

oppaga report

September 2004



Report No. 04-65

DCF Improves Readiness Assessment Process; However, Additional Changes Are Needed

at a glance

The Department of Children and Families has made changes to address our prior recommendations, strengthening its process for determining community-based lead agency readiness to provide child protective services. The department also is making progress in improving its data and accountability monitoring systems.

However, the department needs to take additional action to strengthen the readiness assessment process and its ability to monitor lead agency viability. The department should

- collect and track information on lead agency technical assistance requests to better identify statewide training needs;
- better enforce statutory provisions requiring community alliance members to participate in the readiness assessment review;
- continue its efforts to complete HomeSafenet implementation; and
- implement a comprehensive, coordinated process for monitoring lead agency viability.

Scope

The 2003 Legislature directed OPPAGA and the Auditor General to jointly review and assess the Department of Children and Families' process for determining district and lead agency readiness to provide child protective services.¹ Our initial report

¹ Chapter 2003-146, *Laws of Florida*.

was issued in February 2004 and subsequent reports are due each September and March until full transition to community-based care is accomplished statewide.² This report presents our assessment of the extent to which the department has addressed the findings in our February 2004 report and examines department efforts to ensure the viability of lead agencies.

Background

The 1998 Legislature directed the Department of Children and Families to contract with lead agencies to provide child protective services, including family preservation, emergency shelter, foster care, and adoption services.³ The department likely will meet the statutory mandate to enter into service contracts with lead agencies statewide by December 2004. As of August 2004, the department had contracted with 19 lead agencies, which are currently providing foster care and related services in 63 counties. The department has signed start-up contracts with three lead agencies to provide services in the remaining four counties (see Appendix A).

When completed, the privatization of child protective services will serve large numbers of

² *Special Report: DCF's Lead Agency Readiness Assessment Process Meets Statutory Requirements, But Needs Strengthening*, OPPAGA Report No. 04-15, February 2004.

³ Lead agencies are private, community-based agencies responsible for planning, administering, and delivering client services; ensuring that services are delivered in accordance with state and federal laws; and coordinating with other local public or private agencies that offer services for clients.

children and require significant expenditures. During Fiscal Year 2003-04, there were 84,632 children receiving program services under department and/or lead agency care.⁴ For Fiscal Year 2004-05 the Legislature appropriated \$838,148,725 to the department's child protection program; the department will issue contracts with lead agencies that total more than \$500 million during the Fiscal Year.

To help ensure that privatization is successful, the Legislature required the department to establish an assessment process to review the operational readiness of each district and lead agency. The review process includes an assessment instrument with criteria reflecting national accreditation standards. The process also includes on-site reviews by teams of district and lead agency staff with direct experience with the start up and operation of a community-based care agency and a representative from the community alliance.⁵

Current Status ---

The department has taken steps to address most of the recommendations we made in our February 2004 report, which concluded that the department's lead agency readiness assessment process and instrument met statutory requirements but needed some improvement. However, we believe additional steps should be taken to better ensure that community-based providers are fully ready to assume responsibility for child welfare services, and it will be critical for the department to fully implement its planned accountability system.

DCF has implemented most of our recommendations to change the readiness assessment process and instrument

The department has made changes to address our prior recommendations, strengthening its readiness assessment instrument and process in four areas.

- Assessment teams are now better addressing critical areas during initial site visits, increasing the review's effectiveness.
- Assessment teams are now systematically evaluating supporting documentation.
- The department now requires lead agencies to submit business plans during the readiness assessment process.
- The department has modified the readiness assessment instrument to include minimum requirements for several key deliverables.

However, the department needs to take additional steps to identify lead agency training needs and ensure community alliance participation at site visits.

Assessment teams are now addressing critical areas during initial site visits, increasing the reviews' effectiveness. Our February 2004 report noted that two assessment teams certified lead agencies as ready to provide services without having fully reviewed and addressed all critical operational areas such as human resources, quality assurance plans, and budget and finance information. We recommended that the department require all operational areas to be addressed during the initial site visit.

The department has addressed this recommendation by adding critical elements to its site visit agenda. The assessment team coordinator is to ensure that these elements are discussed and that there is sufficient time scheduled during site visits for this discussion. Our observations of initial site visits for two lead agencies transitioning since our last report concluded that these requirements are being met. During the first site visit of each lead agency, the assessment team used a prescribed agenda, which assured that the team heard a discussion of the most critical issues. In each case, the teams reviewed all corrective actions and provided guidance.

Assessment teams are now systematically evaluating supporting documentation. Our February 2004 report concluded that three assessment teams had not reviewed all critical documents submitted by lead agencies. For example, the documentation submitted by one lead agency incorrectly indicated that the department had approved the system of care design. We recommended that the department develop a mechanism to ensure that assessment

⁴ This includes all children provided emergency shelter or ongoing in-home or out-of-home services, but does not include children involved only in an investigation. It also does not include prevention.

⁵ A community alliance is a group of stakeholders, community leaders, client representatives and human services funders in each county that provides a focal point for community participation and governance of community-based services.

teams review and approve critical documents prior to the department contracting for services.

To address this recommendation, the department has developed the Organizational, Financial, and Risk Checklist, which itemizes the specific deliverables required by statute or contract and includes minimum specifications. The assessment team coordinator distributes copies and supporting documentation to team members at each final site visit. Team members have five business days following the site visit to review the information and report exceptions or recommendations.

Our observations of final site visits for five of the seven lead agencies that have undergone readiness assessments since December 2003 concluded that the checklist is being used as intended. For example, one team found an exception to readiness as a result of a review of financial documents. The exception required the lead agency to review and negotiate a number of services positions that were being retained by the district.

Lead agencies are now required to submit business plans during the readiness assessment process. Our February 2004 report noted that the original readiness assessment instrument required lead agencies to develop and submit a long-term business plan within 90 days after the effective date of its services contract with the department. This was problematic because the plan was provided after the assessment process was completed and the readiness assessment teams did not have an opportunity to review the plan. We recommended that the department revise its assessment instrument to require a business plan be submitted prior to execution of a services contract.

To address this recommendation, the department amended its procedures to request lead agencies to submit business plans prior to execution of their services contract. However, only two of the five lead agencies that have gone through the assessment process since February 2004 complied with the new requirement and submitted their business plan by the second site visit. The second site visit for the three lead agencies that did not submit a business plan occurred on February 4 and 5, 2004, several days after the requirement went into effect.

The department has modified the readiness assessment instrument to include minimum requirements for several deliverables. Our February 2004 report noted that the department's

original readiness assessment instrument required lead agencies to submit deliverables for each component, but did not provide minimum requirements and best practices for each deliverable. For example, the instrument did not include the types of tasks that should be documented or department and lead agency roles and responsibilities. We recommended the department modify the instrument to contain examples of minimum requirements and best practices for each critical component.

To address our recommendation, the department revised its readiness assessment instrument to strengthen guidance, detail, and standards for several components of the instrument, including Business Plans, Case Transfer Protocols, Consumer's Access to Services, and the Cultural Diversity Plan. Revisions to the instrument also included a requirement that the department have a written plan that describes how it will perform contract performance and compliance monitoring of the lead agency services contract once implementation occurs.

The department has improved technical assistance provided to lead agencies, but additional steps should be taken. Our February 2004 report concluded that the department had not established a formal, standardized process for providing technical assistance to lead agencies. Lead agency managers asserted that they needed additional technical assistance in critical areas such as invoicing, revenue maximization, and adoptions. To help identify statewide training needs, we recommended that the department track the frequency and type of technical assistance requests from lead agencies.

The department has taken steps to address our recommendation, but additional steps are needed. The department provided statewide training in July 2004 to lead agencies on financial issues such as invoicing and budgeting. The department also provides technical assistance during monthly district administrator's meetings and the readiness team coordinator provides technical assistance to lead agencies as they prepare to transition to community-based care. Further, the department designated the assistant director of Community-Based Care as the contact person for lead agencies to submit all technical assistance requests.

However, additional steps are needed. The department should systematically track lead agency requests for technical assistance in order to identify statewide needs. This will be important as the department is responsible for identifying emerging problems and providing solutions, and the technical assistance needs of community-based care lead agencies will change over time as they become fully responsible for providing child protective services. By tracking requests for technical assistance, the department can more quickly identify common issues and reduce the threats to lead agency viability. To facilitate this process, the central office should track technical assistance requests and assess the magnitude of specific training needs.

The department has modified its readiness assessment instrument to show stakeholder support of lead agency mission and vision, but it needs to better ensure community alliance participation at site visits. One of the Legislature's key goals in privatizing foster care and related services was to encourage community stakeholders to more actively participate in the provision of child welfare services. Our February 2004 report noted that the readiness assessment tool did not require lead agencies to provide sufficient information to demonstrate that they had effectively communicated their mission and vision to community stakeholders. We recommended that the department add a requirement to the assessment instrument requiring documentation, such as survey results, indicating stakeholder understanding of and support for the lead agency's mission and vision statements.

To address this recommendation, the department has modified the readiness assessment tool to assess stakeholder support. This tool includes additional guidance and criteria requirements relating to community development, communication, and integration. During the five lead agencies' site visits we observed, all lead agencies provided a list of their community alliance's priorities for child welfare. Further, the readiness assessment teams, with the exception of one, included community alliance members who fully participated in the assessment visits and spoke about the alliances priorities.

However, in one of the site visits we observed, one team's alliance member participated for only half a day of the first site visit and did not participate at all in the second site visit. Section 409.1671, *Florida Statutes*, requires that the readiness assessment be

conducted by a team that includes a community alliance representative. The department needs to better enforce this statutory provision by instructing assessment teams not to proceed with the readiness assessment site visit without alliance participation.

DCF has made progress in implementing our recommendations to improve accountability

In our previous report, we concluded that the department faced challenges in sufficiently improving its accountability system before completing full transition to community-based care. We recommended that the department strengthen its data and accountability monitoring systems. The department has taken steps to strengthen these systems, although HomeSafenet implementation is not fully complete.

The department has improved its contingency planning process. Our February 2004 report noted that it will be critical for the department to have effective contingency plans to address potential problems in lead agency performance that do not rise to the level of receivership or contracting with a new lead agency.⁶ For example, the department should develop plans for addressing situations such as financial emergencies by lead agencies, incidents of abuse or death of children while in lead agency care, and violations of state or federal law.

The department has developed a process to intervene and provide assistance before lead agency problems threaten termination of the contract. The department's revised community-based care services contract attachment includes language specifying the conditions requiring department intervention. The process requires that if a provider is below target on any performance measure, if there are serious fiscal concerns, or if quality management review findings identify other serious systemic concerns, the district administrator may require corrective action. Potential remedies include requiring monthly reports on the corrective action plan,

⁶Section 409.1675, *F.S.*, describes the conditions under which the department may petition for appointment of a receiver for a community-based care lead agency. The department's lead agency services contract includes a provision identifying the general process to be followed if either party to the contract exercises its contract termination rights. The department and the Florida Coalition of Children have also discussed creating a team of lead agency staff who would be deployed to support the day-to-day operations of a failed lead agency and begin competitive procurement for a new lead agency.

technical assistance from a management team, and/or assignment of a fiscal monitor. Failure to demonstrate satisfactory progress within a negotiated time period may result in, but is not limited to, replacement of management or termination of the contract.

The department is making progress strengthening its monitoring of lead agencies. In our previous report, we concluded that the department's quality assurance monitoring system appeared reasonable, but the department lacked a standard tool for monitoring lead agencies' compliance with contract requirements.

The department has made progress implementing its quality assurance monitoring system. The department began quality assurance monitoring of lead agencies in February 2004 and plans to complete monitoring of all lead agencies currently under services contracts by December 2004. The department also developed a standardized contract monitoring tool in July 2004. The new tool includes standard contract compliance elements and incorporates monitoring elements that are unique to community-based care lead agencies. For example, contract monitors will review the cost allocation plan to ensure that the lead agency is spending according to this departmental approved plan. Also, the new monitoring tool incorporates elements related to subcontractor monitoring, coordination with other agencies and entities as required by contract, and the lead agency's quarterly meetings with district administration and community alliance members.

The department has selected a contractor to complete HomeSafenet implementation. Our February 2004 report noted that the delayed HomeSafenet implementation schedule impeded department oversight of lead agencies.⁷ As of December 2003, the department was unable to provide information on 7 of its 18 legislative performance measures. The department also needed to develop several critical HomeSafenet components that were important to monitoring the program's overall performance, including case planning, financial management, the National Child Abuse and Neglect Data System Report, and interface access to data in external information systems.

The department has made progress in completing HomeSafenet, but it is not yet fully operational. In June 2004, department administrators selected a contractor to complete HomeSafenet and are currently awaiting federal approval of the contract.⁸ The \$20-million contract requires the vendor to develop and deliver the remaining federal and state requirements for the information system including: case management/court processing, financial management, resource management, organizational structure and security, and interfaces. Department officials projected that the system will be completed within 18 months after the contract is awarded. Although HomeSafenet is still not fully functional, the department has increased the number of legislative performance measures for which data is available to 12 out of 18 performance measures as of July 2004. To adequately monitor lead agency performance, it will be essential for the department to have reliable data on all critical performance measures. The department should closely monitor its contractor's performance to ensure that HomeSafenet implementation is completed within budget and deadlines.

Lead Agency Viability —

Enhancements to the department's oversight process are needed to better evaluate lead agency viability

Community-Based Care lead agencies need to be successful in the long term to ensure that children are protected and resources are used efficiently and effectively. The critical nature of long-term viability was recently demonstrated when one lead agency terminated its contract due to management and financial problems. To reduce the risk of similar failures, the 2004 Legislature placed additional requirements on lead agencies and shifted responsibility for developing a risk pool plan intended to mitigate financial risks to lead agencies.

The department has attempted to develop early warning indicators to more quickly identify lead agency problems. As part of this review, the Auditor General's staff compiled examples of factors that can influence lead agency viability (see Appendix B).

⁷ HomeSafenet is the department's child welfare information system.

⁸ The contract is for a systems integrator, which is an individual or company that specializes in building complete computer systems by putting together components from different vendors.

The department should consider these factors in monitoring and identifying threats to viability.

The recent termination of one lead agency's contract demonstrates the need for more focus on long-term viability. Family Continuity Programs, which started as a lead agency in the fall of 1999, terminated its contract effective June 30, 2004. The department contracted with another lead agency to take over services in this area. Financial shortfalls, mismanagement, and caseload increases contributed to this outcome.

- A January 2004 department contract monitoring report noted that Family Continuity Programs (FCP) continued to over-spend its budget after being notified by the department that they would not be reimbursed for dollars exceeding the contract amount. FCP then used its line of credit to pay expenses and accumulated a debt of \$3.8 million.
- FCP also neglected to address recurring contract monitoring report recommendations. For example, contract monitoring reports from both 2003 and 2004 raised concerns about expenses FCP paid to its parent company, Care Development, Inc. During Fiscal Year 2001-02, FCP paid Care Development, Inc., \$330,807 for management support, professional support, and financial support services. However, FCP consistently failed to provide the department with copies of written agreements or other documentation that adequately demonstrated that the costs were both necessary and reasonable for delivery of the services covered by the contract.
- FCP experienced significant increases in the number of children referred to the system of care. According to FCP documents, its caseloads increased 29.7% after it assumed responsibility for child welfare services in Pinellas and Pasco counties. The largest increase took place during the transition of services and during FCP's first year of operations when caseloads jumped 31% and overloaded the capacity of its financial system and caseworkers. FCP was never able to fully recover from the increase in caseload experienced early in its transition.

The 2004 Legislature mandated changes to community-based care to reduce financial risk and help ensure lead agency stability. Chapter 2004-356, Laws of Florida, made two changes to the

community-based care system that should promote long-term viability of lead agencies. First, the Legislature required that the Florida Coalition for Children, in consultation with the department, develop a plan regarding the use and structure of a community-based care risk pool. The plan, due January 2005, must specify the necessary steps to ensure the financial integrity and industry-standard risk management practices of the community-based care risk pool and the continued availability of funding from federal, state, and local sources. The law also requires the Florida Coalition for Children to contract for an actuarial study that will produce options for the long-term use and structure of the risk pool. The coalition plans to distribute the request for proposals in September 2004.

Second, the Legislature mandated that lead agencies should not directly provide more than 35% of services within their service area. Distributing services among numerous subcontractors will help ensure that a majority of services are not disrupted if the lead agency fails. This change also will give department administrators the ability to redistribute the lead agency's services among existing providers until they can find another lead agency to take over.

The department should implement a comprehensive, coordinated process to monitor lead agency viability. At the time of our February 2004 report, the department lacked a system for early identification of lead agency problems, such as benchmarks for early warning indicators. We recommended that the department develop a system for early identification of lead agency problems that would include establishing benchmarks in critical areas such as financial ratios, caseload ratios, caseload changes, and supervisor-to-case manager ratios.

To address this need, several organizational units within the department are collecting child protective services data for analyses. For example, the department's budget office has developed spreadsheets for use by lead agencies, district contract managers, and headquarters staff to track the alignment of funding sources to actual expenditures by the lead agencies. The department also has developed a three-level quality assurance process to monitor lead agencies' program performance and compliance. In this process, lead agencies monitor their direct service units, department district/region offices monitor lead agencies, and the department's central office validates monitoring activities.

However, the department has not yet developed and implemented a centralized, coordinated process for evaluating lead agency viability. Such a process should include establishing measures of viability and benchmarks for the measures, ongoing analyses of the data, department-wide coordination of data analyses, and documentation of these assessments.

With input from the department, lead agencies, Florida Mental Health Institute, the Child Welfare League of America, and other stakeholders, Auditor General staff compiled a list of factors that influence lead agency viability. This list is provided in Appendix B. The department should consider the factors when developing measures and benchmarks for monitoring lead agency viability. Negative trends in these areas would provide a warning of the need to more closely monitor specific lead agencies.

Conclusions and Recommendations

The department has taken steps to address the recommendations we made in our February 2004 report to strengthen its process for assessing lead agency readiness to assume responsibility for providing child protective services. Department assessment teams are now addressing critical areas during initial site visits, increasing the reviews' effectiveness. Teams also are systematically evaluating supporting documentation. The department now requires lead agencies to submit business plans during the readiness assessment process. The department also modified the readiness assessment instrument to include minimum requirements for several key deliverables. The department also is making progress in improving its data and accountability monitoring systems. The department enhanced its contingency planning process, selected a contractor to complete the HomeSafenet implementation, and is in the process

of conducting quality assurance monitoring of lead agencies currently under contract.

However, the department needs to take additional action to strengthen the readiness assessment process and its ability to identify lead agency viability problems.

- To identify statewide training and technical assistance for lead agencies, we recommend that the department require district offices to provide the central office with information on technical assistance requests, and that the department track this information to quantify lead agency training needs.
- We recommend that the department better enforce the statutory provision (section 409.1671, *Florida Statutes*) that community alliance members participate in readiness assessments. This could be done by instructing assessments teams not to proceed with the readiness assessment site visit without alliance participation.
- We recommend that the department closely monitor its contractor's performance to ensure that HomeSafenet implementation is completed within budget and deadlines.
- We recommend that the department develop and implement a comprehensive monitoring process that facilitates and coordinates the collection and analyses of lead agency viability data, establishes measures and benchmarks, and addresses how department units will document their assessments of lead agency viability. In developing this process, the department should consider the viability factors listed in Appendix B.

Agency Response

In accordance with the provisions of s.11.51(5), *Florida Statutes*, a draft of our report was submitted to the Secretary of the Department of Children and Families for review and response. The Secretary's written response is included in Appendix C.

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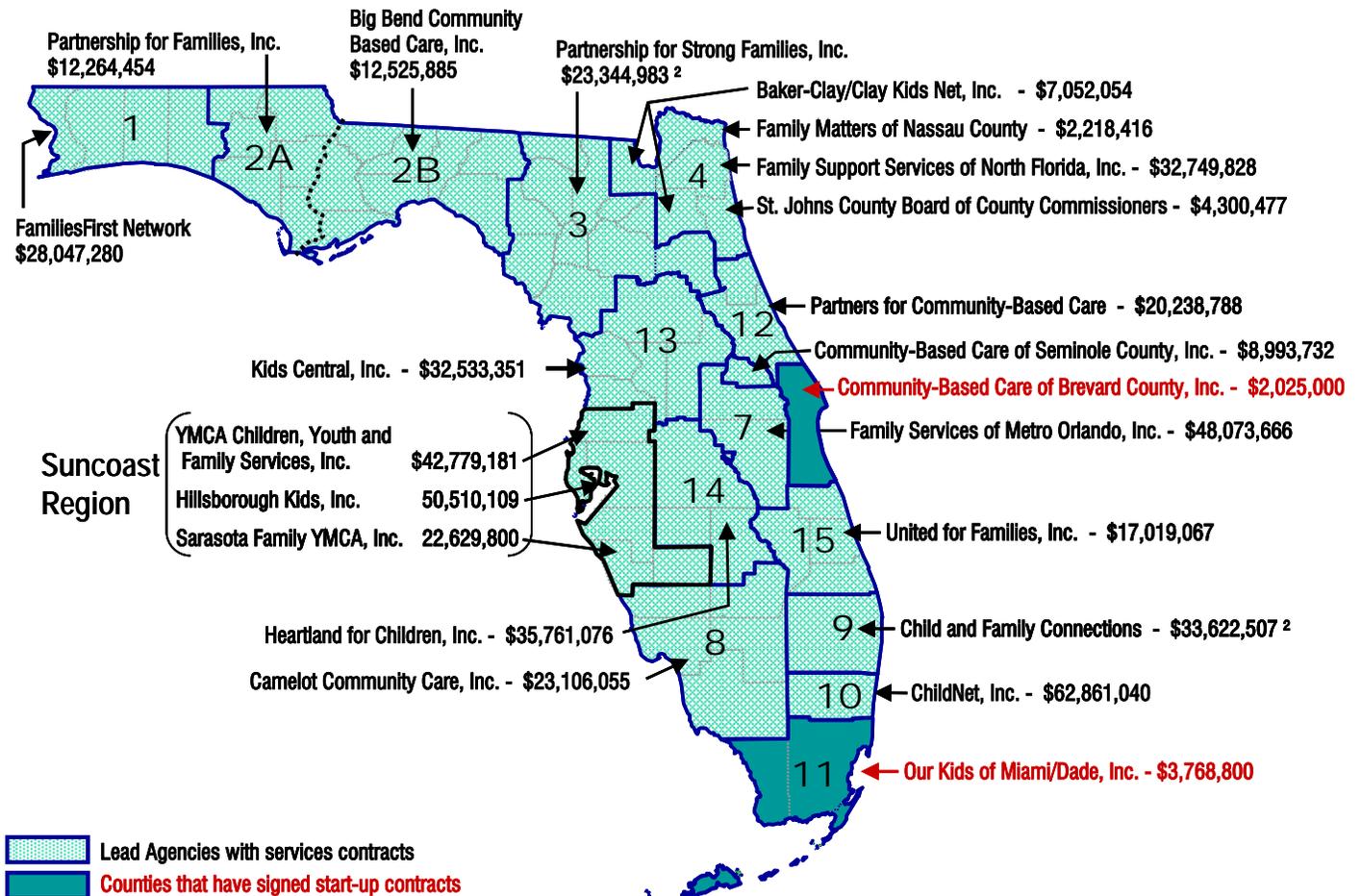
Project conducted by LeNée Carroll (850/488-9232) and Brenda Hughes (850/487-2978)

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Appendix A

Twenty Lead Agencies Are Currently Providing Foster Care and Related Services; the Department Has Signed Start-up Contracts with Two Lead Agencies^{1,2}



¹ Contract amounts are annualized.

² Two lead agencies are transitioning and share resources with the department. Therefore, their final contract amounts may vary slightly from amount shown.

Source: Department of Children and Families.

Appendix B

Factors Influencing Lead Agency Viability

The Auditor General's staff compiled examples of factors that can influence lead agency viability. The department should consider these factors in monitoring and identifying threats to viability.

Oversight	
Board of Directors	Board composition; frequency of meetings; level of involvement and control (review of meeting minutes, Lead Agency fiscal and program related reports, etc.)
Community Leadership/Support	Community Alliance composition; frequency of meetings; opportunities for input by stakeholders/advocates; effectiveness of feedback mechanisms
Fiscal Monitoring	Existence of independent, ongoing monitoring of fiscal operations; existence of significant or recurring issues; appropriate corrective action
Independent Audits	Existence of independent audits; existence of significant or recurring issues; appropriate corrective action
Internal Audits	Existence of internal audit function reporting directly to board; existence of significant or recurring issues; appropriate corrective action
Quality Assurance (QA) Reviews	Existence of an integrated system that generates performance and compliance data at the lowest service level and reports routinely to stakeholders; findings of department QA reviews; existence of significant or recurring issues; appropriate corrective action
Funding	
Allocation	Appropriate funding source allocation and client population utilization
Community Resources	Diversity and sufficiency of contribution from other than department (recurring, in-kind, cost effectiveness of fund raising activities)
Federal Revenue	Extent federal sources maximized
Financial	
Alternative Financing	Level of available credit to address liquidity needs
Budgetary Performance	Comparison of actual expenditures to budget; analysis of variances
Cost Allocation	Adherence to approved cost plan; portion of total cost not directly allocable; validity of time logging systems
Financial Position	Assets, liabilities, equity ratios (short- and long-term)
Liquidity	Cash flow and balance maintained (e.g., number of days of operating cash available, cash flow fluctuations and trends)
Risk Management	Extent covered by performance bonds and other insurance
Vendor and Other Payments	Timeliness of payments to vendors/subrecipients; accuracy and timeliness of DCF invoices
Salaries and Benefits	Total budgeted for management, administrative staff, program staff (direct client contact), and other; average cost per employee for each area and non-salary benefits for management positions
Human Resources	
Certifications	Employees that have achieved certification in their area of expertise
Qualifications	Minimum education and career experience of key positions
Staffing	Composition of management, administrative, program (direct client contact), and program (other than direct client contact); ratio of administrative to direct staff
Training	Nature and extent of training provided (including areas identified in QA and other reviews)
Vacancies	Percentage of positions filled; trend of vacant positions and identification of causes
Operations	
Accounting and Reporting Systems	Reliability and functionality of systems used; accuracy and timeliness of HomeSafenet data
Contingency Planning	Plans to address business continuation, loss mitigation for natural disasters or terrorism
Direct Services	Extent direct client services provided by the lead agency; experience and success of lead agency in providing services
Infrastructure Planning	Plans for maintenance and replacement of assets such as buildings, computers, etc., attributed to normal course of business
Partnership Structure	Partners/subcontractors' experience related to Child Welfare Services
Policies and Procedures	Written policies and procedures effectively communicated to staff and stakeholders
Program Structure	Caseload size; average length of stay; age of children; percentage in-home vs. out-of-home; available support services for active families; prevention/diversion services
Program Performance	Identification, measurement, and evaluation of specific targets
Subcontract Monitoring	Extent and quality of monitoring activities such as review of invoices, independent audit reports, program specific reports, on-site visits; existence of significant or recurring issues; appropriate corrective action; technical assistance

Appendix B

Jeb Bush
Governor



Jerry Regier
Secretary

Florida Department of Children and Families **Office of the Secretary**

August 31, 2004

Mr. Gary R. VanLandingham
Interim Director
The Florida Legislature
Office of Program Policy Analysis and
Government Accountability
111 West Madison Street
Room 312, Claude Pepper Building
Tallahassee, Florida 32399-1475

Dear Mr. VanLandingham:

Thank you for your August 12 letter providing the preliminary findings and recommendations of your report on DCF Improves Readiness Assessment Process; Additional Changes Are Needed.

Enclosed is our Department's response to the findings and recommendations. If your staff has any additional questions, please have them call Mr. David Fairbanks, Deputy Director of Community Based Care, at (850) 487-1987.

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

Sincerely,

/s/
Jerry Regier
Secretary

Enclosure

**FLORIDA DEPARTMENT OF CHILDREN AND FAMILIES
RESPONSE TO OFFICE OF PROGRAM POLICY ANALYSIS AND
GOVERNMENT ACCOUNTABILITY'S REPORT:
DCF Improves Readiness Assessment Process;
Additional Changes Are Needed
August 2004**

Recommendation: To identify statewide training and technical assistance for lead agencies, we recommend that the department require district offices to provide the central office with information on technical assistance requests, and that the department track this information to quantify lead agency training needs.

Department Response: In order to enhance access to best practices, technical assistance and just-in-time training, the Child Welfare Training Unit will identify a Knowledge Management Specialist who will be responsible for developing, implementing and maintaining a web-page, which will be specific to meeting these needs. Additionally, the Child Welfare Quality Management Unit will perform ongoing data analysis to assess performance and outcomes. This information will be provided to the Child Welfare Training Unit on an ongoing basis.

Recommendation: We recommend that the department better enforce the statutory provision (section 409.1671, *Florida Statutes*) that community alliance members participate in readiness assessments. This could be done by instructing assessments teams not to proceed with the readiness assessment site visit without alliance participation.

Department Response: Community Alliance participation in the Readiness Assessment process has consistently proved valuable to the Team's ability to provide a comprehensive review and analysis of district and lead agency readiness. The Department wishes to acknowledge that of the 14 readiness assessment reviews conducted since February 2003, 13 Teams experienced full participation from each of the community alliance members appointed to the Team. In many cases, multiple members participated. To help ensure continued full participation, the Department will modify its procedures to include a request to the community alliance chairperson that a primary and alternate member be appointed to each Team. In the event the primary cannot attend due to an emergency, the Team can go forward with its review and maintain alliance participation.

Recommendation: We recommend that the department closely monitor its contractor's performance to ensure that HomeSafenet implementation is completed within budget and deadlines.

Department Response: The HomeSafenet project has produced a detailed Statement of Work to hire Project Quality Compliance services. The PQC vendor is to review all deliverables assessing acceptability, review quality and commitment to contract.

**FLORIDA DEPARTMENT OF CHILDREN AND FAMILIES
RESPONSE TO OFFICE OF PROGRAM POLICY ANALYSIS AND
GOVERNMENT ACCOUNTABILITY'S REPORT:
DCF Improves Readiness Assessment Process;
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Recommendation: We recommend that the department develop and implement a comprehensive monitoring process that facilitates and coordinates the collection and analyses of lead agency viability data, establishes measures and benchmarks, and addresses how department units will document their assessments of lead agency viability. In developing this process, the department should consider the viability factors listed in Appendix B.

Department Response: We concur with the need to develop and implement a centralized, coordinated process for evaluating lead agency viability. A written procedure will describe multiple measures of viability, including but not limited to:

- **Indicators of Program Performance:** These will be based in part on existing federal and state measures, using both HomeSafenet data and quality assurance review findings.
- **Indicators of Financial Viability:** These will include federal revenue maximization, comparison of budget and expenditures, and various financial ratios (e.g., direct services expenditures vs. indirect costs) to be developed.
- **Indicators of Community Satisfaction:** These will be based on interviews and/or written surveys with various stakeholders.
- **Indicators of Contract Compliance:** These will be based on contract compliance monitoring.

The procedure will also provide clearly defined responsibilities for ongoing analysis of the data, documentation of the findings and initiation of corrective action. Corrective action will include the use of early warnings from high-level measures for all lead agencies to trigger additional reviews with greater depth and frequency for any lead agency with questionable viability.