GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF THE INSPECTOR GENERAL

ACCOUNTING FOR CHILDREN IN OUT-OF-HOME PLACEMENTS WHO ARE IN THE CUSTODY OF THE CHILD AND FAMILY SERVICES AGENCY

CHARLES J. WILLOUGHBY
INSPECTOR GENERAL

OIG No. 03-2-11RL(b) **December 7, 2006**

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Office of the Inspector General

Inspector General

December 7, 2006

Uma Ahluwalia
Interim Director
Child and Family Services Agency
400 6th Street, S.W.
Washington, D.C. 20024

Dear Ms. Ahluwalia:

Enclosed is the final report summarizing the results of the Office of the Inspector General's audit of *Accounting For Children in Out-of-Home Placements Who Are In The Custody of the Child and Family Services Agency* (OIG No. 03-2-11RL(b)). This report is the third and final in a series of audits which focused on the District of Columbia Child and Family Services Agency's (CFSA) management of the District's Foster Care Program.

As a result of our audit, we directed two recommendations to CFSA to take the actions required to correct the described deficiencies. We received responses from CFSA on November 17, 2006, to a draft of this report. CFSA's responses fully addressed all of the recommendations and we consider the actions taken and/or planned to be responsive to each of the recommendations. The full text of CFSA's response is included at Exhibit C.

We appreciate the cooperation and courtesies extended to our staff during the audit. If you have questions, please contact William DiVello, Assistant Inspector General for Audits, at (202) 727-2540.

Sincerely,

Charles J. Willoughby
Inspector General

CJW/ws

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ACCOUNTING FOR CHILDREN IN OUT-OF-HOME PLACEMENTS WHO ARE IN THE CUSTODY OF THE CHILD AND FAMILY SERVICES AGENCY

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EXECUTIVE DIGEST

OVERVIEW

The District of Columbia Office of the Inspector General (OIG) has completed an audit to account for children in out-of-home placements under the custody of the Child and Family Services Agency (CFSA).[1] This report is the third and final of a series of audits that addresses various functions associated with the CFSA's role in caring for children in the District of Columbia (District) who are at risk of abuse and neglect. This report focuses on how well CFSA has managed the program for placing children in out-of-home foster care.

According to CFSA's brochure entitled *Working to Keep Children Safe, Families Together, & Communities Strong*, CFSA's principal mission is to "protect and promote the health, safety, and well-being of the children of the District of Columbia through public and private partnerships focused on strengthening and preserving families, and to achieve permanence for the children with services that ensure cultural competence, accountability, and professional integrity."

CFSA is responsible for recruiting and retaining foster homes for children who have been removed from their original homes due to abuse and/or neglect. Placing children in the least restrictive, most family-like setting is a task of the CFSA's Placement Services Administration. Special care and consideration are made in attempting to place children with family members, including their siblings, and in placements that are in close proximity to their homes and schools. Children are placed in other jurisdictions using the Interstate Compact on the Placement of Children Agreement,[2] when District placements are not available.

The overall objectives of our audit were to determine whether CFSA: (1) managed the Foster Care Program in an efficient, effective, and economical manner; (2) complied with requirements of applicable laws, rules, regulations, policies, and procedures; and (3) implemented internal controls to ensure the health, safety, and welfare of children in youth facilities. The specific objectives for this audit were to account for children under CFSA's custody who reside in out-of-home placements and to determine whether CFSA records accurately reflect the current residency of these children.

[1] CFSA provides out-of-home placements to foster care children who cannot safely remain in their own homes because they have been abused or neglected. Children in the CFSA's custody receive family services, welfare support, and are legal wards of the District of Columbia.
[2] D.C. Code § 4-1422 grants the Mayor authority to enter into and execute a compact on behalf of the District with any state that legally joins the compact for the purpose of interstate placement of foster children.

EXECUTIVE DIGEST

CONCLUSIONS

Overall, CFSA can account for the children it places in various types of foster care homes. Based on a statistical sample of 100 children placed in foster homes, we were able to physically validate 99 placements. The remaining child had absconded and was subsequently detained. Although we did not physically validate this child's placement, we obtained documents from CFSA and a private agency to substantiate the child's periods of abscondence and detention.

We noted that the CFSA FACES database, which consisted of 2,309 records, contained inaccurate placement information for 9 of the 100 children that were selected for review. Based on this error rate, when statistically projected over the entire CFSA database, it can be expected that as few as 79 records (lower limit) and as many as 337 records (upper limit) would contain inaccurate placement information. The inaccuracies found in our audit were mainly due to erroneous and untimely data entered into FACES by CFSA and private agency social workers, as well as the data management team.

We also accounted for all of the 60 children selected in our second statistical sample who reside in residential treatment facilities. However, we noted that placement information was inaccurate for 2 of the 60 children. Based on our sampling attributes, we could not determine the number of potential errors because the actual results did not yield a valid statistical projection. As such, we did not project the potential number of errors with respect to the current residence of CFSA's children placed in residential treatment facilities.

SUMMARY OF RECOMMENDATIONS

We directed two recommendations to the Interim Director, CFSA that focused on implementing internal controls to ensure accurate and timely input of child placement information into FACES and developing procedures for maintaining residential addresses for each provider.

A summary of the potential benefits resulting from the audit is shown at Exhibit A.

MANAGEMENT'S RESPONSE AND OIG COMMENTS

CFSA provided a written response to our draft report on November 17, 2006. We consider the actions taken and/or planned to be responsive to each of the recommendations. The full text of CFSA's response is included at Exhibit C.

INTRODUCTION

BACKGROUND

CFSA Placement Services Administration. The Child and Family Services Agency (CFSA) is responsible for providing a wide range of support and services to children and families who are at risk or have a history of abuse and neglect. Established in the beginning of 2005, CFSA's Placement Services Administration (PSA) is responsible for placement of children in need of traditional and therapeutic foster care, specialized foster care, kinship care, group care, independent living services, and teen placements.

PSA's goal is to match children with a placement that will best meet their needs (see Exhibit B for an illustration of CFSA's Out-of-Home Placement Process). A child is referred to PSA when adequate kinship placement cannot be identified by the family. The referring social worker involves the parent and child in the placement determination and selection when it appears that an out-of-home placement is necessary. CFSA has various foster care placement options as summarized below:

- *Traditional Foster Care in Foster Homes* - Placement in a foster home that is licensed by CFSA or the jurisdiction in which the home is physically located. This home provides ongoing foster care for all children placed away from their parents or guardians and for whom the agency has legal custody and physical care responsibility.

- *Kinship Care Foster Homes* - Placement in the foster home of a relative, which has been licensed by CFSA or the jurisdiction in which the home is physically located. The home provides ongoing foster care for all children placed away from their parents or guardians and for whom the agency has legal custody and physical care responsibility.

- *Community Based Group Home* - Placement in a licensed group home for youths 12 years-old through 18 years-old. Group homes are designed for both emergency and long-term placements and may house no more than eight youths.

- *Residential Treatment Placement* - Provides intensive treatment services to foster care children to address mental and emotional problems. Placements usually last from 1 to 2 years, but may be longer.

- *Teen Parent Group Home* - Placement in a licensed group home designed to meet the needs of teens and their young children.

- *Independent Living Residential Unit* - Supervised apartment living for youths moving toward independence.

INTRODUCTION

CFSA Data Management Team. In September 2005, a data management team was developed within PSA to centralize all placement data throughout CFSA and efficiently manage placement information for all children. The main responsibilities of the data management team are to enter all entry and exit dates for children; oversee and verify all placement information; and manage information recorded on the daily placement log. The data management team also updates the placement log, reconciles provider payment information, ensures that placements are current, and that data are correctly entered into CFSA's computerized management information system (FACES).[3]

CFSA Out-of-Home Care and Support Program. CFSA's Out-of-Home Care and Support program provides placement, health care, and related services to abused and/or neglected children in CFSA custody and living away from home, until they are reunited with their families or placed in a permanent home. These services include child placement; family resources; health services and clinical support; and licensing and monitoring services. Child placement provides living arrangements and related support services to children in order to ensure their safety.

OBJECTIVES, SCOPE, AND METHODOLOGY

The overall objectives of our audit were to determine whether CFSA: (1) managed the Foster Care Program in an efficient, effective, and economical manner; (2) complied with requirements of applicable laws, rules, regulations, policies, and procedures; and (3) implemented internal controls to ensure the health, safety, and welfare of children in youth facilities. Our specific objectives for this audit were to account for children under CFSA's custody who reside in out-of-home placements and to determine whether CFSA records accurately reflect the current residency of those children.

To accomplish our objectives, we conducted interviews and discussions with responsible CFSA officials and personnel to gain an understanding of policies and procedures used to place children. We also reviewed all applicable regulations, policies, and procedures related to child placements. To verify the accuracy of the child placement records, we visited traditional foster care homes, kinship care foster homes, community based group homes, teen parent group homes, and independent living residential units.

CFSA officials informed us that the foster care providers we visited were licensed; however, we did not verify the licenses of the providers. We observed and held discussions with each

[3] On February 27, 2006, FACES was replaced with FACES.NET. FACES.NET is a web-based system that is accessible from any location where there is internet service. FACES.NET is designed to support social workers and other agency personnel in case management activities such as, documenting contacts/visits; writing case plans and court reports; issuing payments to service providers; collecting data to produce outcome-based management; and standardizing policy and practice. For consistency purposes in this report, the term "FACES" refers to both FACES and FACES.NET, interchangeably.

INTRODUCTION

child (with the exception of infants) to ensure their identity and to observe the child's apparent well-being. However, we did not review CFSA's case files for the children selected in our review. Finally, we mailed confirmation forms to residential treatment facilities to verify the accuracy of CFSA's records with regard to the children listed as residing in those facilities.

As a part of our review, we obtained records from CFSA officials, dated October 6, 2005, indicating that 2,518 children were in out-of-home placements (2,309 in traditional foster care, kinship, group homes, or independent living; and 209 children in residential treatment or other types of facilities/statuses).[4]

Using the Audit Command Language (ACL) software, based on a universe of 2,309 children placed in foster homes in the District of Columbia and surrounding jurisdictions, we statistically selected a sample of 100 children to account for (by site visit) and test the accuracy of CFSA records. In determining our sample, we used 95 percent as the confidence level, ±8 percent as the desired precision, and 3 percent as the expected error rate.

We also obtained records from CFSA officials, dated February 28, 2005, which identified 152 children residing in residential treatment facilities. Using ACL software, based on a universe of 152 children, we statistically selected a sample of 60 children to account for (via written confirmation) and test the accuracy of the records. In determining the sample, we used 95 percent as the confidence level, ±8 percent as the desired precision, and 3 percent as the expected error rate. Sampling results provided an actual sample precision of ±5.6 percent.

We relied on computer-processed data extracted from FACES to provide us with detailed information on children in out-of-home placements. Although we did not perform a formal reliability assessment of the computer processed data, we did examine supporting documents and performed site visits to verify the reliability of the data. We determined that supporting documents and information obtained during site visits generally agreed with the computer-processed information.

[4] "Other types of facilities/statuses" includes children who have absconded, or are in correctional facilities, hospitals, illegal placements, etc.

INTRODUCTION

The audit primarily covered children residing in traditional and kinship care foster homes, group homes, and independent living for the period October 2005 through June 2006.[5] The audit was conducted in accordance with generally accepted government auditing standards, and included such tests as we considered necessary under the circumstances.

[5] Confirmations to verify each child's residence in residential treatment facilities, according to CFSA's Out-of-Home Placement records as of February 2005, were mailed in May 2005.

FINDING AND RECOMMENDATIONS

FINDING: ACCOUNTING FOR CHILDREN IN OUT-OF-HOME PLACEMENTS

SYNOPSIS

Overall, CFSA can account for the children it places in various types of foster care homes. Based on a statistical sample of 100 children placed by CFSA and private agencies in foster homes, we were able to physically validate 99 placements. The remaining child had absconded and was subsequently detained. Although we did not physically validate one child's placement, we obtained documents from CFSA and a private agency to substantiate the child's periods of abscondence and detention.

We noted that the CFSA FACES database, which consisted of 2,309 records, contained inaccurate placement information for 9 of the 100 children that were selected for review. Based on this error rate, when statistically projected over the entire CFSA database, it can be expected that as few as 79 records (lower limit) and as many as 337 records (upper limit) would contain inaccurate placement information. The inaccuracies found in our audit were mainly due to erroneous and untimely data entered into FACES by CFSA and private agency social workers, as well as the data management team. Further, during discussions with CFSA officials, we were informed that private placement agencies had not always provided complete information to CFSA regarding their child placements.

We also accounted for all of the 60 children selected in our second statistical sample who reside in residential treatment facilities. However, we noted that placement information was inaccurate for 2 of the 60 children. Based on our sampling attributes, we could not determine the number of potential errors because the actual results did not yield a valid statistical projection. As such, we did not project the potential number of errors with respect to the current residence of CFSA's children placed in residential treatment facilities.

DISCUSSION

Review of CFSA's Listing for Children in Out-of-Home Placement. We obtained a listing from CFSA entitled, "List of Children in Out-of-Home Placement," dated October 6, 2005. Our review of the listing showed that a total of 2,309 children resided in out-of-home placements, exclusive of children placed in residential treatment facilities and other types of facilities/statuses. The 2,309 children were in various placement types, as shown below:

FINDING AND RECOMMENDATIONS

- 589 kinship;
- 1,365 non-kinship (traditional foster care);
- 168 group homes; and
- 187 independent living.

Results of Statistical Sample. Using the ACL software and based on a universe of 2,309 children placed in foster homes in the District of Columbia and surrounding jurisdictions, we statistically selected a sample consisting of 100 children to account for (by site visit) and test the accuracy of CFSA records.

Site Visits to Foster Care Providers. We conducted site visits to homes of foster care providers and various facilities to identify the child and verify the residence of each child selected in our sample. The sample consisted of 9 children residing in group homes, 10 children in independent living facilities, 21 children in kinship foster care homes, and 60 children in tradition foster care homes.

CFSA and private agency social workers managed the cases of the children selected for review. CFSA social workers managed 62 of the children's cases and 38 cases were managed by private agency social workers. Private agencies and other placement agencies include: PSI Family Services Inc.; The Martin Pollak Project Inc.; Progressive Life Center Inc.; Helping Children Grow, Inc.; Lutheran Social Services of the National Capital Area, Inc.; Foundations for Home and Community First Home Care; and Pressley Ridge.

During the site visits, we physically observed and held discussions with each child (with the exception of infants), as well as the foster care providers. The children ranged in age from 9 months to 21 years. We verified each child's placement through observation and by obtaining identifying information such as the child's date of birth, biological mother's name, and other pertinent information.

Of the 100 children in our sample, we were able to physically verify the placement of 99 children. One child could not be contacted because the child had absconded and was subsequently detained at the time of our review. In our opinion, based on our visits to each child's foster home, most of the children appeared to be satisfied with their foster care providers and living in safe and stable environments. Many of the foster parents interviewed appeared to be committed caregivers and supporters of the children.

We found that in most cases, the social workers appeared to be knowledgeable about the family histories and backgrounds of their assigned children. We also noted that many foster parents and children reported having good relationships with their social workers. Several examples of children living in safe and stable placements, based on our visits to randomly selected foster care providers, are briefly discussed below:

FINDING AND RECOMMENDATIONS

- *Child 50*. The foster care provider appeared to be very experienced, having had children placed in her home over the past 30 years. We were informed that during this time, she adopted three children and currently has one foster child (Child 50) who is 1 ½ years-old. Two of the three adopted children had been placed in her home since they were toddlers. We observed that Child 50 was attached to the foster parent.

- *Child 87*. In addition to Child 87, this foster care provider has two other foster children in the home (all are siblings). The foster care provider makes regular visits to the children's schools to obtain feedback on their academic performance. The foster parent also sets weekly goals with the children and rewards them based on whether they achieve their goals.

- *Child 82*. Based on observations and discussions with the child, we noted that the child was involved in numerous extracurricular activities such as basketball, cheerleading, and poetry writing. Child 82 appeared to have a good relationship with her social worker and provided the social worker with a Christmas gift, as a token of appreciation, during our site visit.

Child in Abscondence. Due to numerous abscondence incidents and later detention, we were unable to account for one child (Child 55) during our audit period. We made several attempts to verify Child 55's placement at the home of the foster care provider. On January 5, 2006, the private agency social worker assigned to the child informed us that the child had been in abscondence since December 2005. In March 2006, we requested a status update on Child 55. CFSA officials told us that the child returned to the foster care provider on January 11, 2006, absconded 15 days later, and had just recently returned. In June 2006, we were informed by the private agency social worker that the child had absconded again and was subsequently picked up by the Metropolitan Police Department.

Accuracy of Out-of-Home Placement Records. Based on site visits to the homes of foster care providers and various facilities, we determined that CFSA's records listing the residency of the children were incorrect for 9 of the 100 children in our sample. We had to obtain the correct address from the social worker assigned to each child in order to complete our site visit. Further, we noted that two of the nine addresses were P.O. Box addresses and, therefore, improper residential locations. We believe that CFSA should maintain a residential (street) address for all foster care providers.

FINDING AND RECOMMENDATIONS

Table 1 below lists the inaccurate addresses contained in CFSA's out-of-home placement listings.

Table 1. Placement Listing Errors

Child	**Provider Address per CFSA's Out-of-Home Placement Listing**[6]	**Actual Provider Address Visited**
Child 4	[redacted] Ambassador Road Baltimore, Maryland	[redacted] Innerdale Court Randallstown, Maryland
Child 11	[redacted] 7th Street, SE Washington, DC	[redacted] 37th Place, SE Washington, DC
Child 36	P.O. Box [redacted] Washington, DC	[redacted] 63rd Street, NE Washington, DC
Child 37	P.O. Box [redacted] Brentwood, Maryland	[redacted] Riverdale Road Lanham, Maryland
Child 52	[redacted] Overview Road Baltimore, Maryland	[redacted] Lucerne Road Randallstown, Maryland
Child 62	[redacted] Loughran Road Ft. Washington, Maryland	[redacted] Bonhill Drive Ft. Washington, Maryland
Child 63	[redacted] Kenilworth Avenue Hyattsville, Maryland	[redacted] Drylog Avenue Seat Pleasant, Maryland
Child 84	[redacted] Kansas Avenue, NW Washington, DC	[redacted] Sellner Lane Clinton, Maryland
Child 94	[redacted] Potomac Avenue, SE Washington, DC	[redacted] West Virginia Avenue, NE, Washington, DC

Projection of Statistical Sample. Our statistical sample showed 9 percent of the children (9 of the 100 children) on CFSA's out-of-home placements listings contained inaccurate placement data. Based upon a total population of 2,309 children, using a 95 percent confidence level and a sample precision of $\pm$5.6 percentage points, we projected that the number of errors in respect to the current residence of CFSA's children in out of home placements ranges from 79 to 337.[7]

[6] Provider addresses taken from CFSA's Out-of-Home Placement listings dated October 6, 2005, March 15, 2006, and May 31, 2006. To preserve the privacy interests of the children and foster families, we have redacted the street numbers from the addresses.

[7] The projected range of errors was determined by calculating the actual number of errors (9) divided by the sample size (100), which equals 9%. Then, we calculated the upper limit precision of 14.6% (sample error rate of 9% + sample precision of 5.6%) and multiplied that by the population (2,309 x 14.6%), which equals 337. We also calculated the lower limit precision of 3.4% (sample error rate percent of 9% minus sample precision of 5.6%) and multiplied that by the population (2,309 x 3.4%), which equals 79.

FINDING AND RECOMMENDATIONS

Review of Placement Listing for Children Residing in Residential Facilities. We requested CFSA officials to provide for our review a listing of children who reside in out-of-home placements. CFSA provided us with a listing, entitled "List of Children in Out-of-Home Placement," dated February 28, 2005. After reviewing the information, we noted that the listing indicated that a total of 152 children resided in residential treatment facilities.

Results of Statistical Sample for Children in Residential Treatment Facilities. Using the ACL software and based on a universe of 152 children residing in residential treatment facilities, we statistically selected a sample consisting of 60 children to account for (via written confirmation) and determine the accuracy of CFSA records. In determining our sample, we used 95 percent as the confidence level, ±8 percent as the desired precision, and 3 percent as the expected error rate.

Written Confirmations. In order to test the accuracy of CFSA's records for children residing in residential treatment facilities, we mailed 60 written confirmation forms to various facilities to verify each child's residence. The majority of these facilities were located in other states, such as Florida, Georgia, Texas, and Pennsylvania. All written confirmations were completed and returned[8] to the OIG. However, an examination of the confirmations disclosed that two did not agree with CFSA's records as to the current residency of the child.

Of the two instances, we found that the children shown as residing at the facilities on the CFSA listing had been discharged from those facilities on October 22, 2004, and January 29, 2005, respectively, prior to the date that the confirmations were mailed. We could not project the potential number of errors with respect to the current residence of CFSA's children placed in residential treatment facilities because the actual statistical results did not yield a projection.

We questioned CFSA officials as well as the private agency social workers assigned to the two children to determine the reason(s) for the inaccuracies. Neither social worker could provide us with an explanation; however, CFSA officials informed us that prior to September 2005, management of placement data was not centralized and, therefore, the individual social workers were responsible for inputting placement data into FACES.

Conclusion. Overall, we concluded that CFSA can account for the children placed in various foster homes. Based on our statistical sample, we accounted for 99 out of 100 children selected for verification. The remaining child was in abscondence during our site visits and subsequently detained. We noted that placement/residency information for children obtained from CFSA officials was inaccurate for 9 of the 100 children, and

[8] Of the 60 confirmations returned, 2 were not returned until 13 months later. According to the facility, CFSA's records contained the correct placement information for the two children.

FINDING AND RECOMMENDATIONS

projected that the number of errors, with respect to the current residence of CFSA's children in out-of-home placements, ranges from 79 to 337, based upon a total population of 2,309.

Using written confirmations, we also accounted for all 60 children selected in our second statistical sample who reside in residential treatment facilities. We noted that placement information was inaccurate for 2 of the 60 children.

RECOMMENDATIONS

We recommend that the Interim Director, Child and Family Services Agency:

1. Implement internal controls to ensure accurate and timely input of child placement information into FACES.

2. Develop procedures for maintaining residential addresses for each provider.

CFSA RESPONSE (RECOMMENDATION 1)

CFSA concurred with the recommendation. In its response, CFSA stated that: (1) they have created a specialized unit within the Placement Administration to centralize placement data entry; (2) all placement information is overseen by a data management team; and (3) they are tracking timeliness and accuracy of placement data entry through a FACES report.

OIG COMMENT

We consider CFSA's actions to be responsive to the recommendation.

CFSA RESPONSE (RECOMMENDATION 2)

CFSA concurred with the recommendation. In its response, CFSA stated that they will remind staff to ensure FACES reflects a residential address for those providers whose checks are sent to a P.O. Box.

OIG COMMENT

We consider CFSA's planned actions to be responsive, meeting the intent of the recommendation.

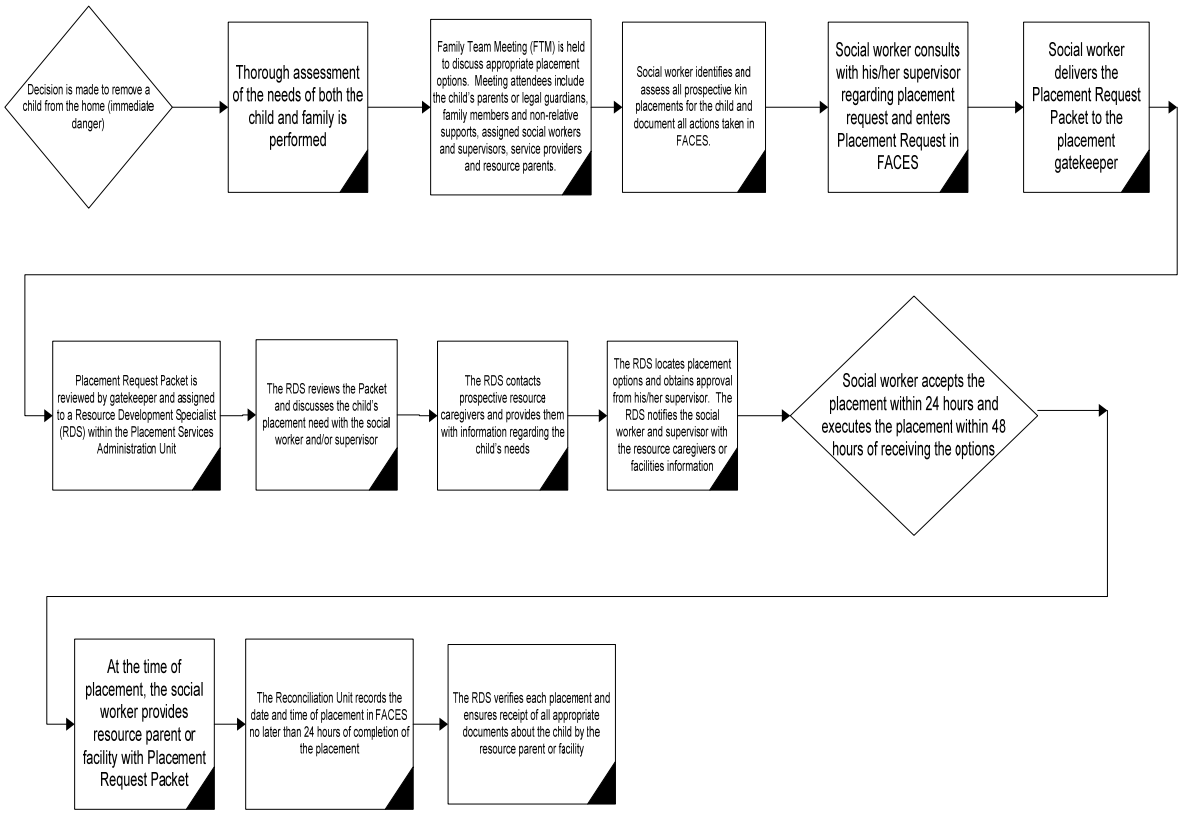
EXHIBIT A - SUMMARY OF POTENTIAL BENEFITS RESULTING FROM AUDIT

Recommendation	Description of Benefit	Amount and Type of Benefit	Status[9]
1	Compliance and Internal Control. Implements procedures to ensure accurate and timely input of child placement information into FACES.	Nonmonetary	Closed
2	Compliance and Internal Control. Develops procedures for maintaining residential addresses for each provider.	Nonmonetary	Closed

[9] This column provides the status of a recommendation as of the report date. For final reports, "**Open**" means management and the OIG are in agreement on the action to be taken, but action is not complete. "**Closed**" means management has advised that the action necessary to correct the condition is complete. "**Unresolved**" means that management has neither agreed to take the recommended action nor proposed satisfactory alternative actions to correct the condition.

EXHIBIT B – CFSA OUT-OF-HOME PLACEMENT PROCESS

The diagram below illustrates the process used by CFSA to place children in out-of-home placements.



Note: This process focuses on CFSA's planned placements. Emergency placements follow the same processes as planned placements except the process is accelerated. For children managed by private agency social workers, the private placement agencies have placement units within their agencies that work with CFSA's placement unit to resolve placement discrepancies.

EXHIBIT C – CFSA'S RESPONSE TO THE DRAFT REPORT

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Child and Family Services Agency

Office of the Director

November 17, 2006

Charles Willoughby
Inspector General
Office of the Inspector General
717 14th Street NW
Washington, D.C. 20005

Re: CFSA Comments to Draft Report on Accounting for Children in Out-of-Home Placements Who Are In The Custody of the Child and Family Services Agency, OIG No. 03-2-11RL(b)

Dear Mr. Willoughby:

Thank you for the opportunity to review and comment on the Draft Report on Accounting for Children in Out-of-Home Placements Who Are In The Custody of the Child and Family Services Agency, OIG No. 03-2-11RL(b). Overall, Child and Family Service Agency (CFSA) agrees with the findings and recommendations, and is eager to use them to refocus our on-going work to implement internal controls to ensure accurate and timely input of child placement information into FACES. We are especially pleased that the report reflects the high degree of accuracy of our FACES placement data as well as our children's satisfaction with their placements.

We would like to take this opportunity to update you on some work we have been doing internally to implement the recommendations identified in the report. The first recommendation is for CFSA to implement internal controls to ensure placement information is timely and accurately entered into FACES. We have undertaken several initiatives to effect this recommendation. First, we created a specialized unit within the Placement Administration to centralize placement data entry, except that relating to placement in residential treatment centers (RTC). The unit is headed by a Senior Data Manager and staffed with two Placement Data Analysts. The unit enters all entry and exit dates for children in placements, other than those in residential treatment centers; previously the assigned Social Worker was responsible for this data entry. Now all information is overseen by the data management team, verified and entered within shorter

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EXHIBIT C – CFSA'S RESPONSE TO THE DRAFT REPORT

time frames. The Data Management Team also manages the information from the daily placement log and updates the Excel spreadsheet daily (for internal tracking purposes). The Data Analysts contact each resource provider the following business day to verify if the child is in that placement and records that verification. If verified placement data cannot be entered into FACES, the Data Management Team troubleshoots this error by contacting the Contracts Administration, Office of Licensing and Monitoring or the identified provider and "fixes" the data error or missing data until it is corrected in FACES and the placement information can be entered. With respect to our RTC placements, we are finalizing a process to ensure data is reconciled on a daily basis so that placement data is accurately portrayed in FACES.

We recently also implemented two other initiatives designed to address this recommendation. Specifically, the Data Management Team is an integral part of the FACES. NET application. We are now tracking the timeliness and accuracy of placement data entry through a FACES report, which is reviewed by our Quality Improvement Committee. The Committee is able to identify issues and develop solutions. Second, we launched this week a newly enhanced Placement Provider Web which creates a more user-friendly mechanism for the private agencies to track placements. Again, we expect these changes will facilitate timely and accurate input of placement data.

You also recommend that CFSA develop procedures for maintaining a residential address for each provider. Our FACES system has the capacity to ensure residential addresses are maintained for each provider and still allow checks to be sent to a Post Office Box as some providers choose to use. We will remind staff to ensure FACES reflects a residential address even for those providers whose checks are sent to a Post Office Box.

Again, thank you for providing us with an opportunity to comment on the draft report.

Sincerely,

Uma S. Ahluwalia

Uma Ahluwalia
Interim Director, Child and Family Services Agency

CC: Edward D. Reiskin, Interim City Administrator
Brenda Donald Walker, Deputy Mayor for Children, Youth, Families and Elders
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