

Risk Pool Peer Review Committee Report
Community-Based Care of Central Florida – Seminole County
March 28, 2016

Community-Based Care of Central Florida – Seminole County (CBCCF-Seminole) submitted a Notice of Intent to apply for Risk Pool Funding on October 21, 2015. The notice was reviewed by the DCF Central Region and was determined to meet the criteria to complete an application. CBCCF-Seminole subsequently submitted an application for risk pool funding on January 7, 2016. The Central Region Contract Manager and Regional Managing Director concurred in the application which was received in the Office of Child Welfare on January 13, 2016.

In anticipation of the application, the department established a Risk Pool Peer Review Committee pursuant to section 409.990(7), F.S. and consistent with the department's Risk Pool Protocol.

The Risk Pool Peer Review Committee for CBCCF-Seminole consisted of:

Pamela Griffith, Vice President of Finance, Eckerd
JoShonda Guerrier, DCF Director of Child Welfare Strategic Projects
Mark Jones, CEO, Community Partnership for Children
Lisa Mayrose, Regional Managing Director, Suncoast Region
Pam Menendez, Director of the Center for Child Welfare, USF
Kelly Messer, Director of Finance, Devereux Florida
Barney Ray, DCF Director, Office of CBC/ME Financial Accountability
Lorita Shirley, Chief of Program Operations, Eckerd
Rebecca Wilkinson-Shields, Pasco Sheriff's Office
Don Winstead, Team Leader

The Risk Pool Peer Review Committee reviewed the Notice of Intent and Application and assembled contextual information regarding caseloads, financial history and performance prior to the site visit. The Peer Review Committee conducted the site visit on January 20 and 21, 2016 at the CBC Central Florida administrative offices in Orlando. Two members of the committee also visited the primary service center in Sanford.

The Peer Review Committee's work was designed to meet the direction of the statute and departmental protocol in order to:

1. Verify that the applicant meets the statutory criteria for eligibility which includes validation that the applicant's financial need was caused by circumstances beyond the control of the Lead Agency's management.
2. Determine if continued on-site technical assistance is appropriate.
3. Make a final recommendation to the Secretary regarding approval or disapproval of the application which may include access to the risk pool or other funding shifts to resolve the shortfall.
4. Determine the amount of funding and mix of funds to be made available.
5. Recommend specific limitations or requirements on the use of additional funds that are linked to correction of factors that caused the funding shortfall.
6. Identify any follow-up actions or additional documentation needed from the Lead Agency or Region, and
7. Report on any technical assistance activities completed and remaining and/or recommendations for future technical assistance.

The work of the Peer Review Committee was organized into seven areas and members of the committee looked in detail at issues in each of the following areas:

1. Findings related to the need for services and commitment of resources.
2. Findings related to protective services including removals, referrals for post-investigative services, activities to protect children without removal and use of resources focused on prevention and intervention.
3. Findings related to provision of services for children in care (both in-home and out-of-home).
4. Findings related to exits from care including exits to permanence.
5. Findings related to funding, fiscal trends and fiscal management.
6. Findings related to overall management.
7. Other factors or considerations noted on the application or determined relevant by the Peer Review Committee.

The following summarizes the findings of the Peer Review Committee

1. Findings related to the need for services and commitment of resources

1.1. What is the relevant community context within which the child welfare system operates?

Seminole County is a relatively small area, both in geography and population. As such, impacts to the system which may remain manageable in other areas of the state may have a much more critical impact locally. Even though the same entity that operates the Orange/Osceola Lead Agency also operates CBCCF-Seminole, the economies of scale in a larger organization are not as available in CBCCF-Seminole.

1.2. This may include incidence of calls to the hotline, child poverty in the area, local factors that influence the need for services, etc.

Calls to the hotline have increased only slightly in recent years. In SFY 12/13 there were an average of 305 calls per month. This increased to 328 calls per month in SFY 13/14 and 331 calls per month in SFY 14/15. So far in SFY 15/16 calls have averaged 326 per month. Removals, however, have increased both in actual numbers and in rate per 100 children investigated. In SFY 12/13, removals averaged 15 per month. This increased to 19 in SFY 13/14 and to 29 per month in SFY 14/15. This year, through January 2016, removals have averaged 25 per month¹. The removal rate for CBCCF-Seminole is not high relative to other areas of the state. Removals per 100 children investigated were 5.6 in SFY 14/15, while the statewide average was 6.1².

Historically, however, the removal rate in Seminole has been among the lowest in the state, so an increase in removal rate approaching the state average places significant stress on the resources of the Lead Agency.

The child poverty rate in Seminole County was 16.1% in 2014 which is below the state child poverty rate of 24.2%. Median family income was almost \$12,000 above the state median family income of \$57,176.³

1.3. Factors may also include community resources available to meet the needs of children and families such as Children's Services Councils, local governmental resources or other unique factors.

There is no Children's Services Council to assist with funding community services and programs for children and families. CBCCF-Seminole describes itself as a default funder for many services for children within and outside of the dependency system. From the perspective of the CBC, many services such as behavioral assessments and residential treatment are being funded by the CBC when the Managing Entity (ME)/behavioral

¹ Office of Child Welfare Spinner Reports

² 2015 Child Protection Summit, A Snapshot of Florida's Child Welfare System

³ Florida Office of Economic and Demographic Research County Profiles

health providers and other partners such as Agency for Persons with Disabilities (APD) and the Department of Juvenile Justice are unwilling or unable to fund high end placements for children. These children subsequently enter the dependency system or are served with prevention funds and have an impactful financial burden on the Lead Agency. Examples provided to the team showed a financial impact of nearly \$750,000 to CBC funding.

Compounding this issue is the very limited capacity to serve children in a therapeutic foster care setting, which is resulting in children being placed in a higher level of care. Florida Safe Families Network (FSFN) payment data showed payments for six children in Therapeutic Foster Care in the period July 1, 2015 through January 31, 2016.

2. Findings related to protective services including removals, referrals for post-investigative services, activities to protect children without removal and use of resources focused on prevention and diversion.

2.1. What are the rates of removal, rates of verification and other measures from protective investigations that affect the need for child welfare services? How have these measures changed over time and how do they compare with other areas of the state?

As indicated above, rates of removal have increased over time, although they do not exceed statewide rates. The removal rate per 100 children investigated has declined slightly from the average in SFY 14/15 of 5.6 to 5.3 in SFY 15/16. Similarly, actual removals have declined from an average of 29 per month in SFY 14/15 to 25 per month in SFY 15/16 through January 2016⁴.

2.2. What activities are in place to provide support to protective investigators and families to permit children to remain safe in their homes?

The Lead Agency, Children's Home Society, the case management organization (CMO) and the Seminole County Sheriff's Office (SCSO) instituted meetings in early 2015 to review cases and improve coordination among the organizations. One change resulting from these meetings was to collocate the diversion team with SCSO's units. This has resulted in more effective use of diversion and is seen as a factor in reduced removals.

2.3. What services are provided with funds used for prevention and diversion?

Family Support Service provision has escalated in Seminole County, increasing nearly 100% – from a total of 85 in July 2014 to 168 in July 2015. However, it was determined that there is a broad spectrum of services covered under this umbrella spanning from a referral to tutoring services to intensive in-home services. These services also appear to be intertwined with safety management services to assist investigators with managing present danger plans. There is work currently being done to ensure consistent and

⁴ Office of Child Welfare Spinner Reports

appropriate documentation of these type of services in the system, focused on those cases only receiving ongoing service intervention and case management.

- 2.4. What evidence exists to show that investment in prevention and diversion services are, in fact, resulting in reduced flow of children into out-of-home care rather than just adding to the cost of services?

The Lead Agency expressed the view that the cases of non-dependent children being served with prevention resources would likely become dependent children if not provided services, however, this issue has not been systematically studied.

- 2.5. How well integrated are the CPI and diversion services components? Are there case transfer issues that affect performance?

As indicated in section 2.2 above, diversion services are now collocated with CPIs. No issues were noted with case transfer procedures.

3. Findings related to provision of services for children in care (both in-home and out-of-home).

- 3.1. What is the composition of the children in care including age cohorts, placement types, use of specialized higher costs settings, use of congregate care, etc.

Based on a review of FSN placement data, it was concluded that CBCCF-Seminole’s composition of children in care aligned with statewide averages. The following is an overview:

Placement Type	State Average	Seminole County Average
Residential	9.8%	10.4%
Foster Home Placements	29.1%	29.1%
Relative Placements	45.4%	46.1%
Non-Relatives	10.6%	10.4%
Other Placement Types	5.1%	3.9%

Placement in Residential Care by Age	State Average	Seminole County Average
0 to 5	3.3%	0%
6-12	21.6%	20.6%
12-17	56%	*80% (total of 56 youth)

While the composition of children in various settings has been in line with state norms, 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.

- 3.2. What is the cost of various placement types? To what extent are the rates paid for foster care (including care with various rates of intensity), congregated care consistent with statewide norms (considering community context)? Have these rates remained relatively consistent over the past few fiscal years?

The rate structure for licensed placements ranged from a low of \$18 per day for traditional foster home placement to \$275 per day for therapeutic residential group care. Seminole County has three levels of enhanced foster care ranging from \$19 per day to \$100 per day. The rate of \$100 per day appeared high when compared to other CBC Lead Agencies. However, it was reported that there were only a couple of youth placed at this level of care. A summary of rates and payments is attached to this report.

- 3.3. What is the cost for dependency case management? Is this consistent with norms for such services? Have these rates remained relatively consistent over the past few fiscal years?

A review of the case management funding methodology revealed that CBCCF-Seminole pays approximately \$550K to fund a standard case management unit. The methodology used by CBCCF-Seminole to include rate structure is in line with statewide averages. There is one case management provider in Seminole County, Children's Home Society (CHS). The rate structure for case management has not been increased over the years; however, as a result of the current situation, CBCCF-Seminole did approve an amendment to the contract authorizing the hiring of an additional 20 case management FTEs. The current budget does not support this course of action but would reduce caseload size to an average of 1:13. CBCCF-Seminole shared that they will most likely stop the hiring of case management FTEs once caseloads reach an average of 1:18 (10 additional FTEs vs 20 included in the amendment).

- 3.4. To what extent is the Lead Agency appropriately utilizing non-child welfare funding for services (such as DCF SAMH Funds, Medicaid, and other non-DCF funding sources).

CBCCF-Seminole is projected to spend approximately \$1.9M in non-child welfare funding. A significant portion of these expenditures are for residential services for non-dependent children. Identification of funding from other sources for these children would reduce the CBCCF-Seminole projected deficit. This is an area for potential improvement both at the regional and state levels.

- 3.5. What evidence exists that case management services are well-managed by the Lead Agency?

CBCCF-Seminole conducts a weekly data call to monitor the performance of their provider agencies. They also conduct daily calls to address increasing costs in out-of-home care (OHC). The calls include stakeholders such as APD and Mental Health

providers when the CBC is providing bridge funding until another source is available for a community family in crisis.

4. Findings related to exits from care including exits to permanence.

4.1. What is the performance of the Lead Agency in the recognized measures of children achieving permanence? Do these findings indicate that children are not remaining in care for longer than necessary? Are these permanency achievement rates consistent across placement settings?

There are three key measures of children achieving permanency. These include children removed in a year that exit to permanency within 12 months, children in care 12 to 23 months at the beginning of a year who exit to permanency by the end of the year and children in care 24 or more months at the beginning of a year who achieve permanency by the end of the year.

The table below shows the performance on these measures by CBCCF-Seminole for children removed in SFY 12/13 or in care on July 1, 2013, children removed in SFY 13/14 or in care on July 1, 2014⁵ and for the latest reporting period, children removed in October through December 2014 or in care as of January 1, 2015.⁶

Measure	Area	Removal in or prior to beginning of SFY 12/13	Removal in or prior to beginning of SFY 13/14	Removal in or prior to beginning of CY2015
Permanency within 12 months of removal (National Standard 40.5%)	CBCCF-Seminole	43.6%	44.6%	63.3%
	Statewide	49.9%	47.4%	45.0%
In care 12 through 23 months at beginning of year who achieve permanency by end of year (National Standard 43.6%)	CBCCF-Seminole	48.9%	49.2%	69.2%
	Statewide	58.8%	55.1%	54.1%
In care 24 or more months who achieve permanency by end of year (National Standard 30.3%)	CBCCF-Seminole	31.9%	53.4%	57.7%
	Statewide	39.2%	39.2%	39.6%

⁵ 2015 Child Protection Summit, Snapshot of Florida’s Child Welfare System

⁶ Office of Child Welfare Key Indicators, January 2016

This data indicates that CBCCF-Seminole's performance was below the statewide level of performance on all three measures for children removed in SFY 12/13 who would have achieved permanency in SFY 14/15. For children removed in SFY 13/14, who would have received permanency in SFY 14/15, performance was below the statewide level on two of the three measures. For the first reporting cycle for 2015, based on children removed in September through December 2014 or in care as of January 1, 2015, CBCCF-Seminole's performance had improved significantly and was above the statewide level on all three measures.

- 4.2. What contextual factors (such as Children's Legal services, dependency court dynamics, etc.) influence time to permanence for children served by the Lead Agency?

There was turnover in the judiciary in 2015 due to the resignation of a judge and assignment of a newly elected judge to the dependency court. CBCCF-Seminole worked with the Chief Judge to request funding from Seminole County for a Juvenile Magistrate. In addition, a second judge has been assigned and the Magistrate and the Judge began hearing cases in December 2015.

Turnover in the CMO was reported to be around 35%. Since new case managers are restricted to protected caseloads with a limited number of children this means that the caseloads of experienced case managers are larger. Information reviewed by the Peer Review Committee indicated that some case managers have caseloads in the range of 25 to 30 children compared to a recommended level of 15 to 18 children.

The Safety Methodology was reported to be working well on the front end of the process but not as well at the back end. Specifically, under the Methodology case managers are supposed to be able to return children to their parents under "Conditions for Return". However, the Peer Review Committee heard of perceptions that Judges, Guardians ad Litem and in some areas Children's Legal Services attorneys have not adopted this approach and case managers are being told that the parent has not substantially complied with their case plans. Therefore, children who could possibly return home with services may be lingering in care longer than needed.

- 4.3. Has there been a change in number of exits or time to exit that is materially influencing the cost of out-of-home care?

While there has been a significant increase in the number of removals the number of exits from care has not kept pace. As indicated in section 2 of this report, in SFY 11/12 and SFY 12/13 removals had been averaging around 14 or 15 a month. Exits had been averaging about the same as removals, which kept the number of children in out-of-home care at a relatively stable level. When removals began to increase in SFY 14/15, exits did not keep pace. In SFY 14/15 removals averaged 29 a month while exits averaged 17 a month. This fiscal year, the average removals have moderated slightly to 25 per month,

but a significant gap remains between removals and discharges. As a result, the number of children in out-of-home care has grown significantly. In January 2014 there were 238 children in out-of-home care. This grew to 438 children in January 2016.

5. Findings related to funding, fiscal trends and fiscal management.

5.1. How has core services funding changed over time? How has the Lead Agency managed these changes? What adjustments to the available array of services have been made?

See Table 1 below. The recurring core services funding for the Seminole County contract decreased each year from State Fiscal Year (SFY) 09/10 (\$10,621,652) to SFY 13/14 (\$9,769,930). New recurring core services funding in SFY 14/15 (\$9,839,499) and SFY 15/16 (\$9,934,988) has not restored core services funding to the level in SFY 09/10. Seminole County contract did receive some non-recurring funding in SFY 12/13 (\$147,922) and SFY 13/14 (\$86,593 from Title IV-B Promoting Safe and Stable Families grant). CBC of Central Florida did request and contracts were amended to move \$1M of non-recurring proviso budget for CBC of Central Florida (which was not specific to service area) from the Orange-Osceola contract to the Seminole contract to help with the Seminole deficit in FY 2014-2015. Seminole contract also received additional allocation from Back of the Bill non-recurring budget in SFY 2015-2016 related to their SFY 14/15 operating deficit of \$485,483.

Seminole County Core Funding History – Recurring and Non-Recurring Budget				
Column->	A	B	C	D
State Fiscal Year	Recurring Core Services Funding	Non-Recurring Core Services Funding	Total Core Services Funding (Total of Columns A + D)	Change in Total Core Services Funding from Previous Fiscal Year
2009-2010	\$10,621,652	\$0	\$10,621,652	
2010-2011	\$10,509,496	\$0	\$10,509,496	(\$112,156)
2011-2012	\$10,209,933	\$0	\$10,209,933	(\$299,563)
2012-2013	\$9,835,096	\$147,922	\$9,983,018	\$226,915
2013-2014	\$9,769,930	\$86,593	\$9,856,523	(\$126,495)
2014-2015(i)	\$9,839,499	\$1,000,000	\$10,839,499	\$982,976
2015-2016 (ii)	\$9,934,988	\$485,483	\$10,420,471	(\$419,028)
Footnotes	(i) Non-recurring in FY14-15 from \$1.5M proviso to CBC of Central Florida. (ii) Non-recurring funding in FY15-16 from Back of the Bill for CBC operating costs deficits incurred in FY14-15.			

5.2. How have any changes to core services funding contributed to any projected deficits for SFY 2015-2016?

State Fiscal Year 10/11 was the first year of an equity formula defined in Florida Statutes. Reductions in core services funding from SFY 09/10 to SFY 15/16 (See Table 1 above) decreased the total funding capacity by a cumulative \$3,630,970. This means if no reductions had occurred from the SFY 10/11 level, the Seminole contract would have had a cumulative total of \$3,630,970 in contract funds more than was allocated over the past six (6) fiscal years. Only \$165,058 in recurring core funding has been restored over the past two years (\$69,569 in SFY 14/15 and \$95,489 in SFY 15/16). The addition of \$1M in non-recurring proviso budget and the \$485,483 from the Back of the Bill funding helped eliminate the SFY 14/15 deficit however these non-recurring funds are no longer available.

5.3. In what ways are funding dynamics in the Lead Agency unique or atypical of funding in other Lead Agencies?

There is a statutory provision and separate line item appropriation which has the effect of requiring the department to contract with Orange County for residential group care at the Greater Oaks Village facility. This group care capacity is available to children from Orange, Osceola and Seminole County separate from, and in addition to the core service funding for the Lead Agencies for these areas.

Based on FSN payment data, \$246,820 worth of care has been provided to Seminole County children. If this trend continues, CBCCF - Seminole would receive at least \$500,000 in group care beyond the \$2.9 million projected as part of the CBCCF – Seminole contract.

5.4. What is the amount of the anticipated deficit for the current year? How reliable and valid are these projections?

At the time of the Risk Pool Application, the CBCCF projected deficit was \$3,123,537. While on-site for the peer review, the updated projection based upon expenditures through December was \$3,256,695. These projections include the following:

An increase to their case management contract with Children's Home Society (CHS) beginning in January 2016 for \$118,566 per month for total increase of \$711,395 through June 2016. This increase is to fund an additional twenty (20) case managers, three (3) family support workers, two (2) case management supervisors and one (1) program manager with the goal to reduce current caseloads reported at 30 to 1 to around 15 to 1 in order to help reduce the number of children in care.

Total projected licensed care cost for dependent children of \$2,888,025. Of this total \$1,688,022 is for Residential Group Care, \$1,009,702 is for Foster Home board payments, \$153,001 is for services for victims of human trafficking and \$37,300 for annual clothing allowances (See Table 2 below).

Table 2 – Licensed Care			
	SFY 2014-2015 Actual Expenditures	SFY 2015-2016 Projected	Increase/ (Decrease)
Residential Group Care	\$ 2,055,688	\$ 1,688,022	\$(367,666)
Foster Board Payments	\$ 747,749	\$ 1,009,702	\$ 261,953
Human Trafficking	\$ 90,212	\$ 153,001	\$ 62,789
Clothing Allowance	\$ 35,400	\$ 37,300	\$ 1,900
Residential Costs for non-dependent children	260,000	\$ 756,678	\$496,678
Total	\$ 3,189,049	\$ 3,644,703	\$455,654

Included in the projection is \$756,678 in residential group or facility costs to serve clients without an open dependency case in order to prevent removal until other funders agree to pick up the cost for these deep end services. As of December, the total accrued expenditures total \$426,281. These expenditures are for approximately 12 children and include providers such as the Center for Drug Free Living, National Deaf Academy, Aspire Healthcare, Attain and Devereux.

In addition, the CBCCF has a five (5) year agreement with CBC of Central Florida - Holdings, Inc. to receive management and administrative services. Prior to SFY 15/16, the fee was based upon an allocation of actual costs among funding sources to this and other affiliate companies. In SFY 15/16, this was changed to assess a 4.25% fee on all direct and allocated costs of CBCCF rather than an allocation of actual costs of the CBCCF - Holdings. The total fee assessed for SFY 14/15 was \$602,742. Based upon the current DCF contract, total funding is \$12,154,279 for Seminole County and 4.25% assessed if all contract funds are expended would be \$516,557 (See Table 3 below). The SFY 15/16 projection includes a total year to date expenses of \$617,616 for this fee. Therefore \$101,059 of the projected deficit includes increased management fees to the CBCCF - Holdings.

The Cost Allocation Plan required by contract has not been approved by DCF for SFY 15/16. The assessment of a management fee based upon a 4.25% rate on direct contract expenditures is in dispute by DCF. Resolution of this plan will impact the projection by CBCCF.

5.5. Are there options other than Risk Pool funding available to reduce the deficit?

Options to reduce the deficit including diverting costs that are currently paid for by CBCCF-Seminole and are eligible for other funders such as Medicaid, Prepaid Children's

Mental Health Plan, SAMH Managing Entity Lead Agency contract, APD waiver and Department of Juvenile Justice. Additionally, an increased capacity for therapeutic foster homes would help reduce reliance on higher cost placements. A review of higher cost clients by an interagency and DCF interprogram workgroup could facilitate this effort to assist the CBC. This workgroup could also identify whether existing placement and services provided to higher cost clients are appropriate for those individual clients and suggest alternatives.

- 5.6. If the Lead Agency meets the criteria for Risk Pool funding, but the amount of funding available is insufficient to cover the projected deficit, what other options are available?

An option is to consider whether or not the existing core services allocated to Seminole County is adequate to maintain service provision in a single contract. If it is determined that it is not viable to do so, DCF should consider the possibility of re-procuring Seminole county as part of a larger service area under one contract which could create some economies of scale and provide more flexibility for resource allocation under a single lead agency.

- 5.7. Are there fiscal practices that could be completed with greater efficiency in order to reduce the projected deficit?

A potential efficiency identified was for CBCCF to explore discontinuing use of the Argos system for service authorizations where manual entry of the same data in FSFN is required. DCF is currently scheduling FSFN System adoption site visits with all CBCs to learn and understand current CBC business practices and processes and also demonstrating for CBC staff the various functions and features of FSFN.

- 5.8. Has the most recent CPA audit indicated any issues that would affect the financial health of the organization?

The CPA Audit for June 30, 2015 disclosed that one prior year finding had not been corrected and there were two new findings. One of the two new findings stated that “Bank reconciliations were not completed and property and equipment capital lease schedules were not updated throughout the year.” The audit stated that the effect was “Cash balances could not be relied upon throughout the year and controls around the reconciliations were not operating effectively.” The cause stated was “Personnel in charge of these duties did not complete them”. The personnel in charge are no longer employed by CBCCF Holdings, Inc. and a CPA consultant was contracted to reconcile the cash accounts.

At the time of the site visit, the bank reconciliations were current through November 2015 and CBCCF anticipated the December 2015 reconciliation to be completed by the end of January 2016. The DCF contract manager should verify that this action has been completed. New personnel have been recently hired or identified that will assume these responsibilities in the future. Review of the November 2015 bank reconciliations

disclosed several old items (approximately \$35,000) and stale dated checks back to February 2013 that need to be researched and cleared up. It is recommended that CBCCF resolve these issues so that all appropriate adjustments are made and items prior to the current fiscal year are resolved. Due to the high volume of transactions, another recommendation is for CBCCF Holding, Inc. to explore acquiring software that will allow for an automated bank reconciliation process to improve efficiency and accuracy for the bank reconciliation process.

6. Findings related to overall management.

- 6.1. To what extent is there clear and effective communication between and among the Region, the Lead Agency, the Sheriff (if applicable), case management organizations and other key community partners?

Communication between leadership within the CBC and Region appears to be very strong. Meetings are occurring on a regular basis working together to address the challenges and concerns within the local area.

Communication with the local Sheriff Department leadership is also occurring. Leadership within the Sheriff Department changed in 2014 and relationships are still building and strengthening.

- 6.2. How actively and effectively does Lead Agency management track programmatic performance and fiscal performance?

According to CBC leadership, regular conversations are also occurring with Children's Home Society (CHS) regarding staffing issues and turnover. A budget amendment was recently submitted to allow for the hiring of 20 additional case management FTEs.

Bi-monthly SOC meetings take place, these meetings include Seminole, Orange, and Osceola Counties. This meeting includes CBC, Region, CMOs, and other community stakeholders. During this meeting discussions regarding outcomes and monthly reporting occur, CBC and Regional leadership also engage all participants in discussion around program and practice successes and concerns.

- 6.3. What actions have been taken by the Region and/or the Lead Agency to resolve the fiscal issues without accessing the Risk Pool? What further actions are planned?

The Region and Lead Agency have taken a number of actions aimed at improving the efficiency of the system of care and addressing causal factors leading to an increased number of children in care. These include meetings with key stakeholders and partners as detailed in exhibit B of the Risk Pool Application.

Additional actions have included training and technical assistance related to implementation of the Safety Methodology and the Quality Parenting Initiative to insure fidelity to best practices.

- 6.4. If potential corrective actions or technical assistance is recommended by the Peer Review Team, what is the commitment of the Region and the Lead Agency to follow through on those recommended actions?

The Lead Agency and the Region both expressed a high level of commitment to following through on recommendations.

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.