



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

**Rick Scott**  
*Governor*

**David E. Wilkins**  
*Secretary*

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**DATE:** October 24, 2011

**TO:** David E. Wilkins  
Secretary

**FROM:** Dawn E. Case  
Inspector General

**SUBJECT:** Six-Month Status Report for Auditor General Report No. 2011-176

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In accordance with Section 20.055(5)(h), Florida Statutes, enclosed is our six-month status report on Auditor General Report No. 2011-176, "Department of Children and Families, Independent Living Transition Services program, Operational Audit."

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

Enclosure

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

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Mission: Protect the Vulnerable, Promote Strong and Economically Self-Sufficient Families, and Advance Personal and Family Recovery and Resiliency

# Florida Department of Children and Families

## OFFICE OF THE INSPECTOR GENERAL INTERNAL AUDIT

Project #E-1011DCF-245

### *Six-Month Status Report*

October 24, 2011

#### DEPARTMENT OF CHILDREN AND FAMILY SERVICES

### INDEPENDENT LIVING TRANSITION SERVICES PROGRAM OPERATIONAL AUDIT

#### Purpose

The purpose of this report is to provide an update to the Agency Head regarding the status of corrective actions taken six months after the Auditor General (AG) published "Department of Children and Families, Independent Living Transition Services program, Operational Audit," (Report No. 2011-176).

#### Report Findings, Comments and Status

The Department was responsible for providing updated status and corrective action comments for findings one through nine. Presented below are the full text of the Auditor General's recommendations and up-to-date corrective action comments and status, as reported by the Family and Community Services Program (PDFS).

**RECOMMENDATION NO. 1:** *We recommend that the Department reconsider the needs assessment process for high school students and provide for an estimate of living and educational needs for each student. We also recommend that for post-secondary students, the Department take steps to ensure that needs assessments are accurately completed and properly supported.*

#### **Status (per Family and Community Services Staff): Ongoing**

A technical assistance guide on how to properly complete the Post Secondary Needs Assessment has been developed and policy and technical guidance on how to scan and store documents within the Florida Safe Families Network (FSFN) system has been provided to all Community-Based Care (CBC) Lead Agencies. The combination of these two activities directly addresses the issue of the Post Secondary Needs Assessment being properly completed with all supporting documentation. FSFN scanning documentation can be found on the Florida's Center for the Advancement of Child Welfare Practice Website:

[http://centerforchildwelfare.fmhi.usf.edu/kb/policymemos/A11-003849\\_Attmt\\_Guide%20to%20Using%20FSFN%20Scanning%20Feature.rev2.pdf](http://centerforchildwelfare.fmhi.usf.edu/kb/policymemos/A11-003849_Attmt_Guide%20to%20Using%20FSFN%20Scanning%20Feature.rev2.pdf)

The Department is continuing to evaluate how best to be evaluating and addressing issues associated with the current High School Needs Assessment.

**RECOMMENDATION NO. 2:** *We recommend that the Department establish rules or guidelines outlining accountability measures related to providing attendance and proof of appropriate progress for young adults in GED programs.*

**Status (per Family and Community Services Staff): Fully Corrected**

The Department developed emergency rule for 65C-31, Florida Administrative Code. However, the Joint Administrative Procedures Committee (JAPC) indicated that section 409.1451 (5)(b), Florida Statutes, states "satisfactory progress as defined by the educational institution." Therefore, the Department is currently unable to proceed in this area without legislative authority.

**RECOMMENDATION NO. 3:** *We recommend that the Department establish clear guidelines for Community-Based Care (CBC) use regarding when it is appropriate for a young adult to receive both Transitional and Aftercare Support Services based on the situation of the young adult. In addition, we recommend that the Department ensure that payments to young adults are properly coded and that sufficient documentation, including applications, is completed and maintained in the case files.*

**Status (Family and Community Services Staff): Fully Corrected**

In July 2007, the Independent Living Guide and Code Definitions Guidebook was provided to each CBC Lead Agency. The guide provides a complete and comprehensive definition of the expenditures allowed for each service type.

The guidebook remains available in an electronic format on the Florida's Center for the Advancement of Child Welfare Practice Website:

[http://centerforchildwelfare.fmhi.usf.edu/kb/indliv/IL\\_Notebook\\_CH\\_11-20.pdf](http://centerforchildwelfare.fmhi.usf.edu/kb/indliv/IL_Notebook_CH_11-20.pdf).

**RECOMMENDATION NO. 4:** *We recommend that the Department enhance its monitoring procedures to ensure that payments to young adults are in compliance with Federal requirements and that administrative and support services costs allocated to the Chafee Program relate to Program-eligible young adults. In addition, we recommend that the Department take steps to ensure that the CBCs properly record ILTS Program payments.*

**Status (per Family and Community Services Staff): Fully Corrected**

In April 2011, the Department distributed policy and technical guidance to all CBC Lead Agencies on how to properly utilize the scanning functionality of FSFN in an effort to ensure that supporting Independent Living Transitional Services (ITLS) are properly documented within the FSFN system. Documentation associated with the FSFN requirements is available on the Florida's Center for the Advancement of Child Welfare Practice Website:

[http://centerforchildwelfare.fmhi.usf.edu/kb/policymemos/A11-003849\\_Attmt\\_Guide%20to%20Using%20FSFN%20Scanning%20Feature.rev2.pdf](http://centerforchildwelfare.fmhi.usf.edu/kb/policymemos/A11-003849_Attmt_Guide%20to%20Using%20FSFN%20Scanning%20Feature.rev2.pdf).

**RECOMMENDATION NO. 5:** *We recommend that the Department perform monitoring to ensure Department payments to young adults do not exceed the annual Chafee Education and Training Vouchers (ETV) Program spending limit. Additionally, to ensure compliance with Department rules, we recommend that the Department establish procedures to monitor the Road-to-Independence (RTI) and Subsidized Independent Living (SIL) spending caps on a monthly basis.*

**Status (per Family and Community Services Staff): Fully Corrected**

Educational Training Voucher (ETV) monitoring of individual child payments are ongoing and monitoring of Subsidized Independent Living (SIL) payments have been added to the contract monitoring tool.

**RECOMMENDATION FA NO. 6:** *We recommend that the Department disseminate guidance and provide training to CBCs regarding the performance and documentation of SIL Program tasks.*

**Status (per Family and Community Services Staff): Fully Corrected**

The Department continues to provide technical assistance and general support of CBC functions related to ILTS.

**RECOMMENDATION NO. 7:** *We recommend that the Department take steps to ensure that required staffings, assessments, and case plans are properly and timely conducted and documented.*

**Status (per Family and Community Services Staff): Fully Corrected**

Distribution of memorandum entitled "Phase III, Independent Living Special Quality Assurance (QA) Review," dated 3/25/2011, emphasized the importance of completing all required activities associated with ILTS. Additionally, distribution of policy and technical guidance on FSFN scanning and storage requirements has been provided to all CBC Lead Agencies. Documentation is available on the Florida's Center for the Advancement of Child Welfare Practice Website:

[http://centerforchildwelfare.fmhi.usf.edu/kb/PlcyMmo/A11004354\\_FINAL%20Signed%20Memo%20re%20Phase%20III%20Independent%20Living%20Special%20QA%20Review%20Memo.pdf](http://centerforchildwelfare.fmhi.usf.edu/kb/PlcyMmo/A11004354_FINAL%20Signed%20Memo%20re%20Phase%20III%20Independent%20Living%20Special%20QA%20Review%20Memo.pdf)

Also, see memorandum "Provisions of Law: Transition Plans for Youth Aging Out of Care," dated 8/20/2010.

[http://centerforchildwelfare.fmhi.usf.edu/kb/PlcyMmo/A10-011475\\_FINAL%20Signed%20Memo%20re%20Transition%20Plans%20for%20Youths%20Aging%20Out%20of%20Care.pdf](http://centerforchildwelfare.fmhi.usf.edu/kb/PlcyMmo/A10-011475_FINAL%20Signed%20Memo%20re%20Transition%20Plans%20for%20Youths%20Aging%20Out%20of%20Care.pdf)

**RECOMMENDATION NO. 8:** *We recommend that the Department consider requiring the CBCs to fully utilize Florida Safe Families Network's (FSFN) functionality related to the Independent Living Transition Services (ILTS) Program.*

**Status (per Family and Community Services Staff): Ongoing**

The Department is currently in process of evaluating the inclusion of data entry and documentation requirements into all CBC Lead Agency contracts.

**RECOMMENDATION NO. 9:** *We recommend that FDCFS continue to correspond with SAMHSA regarding the efforts that may be made to comply with the MOE requirements. Additionally, we recommend that FAHCA periodically provide FDCFS with reports of actual expenditures to allow FDCFS to monitor total expenditures incurred and timely identify instances where expenditures may not be sufficient to meet the MOE requirement.*

**Status (per Substance Abuse and Mental Health staff): Fully Corrected**

The Department concurred with the recommendation that Progressive Intervention and Program Improvement (PIPI) be utilized to address CBC Lead Agency noncompliance with issues related to ILTS. However, by instituting ongoing quality assurance review of key portions of the ILTS program and by providing policy and technical guidance on how to better utilize FSFN scanning and storage functionality the Department feels that all CBC service providers should be able to move towards a more proactive standard of oversight within the ILTS program. The ongoing review process should help to limit the need for the Department to utilize PIPI process.

This follow-up audit was conducted as required by Florida Statute 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.