



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

Orange County Youth and Family Services

1800 East Michigan Avenue
Orlando, Florida 32806

April 3-4, 2024

Compliance Monitoring Services Provided by



EXECUTIVE SUMMARY

Forefront LLC conducted a Quality Improvement (QI) monitoring visit on behalf of the Florida Network of Youth and Family Services (FNYFS) for Orange County Youth and Family Services (OCYFS) for the FY 2023-2024 at its program office located at 1800 East Michigan Avenue, Orlando, 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. Orange County Youth and Family Services 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 from July 2023 through June 30, 2024.

The review was conducted by Keith Carr, Consultant for Forefront LLC. Agency representatives from Orange County Youth and Family Services present for the entrance interview were: Barbara Williams, Division Manager; Shashonadalyn Upson, Senior Program Manager; Angela Patton, Program Manager; Vemari Rivera, Supervisor; Cayla Williams, Supervisor; Lyneisha Morrison, Program Manager; Felicia Brown, Senior Program Manager; Diana Mendez, Medical and Mental Health Administrator; Bevetta Sibblies Martin, Senior Fiscal Coordinator; Paulette Hinton, Senior On-Call; and Leslie Rivera, Registered Nurse. The last onsite QI visit was conducted on October 12-13, 2022.

In general, the Reviewer found that Orange County Youth and Family Services is in compliance with specific contract requirements. **The agency received an overall compliance rating of 100% for achieving full compliance with twelve out of fourteen compliance indicators** on the CINS/FINS Monitoring Tool. There were no corrective actions or recommendations as a result of the compliance monitoring visit.

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

2023-2024 CINS/FINS PROGRAM COMPLIANCE MONITORING TOOL
Report Number: CM 4-3-4-2023-2024

Agency Name: Orange County Youth and Family Services					Monitor Name: Keith Carr, Lead Reviewer		
Contract Type : CINS/FINS					Region/Office: 1800 East Michigan Avenue, Orlando, Florida 32806		
Service Description: Comprehensive Onsite Compliance Monitoring					Site Visit Date(s): April 3-4, 2024		
	Explain Rating						
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:
I. Administrative and Fiscal							
DJJ Quality Improvement Peer Reviewer a. Provider shall demonstrate that a minimum of two (2) staff members have been trained to be certified as DJJ QI Peer reviewers. Provider shall participate in a minimum of one (1) on-site quality assurance review of a similar type of program in another judicial circuit during each 12-month period of the contract, if requested.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The agency meets the minimum of two staff members that have been trained to be certified as DJJ QI Peer Reviewers. The following certified peer reviewer staff includes Shashonadalyn Upson, Senior Program Manager and Angela Patton, Program Manager. Each of the aforementioned staff have participated on an onsite Quality Improvement Review during FY2023-2024.	
Additional Contracts a. Provider shall provide a listing of all current federal, state, or local government contracts, as well as other contracts entered into with for profit and not-for-profit organizations. Such a listing shall identify the awarding entity and contract start & end dates. PTV	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The agency has three Florida Department of Juvenile Justice (DJJ) contracts that include the Juvenile Assessment Center, Oaks Specialized Community Supervision Program (Oaks SCSP), and DJJ Respite. The agency has an additional contract with the Florida Department of Children and Families (DCF) that includes Great Oaks Village (GOV).	

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						All other contracts are funded by the FNYFS. At the time of this onsite program review, there are no contracts under corrective action.
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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Documentation – Orange County, a political subdivision of the State of Florida, has an ongoing inter-local self-insurance program for workers' compensation, general liability, auto liability, and property. This program covers the employees, officials, and most of the constitutional officers of Orange County, Florida. Orange County is designated as a Qualified Self Insurer. The County self-insured property deductible is \$2,500 with a \$1,000,000 limit. The County also purchases commercial general liability insurance. The property program consists of several layers with several insurance carriers participating with a limit of

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					Notes Explain Unacceptable or Conditionally Acceptable:	
					<p>\$1,000,000,000. Policy effective date is 10/1/2023-10/1/2024.</p> <p>The County also elects to purchase excess liability coverage above and beyond the limits of the inter-local self-insurance program (\$1,000,000). However, the limits of the self-insurance program and the purchasing of excess coverage should not be construed as a waiver of the County's sovereign immunity or the provisions of Section 768.28 of the Florida Statutes.</p> <p>The automotive insurance coverage is addressed through the County's Self-Insured Insurance coverage and exceeds all required automobile insurance limits.</p> <p>The Florida Network is listed as the certificate holder.</p>	

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External/Outside Contract Compliance a. Provider has corrective action item(s) cited by an external funding source (Fiscal or Non-Fiscal). ON SITE					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	I - During the Entrance Conference, the provider indicated that there are no outstanding corrective action item(s) cited by an external funding source.
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					<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D - Fiscal Policies and Procedures are maintained in the agency's Procurement Procedures Manual that appears to be consistent with GAAP and provide for limited internal controls. The Accounting Policies and Procedures were last reviewed on September 14, 2022.
b. Agency maintains a general ledger and the corresponding source documents. A general ledger must be set up to track the activity of the grant separately (standard account numbers / separate funds for each revenue source, etc.). PTV					<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D - General ledger (GL) for Department 062 (CINS/FINS) COMMUNITY AND FAMILY SERVICES FUND: 8005 CINS/FINS 14-22 for the period July 2023 through March 2024. The agency maintains a detailed general ledger with corresponding source documents.

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						The general ledger is structured to track all funding sources and there is a separate GL for the CINS/FINS program and all additional FNYFS funded programs.	
c. 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.) – ON SITE		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I / D – The program is not allowed to access petty cash since supervisors and administrative assistants have credit cards to use for items that do not require a check request. The agency submitted documented evidence of the past six months, April 2022 – September 2022, of youth shelter petty cash reconciliation activity reports.
d. Financial records and reports are current. Includes bank statements reconciled within 6 weeks of receipt. Vendor invoices past 6 months. Invoices are submitted on a monthly basis with supporting documentation. (Disbursements/invoices are approved & monitored by management). ON SITE		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I / D – Fiscal reconciliation transactions related to the CINS/FINS contract are handled by its Comptroller's office. Orange County monitors all fiscal transactions and expenditures related to children's program grants. Since the previous Compliance Monitoring review, the

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						agency has not changed the practice of requiring all CINS/FINS related transactions to be processed by the OCYFS fiscal staff on a weekly basis. All expenditures and transactions processed are overseen by the agency's Medical and Mental Health Administrator.
e. 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. PTV/ON SITE	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	I – The agency has not purchased any items with FNYFS funds. Per the Division Program Manager, OCYFS does not have any inventory purchased with FNYFS funds.
f. Agency submits payroll taxes and deposits (and retirement deposits as applicable), <u>Employee</u> IRS Form W-2 and <u>Independent Contractors</u> IRS Form 1099 forms prior to federal requirements. ON SITE	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D - The agency provided copies of Form 941 Employer's Quarterly Federal Tax Return for the 3 rd (July, August and September) and the 4 th (October, November and December) quarters of 2023. The tax payments are submitted and demonstrate that the agency submits payroll taxes to

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						the appropriate authority as required. No balances due were reported on the 941s.	
g. Budget to actual reports prepared and reviewed by appropriate management. Variance from the budget are investigated and explained. PTV/ON SITE	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D - Agency provided budget-to-actual report for period 7/01/2023 – 2/01/2024 with budget, expenditures, and balance remaining for the period to date. The report tracks the expenditures for the FNYFS programs separately. The variances for both the residential and non-residential programs are reflected in the Net Income amounts.	
h. 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 and approved in writing. Copy of Audit is submitted to the FNYFS by December 31st. Can obtain from FNYFS	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D – A copy of the annual financial audit conducted for year ending September 30, 2023 by Phil Diamond, CPA, LLP and dated, March 25, 2024. No Management Letter was required as there were no findings required to be reported in a separate management letter. A copy of the financial audit is on file with the Reviewer.	

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i. Agency maintains confidentiality policy with written policies and procedures to ensure the security and privacy of all employee and client data. Personal information is not easily accessible. Agency maintains a backup system in case of accidental loss of financial information. Security procedures are in place to protect laptops. Obsolete documents are shredded and computer hard drives are wiped prior to discarding. ON SITE	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D – The agency Confidentiality Policy and Procedures are addressed in their HIPAA Privacy Rule Policies and Procedures and Information Technology Standards include: - Standards for In-House Servers and Server Operating Systems - Network Systems Requirements - Network Security - Wireless Local Area Network (LAN) (Ethernet) Security - Wireless Wide Area Network (WAN) Security - Externally-Hosted System Standards - Computing Center Standards All sensitive information is saved on the Universal drive and daily back-ups are made to keep data back-up current. The Program Manager reported no staff member is assigned a laptop.	

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				Not Applicable		
j. Agency provided evidence that every direct care staff employee, as of October 1, 2023, is being paid at least \$19.00 per hour. This also includes funding for additional staff as approved by the Department. ON SITE	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The agency provided documented evidence of each direct care staff member's hourly rate of pay as of October 1, 2023, being paid at least \$19.00 per hour.

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CONCLUSION

Orange County Youth and Family Services has met the requirements for the CINS/FINS contract as a result of full compliance with 12 applicable indicators of the Administrative and Fiscal Contract Monitoring Tool. Consequently, the overall compliance rate for this contract monitoring for applicable compliance monitoring indicators on this visit is 100%. There are no corrective actions or recommendations made as a result of the contract monitoring. Overall, the provider is performing satisfactorily in meeting the fiscal and administrative terms of its contract. In addition, all of the indicators reviewed were carried out in a manner which meets the standard as described in the report findings.

SUMMARY OF RECOMMENDATIONS

No Recommendations or Corrective Actions.

If required, 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 responsible. 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 (www.floridanetwork.org) website forms section and download the Service Provider Corrective Action Tracking Form.