Risk Pool Peer Review Committee Reports
Summary of Findings, Conclusions and Recommendations
March 28, 2016

The Risk Pool Peer Review Committee reports each contain findings and conclusions as well as recommendations. This summary report provides those sections from each of the reports.

COMMUNITY-BASE CARE OF CENTRAL FLORIDA – SEMINOLE COUNTY

Summary of Findings and Conclusions

The primary factors in the current situation are:

- An increase in removals that has overtaken the capacity of the CBC. Average monthly removals were 15 in SFY 12/13. This grew to 19 in SFY 13/14 and 29 in SFY 14/15. So far this year, the average removals have moderated slightly to 25 per month, but a significant gap remains between removals and discharges.
- The removal rate per 1,000 children in the population and the removal rate per 100 children investigated are not higher than the state average, however they are high relative to the historic levels in Seminole County and relative to the historical core service funding.
- Recurring core services funding for CBCCF-Seminole has declined over time. In SFY 09/10 recurring core service funding was $10.6 million, while this year it was $9.9 million. With non-recurring funds, the current year funding of $10.4 million remains below SFY09/10 levels. In contrast, from SFY09/10 to the current fiscal year, out-of-home care has increased from 230 children to 421 children.
- As a relatively small lead agency, CBCCF-Seminole does not have sufficient financial resiliency to absorb an increase of the magnitude that has been experienced. CBCF - Seminole's deficit is the highest relative to the amount of core services funding of any CBC that has applied for Risk Pool funding.

Additional factors:

- The increase in children in out-of-home care has overwhelmed the capacity of licensed family-based care. Information provided by the CBC indicates there are currently 44 children (22 of whom are in sibling groups) who are in group care that would be more appropriate for placement in family-based care. This increases the cost of care.
- CBCCF-Seminole is using a portion of prevention funds for residential care of non-dependent children. The rationale is that these children would likely become dependent but for providing this level of care. Some of these children come to the attention of the CBC through hotline referrals while others come to their attention from other community sources. CBCCF-Seminole has provided a list of 11 children with costs of $364,503 to

date. Estimates are that residential costs for non-dependent children this year will total approximately $750,000.

Recommendations:

It is recommended that CBC-Seminole receive Risk Pool funding for SFY 15/16, subject to the following requirements:

1. CBC Seminole should develop a plan to eliminate the use of group home placements for children and sibling groups that can be more appropriately served in family settings. The Lead Agency, in cooperation with the Region should develop a plan to accomplish this by the end of calendar 2016.

2. The Region in conjunction with CBC Seminole should review the use of the Safety Methodology in making reunification decisions. Training and technical assistance should be provided to all entities that are involved in these decisions to ensure that children who can safely return home are reunified as quickly as possible.

3. The CFO of CBCCF-Seminole should insure that bank reconciliations are being performed on a monthly basis and report this to the DCF Contract Manager.

4. CBC Seminole should revise its agreement with the holding company to conform to cost allocation methodologies acceptable to the department and the relevant OMB regulations. This revised agreement is subject to approval by the DCF Office of Financial Management and should be accomplished within 60 days.

5. The Central Region, The Board of Directors of CBC Seminole and stakeholders in Seminole County should undertake an in-depth analysis of the future viability of CBC-Seminole as a stand-alone entity. Unless additional community financial resources can be identified to sustain this entity, strong consideration should be given to restructuring this entity into a larger entity to improve its financial viability. The Regional Managing Director in consultation with the Board of Directors and other stakeholders should make a recommendation to the Secretary within 120 days as to whether this contract should be restructured.

CHILDNET – PALM BEACH COUNTY

Summary of Findings and Conclusions

- Palm Beach County experienced a significant increase in removals beginning in July 2013. While removals have stabilized in recent months, a gap remains between removals and discharges. The result has been an increase in the number of children in out-of-home care.

- Safety management services are insufficient and there are few resources committed to prevention and diversion services to reduce entries into out-of-home care.

- Utilization of relative care is low and actions to increase identification of appropriate relative that have begun should receive high priority. Family finding and enhanced diligent search efforts are needed to fully leverage the use of kinship caregivers.
- Licensed foster family homes could be more effectively utilized to reduce use of residential group care, particularly for children with mild to moderate needs.
- Residential group care is over-utilized. While there are some excellent group care providers in the community, the high cost of care is creating a level of expenditures that is not sustainable and reduces the resources needed to improve the effectiveness of other components of the system of care. Group care should be used for children and youth needing this level of care and children, including children in sibling groups should be "stepped down" to more appropriate levels of care.
- Review of high costs cases that are potentially eligible for funding by Medicaid or by other funding sources indicates that there is potential savings that can be realized.

Recommendations:

The Risk Pool Peer Review Committee recommends that ChildNet receive Risk Pool funding contingent on agreement by the Region and the Lead Agency to develop and implement a comprehensive corrective action plan with key elements as outlined below. The goals of the corrective action plan would be to improve the efficiency and effectiveness of the Palm Beach system of care and bring costs and resources into alignment for the 2016/17 state fiscal year. Elements of the corrective action plan should include:

1. Actions to implement an effective safety management and decision support system to support actions by protective investigators to avoid unnecessary removals. In addition to prevention of unnecessary removals, actions should facilitate more rapid reunification consistent with the department's case practice model.
2. Increased use of kinship care including relative and non-relative caregivers. The Region and Lead Agency should include training on family engagement, such as Kevin Campbell's Family Finding model as part of the identification of appropriate relatives not only for initial placement but as possibilities for stepping down from residential group care.
3. More effective utilization of foster family homes. This should include use of existing capacity in licensed homes to serve children who are in residential care and who's needs are more consistent with family-based care. This should also include sibling groups that are currently in group care.
4. Reduction of use of residential group care. The Lead Agency should establish a goal of achieving a level of utilization of group care that approximates the state average in use of this level of care.

5. Review of high cost cases with potential for accessing other funding sources. The Lead Agency and Region should review all cases with potential for funding from Medicaid or from other funding sources to reduce the impact of these situations on the core funding in child welfare.

The Peer Review Committee believes accomplishment of these actions will put ChildNet on a sustainable path for the future and will improve the ability of the system of care to meet the needs of children and families in Palm Beach County.

CHILDNET – BROWARD COUNTY

Summary of Findings and Conclusions:

- ChildNet – Broward's current situation is a combination of factors including increased removals, and decreased discharges leading to a significant increase in the number of children in out-of-home care. This has occurred at a time when recurring core services funds declined from SFY 10/11 to SFY 14/15. While recurring core services funds increased in SFY 15/16, the total recurring funding remained below SFY 10/11.

- ChildNet has done a good job in placing children in the least restrictive environment, however, the high removal rate and low discharge rate has resulted in high caseloads, higher costs, and declining quality. The Children's Services Council provides great support to the child welfare system, but ChildNet needs to develop in-home services for unsafe children and for safety management to help alleviate some of the removals.

- A key challenge in Broward County is that the responsibility for essential components of the system of care is spread among several different entities including Broward Sheriff's Office for the Child Protective Investigation function, the Office of the Attorney General for the Children's Legal Services function, and the Lead Agency for Child Welfare functions. Unless there is a strong sense of community ownership of the child welfare system of care, different organizations may be accountable for parts of the system, but effective management of the overall system can suffer.

- The Peer Review Committee found a number of contextual factors to be relevant including turnover in key leadership in several of the entities as well as excessively high judicial caseloads. The result has been a child welfare system with delays in permanency and unacceptable high caseloads for case managers.

- While there are several actions that can be taken to improve the situation, the Peer Review Committee is not confident that these actions alone will resolve the underlying structural issues in Broward County.

- The current trends indicate that ChildNet is not on a path of longer term sustainability. While supplemental funding such as previously provided to cover the SFY 14/15 deficit and Risk Pool funding will avoid service disruptions this year, absent a significant

infusion of resources, CBC – Broward is likely to experience a significant deficit next fiscal year.

Recommendations:

The Risk Pool Peer Review Committee recommends that ChildNet receive Risk Pool funding contingent on their agreement to development a corrective action plan to:

1. Ensure that Family Support Service cases are appropriately entered into FSFN.
2. Work with BSO and DCF to facilitate receipt of technical assistance from a peer Sheriff's Office that performs protective investigations with support from the DCF Office of Child Welfare in key elements of the department's practice model.

The Peer Review Committee does not find that these corrective actions will address the broader system-wide issues that were evident in the ChildNet review. The issue of long-term sustainability of the Community-Based Care lead agency in Broward County demands the attention of key leaders in Broward County. There is an urgent need to address the current trends and the inability of the system of care to respond to the needs of the volume of children and families needing to be served. In the absence of action to address the underlying issues affecting the entire system of care, the long-term financial viability of the ChildNet is at significant risk.

We recommend that the Secretary in cooperation with the Board of Directors of ChildNet convene a meeting of key leaders in each agency involved with child welfare along with other key community stakeholders to examine the operation of the current system of care and develop a coordinated plan to address the factors that are affecting child welfare in Broward.

SARASOTA FAMILY YMCA – SAFE CHILDREN COALITION

Summary of Findings and Conclusions:

- The key factor in increased costs is the dramatic increase in removals – particularly in Manatee County. While removals have increased in each of the counties in the Circuit 12 the increase in Manatee County has been the most significant – more than doubling since SFY 13/14.
- Sarasota YMCA has done a good job of placing children in the least restrictive placements. Currently, 59% of children are in kinship settings, 28% in family-based Foster Care and 11% in RGC. However, they have reached a point where they have exhausted their least-restrictive placements. Due to saturation of licensed family homes, children are being placed in high cost group care. This is particularly evident in the placement of sibling groups. Sarasota YMCA has the best performance in the state in keeping sibling groups together with 75.5% kept together compared to the state average of 64%. However, this comes at the expense of increasing use of group care including

increased use of placements outside of the circuit. The marginal cost for the next placement is high.

- The increased number of children entering care threatens the efficiency of the overall child welfare system. Court time is increasingly unavailable and caseloads are increasing. Historically, Sarasota YMCA's performance on exits to permanency has been among the best in the state. Without reduction in the number of removals, this cannot be expected to continue.

- The Peer Review Committee found that there is a strong perception that the number of removals are appropriate to the situations encountered. Both in Manatee County and Sarasota/Desoto Counties protective investigation staff indicate that they do not believe the implementation of the new practice model is driving removals, but rather improving their ability to better understand the situations and the family dynamics. They believe that the right children are being removed for the right reasons.

- While there are factors that justify high removal rates including the incidence of substance abuse including heroin and fentanyl addiction, high rates of addiction are not new to this area of the state. The Peer Review Committee believes that there are decision support tools and safety management practices that could mitigate the high rate of removals. There are early efforts to provide decision support services based on approaches being used in the Northwest Region. The Peer Review Committee found resources committed to upfront services to prevent or divert removals as being an area where significant improvement is possible. The Peer Review Committee found that the Sarasota YMCA does not have an effective diversion program to prevent removals.

Recommendations

The Peer Review Committee recommends that the Sarasota YMCA receive Risk Pool funding contingent on the agreement of the Region and the Lead Agency to implement the following recommendations:

1. The Peer Review Committee recommends that the Region and the Sarasota YMCA visit Kids Central and Family Support Services of North Florida to observe practices that these CBC lead agencies have used to successfully divert children from entry into out-of-home care in addition to expanding the use of decision support practices that have already begun in Sarasota County.

2. It is further recommended that key leadership in the Region and the Sarasota YMCA engage the leadership of the Manatee Sheriff's Office to determine ways to enhance child safety through more effective in-home support and decision support. This could include technical assistance from another Sheriff's office that performs Child Protective Investigations.

Additional recommendations include:

3. Review of the efficiency of foster care licensing and recruitment to expand the license capacity of family foster homes. Particular emphasis should be placed on recruiting and licensing homes that will take siblings so the sibling groups do not have to go into residential placements.
4. Review of all high cost children for whom access to funding from other sources, particularly Medicaid to determine if alternative funding is available.
5. Identification of the longest staying children in the system and review through actions to achieve permanency for these children.

BREVARD FAMILY PARTNERSHIP

Summary of Findings and Conclusions

- Brevard Family Partnership attributes a significant portion of their projected deficit to reductions in funds due to the inadequacy of the previous equity allocation formula in reflecting their needs. Brevard Family Partnerships has the highest number of Family Support Services cases among the CBCs and these cases were not counted in the allocation formula. While there was a slight increase in recurring core services funding from SFY 14/15 to this fiscal year, recurring core funding has remained below the SFY 10/11 level in each year since then.
- Brevard Family Partnership has taken a number of steps to reduce costs including reductions in administrative expenditures and consolidation of case management from three case management organizations (CMO) to one.
- Performance related to exits to permanency have been below at or near the bottom among CBCs on all three measures. Placement stability has also been below the state average. The case management organization has experienced high turnover and this instability have likely contributed to these performance deficits. Turnover rates from July 2014 through May of 2015 were within the range of 70.3% to 88.9%. This number has reduced to 58.8% in January 2016, however, there is a high likelihood that this continued turnover is further impacting the agency's ability to safely achieve permanency for the increased amount of children being served in out-of-home care.
- Brevard Family Partnership (BFP) has a wide array of services through Brevard C.A.R.E.S. This includes formal safety management, crisis response, a robust in-home program using certified workers and parent peer partners, and a strong family support services program for safe-high/medium & low-risk children, as well as community children.
- In spite of the strong upfront services, over the past two years, there has been an increase in removals and a decrease in discharges. The gap between removals and discharges has

resulted in an increase in out-of-home care. In recent months both trends have changed. Removals have been declining and discharges have increased. If current trends continue, it is likely that BFP will be on a sustainable path next year.

- Since Decision Support Teams (DST) were instituted three months ago, removals have significantly dropped for the same three-month period a year ago.
- In July 2015, BFP was not satisfied with the performance of the licensing and placement provider and brought these functions in-house. Since then, BFP has instituted a step-down process along with a bonus stipend to keep children in their placements. This has helped stabilize what was a rising daily cost. They are paying a premium for RGC since there is a shortage of available beds in the area. The daily cost of OHC rose from $11,500 to a high of $19,288. Since they have initiated the new step-down process, this rate is now declining.

Recommendations

The Peer Review Committee recommends that Brevard Family Partnerships receive Risk Pool funding contingent on the Region's and Lead Agency's agreement to implement the following recommendations:

1. The Central Region should build on the progress made on implementation of Decision Support Teams to include multi-disciplinary and multi-agency participation, particularly at night and on weekends. They should expand training on the safety methodology and should work with BFP and other system of care partners to incorporate conditions for return language into all phases of practice.
2. Brevard Family Partnerships should continue to work with Impower, the CMO, to stabilize turnover. Some other organizations have improved staff stability by instituting a multi-level classification system to create a career ladder for case managers.
3. Brevard Family Partnerships should create a task force to work on the 100 children that have been in care for the longest duration and focus on achieving permanency. They should also introduce Permanency Roundtables (PRT) into their ongoing practice.
4. BFP should continue efforts to increase licensed foster homes and focus on sibling groups and also continue efforts to step children down to lower cost placement settings.