



State of Florida  
Department of Children and Families

Ron DeSantis  
Governor

Shevaun L. Harris  
Secretary

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**DATE:** January 11, 2024 JLAC Received 1.11.2023  
**TO:** Shevaun L. Harris, Secretary  
**FROM:** Keith R. Parks, Inspector General *KRP*  
**SUBJECT:** Six-Month Status Report for OPPAGA Report No. 23-08

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In accordance with § 20.055(6)(h), Florida Statutes, enclosed is our six-month corrective action status report on the Office of Program Policy Analysis and Government Accountability (OPPAGA) Annual Report on the Commercial Sexual Exploitation of Children in Florida issued in July 2023. The purpose of the status report is to provide information on Department progress in implementing corrective actions.

The "Corrective Action Status" column in the attached report includes information directly submitted by the Office of Child and Family Well-Being and provides updates and the status of implementation to the applicable findings.

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

Enclosure

cc: Casey Penn, Deputy Secretary  
Molly McKinstry, Chief of Staff  
Melinda Miguel, Chief Inspector General, Executive Office of the Governor  
Joint Legislative Auditing Committee

KRP/tw

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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

**Department of Children and Families – State of Florida**  
**Annual Report on the Commercial Sexual Exploitation of Children in Florida**  
**OPPAGA Report No. 23-08, Issued July 2023**  
**Six-Month Status Report: January 2024**

Finding	Recommendation	Agency Response	Corrective Action Status
<p>Florida statute requires DCF to maintain data on children assessed for placement in a safe house or safe foster home, including information such as the number of children for whom a placement was unavailable, reasons a placement was unavailable, and the county in which the placement was unavailable. These assessments are completed using the department’s Level of Human Trafficking Placement Tool. OPPAGA requested data related to the tool; however, DCF staff reported being unable to provide these data, as the tools are saved as scanned images with no extractable data.</p>	<p><u>Recommendation 1</u>            Improve the collection of data related to youth assessed for placement in safe houses and safe foster homes.</p>	<p>The Department has been engaged in modernizing the child welfare data system under the Comprehensive Child Welfare Information System (CCWIS). Initial System changes will be launched in October 2023 and enable the future inclusion of Comprehensive Placement and Human Trafficking Levels of Care tools. As the Department continues to transition to CCWIS, these tools will transition into the new system.</p>	<p>The Department is executing strategies to improve data collection related to youth assessed for placement in safe houses and safe foster homes:</p> <ul style="list-style-type: none"> <li>• In September of 2023, the FSFN enhancement build was <b>completed</b>, adding the Comprehensive Placement Tool in CCWIS. This new enhancement allows the Department to capture information for Comprehensive Placement Assessments (CPA) and associated meetings. The new CCWIS enhancement has a category for CSEC/Labor related placements which allows the tracking of information such as dates and the total number of children for whom this type of placement was recommended.</li> <li>• CCWIS system enhancements that are <b>in process</b> include fully developing the identification of Human Trafficking victims and all statutorily required data elements.</li> </ul>

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			<p>While system updates are in process, Regional Human Trafficking Coordinators continue to manually track information on safe house referrals and placements.</p> <ul style="list-style-type: none"> <li>The collected information covers the Department’s statutory requirement to report the number of children assessed for safe house placement, the number of children placed in safe houses, and the number of children who were not placed for a variety of reasons (runaway episode, refusing to go, etc.).</li> </ul>
<p>DCF modified the administrative rule in 2021 to create a lower-level safe house (Tier 1) that would have fewer restrictions on aspects such as schooling and electronics. However, at the time of OPPAGA’s review, no providers had been licensed as Tier 1 homes.</p>	<p><u>Recommendation 2</u>            Work with Lead Agencies and providers to recruit Tier 1 safe houses.</p>	<p>The Department’s Licensing Department has begun meeting with the provider networks and lead agencies to actively recruit providers, review all current providers across the continuum (at-risk; traditional group homes; foster network), assess current level of care provided, and gauge interest in shifting to another level of care needed within the continuum such as Safe House, Safe Home, or Qualified Residential Programs (QRTP).</p>	<p>The following <b>ongoing</b> strategies have been implemented to increase Tier 1 Safe Houses:</p> <ul style="list-style-type: none"> <li>The Licensing Office continuously makes efforts to recruit new safe house providers for Tier 1 and Tier 2. For example, at time of re-licensure, the Licensing Team is re-engaging all licensed At-Risk Homes (of Human Trafficking) to assess and determine if the home would be better suited to</li> </ul>

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			<p>serve as a Safe House Tier 1 or 2. In addition, the Licensing Team will continue to identify licensed providers that are not a Safe House but show a trend of serving victims of human trafficking. Once identified, these licenses providers are assessed to determine if they would be appropriate to receive a Safe House license.</p> <ul style="list-style-type: none"> <li>• Discussions were held with current safe house Tier 2 providers about opening additional facilities as step-down (Tier 1) options for youth completing Tier 2 safe house programs.</li> </ul> <p>As a result of implementing these strategies, thus far, there is one home in the Central Region that is willing to function as a Tier 1 safe house. The home was previously an at-risk home for males though one male child is still placed in the home. After the remaining male child ages out-of-care, the home will begin accepting female CSEC victims in need of Tier 1 care.</p>

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<p>As very few youth are placed in safe houses in their own catchment areas, it appears to be difficult for lead agencies to determine the quality and provision of services in these placements.</p>	<p><u>Recommendation 3</u>  Collaborate with lead agencies to develop a consistent process for monitoring and assuring the quality of safe house providers.</p>	<p>The quality of Safe House services is monitored by the Department Licensing Team through reviews of child files, interviews with children, and quality surveys. DCF recently implemented quarterly visits in February 2023. These visits help to identify, resolve, and enhance the quality of Safe House. Since February 2023, the Department has trained staff and conducted visits to each of the six Safe Houses with no safety concerns founded. The change in process will provide the Safe House providers and the Department’s Licensing Team an opportunity for consistent communication, quality assurance, and ongoing system improvement.</p>	<p>The following three strategies were developed and implemented to increase the quality and oversight of Safe House services:</p> <ol style="list-style-type: none"> <li>1. The Department <b>completed</b> the implementation of ongoing quarterly visits to each Safe House to provide increased on-site evaluation of the services and programs provided to human trafficking child survivors. In coordination with the Human Trafficking Regional Coordinator (or Statewide Manager if the coordinator is unavailable), the Licensing Unit conducts the quarterly visits. Immediate concerns from quarterly visits are promptly shared with lead agencies.</li> <li>2. The Department <b>completed</b> the implementation of ongoing quarterly technical assistance calls with all Safe House providers as an opportunity to talk through questions, concerns, needs of the home, etc. In coordination with the</li> </ol>

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			<p>Licensing Team, the Human Trafficking Unit hosts the quarterly visits. Additionally, when needed, Coordinators work closely with Safe Homes to provide support for training, education needs, needs of survivors in their programs, etc.</p> <p>3. The Department is <b><i>in the process</i></b> of implementing a consistent process to provide lead agencies with information on the quality and service provision of each safe house when disciplinary action is taken. The process implemented may use the existing process that informs lead agencies of a placement hold that is issued to a Safe House due to licensing violations. Additionally, the Human Trafficking team is increasing engagement with each lead agency's human trafficking contact to provide updates on each Safe House.</p>

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<p>While the OAG has the authority to waive many of the reporting and time-related requirements for minor victims looking to access compensation funds, very few youth apply for or receive these funds. Providers have reported to OPPAGA that these funds are difficult to access due to the strict eligibility criteria.</p>	<p><u>Recommendation 4</u>            Review the criteria for Victims Compensation funds for CSE victims.</p>	<p>The Department is partnering with the Attorney General's office and other key partners such as the Department of Juvenile Justice to address this recommendation.</p>	<p>Strategies to address this finding are <i>in process</i>:</p> <ul style="list-style-type: none"> <li>• The Human Trafficking unit is adding information to its trainings about the availability of compensation funds. This task is scheduled to be completed in Q1 2024.</li> <li>• The Human Trafficking Unit is in the process of sending reminders to all local anti-trafficking task forces and coalitions to disseminate this information during January Human Trafficking Awareness month events.</li> <li>• Children in the Department's custody who were commercially sexually exploited are assigned to GAL and Attorney Ad Litem to represent their interests. The Human Trafficking Unit will explore the most efficient pathway to ensure these two entities are aware of the process to apply for compensation funds.</li> </ul>