



State of Florida
Department of Children and Families

Ron DeSantis
Governor

Chad Poppell
Secretary

DATE: December 20, 2019

TO: Chad Poppell
Secretary

FROM: Keith R. Parks
Inspector General

SUBJECT: Corrective Action Status Report for Office of Program Policy Analysis and Government Accountability Report No. 19-05

In accordance with § 20.055(6)(h), Florida Statutes, enclosed is our six-month status report on Office of Program Policy Analysis and Government Accountability Report No. 19-05, *Placement Options for CSE Victims Have Increased; CSE-Specific Services Remain Limited*, dated July 2019.

If I may be of further assistance, please let me know.

Enclosure

cc: Melinda Miguel, Chief Inspector General, Executive Office of the Governor
Patricia Babcock, Deputy Secretary
David Mica, Chief of Staff
Patricia Medlock, Assistant Secretary for Child Welfare
Ginger Griffeth, Director, Child Welfare Practice
Kathy DuBose, Staff Director, Joint Legislative Auditing Committee

SM/ej

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Mission: Work in Partnership with Local Communities to Protect the Vulnerable, Promote Strong and Economically Self-Sufficient Families, and Advance Personal and Family Recovery and Resiliency

**OIG – Internal Audit
 Corrective Action Status Report
 Placement Options for CSE Victims Have Increased;
 CSE-Specific Services Remain Limited
 OPPAGA Report No. 19-05, Issued July 2019
 As of December 18, 2019**

Findings	Recommendation	Auditee Response	Corrective Action Status
<p>PREVALENCE: Number of verified CSE victims continued to rise in 2018; population characteristics similar to victims identified in prior reports.</p>	<p>None.</p>	<p>DCF, in partnership with other state agencies, task forces, and community stakeholders continues to conduct extensive training to teach frontline staff, first responders, and members of the public how to recognize and report potential human trafficking. These training efforts, along with targeted screening and identification efforts within fields such as juvenile justice, health and law enforcement likely contribute to increased identification of CSE victims.</p> <p>Training, including adaptations based on new research and emerging trends, will continue to be a priority as we strive to identify and serve human trafficking victims in Florida. During the review period, DCF offered additional training to Department hotline staff to ensure appropriate identification and coding of suspected human trafficking cases as well as a statewide Human Trafficking Train-the-Trainer session that was open to every DCF Region, Sheriff's Office CPI Unit, and CBC.</p>	<p>No additional comments.</p>

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<p>PLACEMENTS AND SERVICES: CSE service model is slowly evolving to ensure placements and services for dependent and community children, but challenges remain.</p>	<p>None.</p>	<p>On April 1, 2018, DCF began the process of following up on all verified CSE cases within six-months of the close of the investigation to determine service engagement. As noted in the report, these follow-ups revealed some challenges to service provision including youth not being ready to engage in services and limitations in CSE-specific service availability in some areas. The Department will continue to monitor these 6-month follow-ups to determine any frequent barriers to service provision and ways to overcome those barriers.</p> <p>Florida has spent the last several years focused on establishing a comprehensive system of care equipped to meet the many individualized needs of CSE victims, including both community and dependent youth. Over the course of the review period, DCF held quarterly meetings with specialized CSE residential providers to talk through successes and concerns, share information on potential funding streams, and discuss provider-requested topics. In an effort to expand and strengthen services, DCF has also continued to hold informational meetings with prospective safe house providers, facilitated community stakeholder meetings with community-based service providers, and helped train many key partners, including services providers, to equip them to identify and serve this population.</p> <p>It is a DCF priority to identify existing resources that can be leveraged in the development of a comprehensive system of care and identify promising practices for producing the best outcomes. A key end goal is to create a strong continuum of care for all victims of human trafficking and ensure accountability of state funds being provided for serving this population.</p>	<p>No additional comments.</p>

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<p>OUTCOMES (2013 THROUGH 2017): Many children with verified CSE have DCF and/or DJJ involvement in the years following verification; K-12 school attendance rates are low.</p>	<p>None.</p>	<p>When assessing social outcomes over a short time period, it is important to note the extreme level of trauma that most CSE victims have experienced. Any therapeutic treatments must address all the types of trauma that a youth has experienced in addition to their CSE. Many survivors explain that their healing journey often continues decades later. Upon initial identification, there may be a great deal of resistance to services and the victim may not self-identify as a victim or survivor. We understand that progress in social outcomes, school outcomes, therapeutic healing, and an ability to recognize victimization and leave the exploitative situation may take years as a result of this high level of trauma. It continues to be a DCF priority, in partnership with other agencies represented on the Statewide Council on Human Trafficking, to ensure that we understand the services that produce the best outcomes for this population and continuously identify existing resources that can be leveraged in creating a comprehensive system of care to meet complex, long-term needs.</p> <p>More program evaluations are needed to determine best practices in serving this population. However, Progress Reports completed by the University of South Florida on the Citrus Helping Adolescents Negatively Impacted by Commercial Exploitation (CHANCE) Program have shown some promising improvements for youth served. In CHANCE Evaluation: Progress Report 6, it was noted that “significant improvements were observed in the areas of leadership, family functioning, school behavior, oppositional behavior, adjustment to trauma, runaway behaviors, and intentional misbehavior.” Similar findings were produced from the initial evaluation report of Devereux’s DELTA Program being conducted by the University of Central Florida.</p> <p>DCF continues to prioritize the needs of the child on an individual basis, including a specific tool to assess the level of placement needed, in an effort to address their most critical needs and enhance long-term outcomes. Further studies like the CHANCE Evaluation will provide the necessary information to create an evidence-based continuum of care that can address the specific needs of CSE youth.</p>	<p>No additional comments.</p>

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<p>REVIEW OF RE-VICTIMIZED CHILDREN'S CASE FILES: Re-victimized CSE children face significant challenges.</p>	<p>None.</p>	<p>The Department appreciates OPPAGA's analysis on youth who experience multiple or continued instances of CSE victimization. The report importantly highlights the high level of adverse childhood experiences and resulting trauma and behavioral health issues that create an increased vulnerability to continued exploitation. The report also highlights that revictimization often leads to additional poor outcomes such as extensive juvenile justice involvement, chronic runaway behavior, and the likelihood that the youth may engage in risky behaviors such as survival sex to have basic needs met. All these factors compound the needs of these youth, but also make it particularly difficult to engage this subpopulation of CSE victims in long-term services to address their needs. Revictimization is a factor that is addressed through the multidisciplinary team staffing process as it pertains to safety concerns and service recommendations. The Department strives to understand the risk factors for each youth in order to determine the most appropriate plan to meet their individualized needs.</p>	<p>No additional comments.</p>
	<p>Recommendation 1: We recommend that DCF and DJJ expand the provision of CSE-specific services for victims residing in DJJ facilities.</p>	<p>The Department has partnered with the Department of Juvenile Justice (DJJ) for over 5 years on CSE initiatives to enhance both agencies' efforts to identify and serve commercially sexually exploited children. For CSE youth that are involved in the juvenile justice system, DJJ personnel are a key part of the multidisciplinary team staffing process to determine appropriate services for a youth and ensure that all those working with the youth are addressing their needs as a CSE victim. The Department will continue to work closely at the state level with DJJ to explore service provision options for youth in residential facilities throughout Florida as well as at the local level to coordinate services for individual youth. DCF looks forward to a continued partnership with DJJ as the two agencies collaborate to ensure effective service provision to all CSE children regardless of their current placement.</p>	<p>Partially Implemented</p> <p>In terms of equipping DJJ to provide services within their programs, DCF has provided consultation to DJJ on programs that could be led by their staff and utilized within residential facilities and funding options for implementation. DCF also continues to work with community-based service providers and provides training and technical assistance around serving youth in residential facilities.</p> <p>This is a continuing effort currently being led by DJJ.</p>

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	<p>Recommendation 2: We recommend that DCF create a repository of information for new CSE providers.</p>	<p>The Department strives to come alongside prospective CSE providers as early in the exploratory process as possible. The Department has met with many prospective safe house and community-based service providers during the earliest brainstorming phases to provide important information on serving this population and being a safe house provider. This often includes certification language for safe houses, connection to licensing specialists, contact information for other providers that we encourage them to connect with, information we know about the population, and potential things they will need to consider such as funding and zoning. For providers that are further along in the process, the Human Trafficking Unit Staff try to connect with them as soon as we are made aware that they are offering, or interested in offering, services to CSE youth. Historically, DCF's Human Trafficking Unit Staff in partnership with licensing staff and other CSE providers have served as the repository of information on serving the population. However, DCF is committed to ensuring that both DCF Regional staff and prospective providers are easily able to locate and access the necessary information to knowledgeably move forward in the process of developing a CSE program. DCF will explore options for increasing accessibility of key information for prospective providers. The Human Trafficking Unit will also continue to serve as a resource and support to anyone serving or interested in serving this population and continue to connect with prospective providers throughout the program development process.</p>	<p>Fully implemented</p> <p>A repository of information related to opening a safe house or safe foster home was added to the Resources section of the Human Trafficking Page on the Department's Internet. The information can be accessed at the following link: https://www.myfifamilies.com/service-programs/human-trafficking/resources.shtml</p>