

## Florida Network for Youth and Family Services Compliance Monitoring Report for



Tampa Housing Authority 5301 West Cypress Avenue Tampa, Florida 33607

**Compliance Monitoring Services Provided by** 



#### **EXECUTIVE SUMMARY**

Forefront LLC conducted a joint Modified Quality Improvement (QI) and Florida Network of Youth and Family Services (FNYFS) monitoring visit for Tampa Housing Authority (Tampa) for the FY 2022-2023 at its program office located at 5301 West Cypress Avenue, Tampa, Florida. Forefront LLC (Forefront) is an independent compliance monitoring firm that is contracted by the FNYFS to perform onsite program reviews to assess the agency's adherence to fiscal, programmatic, and overall contract requirements. Tampa Housing Authority is contracted with the Florida Network of Youth and Family Services (FNYFS) to provide direct services to Children/Families in Need of Services (CINS/FINS). The services to be provided are identified in Contract Section A - Descriptions and Specifications and Section B - Delivery and Performance and are funded with General Revenue Funds effective for July 1, 2022 through June 30, 2023.

The review was conducted by Baldwin Davis Consultant for Forefront LLC, and Forefront LLC Principal and Lead Peer Reviewer, Keith Carr. Agency representatives from Tampa Housing Authority present for the entrance interview were Matthew Dickey, Data Manager and Jessy Kingsman, Case Manager. <u>The last QI visit was conducted May 19, 2022.</u>

In general, the Reviewer found that Tampa Housing Authority is not in compliance with specific contract requirements. Tampa Housing Authority **received an overall compliance rating of 33.3% for achieving partial compliance** with three applicable indicators of the Modified Administrative and Fiscal Contract Monitoring Tool. There are corrective actions as a result of the monitoring visit and recommendations are made.

The following report represents the results of the in-depth evaluation of the provider's General Administrative performance, with all findings clearly documented. Copies of all completed tools utilized during the visit to determine these ratings will be maintained on file with the Reviewer. If any information or clarification is required, please contact Keith Carr by E-mail: keithcarr@forefrontllc.com

#### 2022-2023 CINS/FINS PROGRAM COMPLIANCE MONITORING TOOL

Report Number: CM 02-01-2022-2023

Agency Name: Tampa Housing Authority						Monitor Name: Baldwin Davis, Lead Reviewer	
Contract Type: CINS/FINS					Region/Office: 5301 West Cypress Avenue, Tampa, Florida		
Service Description: Comprehensive Onsite Compliance Monitoring						Site Visit Date(s): February	1, 2023
	Explain Rating					Detin ve Deced Hoom	Natas
Major Programmatic Requirements	Unacceptable	Conditionally Unacceptable	Fully Met	Exceeded	Not Applicable	Ratings Based Upon: I = Interview O = Observation D = Documentation PTV = Submitted Prior To Visit (List Who and What)	Notes  Explain Unacceptable or Conditionally Acceptable:  (Attach Supportive Documentation)
I. Administrative and Fiscal							
Limits of Coverage  a. Provider shall provide and maintain during this contract, the following minimum kinds of insurance: Worker's Compensation and Employer's liability insurance as required by Chapter 440, F.S. with a minimum of \$100,000 per accident, \$100,000 per person and \$500,000 policy aggregate. Commercial General Liability with a limit of \$500,000 per occurrence, and \$1,000,000 policy aggregate. Automobile Liability Insurance shall be required and shall provide bodily injury and property damage liability covering the operation of all vehicles used in conjunction with performance of this contract, with a minimum limit for bodily injury of \$250,000 per person; with a minimum limit for bodily injury of \$500,000 per accident; with a minimum limit for property damage of \$100,000 per accident and with a minimum limit for medical payments or \$5,000-\$10,000 per person. Florida Network is listed as payee or co-payee. PTV						Documentation: Commercial Liability Insurance is secured through HAI Group. The policy included \$1,000,000 per Occurrence; Fire Damage limits \$50,000; Sports Liability limits \$250,000. Personal and Advertising Injury Liability is set at \$1,000,000; and Mold, Other Fungi or Bacteria Liability Claim is set at limits of \$100,000. Policy is effective 10/01/2022-10/01/2023. The certificate of insurance lists the Florida Network as additional insured.  Workers Compensation and Employers Liability Insurance is provided through The Zenith. Workers Compensation and Employers Liability Insurance is provided through The Zenith. The policy coverage includes \$1,000,000 in Bodily injury for each	Corrective Action 1: The agency is required to present a current Workers' Compensation Policy with Florida Network added as additional insured.

Agency Name: Tampa Housing Authority						Monitor Name: Baldwin Davis, Lead Reviewer		
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Service Description: Comprehensive Ons	site C	omplian	ce Mor	nitorir	ng	Site Visit Date(s): February	1, 2023	
		Explain	Rating	J		Ratings Based Upon:	Notes	
Major Programmatic Requirements	Unacceptable	Conditionally Unacceptable	Fully Met	Exceeded	Not Applicable	I = Interview O = Observation D = Documentation PTV = Submitted Prior To Visit (List Who and What)	Explain Unacceptable or Conditionally Acceptable:  (Attach Supportive Documentation)	
						Accident; \$1,000,000 in Bodily Injury for each Disease policy limit; and \$1,000,000 in Bodily injury for each Disease each employee. The policy is effective 07/01/2022-07/01/2023.  Auto Insurance is provided through the Auto-Owners Insurance automobile insurance company. Coverage includes combined liability for \$1million, PIP for \$10,000 each person, medical limited to \$2,500, and uninsured motorist coverage for \$10,000/person and \$20,000/accident. Policy is effective 10/01/2022-10/01/2023. The certificate of insurance lists the Florida Network as additional insured.		
Fiscal Practice  a. Agency must have employee and fiscal policy/procedures manuals that are in compliance with GAAP and provide sound internal controls. Agency maintains fiscal files that are audit ready. PTV						Documentation: Fiscal Policies and Procedures are maintained in the agency's Accounting Policies and Procedures Manual that are general and provide for limited internal controls. The agency's policy manual titled Operating Procedures – Accounting - Finance was last reviewed March 1, 2022. The policy	No recommendation or Corrective Action.	

Agency Name: Tampa Housing Authority Contract Type: CINS/FINS  Service Description: Comprehensive Onsite Compliance Monitoring						Monitor Name: Baldwin Davis, Lead Reviewer Region/Office: 5301 West Cypress Avenue, Tampa, Florida Site Visit Date(s): February 1, 2023	
		Explain	Rating			Ratings Based Upon:	Notes
Major Programmatic Requirements	Unacceptable	Conditionally Unacceptable	Fully Met	Exceeded	Not Applicable	I = Interview O = Observation D = Documentation PTV = Submitted Prior To Visit (List Who and What)	Explain Unacceptable or Conditionally Acceptable: (Attach Supportive Documentation)
						manual covers standard operating procedures for critical financial functions.	
b. Petty cash ledger system is balanced, and all cash disbursements are compliant with financial policies and allowable under the contract. (Disbursements/invoices are approved & monitored by management.) – <b>ON SITE</b>						Interview:  N/A - No change in practice was reported for the agency since the last site program review in May 2022. The provider has a Petty Cash Policy in place. Staff states that petty cash is not held and has not been used since the last review and that if there is any request for petty cash it is to be placed in advance via a check request.	No recommendation or Corrective Action.
c. Agency maintains inventory in accordance with a written policy and FNYFS contractual requirements. If over \$1,000 inventory has DJJ Property Inventory Number/Tag. In the event the provider has purchased computer equipment an Informational Resources Request (IRR) has been submitted to DJJ. <b>PTV/ON SITE</b>						Interview: N/A – The agency has not purchased any items with FNYFS monies since the last time on-site.	No recommendation or Corrective Action.
d. A Single Audit is performed as part of the annual audit if expenses are greater than \$750,000. The agency must submit a Corrective Action Plan for findings cited in the management letter and single audit. An annual financial audit was completed within 120 days after the previous fiscal year/calendar year and that a copy was provided to the Network unless and extension has been requested		⊠				Documentation: An annual single audit was conducted by Berman Hopkins CPA & Associates LLP for the year ended 3/31/22 in a letter dated March 31, 2022. A Management Letter with Corrective Active Plan (CAP) is applicable and	Corrective Action 2: The agency must report an update regarding corrections to address their fiscal audit findings to Florida Network and submit the results of their corrective action to the Florida Network and/or DJJ for contract management review.

Agency Name: Tampa Housing Authority					Monitor Name: Baldwin Davis, Lead Reviewer		
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Service Description: Comprehensive Ons	ite Co	ompliand	e Mor	itorir	ng	Site Visit Date(s): February	1, 2023
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Major Programmatic Requirements	Unacceptable	Conditionally Unacceptable	Fully Met	Exceeded	Not Applicable	I = Interview O = Observation D = Documentation PTV = Submitted Prior To Visit (List Who and What)	Explain Unacceptable or Conditionally Acceptable:  (Attach Supportive Documentation)
and approved in writing. Copy of Audit is submitted to the FNYFS by December 31st. <b>Obtain from FNYFS</b>						required during this audit as there were findings that needed to be reported to Florida Network in letter dated December 28, 2022.	

#### CONCLUSION

Tampa Housing Authority has not met the requirements for the CINS/FINS contract as a result of full compliance with all five applicable indicators of the Modified Administrative and Fiscal Contract Monitoring Tool. Two of the five indicators were not applicable because the provider does not have any current inventory purchased with DJJ/FN Funds and they do not currently use a petty cash system. Consequently, **the overall compliance rate for this contract monitoring visit is 33.3%.** There are two corrective actions cited and recommendations made as a result of the contract monitoring visit. Overall, the provider is not performing satisfactorily in meeting the fiscal and administrative terms of its contract. In addition, the indicators reviewed were carried out in a manner which meets the standards as described in the report's findings.

#### **SUMMARY OF RECOMMENDATIONS**

#### **Corrective Action 1:**

It is recommended that the agency formally reports these findings to the Florida Network Youth and Family Services and submits the corrective action plan results required by the management letter of December 2022 once it meets its independent fiscal audit compliance.

#### **Corrective Action 2:**

The agency did not provide proof of Workers Compensation Insurance with Florida Network listed as insured and update regarding the results of corrective action required by their fiscal audit. The agency must submit a current Worker's Compensation insurance with Florida Network Youth and Family Services included as additionally insured.

The provider must submit a corrective action plan to address corrective actions cited in the corresponding section of this report. The provider's Corrective Action Plan should address the issues, corrective actions item cited, time frames and staff responsibility. Responses to items cited for corrective actions are due to the Florida Network and the Florida Network Contract Manager within fourteen (14) working days of receipt of this report (See Florida Network Site for the Service Provider Corrective Action Form). The Florida Network Contract Manager will then review the response to the corrective action(s) to determine if the response adequately addresses the problem identified in the report within three (3) days. Upon approval the provider will then implement the approved measure to address the item(s) cited in the report. If the corrective action is successful in resolving the items cited in the report the contract monitor will notify the Provider in

writing that the desired resolution has been achieved. Log on to the Florida Network ( <a href="www.floridanetwork.org">www.floridanetwork.org</a> ) website forms section and download the Service Provider Corrective Action Tracking Form.	
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# Florida Network of Youth and Family Services Quality Improvement Program Report

Review of Tampa Housing Authority - Tampa <u>CINS/FINS</u> Program

DATE: February 1, 2023

**Compliance Monitoring Services Provided by** 



#### LEAD REVIEWER: Baldwin Davis

#### **CINS/FINS Rating Profile**

Standard 1: Management Accountability

 1.01 Background Screening
 Limited

 1.04 Training Requirements
 Failed

 1.06 Client Transportation
 Not Applicable

Percent of indicators rated Satisfactory: 0 % Percent of indicators rated Limited: 50 % Percent of indicators rated Failed: 50 %

Standard 2: Intervention and Case Management

2.03 Case/Service Plan Limited
2.04 CaseManagement and Service Delivery Satisfactory

Percent of Indicators rated Satisfactory: 0 % Percent of Indicators rated Limited: 100 % Percent of Indicators rated Falled: 0 %

Standard 4: Mental Health/Health Services

4.02 Suicide Prevention Satisfactory

Percent of Indicators rated Satisfactory: 100 % Percent of Indicators rated Limited: 0 % Percent of Indicators rated Falled: 0 %

Overall Rating Summary
Percent of indicators rated Satisfactory: 50 %
Percent of indicators rated Limited: 33.33 %
Percent of indicators rated Failed: 16.67 %

#### **LEAD REVIEWER: Baldwin Davis**

#### **Rating Definitions**

Ratings were assigned to each indicator by the review team using the following definitions:

Satisfactory Compliance	No exceptions to the requirements of the indicator; limited, unintentional, and/or non-systemic exceptions that do not result in reduced or substandard service delivery; or exceptions with corrective action already applied and demonstrated.
Limited Compliance	Exceptions to the requirements of the indicator that result in the interruption of service delivery, and typically require oversight by management to address the issues systemically.
Failed Compliance	The absence of a component(s) essential to the requirements of the indicator that typically requires immediate follow-up and response to remediate the issue and ensure service delivery.
Not Applicable	Does not apply.

#### **Reviewers**

#### **Members**

Baldwin Davis - Lead Reviewer Consultant-Forefront LLC/Florida Network of Youth and Family Services Keith Carr – Principal Consultant - Forefront LLC/Florida Network of Youth and Family Services

#### **LEAD REVIEWER: Baldwin Davis**

#### **Methodology**

This review was conducted in accordance with FDJJ-2000 (Quality Assurance Policy and Procedures), and focused on the areas of (1) Management Accountability, (2) Intervention and Case Management, (3) Shelter Care/Health Services, and (4) Mental Health/Health Services, which are included in the Children/Families in Need of Services (CINS/FINS) Standards (Effective September 1, 2022).

#### **Persons Interviewed**

	Chief Executive Officer	X Case Manager		Nurse – Full time
	Chief Financial Officer	Counselor Non-Licensed		Nurse – Part time
	Chief Operating Officer	Advocate	1	# Case Managers
Х	Executive Director	Direct – Care Full time		# Program Supervisors
Х	Program Director	Direct – Part time		# Food Service Personnel
	Program Manager	Direct – Care On-Call	Direct – Care On-Call	
Х	Program Coordinator	Intern		# Maintenance Personnel
	Clinical Director	Volunteer	1	# Other (listed by title): Assistant Director
	Counselor Licensed	Human Resources		

#### **Documents Reviewed**

	Accreditation Reports	Х	Table of Organization		Visitation Logs
X	Affidavit of Good Moral Character		Fire Prevention Plan	х	Youth Handbook
	CCC Reports		Grievance Process/Records		# Health Records
	Logbooks		Key Control Log		# MH/SA Records
	Continuity of Operation Plan		Fire Drill Log	5	# Personnel /Volunteer Records
X	Contract Monitoring Reports		Medical and Mental Health Alerts		# Training Records
	Contract Scope of Services		Precautionary Observation Logs	4	# Youth Records (Closed)
X	Egress Plans		Program Schedules	4	# Youth Records (Open)
	Fire Inspection Report		List of Supplemental Contracts		# Other:
	Exposure Control Plan		Vehicle Inspection Reports		

#### **Observations During Review**

		· ·		
Intake	Х	Posting of Abuse Hotline		Staff Supervision of Youth
Program Activities		Tool Inventory and Storage	х	Facility and Grounds
Recreation		Toxic Item Inventory & Storage	х	First Aid Kit(s)
Searches		Discharge		Group
Security Video Tapes		Treatment Team Meetings		Meals
Social Skill Modeling by Staff		Youth Movement and Counts	Х	Signage that all youth welcome
Medication Administration		Staff Interactions with Youth		Census Board
		Surveys		

#### Surveys

0 # of Youth	0 # of Direct Staff		# of Other	
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**LEAD REVIEWER: Baldwin Davis** 

#### **Comments**

Due to the systemic staffing issues which impact the availability for member agencies to participate in the QI Peer Review team review, this review was conducted using the Modified QI Review Tool.

#### **Monitoring Purpose**

The purpose of this monitoring is to provide an annual quality improvement program review. This is to verify the agency adheres to all current CINS/FINS standards and contract compliance requirements for residential and/or community counseling services.

#### **Strengths and Innovative Approaches**

The agency provided the following programmatic updates:

Tampa Housing Authority (THA) provides individual, case management, and family services to clients who live in rural areas and have minimal access to much needed therapeutic treatment. The Children in Need of Services/Families in Need of Services (CINS/FINS) program is to be contractually managed by a Program Manager who oversees a Treatment Coordinator, a subcontracted part-time therapist and local college interns. Tampa Housing Authority also employs a Data Manager who assists on a part time basis with data entry for the CINS/FINS program.

The program experienced significant turnover during the last two years. Within the last year, the Program Manager's position was vacant but was temporarily filled by the former Treatment Coordinator who later resigned in early May 2022 but was filled in August 2022. Consequently, the Program Manager position remains vacant but the Data Manager and Directors who were present at the exit meeting reported that the Treatment Coordinator would be promoted to that position in the week following this review.

The Assistant Director of the Housing Authority oversees the program and it is supported by interns from local universities and colleges. A total of four interns were providing services at the time of this onsite review and along with the Treatment Coordinator, they see clients in person and are supervised by that Treatment Coordinator.

#### **Narrative Summary**

As part of its wider community services provided to the City of Tampa and more specifically Hillsborough County. Tampa Housing Authority provides community-based CINS/FINS services for youth and their families in Circuit 13, Hillsborough County. The program provides centralized screening and intake services during regular business hours and accepts referrals from established referral partners and local elementary, middle, and high schools. The program also receives referrals from youth, parents/guardians, and local community-based organizations.

At the time of the QI review, services were being provided by a subcontracted part-time therapist, who is a Licensed Mental Health Counselor (LMHC), and a Treatment Counselor who supervises four local college interns in the absence of the Program Manager's position. The program maintains electronic files for each youth which are labeled with the word "confidential" and are accessed through the staff's laptop only.

#### LEAD REVIEWER: Baldwin Davis

#### The overall findings for the QI Review for THA are summarized as follows:

**Standard 1**: Management Accountability. Indicator 1.01 Background Screening was rated Limited; Indicator 1.04 Training received a Failed rating; and Indicator 1.06 Transportation was not applicable.

**Standard 2**: Intervention and Case Management. Indicator 2.03 Case Service Plan of the two applicable indicators was rated limited and Indicator 2.04 Case Management and Service Delivery was rated Satisfactory with no exception.

**Standard 4**: Mental Health and Health Services. One indicator 4.02 is applicable to community counseling agencies. The relevant indicator 4.02 Suicide Prevention was rated Satisfactory with exceptions.

#### Summary of Deficiencies resulting in Limited or Failed Rating (If Applicable):

**Standard 1**: The program has a written policy governing suitability assessment, however they do not conduct suitability assessments for new hire staff, volunteers or interns and they do not have a suitability assessment tool. The program policy does not include a pre service training requirement of safety and supervision as part of their new hire staff training. The staff and four interns files did not indicate them receiving all the required mandatory training during the first 90 days of employment with the missing 90 day training being cultural humility, understanding youth/adolescent development, CPR, First Aid, confidentiality and universal precautions. There is no designated staff for training, files do not include an annual tracking form that keeps track of the training topics and corresponding hours completed annually or training certificates, signin sheets, agendas.

**Standard 2**: Two of the eight applicable files do not have documented evidence of actual completion dates of assigned goals. None of the service plans reviewed onsite consistently document the status of the progress of completing assigned goals at the 30, 60, 90 day review period. The agency's Service Plan Review/Goal Revision Forms is not completed and are blank or contain minimal/limited information. Specifically, no signatures of responsible parties are present in any of the eight files to verify plan reviews were conducted at 30, 60 and 90 day interval.

#### **CINS/FINS QUALITY IMPROVEMENT TOOL**

Quality Improvement Indicators and Results: Please select the appropriate outcome for each indicator		Review Based Upon Document Source For example: Interview/Surveys, Observation, and/or Type of Documentation	Notes Explain any items that have any deficiencies, exceptions or are not applicable.
Standard One – Management A			
		ce with DJJ OIG statewide procedures	Limited
regarding BS of employees, co			
Provider has a written policy and prothe requirement for Indicator 1.01		YES NO (explain below)	_
the requirement for indicator 1.01		If NO, explain here: The agency has a Policy Background Screening # 1.00 that was last reviewed in March 2021 by the Program Manager.	
Agency utilizes an employee suitability prescreening assessment with a passing rate criterion prior to an offer of hire for direct care staff working with youth or the agency has provided an explanation for staff hired with a non-passing/low score.	Exception	The program has a policy that states it utilizes an employee suitability prescreening assessment, with a passing rate criterion prior to an offer of hire, for direct care staff working with youth or will provide an explanation for staff hired with a non-passing/low score.	The program has a written policy governing suitability assessment; however, staff states and confirms that they do not conduct suitability assessments for new hire staff, volunteers or interns. They do not have a suitability assessment tool that is required and authorized for use by the Florida Network Youth and Family Services. The one new hire staff did not complete a suitability assessment.
Background screening completed prior to hire/start date (or exemption obtained prior to working with youth if rated ineligible) for new hires, volunteers/interns, and contractors	Compliance	There was one new staff hired that was due for background screening since the last QI review. The program also utilized the services of four interns during this review period. The new staff and all four interns had eligible background screening results prior to start dates with the program.	
Agency has evidence for employees who have had a break in service and who are in good standing and reemployed with the same agency without an additional suitability assessment or background screening if the break is less than 90 days.	No eligible items for review	There were no staff who were re-hired during this annual review period.	
Five-year re-screening completed every 5 years from initial date of hire	No eligible items for review	There were no applicable 5-year re-screening of staff during this review period.	

Annual Affidavit of Compliance with Level 2 Screening Standards (Form IG/BSU-006) is completed and sent to BSU by January 31st?	Compliance	The program completed the Annual Affidavit of Compliance with Level 2 Screening Standards (Form IG/BSU-006) form and had it notarized and sent to the Department of Juvenile Justice on 1/24/2023, as evidenced by email sent to Background Screening Unit.	
Proof of E-Verify for all new employees obtained from the Department of Homeland Security	Compliance	There was one new staff hired due for employment verification which was done during this review period.	
Additional Comments: There are no	additional comment	s for this indicator.	
1.04: Training Requirements (Staff reprovide CINS/FINS services and per		e necessary and essential skills required to ctions)	Failed
Provider has a written policy and protection the requirement for Indicator 1.04	ocedure that meets	NO  If NO, explain here: The agency has a Policy titled Training # 1.05 that was last reviewed in March 2021 by the Program Manager and has not been updated for the past two years. The written policy is the Department of Juvenile Justice CINS/FINS Program Policy and Procedure Manual and it is not updated to state the specific and current training requirements and expectations for this review period.	
First Year Direct Care Staff			
All direct care staff have completed new hire pre-service training requirements for safety and supervision as required.	Exception	The program had one first year staff that met this criteria.	The program has no evidence of staff and four interns completing new hire pre-service training. The program has policy that was last updated in March 2021 and does not include this pre-service training requirement of safety and supervision as part of their new hire staff training.
All staff completed the United States Department of Justice (DOJ) Civil Rights & Federal Funds training within 30 days from date of hire. (Staff hired before January 1 st were required to complete no later than December 31, 2020)	Compliance	The program had one first year staff and four new interns who completed the United States Department of Justice (DOJ) Civil Rights & Federal Funds training within 30 days from their date of hire.	
All direct care CINS/FINS staff (full time, part time, or on-call) demonstrated a minimum of 80 hours of training or more for the first full year of employment.	No eligible items for review	One current program staff and four interns were hired less than a year ago and so there were no full year of training documentation to review. The staff and interns have several months to complete their full year annual training requirement.	
All staff receives all mandatory training during the first 90 days of employment from date of hire.	Exception	The new hire staff and four interns did not receive all the required mandatory training during the first 90 days of employment from date of hire.	The new hire staff and four interns files did not indicate receiving all the required mandatory training during the first 90 days of employment, from date of hire. The missing 90 day trainings were cultural humility, understanding youth/adolescent development, CPR, First Aid, confidentiality and universal precautions.

Staff Required to Complete Data Entry for NIRVANA or access the Florida Department of Juvenile Justice Information System (JJIS)			
Any designated staff that is responsible for entering NIRVANA or ensuring accurate and complete data entry in the Florida Department of Juvenile Justice Information System (JJIS) have completed all of the required trainings.	Compliance	The designated staff and interns who are responsible for entering NIRVANA have all completed all of the required trainings. The agency's Data Manager is trained designated person for ensuring accurate and complete data entry in the Florida Department of Juvenile Justice Information System (JJIS).	
Non-licensed Mental Health Clinical	Shelter Staff (within	first year of employment)	
Documentation of non-licensed mental health clinical staff person's training in Assessment of Suicide Risk form or written confirmation by a licensed mental health professional of training (includes date, signature and license number of the licensed mental health professional supervisor).	Not Applicable	This indicator is not applicable for community counseling programs.	
In-Service Direct Care Staff			
Direct care staff completes 24 hours of mandatory refresher Florida Network, SkillPro, and job-related training annually (40 hours if the program has a DCF child caring license).	No eligible items for review	The program experienced significant staff turnover during the review period and consequently, there was no applicable in-service staff training record to be reviewed.	

Required Training Documentation			
The agency has a designated staff member responsible for managing all employee's individual training files and completes routine reviews of staff files to ensure compliance.	Exception	The program indicated that it has the designated Program Manager position that is responsible for managing all employee's individual training files and completes routine reviews of staff files to ensure compliance. Currently these are kept with the agency's HR Department that manages the entire agency HR functions.	Oversight of the training requirement falls within the responsibility of the Program Manager position. The agency does not have a Program Manager at the time of the review and is in the process of promoting the Case Manager to that position. Once she is in place, the Program Manager will take on this designated training responsibility.
The program maintains an individual training file for each staff, which includes an annual employee training hours tracking form and related documentation, such as electronic record/transcript, training certificates, sign-in sheets, and agendas for each training attended.	Exception	Training documentation is maintained for staff; however, the documentation reviewed does not include all information that is required to be maintained for staff training records.	Training records in the form of SkillPro and Bridge training logs are maintained by the program but does not include an annual tracking form that keeps track of the training topics and corresponding hours completed annually or training certificates, sign-in sheets, agendas.
Additional Comments: There are no	additional comment		
1.06: Client Transportation			Not Applicable
Provider has a written policy and procedure that meets the requirement for Indicator 1.06		If NO, explain here: The agency has a Policy # 2.08 Client Transportation that was last reviewed in March 2021 by the Program Manager. The policy has not been updated for the past two years (March 2021) nor is it specific to the operational needs of program. The written policy is the Department of Juvenile Justice CINS/FINS Policy and Procedure Manual that does not correctly indicate the transportation process and practice status of the agency since THA does not transport youth.	
Approved agency drivers are agency staff approved by administrative personnel to drive client(s) in agency or approved private vehicle	Not Applicable	Tampa Housing Authority CINS/FINS program does not transport youth.	
Approved agency drivers are documented as having a valid Florida driver's license and are covered under company insurance policy	Not Applicable	Tampa Housing Authority CINS/FINS program does not transport youth.	
Agency's Transportation policy prohibit transporting a client without maintaining at least one other passenger in the vehicle during the trip and include exceptions in the event that a 3 <sup>rd</sup> party is NOT present in the vehicle while transporting	Not Applicable	Tampa Housing Authority CINS/FINS program does not transport youth.	

In the event that a 3rd party cannot be obtained for transport, the agency's supervisor or managerial personnel consider the clients' history, evaluation, and recent behavior	Not Applicable	Tampa Housing Authority CINS/FINS program does not transport youth.	
The 3 <sup>rd</sup> party is an approved volunteer, intern, agency staff, or other youth	Not Applicable	Tampa Housing Authority CINS/FINS program does not transport youth.	
The agency demonstrated evidence via logbook or other written verification that supervisor approval was obtained prior to all single youth transports.	Not Applicable	Tampa Housing Authority CINS/FINS program does not transport youth.	
There is documentation of use of vehicle that notes name or initials of driver, date and time, mileage, number of passengers, purpose of travel and location.	Not Applicable	Tampa Housing Authority CINS/FINS program does not transport youth.	
Additional Comments: There are no	additional comment	s for this indicator.	
2.03 - Case/Service Plan			Limited
		YES	
Provider has a written policy and pro	cedure that meets	If NO, explain here:	
the requirement for Indicator 2.03		The agency has a Policy # 2.06 Case/Service	
		Plan. This policy was last reviewed in March 2021	
		by the Program Manager.	
The case plan is developed based on information gathered during the initial screening, intake, suicide screening and NIRVANA.	Compliance	A random sample of eight open and closed client residential and community counseling records which received services in the last six months was conducted to assess the agency adherence to the requirements of this indicator. All community counseling files reviewed contained a service plan developed from information gathered at the initial screening, intake, suicide screening and NIRVANA assessment. Two files selected were closed due to client and family not responding to multiple attempts to schedule official appointments to continue services following the completion of the NIRVANA assessment. Additionally, transition of staff at the Supervisor and Counselor levels indicates turnover and placement of new staff in these positions in the last 3-4 months. A review of client files observed by the reviewer indicates all major service delivery requirements such as proof of screenings, intakes and assessments were completed. Other service delivery requirements such as Service Plan review sessions and tracking of Goals and objectives completed by each client was confirmed by reviewing case notes in each file.	

Case/Service plan is developed within 7 working days of NIRVANA	Compliance	All client file case records contained service plans developed within seven days of completion of the NIRVANA assessment.	
Case plan service Plan includes: 1. Individualized and prioritized need(s) and goal(s) identified by the NIRVANA 2. Service type, frequency, location 3. Person(s) responsible 4. Target date(s) for completion and Actual completion date(s) 5. Signature of youth, parent/ guardian, counselor, and supervisor 6. Date the plan was initiated	Exception	of goals and objectives for each client's service plan. The service plan template for each of the applicable files includes multiple goals and objectives, service type, frequency, location, the person responsible for completing the goals and objectives, target date for completion, actual completion date, and the signature of the youth, parent/guardian, counselor and supervisor. All eight applicable client files have no less then three assigned service plan goals, objectives, frequency, persons responsible, and date the plan was initiated. Six of the eight applicable files have documented evidence of actual completion dates of assigned goals. All client files have documented	Two of the eight applicable files do not have documented evidence of actual completion dates of assigned goals. Review of the current practice found existing client forms with missing information related to the status of all eight Treatment Plans.  Eight of eight client records do not have documented evidence of youth's signature to verify in client engagement during service plan process.  Eight of eight client records do not have documented evidence of the parent/guardian signature to verify in client engagement during service plan process.  Eight of eight client records do not have documented evidence of signature to verify in counselor's engagement during service plan process.  Eight of eight client records do not have documented evidence of signature to verify in supervisor's engagement during service plan process.  Agency file format has areas designed on the form to capture actual signatures, however, none of the files have documented evidence of collecting signatures of participants. A review of client files, observed by the reviewer, indicates all major service delivery requirements such as proof of screenings, intakes and assessments were completed. Other service delivery requirements such as Service Plan review sessions and tracking of goals and objectives completed by each client was confirmed by reviewing case notes in each file.
Case/service plans are reviewed for progress/revised by counselor and parent (if available) every 30 days for the first three months and every 6 months after  Additional Comments: There are no	Exception	and completion. The current status of client files captures progress in case notes only. Eight of eight client file records reviewed were applicable for 30, 60 and 90 day case reviews.	None of the service plans reviewed onsite consistently document the status of the progress of completing assigned goals at the 30, 60, 90 day review period in a service plan review document.  The agency's Service Plan Review/Goal Revision Forms are not complete and are blank or contain minimal/limited information. Eight of the eight applicable service plans did not have evidence of 30, 60, and 90 day reviews documented correctly in each client file. All progress found related to the status of the case was found in the progress notes. Files reviewed failed to contain evidence of the client file agency template to provide the status of progress in service plans, signatures of responsible parties, and any future steps to achieve goals and objectives as required.

2.04 - Case Management and Service Delivery			Satisfactory
Provider has a written policy and procedure that meets the requirement for Indicator 2.04		YES  If NO, explain here:  The agency has a Policy # 2.07 Case Management Services. This policy was last reviewed in March 2021 by the Program Manager.	
Counselor/Case Manager is assigned	Compliance	All eight case records reviewed had an assigned case manager.	
The Counselor/Case Manager completes the following as applicable:  1. Establishes referral needs and coordinates referrals to services based upon the on-going assessment of the youth's/family's problems and needs  2. Coordinates service plan implementation  3. Monitors youth's/family's progress in services  4. Provides support for families  5. Monitors out-of-home placement (if necessary)  6. Makes referrals to the case staffing to address problems and needs of the youth/family  7. Accompanies youth and parent/guardian to court hearings and related appointments  8. Refers the youth/family for additional services when appropriate  9. Provides case monitoring and reviews court orders  10. Provides case termination notes  11. Provides follow-up after 30 days of exit  12. Provides follow-up after 60 days of exit	Compliance	Five applicable client file case records reviewed had coordinated service plan implementation and planning associated with referrals completed for the identified needs. Three cases did not require coordinated service planning referrals to be completed to address the identified needs. Eight of eight records reviewed contained progress notes documenting the monitoring of the youth's/family's progress throughout the case. All eight client case records reviewed contained a progress note during the intake meeting with the family. Five of eight applicable case records reviewed had documentation of providing support to families associated with referral planning. Only one case record reviewed was applicable for additional referrals, and there was documented evidence this was completed. Five applicable case records reviewed provided appropriate case monitoring. None of the case records reviewed had any open court matters for the case manager to assist the family in addressing, or monitoring of out-of-home placement. Five of five applicable case records contained a closure progress note as required. Four of the four closed case records were applicable for 30 day follow-up contacts, three had documented 30-day follow-ups. The remaining 30-day follow did not have evidence the follow-up was completed. However, the case notes indicated multiple attempts to contact the client and family. Two of the four closed case records were applicable for 60-day follow-ups. Both cases contained a completed 60-day follow-up.	
The program maintains written agreements with other community partners that include services provided and a comprehensive referral process  Additional Comments: There are no	Compliance	The program maintains written agreements with other community partners for services and has a referral process which is utilized.	

4.02 - Suicide Prevention			Exception
Provider has a written policy and procedure that meets the requirement for Indicator 4.02		YES	
		If NO, explain here:	
		The agency has a Policy # 2.03 Identification of Suicide Risk in Community Counselling Programs. This policy was last reviewed in March 2021 by the Program Manager.	
Suicide Risk Screening and Approval	(Residential and Con	nmunity Counseling)	
Suicide risk screening occurred during the initial intake and screening process. Suicide screening results reviewed and signed by the supervisor and documented in the youth's case file.	Compliance	Eight applicable case records were reviewed to assess the agency's adherence to the requirements of this indicator. All youth were screened for suicide risk during the initial intake process using the CINS/FINS Intake Assessment form. One of eight client case file records reviewed had a client report feeling like killing themselves and was documented as positive for suicide risk screening during the home visit counseling session. The screening results were signed by a supervisor.	
The program's suicide risk assessment has been approved by the Florida Network of Youth and Family Services	Compliance	The program's suicide risk assessment was previously approved by the Florida Network.	
Supervision of Youth with Suicide Ris	k (Shelter Only)		
Youth are placed on the appropriate level of supervision based on the results of the suicide risk assessment.	Not Applicable	Not applicable for community counseling programs.	
Staff person assigned to monitor youth documented youth's behavior at 30 minute or less intervals	Not Applicable	Not applicable for community counseling programs.	
Supervision level was not changed/reduced until a licensed professional or a non-licensed mental health professional under the supervision of a licensed professional completed a further assessment OR Baker Act by local law enforcement	Not Applicable	Not applicable for community counseling programs.	

Youth with Suicide Risk (Community Counseling Only)			
Youth identified for suicide risk during intake was immediately assessed by a licensed professional or non-licensed professional (under the direct supervision of a licensed mental health professional) and the parents and supervisor were both notified of the results.	Compliance	All client cases reviewed onsite were properly screened using the agency's suicide risk screening process. None of the client cases reviewed were identified as being positive for suicide risk. The agency is contracted with a licensed clinical professional. The licensed professional provides clinical oversight on all cases serviced by the agency.	
During the intake, if the appropriate staff is unavailable, youth identified for suicide risk was immediately referred by the provider and the parent/guardian is notified of the suicide risk findings disclosed and advised that an Assessment of Suicide Risk should be completed ASAP by a licensed professional.	Exception	One client reported to an agency Counselor they were feeling like killing themselves during a general counseling session. Counselor called Program Manager to inform her of comments. The Project Manager called the local Crisis Center. Crisis Center did not answer and Counselor called Police Department. A Police Officer conducted a status check at the client's home to determine if they met Baker Act status requirements. The client did not meet Baker Act status and was determined as needing to be transported to the local mental health receiving facility. The Counselor consulted the Licensed Clinical Social Worker (LCSW) and per consultation with LCSW the client was retained in program.	Documented evidence of an assessment to determine the client's suicide risk status and a safety plan was not found in the client file.
Information on resources available in the community for further assessment was provided to the parent/guardian and is documented in the youth's file and signed by the parent/guardian OR a written follow-up notification was sent by certified mail if the parent/guardian was not present during the screening and was notified by telephone.	Exception	provided information resources to	Documented evidence of the agency providing informational resources were not found in file, at time of the review, indicating the agency provided the client, parent and or guardian with community resources for additional assessment as needed.
If the parent/guardian cannot be contacted, all efforts to contact them are documented in the case file.	Compliance	Parent was informed of incident as the counseling session was being conducted in the home.	
When the screening was completed during school hours on school property, the appropriate school authorities were notified.	Compliance	The counseling session was conducted with the client after school at the client's home.	
Additional Comments: There are no additional comments for this indicator.			