

Department of Children and Families

Office of Inspector General



Annual Report Fiscal Year 2014-2015

September 22, 2015

Keith R. Parks
Inspector General

Rick Scott
Governor

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Secretary

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Executive Summary

In accordance with § 20.055, Florida Statutes (F.S.), the Office of Inspector General (OIG) is “established in each state agency to provide a central point for coordination of and responsibility for activities that promote accountability, integrity, and efficiency in government.” Additionally, the Inspector General is required to complete an annual report by September 30, summarizing the activities of the office during the prior fiscal year. Consistent with these duties, the following accomplishments, highlights, and activities demonstrate significant efforts of the Department of Children and Families (Department) OIG staff during Fiscal Year 2014-2015:

- Received, reviewed, and processed 4,138 complaints or requests for assistance from Department managers, employees, clients, or citizens;
- Opened 157 cases, and completed 103 investigations and 6 management reviews, that examined allegations of violations of statute, rule, policy, contract, or systemic issues, and tracked 111 corrective actions by management to ensure responses to recommendations for personnel action or policy clarification were appropriately addressed;
- Processed 2,637 Inspector General Reference Checks for current and former Department and provider employees;
- Conducted 49 Outreach Training Sessions for 1,528 Department and/or provider employees on the role of the OIG, when to report suspected employee wrongdoing, the Whistle-blower’s Act,¹ and how to recognize violations of statute, rule, policy, or contract;
- Served as the Ombudsman of the Fair Labor Standards Act (FLSA) for the Department;
- Completed 13,244 fair hearing requests, 359 administrative disqualification hearing requests, and 134 nursing facility discharge or transfer hearing requests;
- Published 13 assurance or consulting reports, which contained 28 recommendations for improvement of efficiency and effectiveness in Department programs;
- Coordinated liaison activities for the Office of the Auditor General, Office of Program Policy Analysis and Government Accountability, and federal agency requests for responses and information regarding audits and reviews; and
- Reviewed and processed 230 Department contractor and provider audit packages of state financial assistance as required by § 215.97, F.S.

¹ The Whistle-blower’s Act, § 112.3187-112.31895, F.S., is intended to protect current employees, former employees, or applicants for employment with state agencies or independent contractors from retaliatory action. Whistle-blower designation is determined by the OIG. If a complaint meets whistle-blower criteria, the whistle-blower’s identity is protected from release and an investigation is conducted pursuant to § 112.3189, F.S.

Introduction

The OIG has worked diligently to meet its statutory mandates and fulfill its mission of “Enhancing Public Trust in Government.” This annual report summarizes the OIG’s activities and accomplishments for Fiscal Year 2014-2015.

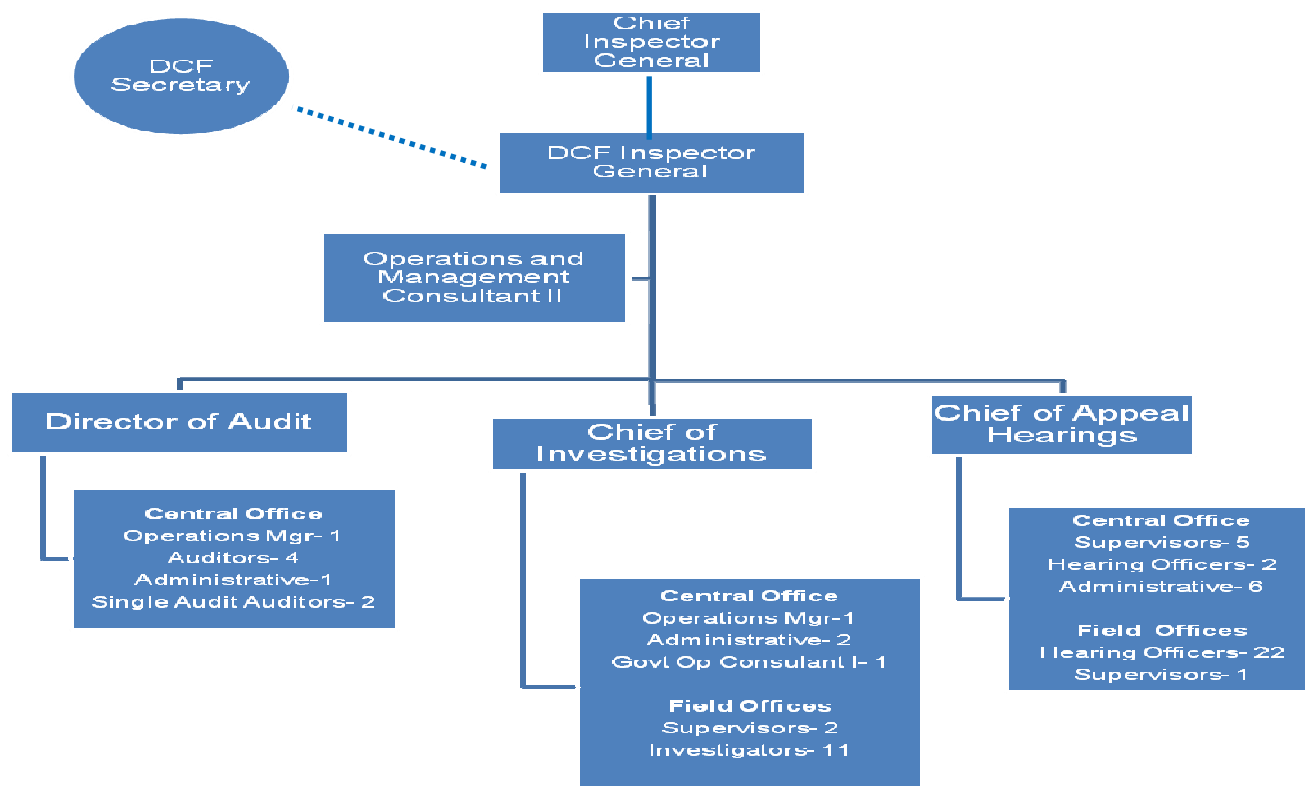
Statutory Requirements

The OIG is established in each state agency to provide a central point of coordination and responsibility for promoting and ensuring accountability, integrity, and efficiency in government. In accordance with § 20.055, F.S., the Inspector General is appointed by and reports to the Chief Inspector General, but shall be under the general supervision of the agency head. As outlined in statute, the Inspector General’s duties include:

- Advising in the development of performance measures, standards, and procedures for the evaluation of state agency programs;
- Assessing the reliability and validity of information provided on performance measures and standards, and making recommendations as needed;
- Reviewing the actions taken by the agency to improve program performance and making recommendations for improvement;
- Providing direction for, supervising, and coordinating audits, investigations, and management reviews relating to the programs and operations of the agency;
- Conducting, supervising, and coordinating activities that promote economy and efficiency and prevent or detect fraud, waste, and abuse;
- Keeping the Chief Inspector General informed of fraud, abuses, and deficiencies relating to programs and operations administered or financed by the agency, recommending corrective actions concerning fraud, abuses, and deficiencies, and reporting on the progress made in implementing corrective action;
- Ensuring effective coordination and cooperation between the Auditor General, federal auditors, and other governmental entities;
- Reviewing rules relating to programs and operations and making recommendations regarding impact;
- Ensuring an appropriate balance between audit, investigative, and other accountability activities; and
- Complying with the *General Principles and Standards for Offices of Inspector General* as published and revised by the Association of Inspectors General.

Organizational Chart

As of June 30, 2015, the OIG consisted of three sections: Appeal Hearings, Internal and Single Audit, and Investigations. Appeal Hearings and Investigations staff are located in the central office and field offices throughout the state.²



Professional Certifications

Staff members hold the following professional credentials:

- Certified Inspector General
- Certified Inspector General Investigator
- Certified Inspector General Auditor
- Certified Internal Auditor
- Certified Fraud Examiner
- Certified Public Accountant
- Certified Information Systems Auditor
- Certified Government Auditing Professional
- Certified EnCase Examiner
- Certified Child Protective Investigator
- Certified Hearing Official
- Certified Public Manager
- Licensed by the Florida Bar

² **Field Offices:** Investigations – Ft. Lauderdale, Jacksonville, Miami, Orlando, Tallahassee, and Tampa
Appeal Hearings – Ft. Lauderdale, Ft. Myers, Gainesville, Jacksonville, Largo, Miami, Orlando, Tallahassee, Tampa, and West Palm Beach

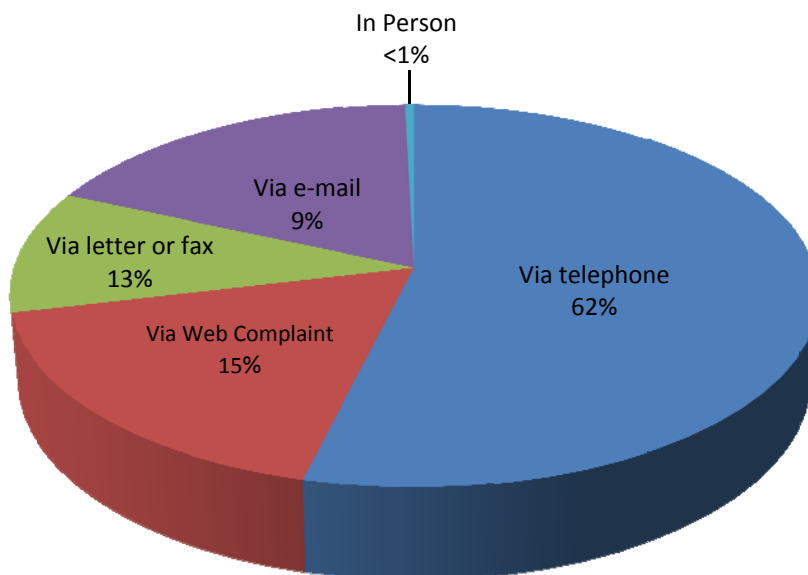
Investigations Section

Intake Unit

The Intake Unit handles incoming calls and reviews all complaints or requests for assistance received by the Investigations Section via telephone, letter, fax, or e-mail. The Intake Unit reviewed a total of **4,138** complaints or requests for assistance.

The Intake Unit received the 4,138 complaints or requests for assistance in the following manner:

- 2,578 received via telephone
- 627 received via web complaint
- 532 received via letter or fax
- 386 received via e-mail
- 15 received in person



Investigations Unit

The Investigations Unit staff initiate investigations or management reviews when violations of statute, rule, policy, and/or contract are alleged, including those filed under the Whistle-blower's Act. While investigations are administrative in nature, criminal violations are often discovered during the investigative process. When a determination is made that the subject of an investigation has committed a potential criminal violation, the investigation is coordinated with the Florida Department of Law Enforcement, local law enforcement agencies, or the appropriate State Attorney's Office for criminal prosecution.

Investigations and Management Reviews

157 cases were opened for investigation or management review.

109 investigations and management reviews were completed.

Whistle-blower Investigations

5 investigations were initiated in accordance with the Whistle-blower's Act.

Recommended Corrective Actions

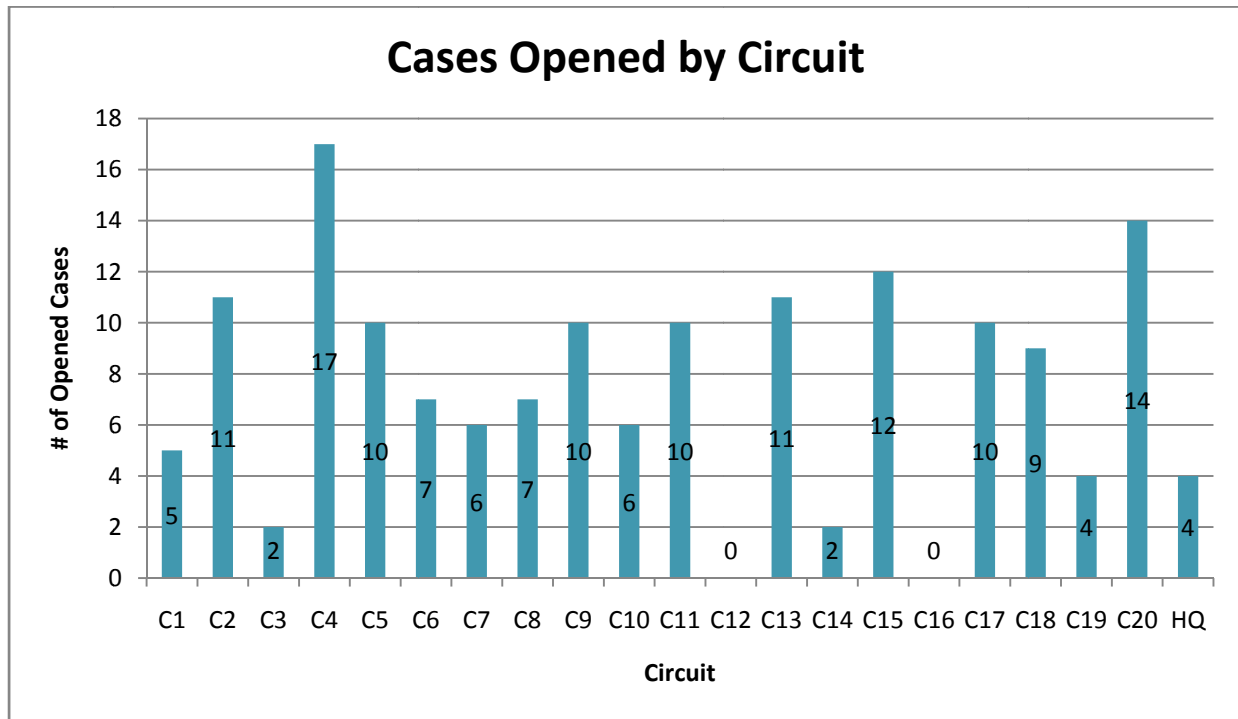
A total of **111** corrective actions, entailing **164** recommendations, were issued by the Investigations Unit. Based on the investigation or management review, the Investigations Unit may make recommendations in the form of corrective actions. The recommendations are for the purpose of process improvement and are made to Department or contracted provider management. The final reports, including recommendations, are sent to all appropriate parties and actions are tracked to completion.

Personnel Actions Associated with Investigations and Management Reviews

Personnel actions may also occur as a result of allegations reported to the OIG, or investigations or management reviews completed by the OIG. The following actions were reported to the OIG and took place at the discretion of management or the employees themselves:

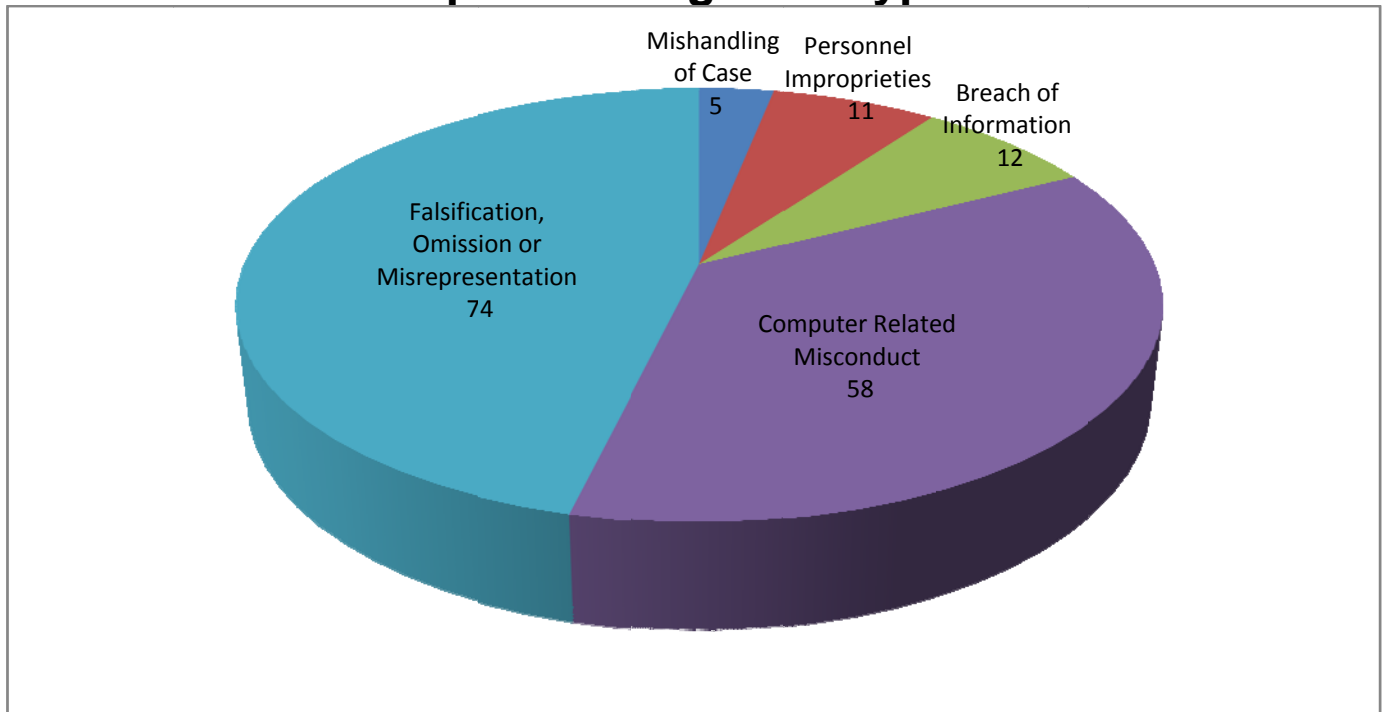
- 50** Resignations
- 36** Terminations
- 6** Written Counseling
- 5** Verbal Counseling
- 2** Written Reprimands
- 1** Suspension

The following chart provides a comparative analysis of the 157 cases opened by Circuit:



The top five allegation types³ and corresponding numbers of allegations investigated for cases closed are as follows:

Top Five Allegation Types



³ These are the top five of the 160 allegations in the 109 closed cases.

Public Records Requests

The Investigations Section responded to **42** public records requests under Chapter 119, F.S.

Inspector General Reference Checks

Current and former Department and provider employees being considered for re-hire, transfer, promotion, or demotion are screened to determine if they were the subject of an OIG investigation. The OIG processed **2,637** such reference checks.

Inspector General Outreach Program

The Investigations Unit offers an outreach program with contracted and subcontracted providers, and Department staff. This program involves meeting with management and subordinate staff, and conducting training sessions to educate them on the role of the OIG, when to report suspected employee wrongdoing, protection afforded under the Whistle-blower's Act, and how to recognize violations of statute, rule, policy, or contract. A total of **49** training sessions, involving **1,528** individuals, were completed with Department employees and/or contracted and subcontracted providers.

Appeal Hearings Section

The Appeal Hearings Section conducts administrative hearings for applicants or recipients of public assistance programs, and individuals being transferred or discharged from nursing facilities. The section also conducts disqualification hearings for the Department when individuals are alleged to have committed intentional program violations in the Cash or Food Assistance programs.

The Appeal Hearings Section reports directly to the Inspector General. This assures independence and complies with federal regulations requiring a hearing officer to be a headquarters-level employee. Hearings are funded with 50% federal funds and 50% state general revenue.

Hearings Authority

The section operates pursuant to the following statutory authorities:

- § 409.285, F.S., Opportunity for hearing and appeal
- § 120.80, F.S., Exceptions and special requirements; agencies
- § 400.0255, F.S., Resident transfer or discharge; requirements and procedures; hearings
- § 393.125, F.S., Hearing rights

The administrative rules for the Department's fair hearing procedures appear in Rule 65-2.042, et seq., Florida Administrative Code, Applicant/Recipient Fair Hearings.

The major controlling federal regulations are as follows:

- Temporary Assistance to Needy Families Personal Responsibility and Work Reconciliation Act of 1996
- Medicaid - 42 CFR § 431.200, Fair Hearings for Applicants and Recipients
- Food Assistance - 7 CFR § 273.15, Fair Hearings
- 7 CFR § 273.16, Disqualification for intentional Program violation

Hearings Jurisdiction

The section conducts hearings for the following programs:

Office of Economic Self-Sufficiency (ESS)

- Cash, Temporary Assistance to Needy Families (TANF)
- Food Assistance
- Disaster Food Assistance Program
- Medicaid Eligibility
- Refugee Assistance Program
- Institutional Care Program
- Optional State Supplementation

Medicaid Benefits

- Agency for Health Care Administration
- Agency for Persons with Disabilities
- Nursing Facility Discharge or Transfer Hearings

Others

- Department of Health Special Supplemental Food Program for Women, Infants, and Children (WIC)
- Eligibility or amount of assistance for Office of Child Welfare programs funded through the Social Security Act
- Child Support Enforcement issues for the Department of Revenue

Completed Hearings Activities

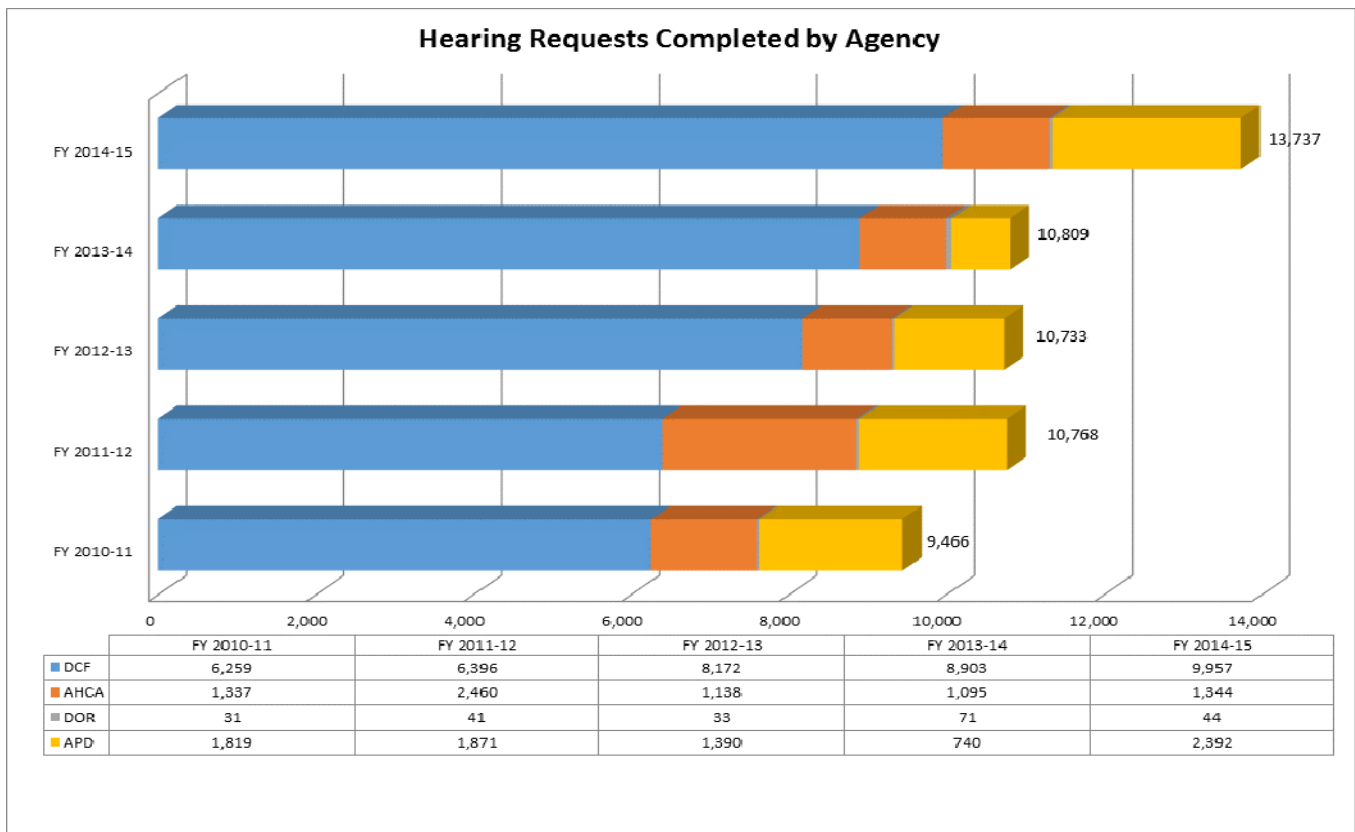
During Fiscal Year 2014-2015:

13,244 fair hearing requests were completed

359 disqualification hearings for Cash or Food Assistance Program benefits were conducted and completed

134 nursing facility discharge or transfer hearings were completed

Additionally, the section processed **1,121** waivers of Administrative Disqualification Hearings.



Internal and Single Audit Section

Internal Audit Unit

The Internal Audit Unit's primary responsibility is to assist Department management in determining whether adequate controls exist and risks are mitigated to ensure the orderly and efficient conduct of business. In addition, § 20.055(2)(a), F.S., includes a description of activities related to the development, assessment, and validation of performance measures. These activities are integrated into the audit process.

The Internal Audit Unit published 13 reports, which included 28 recommendations for improvement. The unit coordinated with external auditors such as Florida's Auditor General, the Federal Department of Health and Human Services' Office of Inspector General, and the Office of Program Policy Analysis and Government Accountability to avoid duplicative efforts and facilitate the auditing process.

Six external report responses were coordinated and liaison activities were facilitated, such as requests for responses and information related to audits and reviews that were in progress. In addition, nine external follow-up reports were conducted.

Single Audit Unit

The Single Audit Unit was created within the Department to monitor, use, and follow-up on audits of state and federal funding. The activity is mandated by federal Circular A-133 and § 215.97, F.S. Public accounting firms perform financial audits of Department contractors and providers. These audits and associated reports are generally required by contract, and are considered a crucial accountability component for state and federally funded initiatives. Financial accounting and reporting is complex and technical. Contract managers generally do not have the financial background or expertise to properly assess the financial statements and the related schedules, so this activity is now centrally located in the Single Audit Unit.

The mission of the Single Audit Unit is to interpret the critical information provided by independent external auditors and to keep management and contract managers apprised of pertinent financial information contained in the reports. The unit's two staff members reviewed and processed 230 provider audit packages.

At the completion of each desk review, an Audit Review Status Report is prepared and sent to the Department's contract manager, with a copy to the appropriate Contract Oversight Unit supervisor. Many desk reviews require no follow-up action. Desk review issues that require further attention of contract managers range from review findings communicated for informational purposes, to significant issues requiring corrective action by the provider. The Single Audit Unit staff also provides feedback to external auditors where correction of an existing audit, or prospective improvement of future audit reports, is required. In addition, the Single Audit Unit staff provides clarification and guidance to independent auditors on the complex and changing requirements of state and federal audits.

Florida Inspectors General Expertise System (FIGES)

The Internal Audit Section staff created and serve as the Site Administrator for the *Florida Inspectors General Expertise System (FIGES)*. *FIGES* is a public internet database of Florida state government, Office of Inspectors General. It contains contact information, areas of expertise, and professional certifications for Office of Inspectors General staff (<http://figes.dcf.state.fl.us>).

Appendix

Summary of Internal Audit Projects Issued

PROJECT #A-1314DCF-030 -- *Transition to VoIP: Costs Associated with Termination of Legacy Centrex Telephones*

The objective of this audit was to determine whether the Department's procedures ensured that Centrex telephone lines were disconnected timely as the Department made the transition from legacy Centrex telephone systems to VoIP (Voice over Internet Protocol) telephones.

The audit disclosed that the Department's procedures for ensuring prompt disconnection of Centrex telephone lines were not initiated timely, resulting in payment of at least \$262,506 for dual telecommunication services from four to 15 months after the successful implementation of VoIP telephones. Recommendations were to implement disconnection procedures timely and initiate regular audits of VoIP and Centrex telephones to ensure prompt disconnection of non-essential telephones and avoid continued excessive costs to the Department.

PROJECT #A-1314DCF-111 -- *Records Retention Advisory*

The OIG received a request from the Director of Technology Services to review electronic mail records retention practices. The Department's operating procedure on records management, CFOP 15-4, was last updated November 1, 1999, and did not address the retention of electronic information. The concern was that over 30 terabytes of electronic mail and information had been stored costing the Department approximately \$400,000 per year. OIG staff conducted research to learn about e-mail retention policies and procedures used by other agencies and states. Recommendations were based on research results and were shared to assist in providing direction for updating the Department's policies and procedures.

PROJECT #A-1415DCF-010 -- *Fleet Management Vehicle Usage*

The objective of this audit was to evaluate management's policies and practices regarding the usage, safety, and maintenance of the Department's vehicles for employee and client transportation. The scope of this audit focused primarily on fleet management activities during the period January 1, 2014 through December 31, 2014, including policies and practices in effect as of December 31, 2014.

The audit disclosed the following findings addressed in our recommendations:

- With limited funding for acquiring vehicles, the Department faces challenges in effectively planning for and managing the size and composition of its fleet, particularly in the regions.
- As of May 4, 2015, five of the 50 vehicles in our sample had open safety recalls.
- Excessive maintenance and repair costs may outweigh the benefits of keeping certain vehicles.

- For the months tested, the available Vehicle Usage Records for vehicle DCF38190 did not adequately document the vehicle's usage.

Recommendations were as follows:

- Determine the cost of assigning vehicles to employees versus the cost of reimbursing employees for mileage and vehicle insurance.
- Ensure that the five vehicles are repaired in accordance with the manufacturer's safety recall and that any other fleet vehicles are maintained accordingly.
- Determine the cost of repairs for donated vehicles.
- Determine the number of pool vehicles for shared use by Department staff.
- Staff should record their daily use of Department vehicles and odometer readings.

PROJECT #A-1415DCF-012 -- *Post-Audit Sampling of Mileage Reimbursements to Northwest Region Non-Office of Child Welfare Employees*

The objective of this post-audit sampling was to determine whether payments for employee mileage reimbursements were compliant with applicable state law, rule, and Department operating procedures. The scope was limited to payments for mileage reimbursements to non-Office of Child Welfare employees of the Department's Northwest Region recorded in the Florida Accounting Information Resource (FLAIR) system during the period April 1, 2014 through June 30, 2014.

The audit disclosed the following:

- Employees did not always fully or accurately complete their Vouchers for Reimbursement of Traveling Expenses or Vicinity Mileage Logs.
- Employees did not always state the purpose of the travel performed.

Management of the Northwest Region, and management of the Office of Financial Services, addressed the findings and recommendations and took appropriate corrective action.

PROJECT #A-1415DCF-044 -- *Post Audit Sampling of Mileage Reimbursements to SunCoast Region Non-Office of Child Welfare Employees*

The objective of this post-audit sampling was to determine whether payments for employee mileage reimbursements were compliant with applicable state law, rule, and Department operating procedures. The scope of this post-audit sampling was limited to payments for mileage reimbursements to non-Office of Child Welfare employees of the Department's SunCoast Region that were recorded in the FLAIR system during the period April 1, 2014 through June 30, 2014.

The audit disclosed the following:

- The Vicinity Mileage Log was not always included with the Voucher for Reimbursement of Traveling Expenses.

- The amount of mileage recorded on the Voucher for Reimbursement of Traveling Expenses was not always supported by the mileage documented on the Vicinity Mileage Log.
- The criteria outlined in CFOP 40-1 were not always followed.

Management reviewed the report with regional supervisors, and distributed a copy of the operating procedures and the report to all impacted employees.

PROJECT #A-1415DCF-062 -- *Post Audit Sampling of Mileage Reimbursements to SunCoast Region Office of Child Welfare Employees*

The objective of this post-audit sampling was to determine whether payments for employee mileage reimbursements were compliant with applicable state law, rule, and Department operating procedures. The scope of this post-audit sampling was limited to payments for mileage reimbursements to Office of Child Welfare employees of the Department's SunCoast Region that were recorded in the FLAIR system during the period April 1, 2014 through June 30, 2014.

The audit disclosed the following:

- Two employee reimbursements were in excess of the mileage amount documented on the Vicinity Mileage Log.
- The amount of mileage recorded on the Voucher for Reimbursement of Traveling Expenses was not always supported by the mileage documentation contained on the mileage log.
- The criteria outlined in CFOP 40-1 were not always followed.

Management reviewed the report with regional supervisors, and distributed a copy of the operating procedures and the report to all impacted employees.

PROJECT #A-1415DCF-086 -- *Post Audit Sampling of Mileage Reimbursements to Central Region Non-Office of Child Welfare Employees*

The objective of this post-audit sampling was to determine whether payments for employee mileage reimbursements were compliant with applicable state law, rule, and Department operating procedures. The scope of this post-audit sampling was limited to payments for mileage reimbursements to non-Office of Child Welfare employees of the Department's Central Region that were recorded in the FLAIR system during the period April 1, 2014 through June 30, 2014.

The audit disclosed the following:

- The Vicinity Mileage Log was not always included with the Voucher for Reimbursement of Traveling Expenses.
- The amount of mileage recorded on the Voucher for Reimbursement of Traveling Expenses was not always supported by the mileage documentation contained on the mileage log.

- The criteria outlined in CFOP 40-1 were not always followed.

Management responded by taking specific action on the identified payment errors and indicated additional training was taking place as well as modification of one of the forms used in the process.

PROJECT #A-1415DCF-087 -- *Post Audit Sampling of Mileage Reimbursements to Central Region Office of Child Welfare Employees*

The objective of this post-audit sampling was to determine whether payments for employee mileage reimbursements were compliant with applicable state law, rule, and Department operating procedures. The scope of this post-audit sampling was limited to payments for mileage reimbursements to Office of Child Welfare employees of the Department's Central Region that were recorded in the FLAIR system during the period April 1, 2014 through June 30, 2014.

The audit disclosed the following:

- One employee's Voucher for Reimbursement of Traveling Expenses included an adjustment, which resulted in an overpayment to the employee.
- The Vicinity Mileage Log was not included with the Voucher for Reimbursement of Traveling Expenses.
- The amount of mileage recorded on the Voucher for Reimbursement of Traveling Expenses was not always supported by the mileage documentation contained on the Vicinity Mileage Log.
- The criteria outlined in CFOP 40-1 were not always followed.

Management responded by taking specific action on the identified payment errors and indicated additional training was taking place as well as modification of one of the forms used in the process.

PROJECT #A-1415DCF-182 -- *Post-Audit Sampling of Mileage Reimbursements to Northwest Region Office of Child Welfare Employees*

The objective of this post-audit sampling was to determine whether payments for employee mileage reimbursements were compliant with applicable state law, rule, and Department operating procedures. The scope of this post-audit sampling was limited to payments for mileage reimbursements to Office of Child Welfare employees of the Department's Northwest Region that were recorded in the FLAIR system during the period April 1, 2014 through June 30, 2014.

The audit disclosed the following:

- An employee was reimbursed \$822.80 for mileage even though their supporting Vicinity Mileage Logs lacked the required beginning and ending odometer readings.

- In some instances, mileage claimed by employees on their Voucher for Reimbursement of Traveling Expenses was not supported by, or in agreement with, the mileage recorded on their Vicinity Mileage Logs.
- Employees did not always claim map mileage and vicinity mileage on their Voucher for Reimbursement of Traveling Expenses, in accordance with Department policy.
- Employees did not always fully or accurately complete their Voucher for Reimbursement of Traveling Expenses.

Management of the Northwest Region, and management of the Office of Financial Services, addressed the findings and recommendations and took appropriate corrective action.

PROJECT #C-1112DCF-233 -- *Monitoring of Fair Labor Standards Act Compliance*

On March 2, 2012, the Department and the United States Department of Labor, Wage and Hour Division (DOL), requested the OIG to serve as ombudsman and provide three-year oversight of the Fair Labor Standards Act of 1938 (FLSA) conformance by the Department. The oversight provided was in accordance with the Compliance Agreement signed by these two organizations.

The ombudsman monitored the Department's performance regarding FLSA to ensure the Department conforms to the overtime compensation and recordkeeping provisions of FLSA, and adheres to the stipulations of the Compliance Agreement. Between March 2, 2012 and March 1, 2015, there were 23 allegations of FLSA violations filed with the OIG. The sources of the allegations were the hotline, e-mail, memorandums, and the web. The allegations were appropriately investigated by the OIG.

If the OIG management review substantiated an issue of non-compliance, the OIG recommended that the Regional Managing Director review the OIG report and ensure that management follow all policies and procedures related to employee compensation, specifically FLSA, and provide additional training where needed.

PROJECT #C-1415DCF-005 -- *The Impact of the Federal Information Security Management Act of 2002 on Department Information Systems – Compliance Advisory*

This consulting activity was conducted at the request of the Department's Information Security Manager. The objectives were to determine the following:

- How the Federal Information Security Management Act of 2002 (FISMA) applies to the Department; and
- Which Department systems may require compliance with FISMA.

The consulting activity identified the following:

- Due to competing federal security requirements, it is unclear as to which Department information systems are required to follow FISMA. Therefore, as of August 2014, the OIG is not aware of any Department information systems required to follow FISMA; and
- A sudden required move to FISMA may be excessive in cost, and difficult to accomplish rapidly. However, any Department system currently in, or working towards, compliance

with Minimum Acceptable Risk Standards for Exchanges (MARS-E) or, Rule 71A-1, F.A.C., may mitigate these issues due to similarities with FISMA and National Institute of Standards and Technology (NIST) based guidelines.

PROJECT #C-1415DCF-079 -- *Review of Expenditures by a Former ChildNet, Inc. Employee*

This consulting activity was conducted in conjunction with OIG investigative case #2012-0132. This was a limited scope engagement to provide assistance to OIG Investigations Unit staff in reviewing documentation of expenditures, for the period September 2010 through May 2013, charged on various ChildNet, Inc. credit cards by a former employee. The objective was to determine whether the expenditures charged on the employee's credit cards were for costs that are unallowable under Contract #JJ212 between the Department and ChildNet, Inc.

As a result of this consulting activity, the OIG Investigations Unit recommended in the Investigative Report that the Assistant Secretary for Administration ensure the following corrective actions are taken:

- Determine whether the expenditures identified as questionable (\$2,071.75) were allowable under the contract;
- Seek recoupment of all expenditures identified as unallowable (\$2,243.15); and
- Seek recoupment of all expenditures identified as questionable and further determined to be unallowable.

PROJECT #C-1415DCF-177--*Information Technology Risk Assessment 2015*

An internal audit information technology auditor assisted in ensuring completion of the requirement for each agency to “conduct, and update every 3 years, a comprehensive risk analysis to determine the security threats to the data, information, and information technology resources of the agency,” per [§ 282.318(4)(c) and (f), F.S.].

The process was coordinated by the Department Information Security Manager using a self-assessment survey tool composed of questions based on the standards incorporating Rule 71A-1, F.A.C. The internal auditor reviewed the completed assessment and verified the reasonableness of the responses.

External Audit Reports Issued

Florida's Auditor General

- | | |
|----------|--|
| 2015-002 | Contract and Grant Management Processes at Selected State Agencies – Operational Audit |
| 2015-023 | Grants and Other Revenue Allocation and Tracking System (GRANTS) – Information Technology Operational Audit |
| 2015-155 | Selected Behavioral Health Managing Entities Oversight of Substance Abuse and Mental Health Services – Operational Audit |

- 2015-156 Selected Community-Based Care Lead Agencies Oversight of Foster Care and Related Services – Operational Audit
- 2015-166 State of Florida Compliance and Internal Controls Over Financial Reporting and Federal Awards

United States Department of Health and Human Services

CIN A-04-14-24968 USDHHS Audit Resolution update to Auditor General Report #2014-173

Follow-up to Auditor General Reports

Summary Schedule of Prior Audit Findings, Florida Department of Children and Families for the Fiscal Year Ended June 30, 2014

- 2014-016 Independent Living Transition Services, Foster Care Licensing, and Provider Performance Measures – Operational Audit
- 2014-143 Florida Safe Families Network (FSFN) Information Technology Operational Audit
- 2014-173 Compliance and Internal Controls Over Financial Reporting and Federal Awards
- 2014-184 Payroll and Personnel Processes at Selected State Agencies
- 2014-188 Domestic Violence Program, Telework Program, and Selected Administrative Activities – Operational Audit
- 2014-196 Florida Online Recipient Integrated Data Access (FLORIDA) System – Information Technology Operational Audit
- 2015-002 Contract and Grant Management Processes at Selected State Agencies – Operational Audit
- 2015-023 Grant and Other Revenue Allocation and Tracking System (GRANTS) – Information Technology Operational Audit

Summary of Investigations and Corrective Actions Completed

Headquarters

2013-0126 An Office of Public Benefits Integrity (OPBI) Investigator falsified information in ACCESS Case #1189940183. **Supported.** The OPBI Investigator engaged in employee misconduct by providing false information in an e-mail to her supervisor regarding ACCESS Case #1240705891. **Supported.** The OPBI Investigator falsified information in ACCESS Cases #1149764767 and #1253144460. **Neither Supported Nor Refuted.**

Corrective Action: The employee was reassigned to duties in a different work unit and a copy of the report was placed in the employee's personnel file.

2014-0067 A Regional Managing Director created a hostile work environment. **Not Supported.** The Regional Managing Director engaged in gender discrimination against a female employee. **Not Supported.**

Corrective Action: The Deputy Secretary discussed the report with the employee and followed the discussion with a memorandum reiterating the four main points of: pausing before responding to situations in order to make wiser and more effective responses; prompt notification to the OIG; commitment to the pursuit of increased fidelity to the safety methodology; and the situation regarding a subordinate employee raised in the report.

2014-0076 Department officials concealed or attempted to conceal records of 30 child deaths. **Not Supported.**

Corrective Action: Children and Families Operating Procedure (CFOP) 215-6 was last amended April 1, 2013, and no additional and/or substantive changes had occurred within the Incident Reporting and Analysis System (IRAS) application itself that required any amendments to the operating procedure. Beginning in May 2014, the Department initiated a number of changes and enhancements to IRAS utilizing a phased-in approach: Phase I was completed and deployed on June 26, 2014; Phase II was completed and deployed on July 15, 2014; and Phase III was completed and operational as of October 30, 2014. The Department conferred with the General Counsel, Regional Leadership, and the local Rapid Response Team.

Circuit 1

2011-0022 A Child Protective Investigator falsified child protective investigation records concerning Florida Safe Families Network (FSFN) Investigation #2010-249391. **Supported.** The Child Protective Investigator falsified child protective investigation records concerning FSFN Investigation #2010-240960. **Supported.** The Child Protective Investigator falsified child protective investigation records in 23 FSFN investigations. **Supported.**

Corrective Action: The employee resigned and a copy of the report was placed in the employee's personnel file.

2014-0006 A Family Services Counselor of a contracted provider falsified child protective supervision records in FSFN Case IDs #100573952, #100594750, #2609750, and #106820. **Supported.**

Corrective Action: The employee was terminated and a copy of the report was placed in the employee's personnel file.

2014-0029 A Family Services Counselor of a contracted provider falsified child protective supervision records in FSFN Case ID #2039120. **Neither Supported Nor Refuted.**

Corrective Action: The employee was terminated and a copy of the report was placed in the employee's personnel file.

2014-0033 A Family Services Counselor of a contracted provider falsified child protective supervision records in FSFN Case IDs #100727172 and #100828806. **Neither Supported Nor Refuted.**

Corrective Action: The employee was terminated and a copy of the report was placed in the employee's personnel file.

2014-0059 An Adult Protective Investigator misused her position by using Department information technology resources without a legitimate business reason. **Supported.**

Corrective Action: The employee resigned and a copy of the report was placed in the employee's personnel file.

2014-0099 A Family Support Worker of a contracted provider misappropriated donated items and gift cards for personal use and used the provider's fuel card for fuel for her own vehicle. **Investigation Terminated.**

Corrective Action: The decision to terminate the investigation was based on information that the donated items were meant to go to a local foundation and not the contracted provider, and the theft of the gift cards initiated a local law enforcement investigation. Further, there was insufficient information to identify a possible date range for inappropriate fuel card use. In addition, the contracted provider was addressing the control measures in place regarding these issues prior to the initiation of the investigation.

Circuit 2

2012-0098 An ACCESS Interviewing Clerk/Customer filed a false application for termination of benefits for another individual (ACCESS Application #722866223) in Florida Online Recipient Integrated Data Access (FLORIDA)

Case #1268427543. **Neither Supported Nor Refuted.** The ACCESS Interviewing Clerk/Customer worked on ACCESS Application #640697307 for FLORIDA Case #1268427543, a case of personal interest. **Neither Supported Nor Refuted.** The ACCESS Interviewing Clerk/Customer viewed ACCESS Application #722866223 without a legitimate business reason. **Neither Supported Nor Refuted.** The ACCESS Interviewing Clerk/Customer submitted ACCESS Application #639293707 on behalf of a person without that person's knowledge. **Not Supported.** The ACCESS Interviewing Clerk/Customer worked ACCESS Application #639293707, a case of personal interest. **Neither Supported Nor Refuted.** The ACCESS Interviewing Clerk/Customer accessed her personal case in AMS without a legitimate business reason. **Supported.** The ACCESS Interviewing Clerk/Customer failed to obtain prior supervisory approval for additional employment outside of state government. **Supported.** The ACCESS Interviewing Clerk/Customer submitted a falsified doctor's note to excuse an unauthorized absence. **Not Supported.**

Corrective Action: The employee resigned and a copy of the report was placed in the employee's personnel file. The computer systems that support customer eligibility were to improve application stability and security. The security process and procedures, which have withstood security audit scrutiny, were reviewed and continue to meet and/or exceed industry standards. Employee usage and security permission levels will continue to be monitored while aggressively seeking ways to utilize new technologies to combat waste, fraud, and abuse within the public assistance benefit programs administered by the Department.

2014-0108 A Child Protective Investigator falsified child protective investigation records in FSFN Investigation #2014-203136. **Not Supported.**

Corrective Action: No action required.

2014-0117 A Child Protective Investigator breached confidential child protective information by allowing his wife to data enter his case notes in FSFN. **Not Supported.**

Corrective Action: Due to additional information obtained that there were discrepancies in the Child Protective Investigator's timesheets as compared to FSFN worker transactions, the supervisor met and reviewed time records with the employee and the timesheets have been corrected. In addition, the Operations Program Administrator reminded all staff at a March 2015 staff meeting to accurately record and report all work time.

2015-0057 A Systems Project Administrator shared his People First password with his lead worker. **Investigation Terminated.**

Corrective Action: The decision to terminate the investigation was based on information that the employee made a mistake due to an understanding

stemming from the Time Direct timekeeping system (over 10 years prior). The employee was verbally counseled.

2015-0065 A Senior Child Protective Investigator accessed confidential FSFN Intake Report #2015-121580 without a legitimate business reason. **Supported.** The Senior Child Protective Investigator breached confidential information to a parent participant prior to the commencement of a child protective investigation. **Supported.**

Corrective Action: The employee resigned and a copy of the report was placed in the employee's personnel file. The Florida Certification Board was notified and initiated an ethics investigation on the employee.

Circuit 3

There were no cases closed in Circuit 3 during FY 2014-2015.

Circuit 4

2012-0062 A Family Services Counselor of a subcontracted provider falsified child protective supervision records in FSFN Case ID #100430012. **Neither Supported Nor Refuted.** The Family Services Counselor released foster parent information to an unauthorized individual. **Not Supported.**

Corrective Action: The employee resigned and a copy of the report was placed in the employee's personnel file.

2013-0140 A Child Protective Investigator falsified child protective investigation records in FSFN Investigation #2013-274340-01. **Supported.** The Child Protective Investigator falsified child protective investigation records in FSFN Investigations #2013-285058-01 and #2013-300051-01. **Supported.**

Corrective Action: The employee was terminated and a copy of the report was placed in the employee's personnel file. The employee's Child Welfare Protective Investigator certification expired and remains inactive.

2014-0034 A Child Protective Investigator falsified child protective investigation records in FSFN Investigation #2014-018011-01. **Supported.**

Corrective Action: The employee resigned and a copy of the report was placed in the employee's personnel file.

2014-0094 A Family Services Counselor of a contracted provider had an inappropriate relationship with a member of a client's household. **Investigation Terminated.**

Corrective Action: The decision to terminate the investigation was based on the facts that the employee was terminated from her position after admitting to the allegation and the Florida Certification Board was conducting an ethics investigation. The benefit of pursuing the investigation did not outweigh the expenditure of resources to do so.

2014-0096 A Unit Supervisor of a subcontracted provider inappropriately touched a client. **Investigation Terminated.**

Corrective Action: The decision to terminate the investigation was based on the information that an active criminal investigation was being conducted by local law enforcement. Due to the fact that the alleged act was criminal in nature, law enforcement was the appropriate investigative entity.

2014-0149 A Network Peer Navigator of a subcontracted provider misused her position to communicate with a client in a pre-trial detention facility. **Investigation Terminated.**

Corrective Action: The decision to terminate the investigation was based on a lack of jurisdiction. The employee's position was not paid for through Department funds. The employee was terminated by the subcontracted provider.

Circuit 5

2013-0120 A Case Manager of a subcontracted provider falsified a travel voucher. **Supported.** The Case Manager used a company vehicle for personal reasons. **Supported.** The Case Manager falsified child protective supervision records in FSFN Case IDs #100916421 and #100678106. **Neither Supported Nor Refuted.**

Corrective Action: The employee was terminated and a copy of the report was placed in the employee's personnel file. The Florida Certification Board was notified and the employee's Child Welfare Case Manager certification expired and remains inactive.

2014-0043 A Case Manager of a subcontracted provider had an inappropriate relationship with a client. **Neither Supported Nor Refuted.** The Case Manager falsified child protective supervision records in FSFN Case ID #100793805. **Supported.**

Corrective Action: The employee resigned and a copy of the report was placed in the employee's personnel file. The Florida Certification Board was notified and initiated an ethics investigation on the employee.

2014-0115 A Child Protective Investigator breached confidential information pertaining to FSFN Case ID #100721173. **Supported.**

Corrective Action: The employee resigned and a copy of the report was placed in the employee's personnel file.

- 2014-0131 An Economic Self-Sufficiency Specialist II disclosed confidential ACCESS customer information to unauthorized individuals. **Neither Supported Nor Refuted.**
- Corrective Action:** The employee received a verbal counseling and a copy of the report was placed in the employee's personnel file. Program Administrators were requested to have staff read the signed agreement between the Department and the Department of Highway Safety and Motor Vehicles (DHSMV), and training on Security Awareness and Unauthorized Disclosure of information was held.
- 2014-0133 An Adult Protective Investigator falsified adult protective case records pertaining to FSFN Investigations #2014-215504 and #2014-246077. **Neither Supported Nor Refuted.**
- Corrective Action:** The employee resigned and a copy of the report was placed in the employee's personnel file.
- 2014-0146 A Family Behavior Therapy (FBT) Program Supervisor of a subcontracted provider shared her username and password with a co-worker. **Supported.** An FBT Therapist used a co-worker's username and password to access a computer program. **Supported.**
- Corrective Action:** The FBT Program Supervisor received a written counseling and the FBT Therapist received a verbal counseling. A copy of the report was placed in the employees' personnel files.
- Circuit 6**
- 2007-0126 A Case Manager of a subcontracted provider falsified entries in FSFN concerning face-to-face visits for FSFN Case IDs #151785 and #94789. **Supported.**
- Corrective Action:** The employee resigned and a copy of the report was placed in the employee's personnel file.
- 2013-0018 A Case Manager of a subcontracted provider falsified documents in FSFN Case ID #100556956. **Supported.**
- Corrective Action:** The employee was terminated and a copy of the report was placed in the employee's personnel file. The Florida Certification Board was notified and the employee's Child Welfare Case Manager and Child Protection Professional certifications expired and remain inactive.
- 2014-0004 A Case Manager of a subcontracted provider falsified information pertaining to face-to-face home visits in two separate FSFN cases (FSFN Case IDs #100462273 and #100715767). **Supported.**

Corrective Action: The employee was terminated and a copy of the report was placed in the employee's personnel file. The Florida Certification Board was notified and revoked the employee's Child Welfare Case Manager certification.

2014-0065 A Family Support Specialist of a subcontracted provider misused her position to facilitate visits involving a parent and a participant in FSFN Case ID #100548644. **Not Supported.**

Corrective Action: No action required.

2014-0083 An Economic Self-Sufficiency Specialist I utilized multiple Department information systems to access information on cases of personal interest. **Supported.**

Corrective Action: The employee resigned and a copy of the report was placed in the employee's personnel file.

2015-0046 An Economic Self-Sufficiency Specialist I accessed FLORIDA Cases #1384803891 and #1390634124 without a legitimate business reason. **Supported.**

Corrective Action: The employee was terminated and a copy of the report was placed in the employee's personnel file.

Circuit 7

2013-0144 An Adult Protective Investigator falsified an adult protective investigation record in FSFN Intake #2013-331942. **Supported.** The Adult Protective Investigator failed to protect her computer systems passwords. **Supported.**

Corrective Action: The employee resigned and a copy of the report was placed in the employee's personnel file.

2014-0025 A Child Protective Investigator falsified a child protective investigation record in FSFN Intake #2013-217984. **Supported.**

Corrective Action: The employee resigned and a copy of the report was placed in the employee's personnel file.

2014-0058 An Adult Protective Investigator falsified an adult protective investigation record in FSFN Investigation #2014-080107. **Neither Supported Nor Refuted.** The Adult Protective Investigator falsified an adult protective investigation record in FSFN Investigation #2013-344744. **Not Supported.**

Corrective Action: The employee was issued a written counseling and a copy of the report was placed in the employee's personnel file.

2014-0121 An Economic Self-Sufficiency Specialist I falsified ACCESS Management System Work Records Details and FLORIDA Running Record Comments in ACCESS Case #1007188537. **Neither Supported Nor Refuted.**

Corrective Action: The employee received a two-day unpaid suspension and a copy of the report was placed in the employee's personnel file.

Circuit 8

2012-0051 A Family Care Counselor of a subcontracted provider falsified child protective supervision records in FSFN Case ID #100392631. **Neither Supported Nor Refuted.**

Corrective Action: The employee was terminated and a copy of the report was placed in the employee's personnel file. The Regional Managing Director reviewed information regarding use of the Remote Data Capture (RDC) system and it was previously decided that due to problems with the system causing an increased workload without adding any value to the work, it was at the provider's discretion whether to use the RDC system.

2014-0018 A Child Protective Investigator falsified a child protective investigation record in FSFN Investigation #2013-319929. **Supported.** The Child Protective Investigator falsified a child protective investigation record in FSFN Investigation #2013-320802. **Supported.**

Corrective Action: The employee resigned and a copy of the report was placed in the employee's personnel file. The Florida Certification Board was notified and revoked the employee's Child Welfare Protective Investigator certification.

2014-0055 An Eligibility Determination Specialist of a contracted provider accessed FSFN Investigation #2014-095450 without a legitimate business reason. **Not Supported.**

Corrective Action: Due to the complainant's concerns that a manager appeared to instruct him not to contact the OIG with possible legitimate wrongdoing by employees or contracted agencies, the Regional Managing Director sent notice to all Department and contracted provider management regarding CFOP 180-4 and asked that the information be shared with staff.

2014-0101 An Adult Protective Investigator falsified adult protective investigation records in FSFN Investigation #2014-174085. **Supported.**

Corrective Action: The employee was terminated and a copy of the report was placed in the employee's personnel file.

Circuit 9

- 2012-0043 A Child Protective Investigator falsified child protective investigation records in FSFN Investigations #2012-051415 and #2012-068760. **Supported.**
- Corrective Action:** The employee resigned and a copy of the report was placed in the employee's personnel file.
- 2013-0117 A Case Manager of a subcontracted provider falsified a child protective supervision record in FSFN Case ID #100403358. **Supported.** The Case Manager falsified a child protective supervision record in FSFN Case ID #100375185. **Supported.**
- Corrective Action:** The employee was terminated and a copy of the report was placed in the employee's personnel file. The Florida Certification Board was notified and the employee's Provisional Child Welfare certification was revoked. The new Department Standard Integrated Contract includes a provision requiring use of the Office of Inspector General's Reference Check Form for applicants who have previously worked for the Department or a contracted provider agency. The subcontracted provider also conducts re-screening of employees every five years and local law enforcement screens annually.
- 2013-0141 A Child Protective Investigator falsified a child protective investigation record in FSFN Investigation #2013-283646-02. **Supported.**
- Corrective Action:** The employee resigned and a copy of the report was placed in the employee's personnel file. The Florida Certification Board was notified and revoked the employee's Child Welfare Protective Investigator certification.
- 2014-0057 An Economic Self-Sufficiency Specialist I accessed ACCESS Case #1334806748, a case of personal interest, without a legitimate business reason. **Supported.**
- Corrective Action:** The employee was terminated and a copy of the report was placed in the employee's personnel file. An e-mail was sent to all ACCESS staff addressing the personal interest case policy, and OIG Outreach training is now provided to all new employees during their pre-service training.
- 2014-0100 An Interviewing Clerk accessed confidential information within the DHSMV Driver and Vehicle Information Database (DAVID) without a legitimate business reason. **Supported.** The Interviewing Clerk accessed ACCESS Case #1319413064 without a legitimate business reason. **Supported.**
- Corrective Action:** The employee was terminated and a copy of the report was placed in the employee's personnel file. The ACCESS management team

will continue to stress to staff the importance of viewing information on cases only for work-related reasons.

2014-0137 An Economic Self-Sufficiency Specialist I used the FLORIDA system and accessed ACCESS Case #1243814586 without a legitimate business reason. **Supported.**

Corrective Action: The employee was terminated and a copy of the report was placed in the employee's personnel file. An e-mail reminder was sent to Circuit 9 ACCESS staff addressing the personal interest case policy.

Circuit 10

2013-0146 A Child Protective Investigator falsified child protective investigation records in FSFN Investigations #2013-321390-01, #2013-334073-01, and #2013-335038-01. **Supported.** The Child Protective Investigator falsified child protective investigation records in FSFN Investigations #2013-292432-01, #2013-294876-01, #2013-300191-01, and #2013-305647-01. **Supported.**

Corrective Action: The employee resigned and a copy of the report was placed in the employee's personnel file. The Florida Certification Board was notified and initiated an ethics investigation on the employee.

2014-0026 A Case Manager of a subcontracted provider falsified child protective supervision records in FSFN Case ID #100817316. **Supported.** The Case Manager falsified child protective supervision records in FSFN Case ID #100241752. **Neither Supported Nor Refuted.**

Corrective Action: The employee resigned and a copy of the report was placed in the employee's personnel file. The Florida Certification Board was notified and revoked the employee's Child Welfare Case Manager certification.

2014-0052 An Intercept Specialist of a subcontracted provider falsified client contacts in FSFN Case IDs #100612979 and #2222953. **Supported.** The Intercept Specialist held unapproved secondary employment while employed by the subcontracted provider. **Supported.**

Corrective Action: The employee was terminated and a copy of the report was placed in the employee's personnel file.

2014-0075 An Economic Self-Sufficiency Specialist I accessed a case of personal interest without a legitimate business reason. **Not Supported.**

Corrective Action: No action required.

- 2014-0110 A Family Case Manager Supervisor of a subcontracted provider falsified client contacts in FSFN Case IDs #100832628 and #3270876. **Supported.** A Family Case Manager of the subcontracted provider falsified a travel record. **Supported.**
- Corrective Action:** The employees were terminated and a copy of the report was placed in the employees' personnel files. The Florida Certification Board was notified and revoked the Family Case Manager Supervisor's Child Welfare Case Manager certification. The Florida Certification Board did not take action against the Family Case Manager's Child Welfare Case Manager certification.
- 2014-0113 An Economic Self-Sufficiency Specialist I accessed ACCESS Case #1006411372, a case of personal interest, without a legitimate business reason. **Supported.**
- Corrective Action:** The employee was terminated and a copy of the report was placed in the employee's personnel file. OIG Outreach training is now provided to all new employees during their pre-service training.
- 2014-0120 A Child Protective Investigator falsified child protective investigation records pertaining to FSFN Investigations #2014-184851 and #2014-213661. **Supported.**
- Corrective Action:** The employee resigned and a copy of the report was placed in the employee's personnel file. The Florida Certification Board was notified and initiated an ethics investigation on the employee.

Circuit 11

- 2011-0075 A Full Case Manager of a subcontracted provider falsified child protective supervision records in FSFN. **Supported.**
- Corrective Action:** The employee was terminated and a copy of the report was placed in the employee's personnel file. The contracted provider coordinated the development of a report with their business intelligence vendor that would enhance the capacity to detect incidents such as those that were investigated in this report, and the report was released in July 2015. A training session with Quality Assurance staff from their subcontracted case management agencies was held as soon as the report was available. The photograph review is now included in the contracted provider's quarterly audit of case files and as a performance metric on the monthly agency scorecard.
- 2014-0002 A Human Services Counselor III falsified records in ACCESS Case #1117541231. **Supported.**
- Corrective Action:** The employee resigned and a copy of the report was placed in the employee's personnel file. Internal case audits, previously

conducted quarterly, are now conducted monthly in an effort to detect case anomalies.

2014-0010 A Child Protective Investigator falsified child protective investigation records in FSFN Investigation #2013-302947. **Supported.**

Corrective Action: The employee resigned and a copy of the report was placed in the employee's personnel file. The Florida Certification Board was notified and initiated an ethics investigation on the employee.

2014-0031 An Interviewing Clerk wrote inappropriate and threatening statements in the FLORIDA CLMM screen. **Supported.** The Interviewing Clerk left a Department computer unlocked when absent from his work site. **Supported.** The Interviewing Clerk accessed inappropriate websites from his work computer while at work. **Supported.**

Corrective Action: The employee resigned and a copy of the report was placed in the employee's personnel file.

2014-0054 A Family Services Counselor was compensated by the owner of a daycare center to not cite the center for violations observed during an inspection. **Not Supported.** The Family Services Counselor failed to cite a daycare center for violations observed during an inspection. **Neither Supported Nor Refuted.**

Corrective Action: The employee resigned and a copy of the report was placed in the employee's personnel file. The Child Care Program Office developed and conducted refresher training for employees that conduct child care inspections and their supervisors in all regions.

2014-0060 An Interviewing Clerk accessed ACCESS Case #1440158258, a case of personal interest, without a legitimate business reason. **Supported.**

Corrective Action: The employee was issued a written reprimand and a copy of the report was placed in the employee's personnel file.

Circuit 12

2013-0095 An Economic Self-Sufficiency Specialist II falsified records in the ACCESS Management and/or FLORIDA systems concerning the completion of interviews with customers in ACCESS cases #1045639974, #1102709514, #1186511311, #1259852300, #1277912165, #1308369239, and #1309927456. **Supported.**

Corrective Action: The employee resigned and a copy of the report was placed in the employee's personnel file.

2014-0051 A Program Director of a subcontracted provider accessed FSFN cases without a legitimate business reason. **Not Supported.**

Corrective Action: No action required.

Circuit 13

2013-0087

A Case Manager of a subcontracted provider falsified child protective supervision records in FSFN Case ID #100752901, FSFN Case ID #100197861, and FSFN Case ID #100864952. **Supported.** The Case Manager falsified child protective supervision records in FSFN Case ID #3042668. **Neither Supported Nor Refuted.**

Corrective Action: The employee was terminated and a copy of the report was placed in the employee's personnel file.

2014-0030

An Adoptions Case Manager of a subcontracted provider falsified home visits in Ongoing Case Management Cases #100682582 and #131865. **Supported.** The Adoptions Case Manager falsified home visits in Ongoing Case Management Cases #142306, #100027182, and #100143794. **Supported.**

Corrective Action: The employee was terminated and a copy of the report was placed in the employee's personnel file. The Florida Certification Board was notified and the employee's Child Welfare Case Manager certification was revoked.

2014-0035

A Case Manager of a subcontracted provider made false statements during an official court proceeding. **Not Supported.**

Corrective Action: No action required.

2014-0077

A Case Manager of a subcontracted provider accessed FSFN Case ID #2292193 without a legitimate business reason. **Supported.** An Independent Living Transition Specialist Manager of another subcontracted provider accessed FSFN Case ID #2292193 without a legitimate business reason. **Supported.**

Corrective Action: The Case Manager was terminated and the Independent Living Transition Specialist Manager resigned. A copy of the report was placed in the employees' personnel files.

2014-0097

A Records Specialist of a contracted provider accessed FSFN Case ID #101042188 and FSFN Case ID #1000258264 without a legitimate business reason. **Supported.** The Records Specialist breached confidential information to an unauthorized individual pertaining to FSFN Case ID #1000258264. **Neither Supported Nor Refuted.**

Corrective Action: The employee was terminated and a copy of the report was placed in the employee's personnel file.

2014-0111 An Economic Self-Sufficiency Specialist I accessed ACCESS Case #1277605238, a case of personal interest. **Supported.**

Corrective Action: The employee resigned and a copy of the report was placed in the employee's personnel file.

2014-0112 An Economic Self-Sufficiency Specialist I falsified records in the ACCESS Management System and/or FLORIDA system concerning the completion of interviews with customers in ACCESS Cases #1193019800, #1369204809, and #1256195154. **Supported.**

Corrective Action: The employee was issued a verbal counseling and a copy of the report was placed in the employee's personnel file.

2014-0152 A Family Services Specialist accessed FSFN Investigation #2014-304554 without a legitimate business reason. **Supported.**

Corrective Action: The employee retired and a copy of the report was placed in the employee's personnel file.

Circuit 14

2011-0123 A Child Protective Investigator falsified child protective investigation records in FSFN Investigations #2011-179497, #2011-215542, #2011-206214, and #2011-212273. **Supported.** The Child Protective Investigator falsified child protective investigation records in 28 FSFN investigations. **Supported.**

Corrective Action: The employee resigned and a copy of the report was placed in the employee's personnel file.

2013-0111 An Administrative Assistant and a Paralegal Specialist accessed child protective investigation information in FSFN Case ID #100930010 without a legitimate business reason. **Supported.** The Administrative Assistant and the Paralegal Specialist breached confidential child protective investigation information from FSFN Case ID #100930010 to an individual having a personal interest in the case. **Supported.** An Interstate Compact on the Placement of Children (ICPC) Specialist requested other Department employees, on her behalf, to obtain confidential child protective investigation information from FSFN Case ID #100930010, a case of personal interest. **Supported.** The Paralegal Specialist accessed child protective investigation information in FSFN Case ID #3451749 without a legitimate business reason. **Supported.** The ICPC Specialist accessed child protective investigation information in two cases of personal interest, FSFN Case ID #3451749 and FSFN Case ID #100930010. **Supported.**

Corrective Action: The Paralegal Specialist and ICPC Specialist both resigned, and the Administrative Assistant was issued a written counseling. A copy of the report was placed in the employees' personnel files.

2014-0008 A Care Manager of a subcontracted provider falsified child protective supervision records in FSFN Case IDs #3162758, #100062821, #100159382, #100113633, and #3032087. **Neither Supported Nor Refuted.**

Corrective Action: The employee was terminated and a copy of the report was placed in the employee's personnel file.

Circuit 15

2012-0132 A Chief Financial Officer/Chief Operating Officer of a contracted provider misused his position by using the contracted provider's employees and equipment for personal gain. **Supported.** A Facilities Manager of a contracted provider misused his position by using the contracted provider's employees and equipment for personal gain. **Neither Supported Nor Refuted.**

Corrective Action: The Chief Financial Officer/Chief Operating Officer resigned, and a copy of the report was placed in both employees' personnel files. Based on the determination that the contracted provider was advised of the allegation but failed to notify the OIG, the Regional Managing Director sent a letter of reminder to the contracted provider regarding the importance of reporting any suspected or confirmed wrongdoing to the OIG. With regard to an additional issue discovered during the investigation related to questionable and unallowable expenditures, the Assistant Secretary for Administration is in the process of having the contract manager request that the contracted provider submit all documentation related to the expenditures identified as questionable. When the total amount of any unallowable expenditure is determined, the contract manager will request immediate recoupment from the contracted provider.

2013-0090 An Administrative Assistant of a contracted provider, as a volunteer fire fighter with the local fire department, responded to fire calls and received travel stipends from the local fire department during the timeframe of October 2011 through August 2013, while on duty at the contracted provider. **Supported.**

Corrective Action: The employee resigned and a copy of the report was placed in the employee's personnel file. The Regional Managing Director sent a letter to the contracted provider requesting recoupment of the \$1,882.25 paid to the employee for the time he was absent from work.

2014-0020 A Foster Parent Support and Licensing Specialist of a subcontracted provider accessed FSFN Case ID #100626770 without a legitimate business reason. **Neither Supported Nor Refuted.** The Foster Parent Support and Licensing Specialist disclosed confidential information from FSFN Case ID #100626770 to unauthorized individuals. **Not Supported.**

Corrective Action: The employee resigned and a copy of the report was placed in the employee's personnel file.

- 2014-0087 A Paralegal Specialist accessed FSFN Investigation #2014-189791 without a legitimate business reason. **Supported.**
- Corrective Action:** The employee was issued a verbal counseling and a copy of the report was placed in the employee's personnel file.
- Circuit 16** There were no cases closed in Circuit 16 during FY 2014-2015.
- Circuit 17**
- 2012-0135 Four Mental Health Technicians of a contracted provider falsified a Face Check Sheet, dated March 26, 2012, of observations they purportedly conducted on a resident. **Supported.** Another Mental Health Technician falsified a Face Check Sheet, dated December 13, 2012, of observations that she purportedly conducted on a resident. **Neither Supported Nor Refuted.**
- Corrective Action:** All five of the employees were terminated and a copy of the report was placed in the employees' personnel files. The contracted provider added video cameras to cover residential areas to improve monitoring of residents by nursing staff; implemented an electronic supervision system to document routine and special observations for all residents; and revised their "Supervision of Persons Served" policy to more clearly define staff responsibilities, including implementation of the electronic supervision system procedure.
- 2014-0016 A Lead Mental Health Technician of a contracted provider accessed confidential patient information without a legitimate business reason. **Supported.**
- Corrective Action:** The employee was terminated and a copy of the report was placed in the employee's personnel file.
- 2014-0066 A Senior Counselor of a subcontracted provider accessed records in FSFN Intake and Investigation #2014-122049 without a legitimate business reason. **Supported.** The Senior Counselor disclosed confidential information to an unauthorized individual relating to FSFN Intake and Investigation #2014-122049. **Supported.**
- Corrective Action:** The employee retired and a copy of the report was placed in the employee's personnel file. A Contract Manager reviewed the findings and agreed that there was policy, procedure, and practice in place to safeguard confidential client information and that an additional policy was not necessary.
- 2014-0151 A contracted provider improperly used contract funds to purchase exercise equipment in the amount of \$35,127.35 and to pre-pay a lease for vehicles in the amount of \$267,556.64. **Investigation Terminated.**

Corrective Action: The decision to terminate the investigation was based on information that the contracted provider staff misunderstood aspects of the contract regarding allowable expenditures, and notification that when the matter was brought to the attention of the contracted provider, the contracted provider reimbursed the contract funds to the Department. There was no evidence to suggest that intentional fraudulent activity had occurred.

Circuit 18

2014-0005

A Child Protective Investigator falsified child protective investigation records in FSFN Intake #2011-060884. **Supported.** The Child Protective Investigator accessed FSFN Intakes #2010-002628 and #2011-060884 without a legitimate business reason. **Supported.** The Child Protective Investigator misused her position by placing a child that was on her own caseload in her own custody. **Supported.**

Corrective Action: The employee resigned and a copy of the report was placed in the employee's personnel file. The Florida Certification Board was notified and the employee's Child Welfare Protective Investigator certification was revoked. Due to testimony that the accessing of FSFN cases without a legitimate business reason was not reported to the OIG as required, the Operations Manager conducted a training with staff regarding the requirements of mandatory reporting as outlined in CFOP 180-4.

2014-0028

A Licensing Specialist of a contracted provider falsified required monthly home visits to a foster home. **Neither Supported Nor Refuted.**

Corrective Action: The employee was terminated and a copy of the report was placed in the employee's personnel file.

2014-0088

A Counselor III failed to report known abuse to the Florida Abuse Hotline. **Investigation Terminated.**

Corrective Action: The decision to terminate the investigation was based on the determination that the Counselor III was not an employee of the Department or a contracted or subcontracted provider and the Department did not pay for any of the services provided by the Counselor III; therefore, the OIG did not have jurisdiction to investigate. The employee resigned and the matter was referred to the Department of Health Division of Medical Quality Assurance as the entity with jurisdiction over the Counselor III.

2014-0090

A Family Intervention Specialist of a subcontracted provider accessed FSFN Intake #2014-117355, a case of personal interest, without a legitimate business reason. **Supported.** The Family Intervention Specialist misused her position by attempting to influence law enforcement to issue a trespass warrant. **Neither Supported Nor Refuted.**

Corrective Action: The employee was issued a written counseling and a copy of the report was placed in the employee's personnel file.

2015-0049 A Clinician of a subcontracted provider falsified client records. **Investigation Terminated.**

Corrective Action: The decision to terminate the investigation was based on information that the employee was not paid with Department funds; therefore, the OIG did not have jurisdiction to investigate.

Circuit 19

2014-0064 A Dependency Case Manager of a contracted provider falsified a child protective supervision record in FSFN Case ID #2509935. **Supported.**

Corrective Action: The employee resigned and a copy of the report was placed in the employee's personnel file. The Florida Certification Board was notified and revoked the employee's Child Welfare Protective Investigator certification. The employee's Child Welfare Case Manager certification expired and remains inactive.

2014-0095 An Administrative Assistant of a subcontracted provider stole a client's debit card and committed identity theft. **Investigation Terminated.**

Corrective Action: The decision to terminate the investigation was based on the information that the program services under which the employee was paid are not part of the contract with the Department; therefore, the OIG did not have jurisdiction to investigate.

2014-0145 A Family Support Worker of a subcontracted provider accessed FSFN Case IDs #100298277, #100876616, and #101110740, cases of personal interest, without a legitimate business reason. **Supported.** The Family Support Worker disclosed confidential case information to an unauthorized individual. **Not Supported.**

Corrective Action: The employee was terminated and a copy of the report was placed in the employee's personnel file.

Circuit 20

2013-0075 A Child Protective Investigator falsified child protective investigation records in FSFN Investigation #2013-116557. **Supported.** The Child Protective Investigator falsified child protective investigation records in FSFN Investigation #2013-095920. **Supported.**

Corrective Action: The employee resigned and a copy of the report was placed in the employee's personnel file.

- 2013-0119 A Child Welfare Case Manager of a contracted provider falsified child protective supervision records in FSFN Case ID #2414270. **Supported.**
- Corrective Action:** The employee was terminated and a copy of the report was placed in the employee's personnel file.
- 2014-0014 A Child Protective Investigator Supervisor shared her Department unique personal identifiers with a Senior Child Protective Investigator. **Supported.** The Senior Child Protective Investigator used Department vehicles in an unauthorized manner. **Supported.** The Child Protective Investigator Supervisor condoned the practice of the Senior Child Protective Investigator using Department vehicles for personal use. **Not Supported.** A Program Administrator directed Child Protective Investigators to submit incomplete cases for closure on or before the 45th day so the Circuit's performance would appear to improve on the monthly statewide scorecards. **Not Supported.**
- Corrective Action:** The Child Protective Investigator Supervisor was issued a written counseling and was required to repeat Security Awareness training, and the Senior Child Protective Investigator resigned. A copy of the report was placed in the personnel files of the Child Protective Investigator Supervisor and the Senior Child Protective Investigator. A memorandum was sent out to all Circuit 20 Child Protective Investigators about security awareness and not sharing passwords. In addition, based on matters addressed in this investigation, Security Awareness and the State Vehicle Use policy was discussed at the September 2014 All Staff Meeting. The practice of authorizing state vehicle used through unit supervisors was changed; now one designated support staff individual oversees the vehicles.
- 2014-0036 A Child Protective Investigator mishandled FSFN Investigation #2013-307300-02, resulting in child safety being compromised. **Not Supported.** The Child Protective Investigator mishandled FSFN Investigation #2013-307300-01, resulting in child safety being compromised. **Not Supported.** The Child Protective Investigator mishandled FSFN Investigation #2010-232069-01, resulting in child safety being compromised. **Not Supported.**
- Corrective Action:** Although the findings of the investigation did not support any misconduct or a need for specific corrective actions, the importance of completing thorough child protective investigations and complying with Department policies and procedures was addressed in an All Staff Meeting. Based on the determination that the Child Protection Team and the Department use different terminology in the manner in which findings are concluded, which can lead to inconsistencies, Child Protection Team staff and Child Protective Investigators are now trained to ensure everyone uses the same terminology.
- 2014-0038 A Child Protective Investigator falsified child protective investigation records in FSFN Investigation #2013-324429. **Supported.**

Corrective Action: The employee resigned and a copy of the report was placed in the employee's personnel file.

2014-0039 A Child Protective Investigator falsified child protective investigation records in FSFN Investigation #2013-343366. **Supported.**

Corrective Action: The employee resigned and a copy of the report was placed in the employee's personnel file.

2014-0063 A Case Manager of a subcontracted provider had knowledge of the whereabouts of a missing foster child and failed to immediately report that information as required. **Supported.**

Corrective Action: The employee resigned and a copy of the report was placed in the employee's personnel file.

2014-0085 An Operations and Management Consultant II disclosed Florida Abuse Hotline reporter information in FSFN Investigation #2014-136386-01 to unauthorized individuals. **Neither Supported Nor Refuted.**

Corrective Action: The employee was issued a written reprimand and a copy of the report was placed in the employee's personnel file. Procedures regarding notification for staffings were modified and documents are no longer scanned and e-mailed to participants; the participants are now sent an e-mail including the case number, and each participant accesses the information directly from FSFN.

2014-0109 A Child Protective Investigator Supervisor accessed FSFN Intake #2014-248942 without a legitimate business reason. **Supported.**

Corrective Action: The employee was issued a verbal counseling and required to re-take Security Awareness training, and a copy of the report was placed in the employee's personnel file. The Operations Program Administrator addressed restrictions regarding the access of FSFN cases involving personally known individuals with all Child Protective Investigators at an All Staff Meeting.

2014-0154 A Child Protective Investigator Supervisor engaged in employee misconduct by having inappropriate sexual relationships with Department clients. **Not Supported.**

Corrective Action: No action required.

Institutions

2013-0125 A Florida State Hospital (FSH) Administrative Secretary misused her position by using her Capital Regional Medical Center (CRMC) hCare access privileges for personal benefit. **Supported.** The FSH Administrative Secretary accessed

CRMC hCare by using User IDs and passwords that were not assigned to her. **Supported.**

Corrective Action: The employee resigned and a copy of the report was placed in the employee's personnel file. FSH physicians and staff no longer have access to the CRMC hCare portal. The Office of Information Technology Services reviewed the Department's systems security policies and determined that existing language in the Department Security Agreement Form (CF 114), the information security operating procedures (CFOP 50-2 and CFOP 50-22), and the annual Security Awareness Training was sufficient.

2014-0022 A North Florida Evaluation and Treatment Center (NFETC) Security Officer misused approved administrative military leave by failing to report for military duty. **Supported.**

Corrective Action: The employee was terminated and a copy of the report was placed in the employee's personnel file.

2014-0041 An FSH Behavioral Program Specialist engaged in a personal relationship with a FSH resident currently residing at Northeast Florida State Hospital (NEFSH). **Supported.** The Behavioral Program Specialist accessed the desk file of the resident without a legitimate business reason. **Supported.**

Corrective Action: The employee resigned and a copy of the report was placed in the employee's personnel file. FSH limited access to the electronic desk file system with groups of disciplines identified to specify levels of access. FSH also created a form that was signed by all staff on September 1, 2014 (prior to the release of the OIG report), in which employees acknowledged that they could not access resident electronic medical records or other Protected Health Information unless it was directly related to the performance of their official job duties. All new employees will be asked to sign the acknowledgement form during new employee orientation.

2015-0050 An FSH Unit Treatment and Rehabilitation Senior Supervisor (UTRSS) II shared her desk file password with another supervisor. **Investigation Terminated.** An FSH UTRSS I used the desk file password of another supervisor. **Investigation Terminated.**

Corrective Action: The decision to terminate the investigation was based on information that the employees involved were being disciplined, and the matter was referred to the Office of Civil Rights.

Economic Self-Sufficiency (ESS) Customer Call Center

2013-0064 An Economic Self-Sufficiency Specialist I and another Economic Self-Sufficiency Specialist I misused their Department e-mail accounts by sending e-mails pertaining to the use of illegal drugs. **Supported.** The original Economic Self-Sufficiency Specialist I sent an inappropriate e-mail using his

Department e-mail account. **Supported.** The original Economic Self-Sufficiency Specialist I accessed a gambling website on his Department-issued computer. **Neither Supported Nor Refuted.** The original Economic Self-Sufficiency Specialist I accessed another Department employee's webmail account without authorization. **Supported.** The original Economic Self-Sufficiency Specialist I, the other Economic Self-Sufficiency Specialist I, and four other Economic Self-Sufficiency Specialist Is sent e-mails containing profane or inappropriate language using their Department e-mail accounts. **Supported.** The original Economic Self-Sufficiency Specialist I accessed another Department employee's webmail account without authorization. **Supported.**

Corrective Action: All six of the employees resigned and a copy of the report was placed in the employees' personnel files. The Director of the ESS Customer Call Center sent an e-mail to all ESS Customer Call Center staff reminding them of CFOP 50-22 and requesting that CFOP 50-22 be a discussion in each employee's monthly conference.

Summary of Management Reviews and Corrective Actions Completed

- 2013-0027 A management review was initiated to determine whether Circuit 4 and Circuit 7 Child Protective Investigators (CPIs) worked undocumented overtime hours for which they were not compensated, in violation of the Fair Labor Standards Act of 1938 (FLSA). The management review revealed that the majority of the CPIs accessed FSFN and/or used their Department-issued cellular telephones on days in which they did not claim work time in People First.
- Corrective Action:** The Regional Managing Director has implemented frequent and regular discussions with staff regarding the FLSA. The Assistant Secretary for Operations, through the Assistant Secretary for Administration, issued a memorandum to operational staff reiterating the importance of compliance with the FLSA and pertinent section of CFOP 60-01, addressing proper time recording and review of time records. The memorandum directed staff to confer with Human Resources Shared Services for clarification of any questions or issues staff might have as to proper compliance with CFOP 60-01, and provided staff with the OIG's 24-hour FLSA hotline number that is available for reporting alleged violations.
- 2013-0053 A management review was initiated to determine whether Circuit 20 CPIs worked undocumented overtime hours for which they were not compensated, in violation of the FLSA. The management review revealed that the majority of the CPIs accessed FSFN on days in which they did not claim work time in People First.
- Corrective Action:** The Regional Operations Manager reminded circuit staff about the proper use and documentation of their work hours in All Staff Meetings held in June 2015. The Assistant Secretary for Operations, through the Assistant Secretary for Administration, issued a memorandum to operational staff reiterating the importance of compliance with the FLSA and pertinent section of CFOP 60-01, addressing proper time recording and review of time records. The memorandum directed staff to confer with Human Resources Shared Services for clarification of any questions or issues staff might have as to proper compliance with CFOP 60-01, and provided staff with the OIG's 24-hour FLSA hotline number that is available for reporting alleged violations.
- 2013-0062 A management review was initiated to determine whether Circuit 17 and Circuit 19 ACCESS employees worked undocumented overtime hours for which they were not compensated, in violation of the FLSA. The management review revealed that just over half (56%) of Circuit 17 ACCESS employees and just under half (47%) of Circuit 19 ACCESS employees accessed the ACCESS Management System (AMS) and/or FLORIDA systems on days in which they did not claim work time in People First.
- Corrective Action:** FLSA training information was personally discussed with all staff by the Director and Operations Manager to ensure a clear

understanding of rules and procedures regarding overtime and case processing, and the information will be discussed with all new staff as part of on-boarding activities. Supervisors and Administrators began randomly monitoring staff office activity after 5:00 p.m. All staff were advised that if they worked any hours that they did not claim, they were to advise their supervisor, who will recall the timesheet and allow the staff member to correct it. The Assistant Secretary for Operations, through the Assistant Secretary for Administration, issued a memorandum to operational staff reiterating the importance of compliance with the FLSA and pertinent section of CFOP 60-01, addressing proper time recording and review of time records. The memorandum directed staff to confer with Human Resources Shared Services for clarification of any questions or issues staff might have as to proper compliance with CFOP 60-01, and provided staff with the OIG's 24-hour FLSA hotline number that is available for reporting alleged violations.

2013-0063

A management review was initiated to determine whether Circuit 15 CPIs worked undocumented overtime hours for which they were not compensated, in violation of the FLSA. The management review revealed that the majority of the CPIs accessed FSFN and/or used their Department-issued cellular telephones on days in which they did not claim work time in People First.

Corrective Action: The Assistant Secretary for Operations, through the Assistant Secretary for Administration, issued a memorandum to operational staff reiterating the importance of compliance with the FLSA and pertinent section of CFOP 60-01, addressing proper time recording and review of time records. The memorandum directed staff to confer with Human Resources Shared Services for clarification of any questions or issues staff might have as to proper compliance with CFOP 60-01, and provided staff with the OIG's 24-hour FLSA hotline number that is available for reporting alleged violations.

2014-0013

A management review was initiated to determine whether Circuit 5 management falsified People First timesheets, resulting in CPIs not being properly compensated for overtime hours, in violation of the FLSA. The management review did not reveal any evidence that the supervisors changed employee timesheets.

Corrective Action: The Operations Manager and Program Administrators met for the monthly Circuit Family Safety Management team meeting and discussed FLSA and the requirement to ensure that CPIs are compensated for all hours worked. Program Administrators met with their respective supervisors to review the OIG report and look for weaknesses with staff processes, to address them locally, and the local teams provided a bullet summary of opportunities for improvement and how to improve each item by June 10, 2015. The Assistant Secretary for Operations, through the Assistant Secretary for Administration, issued a memorandum to operational staff reiterating the importance of compliance with the FLSA and pertinent section of CFOP 60-01, addressing proper time recording and review of time records. The memorandum directed staff to confer with Human Resources Shared Services

for clarification of any questions or issues staff might have as to proper compliance with CFOP 60-01, and provided staff with the OIG's 24-hour FLSA hotline number that is available for reporting alleged violations.

2014-0092

A management review was initiated to review the following three issues:

- Whether children under the case management of a contracted provider and a subcontracted provider were housed overnight in offices and hotels, if so, to what extent. The management review found that 11 children under the subcontracted provider's case management were housed overnight in the subcontracted provider's offices and hotels in three cities on various dates between April 2014 and November 2014. Offices and hotels are not licensed, and cannot be licensed, for the temporary or permanent placement of dependent children.
- Whether any attempt by the contracted provider or the subcontracted provider was made to conceal information about children being housed overnight in offices and hotels. No conclusive information was obtained during the course of the management review to implicate contracted provider or subcontracted provider employees in attempting to conceal information about the overnight housing of children in offices or hotels.
- What circumstances led to the overnight housing of children in offices and hotels, and what recommendations would prevent similar events in the future. The management review revealed that there was a significant influx of children into the subcontracted provider's case management during 2014, with a 36.1% increase in the number of children served between October 2013 and October 2014. There are an insufficient number of traditional foster parents, and an absence of licensed therapeutic foster homes, in the counties served by the subcontracted provider, with only 11 licensed therapeutic foster homes in the remaining two counties in the circuit.

Corrective Action: The Deputy Secretary and the Assistant Secretary for Child Welfare agree that foster children under the supervision of the Department, a Community-Based Care (CBC) Lead Agency, or a subcontracted provider organization must ensure children served in out-of-home care are not housed overnight in any unlicensed facility. The recruitment of traditional and therapeutic placements is a critical tool to ensure the stabilization and safety of the children served in out-of-home care. As one of its 2015 Priorities of Efforts, the Office of Child Welfare and Department Region Leadership partnered with CBC Leadership to launch a Fostering Success Statewide Recruitment Campaign, which seeks to achieve and maintain a sufficient capacity of quality family foster homes statewide.

Systemically, the Office of Child Welfare believes each CBC Lead Agency understands its directive and obligation to place children in only licensed or

approved placements following the successful completion of a favorable home study and background check. To that end, the Office of Child Welfare believes direction and continued communication to be the key to continued reinforcement of this provision in rule.

Finance equities and fiscal responsibility is a major component of the Department's efforts to support service availability for the youth and families served by this agency as demonstrated by the Office of Administration's 2015 Priority of Effort: Monitor Financial Model for System of Community-Based Care. The end state of the effort will position the Department and CBC organizations to have a deeper understanding of how each System of Care operates and how each can most effectively administer and analyze expenditures dedicated to serving vulnerable children and their families. This initiative is slated for completion by December 2015.

The Secretary issued a memorandum to all Regional Managing Directors (RMDs) and all Community-Based Care Lead Agency CEO's on June 17, 2015, clearly stating that no child that has been removed from their home shall be allowed, directed, or otherwise put in a position to sleep or spend any significant, extended period of time in an office, hotel/motel, or other unapproved or unlicensed placement. The memorandum further requires that any time there is such a situation, the CEO of the lead agency must notify the RMD; providing the child's name, the location, and any other pertinent details. Additionally, the CEO will also be required to contact the RMD once a licensed or approved placement is made.