



State of Florida
Department of Children and Families

Ron DeSantis
Governor

Shevaun L. Harris
Secretary

DATE: April 30, 2024 JLAC received 4-30-24
TO: Shevaun L. Harris, Secretary
FROM: Keith R. Parks, Inspector General 
SUBJECT: Six-Month Status Report for Auditor General Report No. 2024-040

In accordance with § 20.055(6)(h), Florida Statutes, enclosed is our six-month corrective action status report on the Auditor General *Child Protective Investigations and Oversight and Administration of Community-Based Care Lead Agencies Operational Audit* issued in October 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: Molly McKinstry, Chief of Staff
Casey Penn, Deputy Secretary
Melinda Miguel, Chief Inspector General, Executive Office of the Governor
Joint Legislative Auditing Committee

KP/lt

Department of Children and Families – State of Florida
Six-Month Corrective Action Status Report: April 2024
Operational Audit of the Department of Children and Families, Child Protective Investigations and Oversight and Administration of Community-Based Care Lead Agencies
Auditor General Report No. 2024-040, Issued October 2023

Finding	Recommendation	Agency Response	Corrective Action Status
<p>Finding 1: Department Investigation Records</p> <p>For 1 investigation, Department records did not evidence a criminal records check was completed for one of the two caregivers, and for 20 investigations, the Department did not timely upload (3-22 business days late) updated Present Danger Safety Plans (PDSPs) or Impending Danger Safety Plans (IDSPs).</p>	<p>We recommend that Department management strengthen controls to ensure that required criminal records checks are performed and documented on all applicable child protective investigation case participants and that FSFN is promptly updated for all safety plan revisions.</p>	<p>The Department concurs with the findings. The Department, as it moves towards full implementation of a new Comprehensive Child Welfare Information System (CCWIS) for intakes and investigations, is addressing practice changes for background screenings and records checks to ensure compliance. The Department is also incorporating data reviews to ensure that PDSPs and IDSPs are accurate and sufficient. Based on these data reviews and the launch of the CCWIS modules, the Department expects to complete any identified need for policy and practice updates by December 31, 2023.</p>	<p>Fully Implemented:</p> <p>CCWIS-Intake and Investigations launched in September 2023, providing a more streamlined approach to timely and accurately request criminal records checks for qualifying participants within an investigation.</p> <p>The Hotline Criminal Intelligence Unit has developed and deployed statewide training relating to criminal records checks. Implementation of CCWIS-Intake and Investigations also provide a more streamlined approach to entering and updating safety plans in real time. Additional training has been incorporated to ensure staff are familiar with the policies and procedures related to timely entering documentation including Present Danger Safety Plans</p>

Department of Children and Families – State of Florida
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			<p>and Impending Danger Safety Plans.</p> <p>The Office of Quality and Innovation continues to complete life of case reviews which include factors related to timely and accurate background history checks and timeliness and sufficiency of safety plans.</p>
<p>Finding 2: CBC Case Management</p> <p>In summary, CBCs did not always evidence the conduct of critical child welfare case management activities. These findings included deficiencies in documentation of timely case transfer conferences, case transfer, case acceptance, Family Functioning Assessment Ongoing (FFA-O), IDSP modifications, case planning, documented adoption progress, timely child face-to-</p>	<p>We recommend that CBC management strengthen case management procedures to ensure that FSFN evidences the conduct of all critical child welfare case management activities in accordance with State law, Department rules, and Department policies and procedures.</p>	<p>The Department concurs with this finding. The Department is developing new accountability standards for the CBC lead agencies. This process includes enhancing Corrective Action Planning, implementing new programmatic monitoring procedures, and strengthening oversight and accountability of CBC lead agencies for timely system documentation. The Department anticipates implementing the new</p>	<p>Partially Implemented:</p> <p>Target date for full implementation is 12/31/24 as Programmatic Monitoring develops and contract language is updated.</p> <p>Programmatic Monitoring meetings began on February 29, 2024, and are being held monthly with each CBC. Those participating in these meetings are evaluating data and continuing to identify areas in which improvement</p>

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<p>face contract, timely unannounced visits, and timely parent/guardian contact.</p>		<p>programmatic monitoring by April 30, 2024, and will implement the new Corrective Action Plan approach by November 30, 2023.</p>	<p>can be made. CBC lead agencies are aware of the implementation of increasing penalties for failure to comply with contract requirements.</p> <p>The Department enhanced its approach to Corrective Action Planning (CAP). This approach is collaborative with CBC lead agencies. When issues are identified, the Department provides data to the CBC lead agency to support the identified deficiency. The CBC lead agency then communicates strategies (short, mid, and long-term) for how they will address the issue.</p> <p>The Department continues to track progress of the identified issue through a related CAP which is monitored through monthly Programmatic Monitoring meetings.</p>

Department of Children and Families – State of Florida
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<p>Finding 3: FSFN Data Entry</p> <p>An evaluation of 1,044 service event entries recorded in FSFN between July 2019 through January 2021 was conducted by comparing the service event entry date FSFN to the timestamp on the FSFN event record associated with the entries. There were 189 of these events were not documented within 2 business days of the service event as required by the Department’s contract with CBC lead agencies.</p>	<p>We recommend that CBC management strengthen controls over FSFN data entry to ensure that all service event data is timely recorded in FSFN.</p>	<p>The Department concurs with this finding and is pleased no findings were identified in where service events did not occur. The Department is currently in the planning stages of new accountability standards for the CBC lead agencies. This process includes enhancing Corrective Action Planning, implementing new programmatic monitoring procedures, and strengthening oversight and accountability of CBC lead agencies for timely system documentation. The Department anticipates implementing the new programmatic monitoring approach no later than April 30, 2024, and will implement the new Corrective Action Plan approach by October 31, 2023.</p>	<p>Partially Implemented:</p> <p>Target date for full Implementation is 12/31/24 as Programmatic Monitoring develops and contract language is updated.</p> <p>Programmatic Monitoring began on February 29, 2024, and continues monthly with each CBC. The Programmatic Monitoring Team Reviews include examination of data and exception reports. These reviews continue to strengthen the Department’s current to ensure FSFN data are entered accurately and timely.</p> <p>CBC lead agencies have been informed that CAPs may be implemented when trends are identified that support significant deficiencies, including around data collection and documentation.</p>

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Six-Month Corrective Action Status Report: April 2024
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<p>Finding 4: FSFN Access Controls</p> <p>Selected CBC lead agency controls were evaluated for authorizing, reviewing, and timely deactivating user access to FSFN. A review of 150 FSFN user accounts active during the period July 2019 through January 2021 disclosed that the appropriateness of FSFN user access privileges were not always adequately documented due to incomplete or unavailable FSFN access authorization forms.</p>	<p>We recommend that the CBCs maintain documentation supporting all FSFN user access privileges authorized by management and the BBCBC perform and document periodic reviews of the continued appropriateness of assigned FSFN user access privileges. We also recommend that the CBCs work in concert with the Department to ensure the prompt deactivation of FSFN user access privileges when the access privileges are no longer required.</p>	<p>The Department will review contractual requirements and operating procedures to identify potential changes to ensure user access privileges are appropriated controlled. The Department will review its current FSFN user data for CBC lead agencies, and if further action is required, the Department will issue contract amendments or corrective action plans by December 31, 2023.</p>	<p>Fully Implemented:</p> <p>All CBCs are required to have an IT security officer review and follow Department protocol and procedures.</p> <p>The Department is reviewing FSFN user accounts every six months. If the user has not used their LDAP (access login) in the six-month time frame, their account will be flagged for review. A list of these flagged individuals is created by the Department and sent to the respective CBC lead agency IT security officer to determine if the account should remain active or be de-provisioned.</p>
<p>Finding 5: Monitoring of CBCs</p> <p>During the period of July 2020 through January 2021, Department Contract</p>	<p>We again recommend that Department management ensure that Department records</p>	<p>The Department agrees that during the period reviewed these findings were appropriate.</p>	<p>Fully Implemented:</p> <p>The Department now requires anyone involved with in the contract process to complete</p>

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<p>Oversight Units (COUs) issued 19 CBC monitoring reports. CBC monitoring controls and Department records were evaluated for 5 of the CBC monitoring engagements and noted that, although Department policies and procedures required COU contract monitors to sign a <i>Conflict of Interest Statement</i> before monitoring each CBC, these were not completed prior to the 5 monitoring engagements.</p>	<p>evidence the completion of <i>Conflict of Interest Statements</i> by all Department monitors prior to the conduct of monitoring activities.</p>	<p>After this audit, the Contract Oversight Unit updated the Conflict of Interest procedures to ensure disclosure of any conflicts of interest prior to conducting monitoring activities.</p>	<p>a Conflict of Interest form prior to conducting monitoring activities. To determine where conflicts may exist, the forms are reviewed by the Contract Oversight Unit before activities begin.</p>
<p>Finding 6: CBC Property Records and Controls</p> <p>A review of selected CBC property controls and related records determined that CBC controls and records need enhancement to better ensure and demonstrate the accuracy and completeness of the information necessary to accurately report and maintain proper accountability over</p>	<p>We recommend that CBC management enhance controls to ensure that all required CBC property information is timely and accurately recorded for all applicable property items. We also recommend that CBC management ensure that annual physical inventories be properly conducted and documented in</p>	<p>The Department concurs with this finding. The Department is developing new accountability standards for the CBC lead agencies. This process includes enhancing Corrective Action Planning, implementing new programmatic monitoring procedures, and strengthening oversight and accountability of</p>	<p>Fully Implemented:</p> <p>CBC lead agency Fiscal Property Inventories are completed annually by the Department's General Services Office through the assigned CBC contract managers. During Programmatic Monitoring meetings, the inventory results are evaluated and</p>

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CBC property purchased with Department-provided funds.	accordance with Department requirements and by persons independent of the property record-keeping function. CBC management should also ensure that the results of annual physical inventories are properly reconciled to CBC accounting and property records and that the reconciliations are documented.	CBC lead agencies for timely system documentation. The Department anticipates implementing the new programmatic monitoring by April 30, 2024, and will implement the new Corrective Action Plan approach by November 30, 2023.	opportunities for improvement are identified in areas such as timely documentation.
<p>Finding 7: Subaward Monitoring</p> <p>The monitoring activities of four selected CBCs were evaluated related to subawards with monitoring reports issues during the July 2019 through January 2021. The evaluation included an examination of CBC records for 15 selected monitoring engagements and found that, Embrace Families policies and procedures did not require and consequently, Embrace Families contract monitors did not complete, conflict of</p>	We recommend that Embrace Families management ensure that monitoring records evidence prior to each monitoring engagement that staff are independent of, and have no conflicts of interest related to, the providers being monitored. We also recommend that Embrace Families management ensure that monitoring working papers and supporting documentation are maintained in accordance with Department requirements.	The Department will review these findings with Embrace Families and request additional documentation on monitoring documentation. If appropriate, the Department will impose a corrective action plan. The Department anticipates completion of this additional review before November 2023.	<p>Partially Implemented:</p> <p>Full implementation expected on May 1, 2024, when the Department’s contract with Embrace Families ends.</p> <p>Embrace Families terminated their contract, effective May 1, 2024. The Department is actively transitioning the associated contract to Brevard Family Partnership as the new CBC lead agency.</p>

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<p>interest statements. Additionally, Embrace Families did not maintain the working papers and supporting documentation related to the report for 2 of the 3 monitoring engagements selected for audit.</p>			