 and 4 are fully implemented.

At the exit conference, the FFA representatives expressed their desire to remain in compliance with Title 22 Regulations and contract requirements. The FFA will consult with the OHCMD for additional support and technical assistance, and CAD will assess contract compliance during the next review.



Rosemary Children's Services

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TEACHING THE TEEN

FOSTERING THE FAMILY

January 3, 2017  
County of Los Angeles  
Contracts Administration Division  
3530 Wilshire Blvd. 4th Floor  
Los Angeles, CA 90010  
Attn: Ali Bhatti

To: Mr. Ali Bhatti  
From: Erin Ellis, Foster Care Director, Rosemary Children's Services  
Subject: Corrective Action Plan for the Contracts Administration Division (CAD) Contract Compliance Monitoring Review of Rosemary Children's Services Foster Family Agency for 2016

**Licensure/Contract Requirements**

- **One Special Incident Report was not cross-reported timely, and two others were not reported to CCL.**

**RCS Response:** RCS Foster Care Social Workers (FCSW) are responsible for ensuring that all Special Incident Reports (SIRs) are completed in a timely manner. The Social Worker's Supervisor is responsible for ensuring that the SIRs are cross reported to the appropriate people (CCL and OHC). On October 12, 2016 all of the FFA staff were retrained on SIRs. This training covered timeliness of submitting the SIR as well as who it is reported to. The sign in sheet, agenda and power point from this training are attached. At the FFA All Staff meeting on January 11, 2017 this will be reviewed again with all the FFA staff. Specifically, that all SIRs must be completed, reviewed and submitted immediately or by the next business day, and that all Behavioral/Mental Health incidents must be reported to CCL regardless of where the incident took place. (see attached agenda)

- **Rosemary Children's Services (RCS) FFA received three Community Care Licensing (CCL) substantiated complaints/reports on safety and/or physical plant deficiencies during the rating period.**

**RCS Response:** One of the citations was a Substantiated allegation of personal rights that the foster child was being forced to attend church. RCS completed the Plan of Correction (POC) that involved retraining the foster parent and the back up caregiver on personal rights, including that the children have the right to attend or not attend religious services and activities of their choice. Also, that spot checks will be made with the foster parent and foster children to make sure their rights are no longer being violated. The proof of the completed POC was submitted to CCL before the due date.

The second citation was a case management deficiency regarding reporting requirements. Specifically, that an incident was reported to DCFS and the Child Protection Hotline, but it was not sent to CCL. RCS completed the POC that involved training the FFA staff on Special Incident Reporting. The proof of the completed POC was submitted to CCL before the due date.

The third citation was a case management deficiency regarding foster parents and their adult son not having criminal record clearances associated with the FFA. The family had been certified over 10 years ago, and it is unclear why their clearances were not associated with our FFA at that time. Although there

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Child Welfare  
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Foster Family-Based  
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was paperwork in the file showing criminal record clearances at that time, they did not have the FFA license number on them. Current RCS staff always ensures that all adults that live in a prospective foster home have criminal record clearances associated to RCS FFA prior to certifying the home. RCS completed the POC that involved live-scanning the three adults to obtain current criminal clearances, as well as paid the civil penalties assessed. The proof of the live-scanning was sent to CCL the next day, and all three adults now have current criminal clearances associated with the FFA. The civil penalties were paid upon receipt of the invoice.

RCS will continue to train our staff and foster parents on agency expectations and Title 22 regulations in order to ensure that we make every effort to be free of substantiated investigations

**Facility and Environment:**

- **One of the CFHs had knives in an unlocked drawer and at a child's reach.**

**RCS Response:** RCS FCSWs are responsible for ensuring that the CFHs are in compliance with Title XXII Building and Grounds regulations, which includes ensuring that there is nothing that would jeopardize the health or safety of the foster children. The Certified Foster Parents (CFP) are responsible for adhering to these regulations at all times. It is the FCSWs responsibility to conduct mini weekly home inspections, and to conduct thorough bimonthly home inspections of the CFHs. The forms for both of these contain specific language regarding checking that the knives are locked (see attached forms). On both forms used to conduct these inspections it states "Knives/sharp utensils must be inaccessible to children (stored 5' high/locked)". The FCSWs are to check this every week and both them and the CFP sign the form acknowledging that the home is in compliance. The proof of the completed weekly and bi-monthly home inspections are kept at each FFA office location.

The Foster Care Director will be reviewing the FCSWs responsibility regarding ensuring Title XXII adherence of their CFHs, and specifically that they must open up every drawer and cabinet when inspecting the CFHs at the FFA All Staff meeting on January 11, 2017 (see attached agenda and handouts).

- **Three of the CFHs did not maintain appropriate and comprehensive monetary and clothing allowance logs, as they were missing, incomplete or did not reflect the corresponding month in which it should had been received.**

**RCS Response:** RCS requires that all foster parents provide the children with their allowance weekly, and that they spend a minimum of \$50-\$60 per month on clothing for the children. During the CAD review it was noted that the documentation of the allowance being given was not always accurate, however the children did verify that they have received their allowance every week since placement. The FCSW has already reviewed with that foster mother that both she and the foster children need to initial every week at the time they are given their allowance on the agency Monthly Tasks form.

The Monthly Tasks form is submitted monthly by the CFPs and is used to document the children receiving their allowance as well as the monthly clothing



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expenditure of \$50-\$60, with the original receipts attached. During the CAD review the documentation of the clothing purchases was not clear, with some receipts being missing or having multiple children on the same receipt which causes confusion.

In order to clarify allowance and monthly clothing expenditure regulations the Foster Care Director has amended the Monthly Tasks form to clarify what the CFPs need to complete and submit, and at the FFA All Staff meeting on January 11, 2017 this will be reviewed with the FFA staff. The training will cover the updated Monthly Tasks form as well as Allowance and Monthly Clothing Expenditure Guidelines (see attached agenda and handout).

Additionally, all RCS foster parents will be retrained during the month of January on these same topics by their FCSW. At the FFA All Staff Meeting on January 11, 2017 the Foster Care Director will provide the FCSWs with the Foster Parent Monthly Training packet, which covers the Monthly Clothing Expenditures Policy, Allowance Regulations and updated Monthly Tasks Forms (see attached). The proof of this training will be kept in the foster parent's agency file.

**Maintenance of Required Documentation and Service Delivery**

- **One of the foster children did not have a Quarterly/NSP report from December 2015 in the file at the time of the review. A recreated NSP was provided during the review.**

**RCS Response:** The FCSW that completes the Quarterly Report/NSP for the foster children is responsible for filing a hard copy of the report in the foster child's file at the agency office upon completion. This is part of the agency's formal Quarterly/Needs and Services Plan Report Policy that was revised on December 18, 2015, and was reviewed with all the FFA staff in January 2016, further it is reviewed with all new staff upon hire. The FCSW that was responsible for the missing report in December 2015 is no longer with RCS, and it is unclear why they failed to adhere to the agency's Quarterly/Needs and Services Plan Report Policy.

In order to ensure that all current FCSWs understand and adhere to the agency policy regarding Quarterly/Needs and Services Plans, including filing of the completed reports in the foster children's files at the FFA All Staff Meeting on January 11, 2017 the Foster Care Director will review the Quarterly/Needs and Services Plan Report Policy with all FFA staff (see attached agenda and handout).

**Psychotropic Medication**

- **One of the foster children started to receive psychotropic medication prior to the court order/approval being obtained.**

**RCS Response:** It is RCS agency policy that foster children are not allowed to start any new psychotropic medication until the approved JV-220 (Psychotropic Medication Authorization) is received by RCS from the court. The only exception is in cases that the psychiatrist determines that the medication needs to be started immediately and the psychiatrist has marked it as an emergency situation. In these cases RCS requests a copy of the JV-220 that was submitted



## Rosemary Children's Services

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to the court to document the emergency situation as identified by the psychiatrist. All foster parents and FCSWs are trained regarding these policies.

In regards to the case identified during the CAD review, whereby the foster child had started to receive the psychotropic medication prior to the court approval being obtained, the RCS FCSW had gone with the foster child to the psychiatrist appointment where he was prescribed the psychotropic medication. The psychiatrist had informed the FCSW that they were submitting the JV-220 as an emergency situation that day and instructed them that the foster child should start the medication immediately. On the DCFSS 561 (c) form from that appointment it indicates as such. The FCSW requested the copy of the JV-220 that was submitted, but it was never received. The FCSW continued to follow up and it was discovered that the court did not receive the JV-220 from the psychiatrist. The psychiatrist did eventually submit the JV-220 to the court at a later date and it was approved and received by RCS.

In order to ensure that similar situations do not occur again the agency's current Psychotropic Medication Authorization Policy that was approved as of February 25, 2016, and was reviewed with all FCSWs in March 2016, and since then with all new FCSWs upon hire, will be reviewed by the Foster Care Director at the FFA All Staff meeting on January 11, 2017 (see attached agenda and handout). The Foster Care Director will review the policy and specifically the part that states "The psychiatrist submits the form to the court for authorization of use of the psychotropic medication. The court reviews the request and determines if the use of the medication is approved or not. The foster child is not permitted to take any psychotropic medication until the court approves it and the court stamped approval is received by RCS. The only exception to this is when the psychiatrist marks it as an "emergency" and then the child can begin taking the medication pending the approval. In these cases a copy of the form verifying this was done and submitted to the court must be received by RCS prior to the medication being started." FCSWs will be instructed that the foster children are not to start any new medication until a copy of the JV-220 that is being submitted to the court is received by RCS.

The Foster Care Director will be responsible for ensuring that this CAP is fully implemented. If you have any questions, please feel free to contact me at (626) 403-2277.

Sincerely,

Erin Ellis, MA  
Foster Care Director