



County of Los Angeles
DEPARTMENT OF CHILDREN AND FAMILY SERVICES

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August 30, 2016

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From: Philip L. Browning
Director

TURMONT HOME FOR BOYS GROUP HOME FISCAL COMPLIANCE ASSESSMENT AND CONTRACT COMPLIANCE REVIEW

The Department of Children and Family Services (DCFS) Contracts Administration Division (CAD) conducted a Fiscal Compliance Assessment and a Contract Compliance Review of the Turmont Home for Boys (the Group Home) in December 2015. The Group Home has two sites located in the Second and Fifth Supervisorial Districts and provides services to the County of Los Angeles DCFS placed children. According to the Group Home's Program Statement, its stated purpose is "to provide 24-hour, non-medical care and supervision to residents placed by the Department of Children and Family Services."

At the time of the review, the Group Home served 12 DCFS placed children. The Group Home has two six-bed sites and is licensed to serve a total capacity of 12 girls and boys, ages 13 through 17. The placed children's average length of placement was 15 months and their average age was 16.

SUMMARY

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

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

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

"To Enrich Lives Through Effective and Caring Services"

The Group Home was in full compliance with 7 of 9 applicable areas of CAD's Contract Compliance Review: Licensure/Contract Requirements; Facility and Environment; Education and Workforce Readiness; Health and Medical Needs; Personal Rights and Social/Emotional Well-Being; Personal Needs/Survival and Economic Well-Being; and Personnel Records.

The Psychotropic Medication section was not applicable as no placed children were prescribed psychotropic medication at the time of the review.

CAD noted deficiencies in the areas of: Maintenance of Required Documentation and Service Delivery, related to one Initial Needs and Services Plan not developed timely; and Discharged Children, related to one child who was not discharged according to the permanency plan.

Attached are the details of CAD's review.

REVIEW OF REPORT

On March 21, 2016, Theodore Howard, DCFS CAD, held an exit conference with the Group Home representative Victor Bradley, Executive Director. On April 7, 2016, Ali Gomaa-Mersal, DCFS CAD, held a fiscal exit conference with the Group Home representative, Victor Bradley, Executive Director. There were no fiscal findings. The Group Home representative agreed with the Contract Compliance review findings and recommendations; was receptive to implementing systemic changes to improve the Group Home's compliance with regulatory standards; and agreed to address the noted deficiencies in a Corrective Action Plan (CAP).

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

The Group Home provided the attached approved CAP addressing the recommendations noted in this report. On March 3, 2016, the Out-of-Home Care Management Division provided technical assistance to the Group Home to help in the implementation of their CAP.

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

PLB:KR
LTI:th

Attachments

c: Sachi A. Hamai, Chief Executive Officer
John Naimo, Auditor-Controller
Calvin C. Remington, Interim Chief Probation Officer
Public Information Office
Audit Committee
Sybil Brand Commission
Victor Bradley, Executive Director, Turmont Home for Boys
Leonora Scott, Regional Manager, Community Care Licensing Division
Lajuannah Hills, Regional Manager, Community Care Licensing Division

**TURMONT HOME FOR BOYS
FISCAL COMPLIANCE ASSESSMENT REVIEW
FISCAL YEAR 2015 – 2016**

SCOPE OF REVIEW

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

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

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

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

FISCAL COMPLIANCE

No deficiencies noted.

PRIOR YEAR FISCAL COMPLIANCE ASSESSMENT FOLLOW-UP

CAD conducted a Fiscal Compliance Assessment of the Group Home in County Fiscal Year (FY) 2014-2015. The assessment resulted in one recommendation and CAD verified that the recommendation was implemented.

NEXT FISCAL COMPLIANCE ASSESSMENT

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

**TURMONT HOME FOR BOYS
CONTRACT COMPLIANCE REVIEW SUMMARY**

**License # 191600783
Rate Classification Level: 8**

**License # 197600325
Rate Classification Level: 8**

	Contract Compliance Review	Findings: December 2015
I	<p><u>Licensure/Contract Requirements</u> (9 Elements)</p> <ol style="list-style-type: none"> 1. Timely Notification for Child's Relocation 2. Transportation Needs Met 3. Vehicle Maintained in Good Repair 4. Timely, Cross-Reported SIRs 5. Disaster Drills Conducted & Logs Maintained 6. Runaway Procedures 7. Comprehensive Monetary and Clothing Allowance Logs Maintained 8. Detailed Sign-In/Out Logs for Placed Children 9. CCL Complaints on Safety/Plant Deficiencies 	Full Compliance (All)
II	<p><u>Facility and Environment</u> (5 Elements)</p> <ol style="list-style-type: none"> 1. Exterior Well Maintained 2. Common Areas Well Maintained 3. Children's Bedrooms Well Maintained 4. Sufficient Recreational Equipment/Educational Resources 5. Adequate Perishable and Non-Perishable Food 	Full Compliance (All)
III	<p><u>Maintenance of Required Documentation and Service Delivery</u> (10 Elements)</p> <ol style="list-style-type: none"> 1. Child Population Consistent with Capacity and Program Statement 2. DCFS Children's Social Worker's Authorization to Implement Needs and Services Plans (NSPs) 3. NSPs Implemented and Discussed with Staff 4. Children Progressing Toward Meeting NSP Case Goals 5. Therapeutic Services Received 6. Recommended Assessment/Evaluations Implemented 7. DCFS Children's Social Worker's Monthly Contacts Documented 8. Children Assisted in Maintaining Important Relationships 9. Development of Timely, Comprehensive Initial NSPs with the Child's Participation 10. Development of Timely, Comprehensive Updated NSPs with the Child's Participation 	<ol style="list-style-type: none"> 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 10. Full Compliance

TURMONT HOME FOR BOYS CONTRACT COMPLIANCE REVIEW
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<p>IV</p>	<p><u>Education and Workforce Readiness</u> (5 Elements)</p> <ol style="list-style-type: none"> 1. Children Enrolled in School Within Three School Days 2. Group Home Ensured Children Attended School and Facilitated in Meeting Their Educational Goals 3. Current Report Cards/Progress Reports Maintained 4. Children's Academic Performance and/or Attendance Increased 5. Group Home Encouraged Children's Participation in YDS or Equivalent Services and Vocational Programs 	<p>Full Compliance (All)</p>
<p>V</p>	<p><u>Health and Medical Needs</u> (4 Elements)</p> <ol style="list-style-type: none"> 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 	<p>Full Compliance (All)</p>
<p>VI</p>	<p><u>Psychotropic Medication</u> (2 Elements)</p> <ol style="list-style-type: none"> 1. Current Court Authorization for Administration of Psychotropic Medication 2. Current Psychiatric Evaluation Review 	<p>Not Applicable (All)</p>
<p>VII</p>	<p><u>Personal Rights and Social/Emotional Well-Being</u> (13 Elements)</p> <ol style="list-style-type: none"> 1. Children Informed of Group Home's Policies and Procedures 2. Children Feel Safe 3. Appropriate Staffing and Supervision 4. Group Home's Efforts to Provide Nutritious Meals and Snacks 5. Staff Treat Children with Respect and Dignity 6. Appropriate Rewards and Discipline System 7. Children Allowed Private Visits, Calls, and Correspondence 8. Children Free to Attend or Not Attend Religious Services/Activities 9. Children's Chores Reasonable 10. Children Informed About Their Medication and Right to Refuse Medication 11. Children Free to Receive or Reject Voluntary Medical, Dental, and Psychiatric Care 12. Children Given Opportunities to Plan Activities in Extracurricular, Enrichment, and Social Activities (Group Home, School, Community) 	<p>Full Compliance (All)</p>

TURMONT HOME FOR BOYS CONTRACT COMPLIANCE REVIEW
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	13. Children Given Opportunities to Participate in Extracurricular, Enrichment, and Social Activities (Group Home, School, Community)	
VIII	<u>Personal Needs/Survival and Economic Well-Being</u> (7 Elements) <ol style="list-style-type: none"> 1. \$50 Clothing Allowance 2. Adequate Quantity and Quality of Clothing Inventory 3. Children Involved in the Selection of Their Clothing 4. Provision of Clean Towels and Adequate Ethnic Personal Care Items 5. Minimum Monetary Allowances 6. Management of Allowance/Earnings 7. Encouragement and Assistance with a Life Book or Photo Album 	Full Compliance (All)
IX	<u>Discharged Children</u> (3 Elements) <ol style="list-style-type: none"> 1. Children Discharged According to Permanency Plan 2. Children Made Progress Toward NSP Goals 3. Attempts to Stabilize Children's Placement 	<ol style="list-style-type: none"> 1. Improvement Needed 2. Full Compliance 3. Full Compliance
X	<u>Personnel Records</u> (7 Elements) <ol style="list-style-type: none"> 1. Federal Bureau of Investigation (FBI), California Department of Justice (DOJ), Child Abuse Central Index (CACI) Submitted Timely 2. Timely Completed Criminal Background Statement 3. Education/Experience Requirement 4. Employee Health Screening/Tuberculosis (TB) Clearances Timely 5. Valid Driver's License 6. Signed Copies of Group Home Policies and Procedures 7. All Required Training 	Full Compliance (All)

**TURMONT HOME FOR BOYS
CONTRACT COMPLIANCE REVIEW
FISCAL YEAR 2015 - 2016**

SCOPE OF REVIEW

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

- Licensure/Contract Requirements,
- Facility and Environment,
- Maintenance of Required Documentation and Service Delivery,
- Education and Workforce Readiness,
- Health and Medical Needs,
- Psychotropic Medication,
- Personal Rights and Social/Emotional Well-Being,
- Personal Needs/Survival and Economic Well-Being,
- Discharged Children, and
- Personnel Records.

For the purpose of this review, five placed children were selected for the sample. The Contracts Administration Division (CAD) interviewed the five children and reviewed their case files to assess the care and services they received. Additionally, three discharged children's files were reviewed to assess the Group Home's compliance with permanency efforts. At the time of the review, no placed children were prescribed psychotropic medication.

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

CONTRACTUAL COMPLIANCE

CAD found the following two areas out of compliance:

Maintenance of Required Documentation and Service Delivery

- Initial Needs and Services Plan (NSP) not developed timely.

One child's Initial NSP due on September 14, 2015, was signed by the child on October 14, 2015.

At the exit conference, the Group Home representative stated that they will adopt internal policies to ensure that NSPs are signed timely, or that adequate documentation exists in the child's files to explain why the signature was not obtained within the specified time frame.

Recommendation:

The Group Home's management shall ensure that:

1. Initial NSPs are developed timely.

Discharged Children

- Child not discharged according to permanency plan.

A child with a permanency plan of Planned Permanent Living Arrangement was discharged to another Group Home after a seven-day notice was issued. There was no documentation of the steps taken by the Group Home to save or stabilize the placement before the seven-day notice was issued.

At the exit conference, the Group Home representative stated that they will adopt internal policies to ensure that all Discharge Summaries include clear documentation of all steps taken by the Group Home to save or stabilize the placement before a seven-day notice is issued.

Recommendation:

The Group Home's management shall ensure that:

2. Children are discharged according to their permanency plan.

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

CAD's last compliance report dated February 26, 2016 (review conducted in April 2015), identified seven recommendations.

Results:

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

- All Special Incident Reports (SIRs) are submitted timely and cross-reported to all required parties.
- Disaster drills are conducted and logs are maintained.
- The Group Home is in compliance with Title 22 Regulations and free of Community Care Licensing (CCL) citations.
- Comprehensive and timely Updated NSPs are developed.
- Children's academic performance and/or attendance increased.
- Children are free to receive or reject voluntary medical, dental, and psychiatric care.
- Employee health screenings/Tuberculosis (TB) clearances are timely.

TURMONT HOME FOR BOYS CONTRACT COMPLIANCE REVIEW
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At the exit conference, the Group Home representative expressed a desire to remain in compliance with all Title 22 Regulations and contractual requirements. The Group Home will continue to consult with the Out-of-Home Care Management Division for additional support and technical assistance, and CAD will assess the implementation of the recommendations during the next review.

TURMONT HOME FOR BOYS/GIRLS

A HOME FOR CHILD NURTURE, CARE & DEVELOPMENT
COMMITTED TO AN EXCELLENT HOME ENVIRONMENT

April 6, 2016

Department of Children and Family Services
Contracts Administration Division - Contracts Compliance Section
Attn: Theodore Howard, Children Services Administrator I
3530 Wilshire Boulevard, 4th Floor
Los Angeles, California 90010

Dear Mr. Howard

I am submitting a Corrective Action Plan developed for the deficiencies for the 2015 Monitoring Review.

Maintenance of required documentation and service delivery

(24) Initial NSP (due 09/14/15) not signed by youth until 10/14/15

On March 21, 2016 The Program Director met with each Facility Therapist and Manager to re-train and review implementation and obtaining timely signatures for the NSP.

The plan for this is as follows:

DCFS Placement Social Worker will be contacted immediately by the Facility Manager upon the completion of the NSP if he/she does not attend the NSP meeting. A copy of the NSP will be forwarded to his/her office via e-mail or postal service. Once the DCFS Placement social worker has reviewed the NSP and it requires no changes, we will request that the signature page be signed and returned. If the NSP has been Emailed, Turmont will assure that the CSW acknowledges receipt and implementation of the report and the responding email will be attached to the completed NSP. All attempts via telephone, email and mail will be accurately logged and included in the clients file. The Program Director will review each NSP for accuracy, completion and signatures authorizing implementation.

The Administrator and Program Director will ensure that NSP's will be completed properly and timely with all required signatures to implement the treatment plan, and that all treatment Services are provided according the Program Statement that was designed for Turmont Home for Boys.

Discharged Children

(56) No clear documentation contained in Discharge Overview regarding all steps taken by staff to stabilize placement prior to requesting a 7-Day notice.

Turmont will assist residents in making progress toward their NSP goals for permanency plan. The Administrator and Program Director will assure that Turmont will take all necessary treatment measures to assist children with setting and meeting their goals. The Treatment Team will also have monthly meetings to discuss children's progress and response to treatment. If a client is not making progress toward their permanency plan goals, then alternate treatment strategies will be discussed. Changes to treatment plans will be made, when and if needed, to assist with attainment of goals. All documentation regarding efforts made will be retained in the residents file and will be used to support any change in the original permanency plan.

TURMONT HOME FOR BOYS/GIRLS

A HOME FOR CHILD NURTURE, CARE & DEVELOPMENT
COMMITTED TO AN EXCELLENT HOME ENVIRONMENT

The Administrator and Program Director will assure that the Treatment team will have monthly meetings to discuss children's progress and response to the treatment and goals pertaining to permanency planning and that all documentation to support any changes in the treatment plan are maintained in the residents file.

The Administrator and Program Director will also ensure that the corrective action plan remains implemented and is working as intended.

Thank you for allowing Turmont to make these corrections.

Victor Bradley

Victor Bradley, Program Director