

A Second Chance Inc.
Report on Contract Compliance Procedures
For the Period
July 1, 2009 through June 30, 2010
(Non-Audit Service)

October 18, 2010

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September 30, 2010

Mr. Marc Cherna
Director
Department of Human Services
One Smithfield Street
Fourth Floor
Pittsburgh, PA 15222

Subject: A Second Chance Inc. Report on Contract Compliance Procedures
For the Period July 1, 2009 through June 30, 2010

Dear Mr. Cherna:

We performed certain procedures to determine A Second Chance Inc.'s (ASCI) compliance with its contract #102152 with the Allegheny County Department of Human Services for the period July 1, 2009 through June 30, 2010. These procedures were performed as a non-audit service. Therefore, this engagement is not covered by Generally Accepted Government Auditing Standards. Our purpose was to analyze and review A Second Chance Inc.'s expenses funded by Allegheny County.

For the service period July 1, 2009 through June 30, 2010, Allegheny County paid ASCI \$12,780,236 for Kinship Foster Care services. This included \$1,049,367 from an advance that was applied to June services.

Our procedures revealed that ASCI is not consistently maintaining required service documentation resulting in disallowed costs of \$32,599. Additionally, documentation to support delays in caregiver certifications was not adequate and resulted in an additional \$3,700 in disallowed costs. We also noted that a sample of employees did not obtain the required number of hours in annual training.

Mr. Marc Cherna
September 30, 2010

Our procedures also found that the Department of Human Services needs to improve its internal processes for documenting and retaining changes to provider service provisions incorporated into its contracted agreements.

We would like to thank the management and staff of ASCI for their courtesy and cooperation during our review.

Very truly yours,



Lori A. Churilla
Assistant Deputy Controller, Auditing



MARK PATRICK FLAHERTY
Controller

cc: Honorable Rich Fitzgerald, President, County Council
Honorable William Russell Robinson, County Council
Honorable Dan Onorato, Chief Executive, Allegheny County
Mr. James M. Flynn Jr., County Manager, Allegheny County
Mr. Randolph Brockington, Deputy Director, Department of Human Services
Mr. William Pagonis, Administrator, Department of Human Services
Dr. Sharon Lowe, President and CEO, A Second Chance Inc.
A Second Chance Inc. Board of Directors
Ms. Amy Griser, Budget Director, Allegheny County
Mr. Joseph Catanese, Director of Constituent Services, County Council
Ms. Jennifer Liptak, Budget Director, County Council
Mr. Guy A. Tumolo, Deputy Controller, County Controller's Office
Ms. Pamela Goldsmith, Communications Director, County Controller's Office

EXECUTIVE SUMMARY

Purpose:

The purpose of this engagement was to analyze and review A Second Chance Inc.'s expenditures funded by Allegheny County for the period July 1, 2009 through June 30, 2010.

Background:

A Second Chance Inc. (ASCI) provides Kinship Care services for foster children placed with a family member or family acquaintance by the Allegheny County Office of Children, Youth and Families. Kinship foster care is temporary care provided to children and youth who are unable to remain in their own home and are placed in the custody of the County by the Courts. ASCI performs case management and ensures that the caregiver becomes a certified foster parent eligible for payment. The agency also provides ancillary services to the Kinship Care families that include in-home clinical services, various support and activity groups for children, and parenting classes for birth parents.

ASCI also maintains a regional office in Philadelphia that provides kinship emergency services, foster care and family group decision making services.

As of the date of this report, ASCI received \$12,780,236 from Allegheny County for services rendered from July 1, 2009 through June 30, 2010. This included \$1,049,367 from an advance that was applied to June services.

Results in Brief:

Our testing disclosed:

Finding #1:

ASCI has not consistently maintained the required documentation for children in the Kinship Care program which meets the requirements of its contract or supports all of the services rendered. Out of 60 children tested, ASCI could not provide:

- Individual Service Plans for 2 children (3%) resulting in 150 days and \$6,450 disallowed,
- 19 months of Safety Assessments for 10 children (17%) resulting in 552 days and \$24,816 disallowed,
- 15 months of School Records for 3 children (5%),
- 23 Monthly Reports for 11 children (18%), and
- The Service Authorization for one child (2%) and the case file for another child (2%) until after our exit meeting.

EXECUTIVE SUMMARY

Additionally, ASCI did not conduct a home visit for one of three (33%) college students tested resulting in a disallowed cost of \$1,290, and was overpaid by CFY \$43 for one day of service.

Finding #2:

ASCI is not consistently maintaining sufficient documentation in the case file to explain the delay in certifications for caregivers and does not maintain written correspondence with CYF regarding the delays. Of 74 caregivers tested, 21 (28%) were not certified within 60 days of referral. Of these 21 certifications:

- 8 (38%) were late due to non-compliance of the caregiver regarding submittal of documentation, completing a physical, etc.,
- 6 (29%) were late due to ASCI performing additional procedures regarding the caregiver's criminal background check,
- 3 (14%) appeared to be late due to the misplacement of documents, and
- ASCI could not provide a reason for the delay in certification for 4 (19%) caregivers.

ASCI failed to meet the expectation for documentary evidence for the four caregivers for which no reason for the delay in certification could be provided. Therefore, we disallowed the administrative fee associated with those four cases in the amount of \$3,700. The administrative fee was calculated as the difference between the per diem rate paid by Allegheny County to ASCI and the per diem rate paid by ASCI to the caregiver. We allowed the payments for the first 60 days of service, but disallowed the days until the caregiver was certified.

We also noted that certification was not obtained prior to case closure for 3 (4%) caregivers tested although the case was open over 60 days. In addition, the required Foster Parent's Agreement could not be provided for 4 (5%) caregivers.

Finding #3:

4 of 25 (16%) ASCI direct care employees tested appear to not have completed the 40 hours of annual training required by the Department of Public Welfare regulations.

EXECUTIVE SUMMARY

We noted that ASCI is currently tracking training hours in both its human resources and training departments. For all four employees above, neither human resources nor the training department provided records totaling 40 hours. Furthermore, the hours recorded as completed were inconsistent between the two departments.

Finding #4:

The Department of Human Services (DHS) has the authority to waive required criteria for providers that it has imposed through contract provisions and policies that are not requirements of the state or federal governments. However, our procedures found that DHS does not formalize these waivers in writing.

Recommendations:

We recommend that A Second Chance Inc.:

Recommendation #1:

- Repay Allegheny County \$32,599 in disallowed costs.
- Ensure all appropriate documentation is enclosed in the case files through the implementation of additional review procedures.
- Reinforce through training the importance of maintaining the case file with all required documentation.
- Maintain all signed Service Authorizations in the child's case file.

Recommendation #2:

- Repay Allegheny County \$3,700 in disallowed costs.
- Improve its case file documentation regarding obstacles to certifying caregivers within 60 days from referral.
- Initiate and maintain written communication with CYF that includes both parties acknowledgement of the need for more time when certification will not be completed within 60 days from referral.
- Ensure that all required documentation for a caregiver is maintained in the case file.

Recommendation #3:

- Ensure that all direct care employees obtain at least 40 hours of annual training to remain compliant with Department of Public Welfare regulations.

EXECUTIVE SUMMARY

- Ensure the use and retention of sign-in sheets for all training sessions that include the administrator, training topic(s), total hours, employee's name, signature, and date.
- Utilize a database to track training hours by employee that is periodically reviewed for compliance.
- Assign the responsibility of maintaining proper documentation to one department.

We recommend that the Department of Human Services:

Recommendation #1:

- Develop a repayment plan to ensure the \$32,599 in disallowed costs is received from ASCI.
- Ensure that the caseworker signs and dates all Service Authorizations.

Recommendation #2:

- Require providers to maintain written documentation between the parties regarding extensions or changes to compliance requirements.
- Develop a repayment plan to ensure the \$3,700 in disallowed costs is received from ASCI.

Recommendation #4:

- Implement a policy by which DHS management is required to document all waivers from or changes to service requirements in writing to then be incorporated into the contract document through an amendment.

I. Introduction

Background:

A Second Chance Inc. (ASCI) provides Kinship Care services for foster children placed with a family member or family acquaintance by the Allegheny County Office of Children, Youth and Families (CYF). Kinship foster care is temporary care provided to children and youth who are unable to remain in their own home and are placed in the custody of the County by the Courts. Kinship foster parents are qualified individual (s), including family, who have an existing relationship with the child or family.

ASCI serves approximately 1,500 children a year. It performs case management and assures that the caregiver becomes an approved foster parent eligible to receive foster care payments. The agency also provides ancillary services to the Kinship Care families that include in-home clinical services, various support and activity groups for children, and parenting classes for birth parents. Transportation is provided for medical appointments, supervised visits, etc. In addition to the Pittsburgh location, ASCI maintains a regional office in Philadelphia that provides kinship emergency services, foster care and family group decision making services.

The Department of Human Services (DHS) pays ASCI a daily rate per child based on the child's Placement Assessment Tool (PAT) level, which is determined by CYF prior to placement. This rate includes the amount that ASCI is to pay to the caregiver. The CYF contract manual sets the minimum daily reimbursement rate that ASCI must pay the caregiver.

Typically, ASCI provides a monthly check to the caregiver. However, if the foster child is a college student residing on campus, Allegheny County DHS pays a daily stipend directly to the child. When the child is in the home with the caregiver, ASCI will pay the caregiver.

As of the date of this report, ASCI received \$12,780,236 from Allegheny County for services rendered from July 1, 2009 through June 30, 2010. This included \$1,049,367 from an advance that was applied to June services.

II. Scope & Methodology

Our procedures evaluated A Second Chance Inc.'s (ASCI) compliance with its contract #102152 for the period July 1, 2009 through June 30, 2010. Specifically, we performed the following:

- Interviewed ASCI personnel to gain an understanding of the program and billing/payment processes.
- Reviewed applicable regulations, ASCI's agreement with Allegheny County, Board minutes, and the policies and procedures manual.
- Analyzed the bank account to ensure that Allegheny County payments were properly deposited by ASCI.
- Completed an Internal Control Questionnaire to determine compliance with internal control procedures.
- Analyzed third party revenues collected to determine if any revenue should have been offset against the expenses billed to Allegheny County.
- Performed detail testing of a sample of billed services. This included comparing billed units to supporting service documentation and rates to the contract.
- Performed detail testing of a sample of payments to foster caregivers. This included comparing the days paid to caregivers to days paid by Allegheny County to ASCI.
- Examined documentation related to certification for a sample of foster caregivers.
- Examined clearances and documentation of minimum training requirements for a sample of employees.

We conducted our procedures during July and August 2010. We provided a draft copy of this report for comment to ASCI and the Department of Human Services. ASCI's response begins on page 17. The response from the Department of Human Services begins on page 21.

III. Findings and Recommendations

Finding #1

Lack of Required Documentation Results in Disallowed Costs of \$32,599

A Second Chance Inc. (ASCI) is to maintain for each child and family referred by Allegheny County Office of Children, Youth and Families (CYF) a record that is adequate for planning and evaluating the case, providing a means of communication among all persons contributing to the case, and furnishing documentary evidence of progress and response to the case. The CYF Specifications Manual, which is an incorporated part of the contracted agreement, requires specific information to meet these criteria including:

- The completion of an Individual Service Plan (ISP), which includes the goals and objectives for the child/family while in the program, within 30 days of placement.
- The completion and documentation of the child's record in a safety assessment on each home visit that is to occur at least once every 30 days.
- Enrolling the child in the appropriate education program and maintaining quarterly report cards.
- Submitting a progress report monthly for each child serviced under the agreement.

Our testing found that ASCI has not consistently maintained the required documentation for children in the Kinship Care program which meets the requirements of its contract or supports all of the services rendered. Out of 60 children tested, ASCI could not provide:

- Individual Service Plans for 2 children (3%) resulting in 150 days and \$6,450 disallowed,
- 19 months of Safety Assessments for 10 children (17%) resulting in 552 days and \$24,816 disallowed,
- 15 months of School Records for 3 children (5%),

III. Findings and Recommendations

- 23 Monthly Reports for 11 children (18%), and
- The Service Authorization for one child (2%) and the case file for another child (2%) until after our exit meeting. We requested this information several times during our fieldwork, and DHS requested it from the CEO.

Additionally, ASCI is to provide service for college students while the student is staying in the foster home. We found that ASCI did not conduct a home visit for one of the three (33%) college students tested. Even though the student was home for a total of 30 days over winter break, a home visit was not conducted, resulting in a disallowance of \$1,290.

We also noted that CYF overpaid ASCI \$43 for one day of service due to a discrepancy in the discharge date of the child from the caregiver's home. The caregiver did not receive payment for this day.

RECOMMENDATIONS

We recommend that A Second Chance Inc.:

- Repay Allegheny County \$32,599 in disallowed costs.
- Ensure all appropriate documentation is enclosed in the case files through the implementation of additional review procedures.
- Reinforce through training the importance of maintaining the case file with all required documentation.
- Maintain all signed Service Authorizations in the child's case file.

We recommend that the Department of Human Services:

- Develop a repayment plan to ensure the \$32,599 in disallowed costs is received from ASCI.

III. Findings and Recommendations

- Ensure that the caseworker signs and dates all Service Authorizations.

III. Findings and Recommendations

Finding #2

Lack of Sufficient Documentation Regarding Delay in Caregiver Certification Results in \$3,700 in Disallowed Costs

A Second Chance Inc. (ASCI) is contracted to ensure the caregiver becomes an approved foster parent for the child and is eligible to receive foster care payments. Pennsylvania Department of Public Welfare regulations on foster family care agencies require that certification by the agency be completed within 60 days. Due to the facts that CYF places the child with the caregiver prior to referring the case and only the Allegheny County Courts can decide to change a child's placement from the home, service to the family and subsequent payment by CYF will continue beyond the 60 days without certification. However, the agency is to maintain for each child and family a record that is adequate for planning and evaluating the case, providing a means of communication among all persons contributing to the case, and furnishing documentary evidence of progress and response to the case.

Our procedures found that ASCI is not consistently maintaining sufficient documentation in the case file to explain the delay in certifications for caregivers and does not maintain written correspondence with CYF regarding the delays. Of 74 caregivers tested, 21 (28%) were not certified within 60 days of referral. The days late, which is the number of days beyond 60, ranged from 5 to 94 days. Of these 21 certifications, we found that:

- 8 (38%) were late due to non-compliance of the caregiver regarding submittal of documentation, completing a physical, etc.,
- 6 (29%) were late due to ASCI performing additional procedures regarding the caregiver's criminal background check,
- 3 (14%) appeared to be late due to the misplacement of documents, and
- ASCI could not provide a reason for the delay in certification for 4 (19%) caregivers.

We concluded that ASCI failed to meet the expectation for documentary evidence for the four caregivers for which no reason for the delay in certification could be provided.

III. Findings and Recommendations

Therefore, we disallowed the administrative fee associated with those four cases in the amount of \$3,700. The administrative fee was calculated as the difference between the per diem rate paid by Allegheny County to ASCI and the per diem rate paid by ASCI to the caregiver. We allowed the payments for the first 60 days of service, but disallowed the days until the caregiver was certified.

We also noted that certification was not obtained prior to case closure for 3 (4%) caregivers tested although the case was open over 60 days. In addition, the required Foster Parent's agreement could not be provided for 4 (5%) caregivers.

RECOMMENDATIONS

We recommend that A Second Chance Inc.:

- Repay Allegheny County \$3,700 in disallowed costs.
- Improve its case file documentation regarding obstacles to certifying caregivers within 60 days from referral.
- Initiate and maintain written communication with CYF that includes both parties acknowledgement of the need for more time when certification will not be completed within 60 days from referral.
- Ensure that all required documentation for a caregiver is maintained in the case file.

We recommend that the Department of Human Services:

- Require providers to maintain written documentation between the parties regarding extensions or changes to compliance requirements.
- Develop a repayment plan to ensure the \$3,700 in disallowed costs is received from ASCI.

III. Findings and Recommendations

Finding #3

Direct Care Employees Did Not Obtain the Required 40 Hours of Annual Training

The Department of Public Welfare regulations require that direct care staff and supervisors must receive a minimum of 40 hours of training within the first year of employment and annually thereafter. It further requires that evidence of required training and education be maintained in the personnel records.

A Second Chance Inc. is currently tracking training hours in both its human resources and training departments. Human resources utilizes a training log calendar year sheet completed by the employee quarterly that is to record all training sessions attended, dates and hours. However, we noted that the employee does not always fill-in all of the required fields. The training department utilizes a sign-in sheet for each session that is to have the hours and administrator at the top and employee signatures below. However, we noted that sometimes the names are written or typed in by one individual or the hours may not be recorded.

Our testing revealed that 4 of 25 (16%) direct care employees tested appear to not have completed the required 40 hours of annual training. For all four employees, neither human resources nor the training department provided records totaling 40 hours. Furthermore, the hours recorded as completed were inconsistent between the two departments.

RECOMMENDATIONS

We recommend that A Second Chance Inc.:

- Ensure that all direct care employees obtain at least 40 hours of annual training to remain compliant with Department of Public Welfare regulations.
- Ensure the use and retention of sign-in sheets for all training sessions that include the administrator, training topic(s), total hours, employee's name, signature, and date.

III. Findings and Recommendations

- Utilize a database to track training hours by employee that is periodically reviewed for compliance.
- Assign the responsibility of maintaining proper documentation to one department.

III. Findings and Recommendations

Finding #4

The Department of Human Services Needs to Improve Contract Documentation

The Department of Human Services (DHS) has the authority to waive required criteria for providers that it has imposed through contract provisions and policies that are not requirements of the state or federal governments. However, our procedures found that DHS does not formalize these waivers in writing.

Contract compliance testing is hampered when changes to the service provisions are only communicated verbally and not documented in writing. Numerous verbal and written requests were required to obtain confirmation from the appropriate DHS personnel in order to confirm assertions by the provider that specific service provisions were amended for its agency. Without confirmation, the provider may have had costs disallowed.

Additionally, a written policy of changes to service provisions serves as a tangible point of reference for the contracted parties as well as third parties to examine. Misunderstanding on the part of the contracted parties could occur if there is a change in management of either party and there is no formalized document to reference.

RECOMMENDATIONS

We recommend that the Department of Human Services implement a policy by which DHS management is required to document all waivers from or changes to service requirements in writing to then be incorporated into the contract document through an amendment.

October 10, 2010

Lori Churilla
Assistant Deputy Controller, Auditing
Allegheny County Controller's Office
436 Grant Street, Room 104
Pittsburgh, PA 15219-2498

RE: A Second Chance, Inc.
8350 Frankstown Avenue
Pittsburgh, PA 15221

Report on Contract Compliance Procedures for the Period July 1, 2009 – June 30, 2010

Dear Ms. Churilla:

Please find enclosed the plan of correction response for A Second Chance, Inc. The plan of correction addresses findings noted in the Contract Compliance Procedures review completed in July and August, 2010. This written plan contains the action steps that will be completed to resolve the areas noted based on the exit interview held on September 13, 2010 and receipt of said report on October 4, 2010.

As noted in the exit interview, A Second Chance, Inc. seeks to ensure that every child touched has a right to be safe and must thrive. Therefore, we appreciate your feedback and will work diligently to improve the targeted areas.

Finally, I want to commend the professional manner in which you approached your work with us. As you explained, DHS asked that this audit commence on their behalf as a part of their due diligence. We applaud DHS' effort to ensure that it's providers are meeting their contracted obligations.

In closing, if you have any questions or concerns, please feel free to contact me or Bryan Ulishney at (412) 342-0600. Thank you again.

Sincerely,



Dr. Sharon Lowe
President & CEO

CC: Marc Cherna, Director, Department of Human Services
Randy Brockington, Deputy Director, Department of Human Services
Dr. Marcia Sturdivant, Deputy Director, ACCYF
Brace Lowe, Sr. Executive Vice President of Child & Family Services
Bryan Ulishney, Sr. Executive Vice President of, Finance and Operations
Lisa Walker, Sr. Vice President of TECD & Quality Improvement
Timothy Gonzalez, Sr. Vice President of Child and Family Service

Enclosure

Corporate

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Pittsburgh PA 15221

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Regional

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**Original Plan -
A Second Chance, Inc.**
Response to Contract Compliance Procedures for
Period: July 1, 2009 – June 30, 2010
Response Date: October 10, 2010

A Second Chance, Inc. has a plan to address ongoing areas of improvement with the Kinship Foster Care families serviced. In addition, as requested, we have responded to each scope of service finding outlined in the report presented on October 4, 2010.

SCOPE OF SERVICE REPORT	
<p>Lack of required documentation: out of 60 children.</p> <ul style="list-style-type: none"> • (3%) ISPs for 2 children. • (17%) 19 months of SAs for 10 children. • (5%) 15 months of school records. • (18%) 23 monthly reports for 11 children • (2%) Service Authorization. • (33%) 1 of 3 college age youth not visited during school breaks. • CYF overpaid ASCI for one day of service due to discrepancy in discharge date. <p>Results: Disallowed costs of \$32, 599</p>	<p>ASCI will ensure the following to address this finding area:</p> <ul style="list-style-type: none"> • All supervisors and caseworkers will be retrained relative to the agency protocol and expectations in regard to Contract compliance findings. • Relative to visits occurring every 30 days – POC management staff and casework staff were re-trained on the contract specification in June, 2010, as the prior stated language being used internally outlined an expectation that visits are to be completed 1x per month which was too broad and open to erred interpretation. The expectation was re-defined more specifically and includes the frequency to be 1 visit due for each 30 day period (e.g., If the most recent visit was completed on 5/15/10; then the next visit would be due by 6/15/10). • Program and operations management will emphasize the importance of timely completion and tracking of Safety Assessments, monthly reports and ISPs, holding staff more accountable for missed timeframes, timely review and supervisor sign off, submission to support staff and ultimate send out to CYF within 24 hours, 10 days for Monthly Report and within 30days and every 6 months thereafter. • ASCI caseworker has received refresher training and protocols established to request school records every quarter from KCGs and school personnel. • ASCI supervisors have been trained to access Service Authorization letters and will ensure attainment by the point of certification. • The College Aged Youth protocol requires ASCI caseworkers to have contact with KCG and Kinship young adult during school breaks and document the face to face contact on a Safety Assessment. This will be added to supervisory tracking and there will be refresher training on the protocol by October 15, 2010. • The implementation of KIDs (Key Information and Demographic System) on August 23, 2010 by CYF will improve the communication between ASCI and CYF relative to contractual compliance of ISPs, Safety Assessments, and Monthly reporting. • All documentation listed above must be input into the KIDs by the required timeframes. • In addition, all casework and supervisory staff have received initial, completion of ISPs, Safety Assessment, and Monthly reports trainings on KIDs. • A KIDs protocol and contingency plan was developed to address the new contractual requirement and incidents of when the system may not be fully operational. • ASCI has revamped the audit and Record Management retrieval procedure to

	<p>support a seamless process during subsequent audits in September, 2010.</p> <ul style="list-style-type: none"> • ASCI has restructured the record management and filing procedure from a decentralized to centralized process. This insists on the filing and tracking of all case records in the ASCI system, effective September, 2010. • The Quality Review department will conduct quarterly internal audits. • ASCI and CYF fiscal departments currently reconcile any differences in dates/days on a detailed client-by-client basis for each submitted monthly invoice. Only after the discrepancies are reconciled does ASCI then generate the payments to the caregiver to ensure proper payment. As an additional safeguard, upon receipt of the invoice payment by CYF and the resulting back-up reports detailing the amount of the payment, ASCI will reconcile again the amount received on a client-by-client basis to ensure the amounts received match that of the original ASCI/CYF reconciliation and resulting payments to caregivers. • ASCI will reimburse Allegheny County for disallowed costs by October 31, 2010.
<p>Lack of sufficient documentation regarding delay in Caregiver Certification</p> <ul style="list-style-type: none"> • 8 (38%) were late due to non compliance of the KCG. • 6 (29%) were late due to ASCI performing additional procedures such as criminal background checks • 3 (14%) appeared to be late due to the misplacement of documentation • ASCI could not provide reasons for 4 (19%) of caregivers. <p>Results: Disallowed costs of \$3700.00</p>	<p>ASCI will ensure the following to address this finding area:</p> <ul style="list-style-type: none"> • ASCI has a 48C process also know as a Non compliance policy to address this with KCGs and notify CYF. If an ASCI KCG does not comply with request to complete certification requirements written notification is sent to KCG and CYF caseworker. A staffing is held and KCG's given an agreed upon timeframe to complete the outstanding requirement. ASCI consistently received verbal agreement from CYF to delay certification pending completion of task by due date. ASCI's goal is to ensure resolution on non compliance matters within 45 days of referral. • There are special circumstances that ASCI has identified that require additional follow up prior to certification. When certification is delayed due to situations; ASCI sends written notification to Children, Youth and Families Deputy Director, Regional Office Director, Supervisor, and Caseworker of the record. These situations include: Waivers of Department of Public Welfare regulations due to medical conditions such as Hepatitis and TB; over 6 children, FBI exemption and under 21 years of age and criminal record dispositions that are unreported, • ASCI will maintain written documentation with CYF that includes acknowledgement of the delay in certification and CYFs agreement that the certification will not be completed in 60 days of the referral date. • ASCI has provided documentation training for casework and supervisory staff on the requirements for 48 C, special circumstances, communication and acknowledgement by CYF. • ASCI leadership will engage CYF Regional Office Directors and the Contract Monitor to improve communication and compliance of this requirement. • ASCI will reimburse Allegheny County for disallowed costs by October 31, 2010.

<p>ASCI require direct staff and supervisors receive 40 hours of training with in the first year of employment and every year thereafter.</p> <ul style="list-style-type: none"> • 4 of 25 (16%) direct care employees tested appeared to not have completed the required 40 hours of annual training. • Neither employee Relations nor TECD provided records totaling 40 hours. 	<p>ASCI will ensure the following to address this finding area:</p> <ul style="list-style-type: none"> • A Second Chance, Inc's. Employee Relations and Training, Education, and Community Developments (hereafter, TECD) will be more diligent in ensuring that all training information is reflected in all personnel files. All initial training information will be housed in the respective employee's personnel file, as well as, electronically saved within our HR database system through ADP. • All annual First Aide, CPR and De-Escalation training information will be reflected within a booklet that is specifically for training information and will be housed within the Employee Relations department with TECD housing the duplicate booklet. • TECD will maintain training packets for all training sessions that include: Facilitator, sign-in sheets, total hours, employee's names, signatures, and date in order to have easy access for all trainings completed by the organization. • The Quality Review department will complete Quarterly reviews of this process.
<p>The Department of Human Services has the authority to waive required criteria for providers that it has imposed through contract provisions and policies that are not requirements of the state or federal governments.</p> <p>DHS did not formalize these waivers of contractual requirements in writing.</p> <p>The every 15 day face to face visitation.</p> <p>The Kinship Caregiver receives 24 hours of training.</p>	<p>In collaboration with CYF, ASCI will ensure the following to address this finding area:</p> <ul style="list-style-type: none"> • Dr. Lowe and Dr. Sturdivant have discussed this area and have agreed to continue the mutual collaborative relationship in order to continue to address areas where both organizations improve at all levels of the respective organizations.

Acronym Legend:

ADP: Automatic Data Processing
ASCI: A Second Chance, Inc.
CPR: Cardiopulmonary Resuscitation
CYF: Children, Youth, and Families
ISP: Individual Service Plan
KCG: Kinship Caregiver
KIDS: Key Information and Demographic System
POC: Point of Contact

TB: Tuberculosis
TECD: Training, Education, and Community Development

ALLEGHENY COUNTY DEPARTMENT OF HUMAN SERVICES

Marc Cherna, Director

Dan Onorato, Allegheny County Executive



Randolph W. Brockington, Deputy Director
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Human Services Building – Suite 500
One Smithfield Street
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www.alleghenycounty.us/dhs

October 14, 2010

Lori Churilla
Assistant Deputy Controller, Auditing
104 Courthouse
436 Grant Street
Pittsburgh, PA 15219-2498

Re: A Second Chance, Inc. Draft Report on Contract Compliance Procedures for the Period of July 1, 2009 through June 30, 2010.

Dear Ms. Churilla,

Noted below is our corrected response to the findings noted in the above compliance report.

Upon issue of the final report the Department of Human Services will:

1. Establish a repayment plan with A Second Chance, Inc. for \$36.299 in disallowed costs.
2. Enforce the requirement that caseworkers sign and date all Service Authorizations.
3. Require that all procedural or policy waivers as applied to service providers under contract with the department will be incorporated into the agreement by way of contract amendment or modification as instructed by the County Law Department.

Please contact me at 412.350.5203 should your office have additional questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Randolph W. Brockington".

Randolph W. Brockington
Deputy Director

cc. Catherine Adekoya, Administrator