



**State of Florida
Department of Children and Families**

Rick Scott
Governor

Mike Carroll
Interim Secretary

DATE: July 7, 2014

TO: Mike Carroll
Interim Secretary

FROM: Keith R. Parks
Inspector General

SUBJECT: Six-Month Status Report for Auditor General Report No. 2014-016

In accordance with Section 20.055(5)(h), Florida Statutes, enclosed is our six-month status report on Auditor General Report No. 2014-016, *Independent Living Transition Services, Foster Care Licensing, and Provider Performance Measures - Operational Audit*.

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

Enclosure

cc: Kathy DuBose, Staff Director, Joint Legislative Auditing Committee



OFFICE OF INSPECTOR GENERAL

Mike Carroll
Interim Secretary

Enhancing Public Trust in Government

Keith R. Parks
Inspector General

Project #E-1112DCF-153

July 7, 2014

Six-Month Status Report
**INDEPENDENT LIVING TRANSITION SERVICES,
FOSTER CARE LICENSING, AND PROVIDER
PERFORMANCE MEASURES**
Operational Audit

PURPOSE

The purpose of this report is to provide a written response to the Secretary on the status of corrective actions taken six months after the Auditor General published Report No. 2014-016, *Independent Living Transition Services, Foster Care Licensing, and Provider Performance Measures, Operational Audit*.

REPORT FINDINGS, RECOMMENDATIONS, STATUS & COMMENTS

Three program offices were responsible for providing updated status and corrective action comments to the findings and recommendations. The Office of Child Welfare was responsible for finding numbers 1, 2, 3, 4, 5, 6, and 8; Information Technology Services was responsible for finding number 7; and Substance Abuse and Mental Health Services was responsible for finding numbers 9 and 10. Presented below are the full text of the Auditor General's finding statements and recommendations and up-to-date corrective action comments and status, as reported by the management staff of the aforementioned programs.

FINDING NO. 1: *Federal funds from the Chafee Foster Care Independence Program and Chafee Education and Training Voucher (ETV) Program, as well as State funds, were used to provide assistance to ineligible young adults, including young adults who should have aged out of the ILTS Program at age 23.*

RECOMMENDATION: *We recommend that the CBCs implement procedures to timely detect changes in the eligibility status of young adults receiving ILTS Program assistance and, as appropriate, timely discontinue payments or revise the funding source. We also recommend that the Department periodically analyze ILTS Program payments to verify the age eligibility of the applicable young adults.*

Status (per Child Welfare staff): Fully Corrected

Full integration of Independent Living financial data into the Florida Safe Families Network (FSFN) system and specific Other Cost Accumulator (OCA) codes that allow for the identification of payments based on a child's program eligibility criteria for specific Independent Living payments has been completed. This new functionality allows for CBCs to monitor and detect changes in Independent Living eligibility and payment amounts on an ongoing basis. In addition, Community-Based Care (CBC) financial payment information is subject to both management and oversight reviews.

FINDING NO. 2: *ETV Program-funded payments were made in excess of established Program payment limits. Additionally, the Department and the CBCs had not implemented monitoring procedures to identify excess payments or payments made to ineligible young adults.*

RECOMMENDATION: *We recommend that the CBCs implement procedures to effectively monitor the ETV Program payment limit. Additionally, we recommend that the Department routinely perform*

monitoring of payments made by the CBCs and the CBC subcontractors to ensure that any educational services payments funded by the ETV Program in excess of the annual ETV Program payment limit are timely identified and reclassified to appropriate funding sources.

Status (per Child Welfare staff): Fully Corrected

Effective July 1, 2014, changes to s.409.1451, F.S., established a fixed payment amount of \$1,256 per month for all eligible former foster care educational stipend payments. The establishment of this fixed payment should simplify the CBC payment disbursement and monitoring process.

FINDING NO. 3: *In some instances, the CBCs coded payments to the incorrect ILTS Program service type and made payments for ineligible adolescents.*

RECOMMENDATION: *We recommend that the Department and the CBCs provide training to staff responsible for coding ILTS Program payments and ensure that changes in service types are timely communicated.*

Status (per Child Welfare staff): Fully Corrected

Due to FSFN changes in support of the "Nancy C. Detert Common Sense and Compassion Independent Living Act," a number of new online training modules have been created in support of these modifications. Issues covered by this new training include eligibility, service types, and coding of payments. Training and reference guides in support of this new functionality are available through the University of South Florida, Center for Child Welfare at: <http://centerforchildwelfare.fmhi.usf.edu/IndependentLiving/extendedfc.shtml>.

FINDING NO. 4: *CBCs did not always maintain documentation to demonstrate that Road-to-Independence Program benefits were paid to eligible Program participants in appropriate amounts.*

RECOMMENDATION: *We recommend that the Department and the CBCs ensure that adequate documentation is maintained to demonstrate that RTI Program benefits are paid in appropriate amounts to eligible Program participants.*

Status (per Child Welfare staff): Fully Corrected

The establishment of fixed postsecondary educational support payment amounts and the implementation of new FSFN functionality in support of legislative changes made to the Independent Living Transition Service program should improve documentation of payment amounts and payments.

FINDING NO. 5: *The CBCs did not always maintain documentation to demonstrate that timely assessments, staffings, delinquency record and background checks, and services worker contacts were performed for adolescents receiving ILTS Program services.*

RECOMMENDATION: *For the proper and effective administration of the ILTS Program, we recommend that the Department ensure that the CBCs take appropriate action to demonstrate compliance with all the Program requirements established by law and rule.*

Status (per Child Welfare Staff): Ongoing

All CBCs are subject to ongoing contract management and oversight activities.

FINDING NO. 6: *The CBCs did not fully utilize the Florida Safe Families Network (FSFN) to document and maintain adolescent assessment and staffing information.*

RECOMMENDATION: *We again recommend that the Department direct the CBCs to fully utilize FSFN's functionality related to the ILTS Program.*

Status (per Child Welfare Staff): Ongoing

All CBCs have been informed of this expectation through both Regional Independent Living Transitional Services face-to-face meetings and monthly Regional Independent Living Transitional Services conference calls.

FINDING NO. 7: *The Department did not always timely deactivate FSFN access privileges when users separated from Department employment.*

RECOMMENDATION: *We recommend that the Department continue its efforts to promptly deactivate terminated employee access privileges to the Department's network and information technology applications, including FSFN.*

Status (per Information Technology Services Staff): Ongoing

Information Technology Services Data Security continues its efforts to timely deactivate security access upon receipt of termination notification. As an additional security measure, automated lists of terminated employees are provided daily to Data Security staff to validate that security privileges are deactivated.

FINDING NO. 8: *The Department's regional offices could not always demonstrate that the CBCs' foster care re-licensing activities had been subjected to appropriate monitoring.*

RECOMMENDATION: *We recommend that the Department ensure that documentation is maintained to demonstrate the regional offices' timely and proper monitoring of the CBC family foster home re-licensing activities performed under the Attestation Model.*

Status (per Child Welfare Staff): Partially Corrected

The Department's Statewide Licensing Specialist will facilitate a meeting with the regional licensing offices to determine current re-licensing monitoring practices across the state. Based on current practices, licensing staff will agree on best practices for monitoring re-licensing activities, and will draft a policy guideline for operationalizing improved re-licensing monitoring procedures by July 31, 2014. The guideline will be incorporated into Chapter 65C-13, Florida Administrative Code (currently open for revision) and in the Child Welfare Practice Manual.

FINDING NO. 9: *The Substance Abuse and Mental Health Program's provider performance measure standards were set below the Department's performance measure standards specified in its Long Range Program Plans and, in some cases, were set significantly below the providers' prior year performance results.*

RECOMMENDATION: *We recommend that, when performance measures relate to standard services delivered by all SAMH Program providers, the Department align the service providers' contract performance standards with the Department's performance standards. For those performance measures with standards that are unique to a service provider, we recommend that the Department establish procedures that require contract performance standards be set at or above the provider's prior performance results, unless Department management determines that justification for lower standards exists. For those instances where lower standards are justified, the procedures should provide guidance to staff for determining the lower standards and require that justification for the lower standards be documented in the contract file.*

Status (per Substance Abuse/Mental Health Services Staff): Fully Corrected

The Department no longer contracts directly with providers for Substance Abuse/Mental Health services; instead, the Department contracts with intermediary organizations – the managing entity. The performance measures required of providers are contracted through the managing entity, and have been adjusted to be in line with the Long-Range Program Plan.

FINDING NO. 10: *The Department did not always document a periodic comparison of Substance Abuse and Mental Health Program service providers' actual performance to the performance measure standards incorporated in the providers' contracts.*

RECOMMENDATION: *We recommend that the Department's SAMH Program management implement policies and procedures addressing contract manager monitoring of provider performance. Such policies and procedures should include documentation requirements, as well as guidance for identifying, and time frames for following up with, underperforming providers.*

Status (per Substance Abuse/Mental Health Services Staff): Fully Corrected

The Department no longer contracts directly with providers for Substance Abuse/Mental Health services; instead, the Department contracts with intermediary organizations – the managing entity.

This follow-up audit was conducted as required by Florida Statutes 20.055(5)(h) and section 2500.A1 of the International Standards for the Professional Practice of Internal Auditing as published by the Institute of Internal Auditors. Elton Jones compiled this follow-up audit from representations provided by program management. Please address inquiries regarding this report to Jerry Chesnutt, Director of Auditing, at (850) 488-8722.