



pennsylvania
DEPARTMENT OF HUMAN SERVICES

JAN 14 2016

Ms. Lana Rees, Director
County Executive
154 West Ninth Street
Erie, Pennsylvania 16501

RE: Erie County Children and Youth
Services
Public Agency

License #419240

Dear Ms. Rees:

As a result of the Department of Human Services' (Western Regional Office of Children, Youth and Families) licensing inspection on May 26-29, 2015 of the above agency, the violations with 55 Pa.Code Ch. 3130 and other supplementary program regulations specified on the enclosed Licensing Inspection Summary were found.

All violations specified on the enclosed Licensing Inspection Summary must be corrected by the dates specified on the Licensing Inspection Summary and continued compliance with 55 Pa.Code 3130 and other supplementary program regulations must be maintained.

Sincerely,


Cathy Utz
Deputy Secretary

Enclosure
Licensing Inspection Summary

**COUNTY CHILDREN AND YOUTH AGENCY
ANNUAL SURVEY AND EVALUATION SUMMARY**

NAME OF AGENCY/FACILITY: Erie County Office of Children and Youth				TELEPHONE: 814.451.6600	OCYF REGIONAL STAFF APPROVAL	DATE
ADDRESS: 154 West Ninth Street, Erie, PA 16501				COUNTY: Erie	<i>Tamara Harrell /AK</i> Program Representative:	<i>1/10/16</i>
INSPECTED BY: Tamara Harrell, Rebecca Lewandowski, Vicki Lenhart-Martin, Cyndi Gariepy, Rick Tabor, Jeff Marshall				QSR and INSPECTION DATES: May 26-29, 2015	<i>Appri Gariepy /AK</i> Supervisor:	<i>1/12/16</i>
INITIAL INSPECTION	RENEWAL INSPECTION	COMPLAINT	UNANNOUNCED INSPECTION	RANDOM SAMPLE	<i>Amber S. Kael</i> Regional Director:	<i>1/12/16</i>
	XXX					

The Department of Human Services Western Regional Office of Children, Youth and Families conducted the annual licensing inspection of Erie County Office of Children and Youth Services by means of a random sample record review, internal policy/procedures review, personnel record review and agency fiscal documentation review.

The case sample was drawn from cases assigned to all program units and casework functions within the agency. 10 Child Protective Service Intake records from a total of approximately 625 CPS referrals, 10 Placement records out of a total of approximately 470 children placed, 10 General Protective Services Intake records out of a total of approximately 1630 referrals, 5 new and 6 seasoned resource home records out of 55 total agency Resource Family Home records, 2 foster home visits, 5 of 56 Adoption records, 10 of approximately 700 Ongoing/In-home Services records, and 19 new personnel records as well as training logs for the vast majority of employees.

Erie County Office of Children and Youth Services (ECOCYS) is a public child welfare agency serving primarily an urban (81%) population of approximately 281,000 residents in a 3rd class county. Any case specific regulatory references contained within the License and Inspection Summary does not contain specific identifying demographic data due to statutory prohibitions relating to confidentiality.

SUMMARY OF AGENCY PRACTICES

<p>Practice Area: Safety Assessment and Monitoring</p> <p>QSR Indicator: Safety from Exposure to Threats of Harm</p> <p>QSR Indicator: Safety from Risk to Self/Others</p>	<p>There was not a QSR facilitated in Erie for the 2015 licensing year. However, in the 2014 QSR Erie County OCY did exceptionally well in the QSR status indicator for Safety. In regards to the exposure to threats of harm in all sub-categories were rated at 100% acceptable. Risk to self and others was rated at 89% overall.</p> <p>During the May 2015 licensing it appears that some inconsistency within the agencies continues to exist with the completion of safety plans. There were cases lacking a safety plan when the child has been rated as unsafe. The agency has conducted safety assessment training for all staff to address any misunderstandings that the staff may have.</p> <p>In addition, special attention should also be focused on rating for risk. There were a significant number of</p>
--	--

cases showing a moderate risk rating and indicating impending danger but showing the children conditionally safe, however the case did not accurately represent the situation. The agency has been made aware of the concern for risk inconsistency and is in the process of addressing this problem through training.

Although somewhat improved, the agency's use of structured case note documentation has been and continues to be an area of weakness in regards to the safety assessment process. A large number of the caseworkers are entering detailed and descriptive case notes; however some continue to miss the inclusion of all domains when necessary and are unclear as to who or what the details are referencing.

RECOMMENDATION

It would be recommended that the supervisors increase the monitoring and oversight of the risk assessment, safety assessment worksheet and case note documentation.

Practice Area: Casework Visitation with Family

QSR Indicator: Planning for Transitions and Life Adjustments

QSR Indicator: Parent/Caregiver Functioning

Caseworkers are required to visit each of the children in an ongoing case at least monthly, depending on risk. These visits may occur in the family home, at school, during a supervised visitation with the parents or in the placement setting. Erie County's policy is that all children are open for services, regardless which child was the subject of an investigation. Furthermore, the agency contracts with service providers to provide foster and kinship care approvals. These contractual relationships also require at least a monthly visit with the child in the foster home.

In the 2014 QSR findings, it was noted that although visits were being completed regularly, visits were less than quality in some cases. Engagement efforts and role & voice regarding the fathers were rated exceptionally low. Additionally, role & voice of the youth was rated as only 50% acceptable. Planning for transitions and life adjustments also gave room for improvement at 67% of the scores being acceptable. These indicator scores suggested that many of the visits did not allow for an avenue of discussion or a process of information gathering supportive to a quality visit with all involved parties.

With regards to the parent/caregiver functioning, the scores for both the mother and the father were rated low in the 2014 QSR review. This is typical as the needs of the parents involved are often heightened, thus leading to a lower score. When this is taken into account, the importance of quality and informed visits only seems more supported. As hoped, the substitute caregiver and "other person involved" scores were rated much higher into the acceptable range. This lends to the idea that those people identified as supports or secondary caregivers show a higher level of skill and situational awareness to help provide the child with nurturance, guidance and supervision in order to protect and care for the child.

The May 2015 licensing survey found no significant concerns surrounding visitation with the family and children, in fact, in many cases the caseworkers have gone above and beyond the expectation for visitation with the children in both the family home and in the placement setting.

RECOMMENDATION

It is recommended that the agency continue to assess the practice in which the agency monitors child and family visitations and work toward enhancing the quality of such visits. It is crucial that the agency continue to make every effort to see every child at a minimum of once a month, preferably in the child's current home setting as often as possible.

Practice Area: Fostering Connections Activities

QSR Indicator: Parent/ Caregiver Functioning

QSR Indicator: Role and Voice

QSR Indicator: Engagement

QSR Indicator: Teaming

Erie County has fully enacted the Fostering Connections to Success and Increasing Adoptions Act of 2008. The county works conscientiously to also keep children in their home school or school district. If a child is placed at a shelter or in temporary foster/kinship care the agency makes every effort to have the child attend their home school (i.e. relatives or school district transports, caseworker speaks to McKinney Vento liaison, etc). If the school district refuses the child, caseworkers are to meet with the Office of Children and Youth Education Stability Liaison. The agency ensures medical, emotional and behavioral needs are being met and oversee the child's health care coordination on active cases. Foster care coordinators and caseworkers have been encouraged to place siblings together whenever possible and whenever it does not pose a safety risk. Documentation of the efforts to place siblings together is entered on a placement request form and kept with the file. Accurint and diligent search efforts are being completed and documented.

As noted in the 2014 QSR, the engagement efforts of the father were rated low. The agency has been working on the County Improvement Plan regarding the QSR outcomes. Engagement and teaming is an area of focus. With focus in this area, improved search efforts into family supports would be a likely outcome. Additionally, teaming formation and functioning scored low in 2014. With enhanced practice in this area, more supports would be identified and engagement efforts would ultimately improve. When all integral persons are brought together to discuss the needs of a family, better planning and outcomes will likely result.

The May 2015 licensing survey continues to support these findings and recognizes that the steps taken to improve efforts for teaming and engagement.

RECOMMENDATION

It is recommended that the agency continue to work on goals of the County Improvement Plan to better enhance teaming efforts and function within the agency as well as between the agency, providers and family members. Appropriate team members, leaders and roles must be established early on at the formation of a team. Consistent and regular communication between the members must be a priority to make the team effective.

Practice Area: Shared Case Responsibility Activities

Erie County continues to show strength in the practice of Shared Case Responsibility. OCY, Juvenile Probation and the courts have a strong working relationship that ensures appropriate and effective identification of shared cases. Currently an OCY administrator is contacted when a youth open with OCY is being adjudicated delinquent. The administrator will follow up with the supervisor and/or caseworker to determine case dynamics and make the determination whether SCR is recommended. The OCY worker will then attend the court hearing to hear the results of the order.

RECOMMENDATION

It is recommended that the agency continue to evaluate the Shared Case Responsibility practices being implemented to ensure appropriate identification of shared cases is occurring. Additionally, it is recommended that a more detailed protocol be considered for those cases not open with OCY that probation feels may meet the need for OCY involvement.

<p>Practice Area: Family Service Planning</p> <p>QSR Indicator: Assessment and Understanding</p> <p>QSR Indicator: Long-Term View</p> <p>QSR Indicator: Child/Youth and Family Planning Process</p> <p>QSR Indicator: Planning for Transitions and Life Adjustments</p> <p>QSR Indicator: Intervention Adequacy and Resource Availability</p> <p>QSR Indicator: Maintaining Family Relationships</p> <p>QSR Indicator: Tracking and Adjustment</p>	<p>This is an area of continued and constant focus of improvement for Erie County. Historically, caseworkers were scheduling with families to present a Family Service Plan that had been developed ahead of the meeting. The agency has recognized a greater and more beneficial need for engaging the families in the development of the plan. The focus has shifted to encourage and promote opportunity for team and family development of the plan. In many cases, caseworkers are meeting with families prior to the development of the plan and identifying the areas of concern that brought the agency into the home. Families have been given more of an opportunity to also identify concerns at these visits. The caseworker will often times return to the agency and develop the plan based on the conversations that were held at the visit. The plan is then given to the family for review and signatures. Recent training has focused on identifying appropriate objectives, concerns and services. The importance of individualized plans has been stressed by administration and reviewed at times during MDT meetings. Objectives are to be related to the families individual concerns identified through the visits, safety assessment and risk assessments. Agency policy is for the case worker to review the plan, as well as progress, with the families at each contact to make sure families know why the agency is involved and that the services continue to be necessary and appropriate. During the 2014 QSR, there were some identified inconsistencies in this area. As noted several times, the indicator of father engagement was rated low. The agency was reaching out much more often to the custodial parents, however when the non-custodial parent was not living in the home (which is often times the father), the parent was left out of the planning process. Older youth are often involved in the signing of the plans; however it not always noted that the younger youth are engaged in the process. It is mostly the regulatory youth over the age of 14 who are signing, but rarely younger.</p> <p>RECOMMENDATION:</p> <p>The Department notes that a large number of the caseworkers are identifying areas of concern with the family members during the routine home visits and phone calls. The documentation indicates that the family is aware of why the agency is involved and many times documents issues that the parents present as concerns for the family. It is recommended that the supervisors monitor case dictation to ensure that documentation clearly details that the family goals are discussed in the family conversations. Father and non-custodial parent engagement is a significant focus of concern in this practice area. It would be recommended that the agency continue to focus on improvement strategies to better search, engage and involve the non-custodial parent in all areas of case practice.</p>
<p>Practice Area: Family Engagement Practices</p> <p>QSR Indicator: Physical Health</p> <p>QSR Indicator: Emotional Well-Being</p> <p>QSR Indicator: Early Learning and Development</p> <p>QSR Indicator: Engagement Efforts</p> <p>QSR Indicator: Role and Voice</p> <p>QSR Indicator: Teaming</p>	<p>Family Engagement practices have been a main focus within Erie County over recent licensing years. The county has made significant attempts to better engage families at the time of initial contact as well as throughout the supervision of a case. The use of FGDM has been in practice in Erie County for many years with an improvement in utilization over the last few years.</p> <p>Additionally, Erie County has a working practice for using Accurint and other diligent search efforts to locate absent fathers, relatives and additional support systems that may be beneficial in managing an active case. Procedurally, Erie County notifies any <i>identified</i> father that a case has been activated on their child and gives the father the opportunity to participate in the service. The focus has been to better utilize fathers and paternal kin as resources when children are removed from the care of their mothers. As noted above however, during the 2014 QSR the engagement of the fathers was lacking over the majority of cases. Although fathers may be informed of agency involvement, there are inconsistencies in the level of engagement and follow through with the fathers. The county continues to work through the County Improvement Plan, which addresses this area.</p>

	<p>RECOMMENDATION</p> <p>It is recommended that the agency continue to encourage the utilization of FGDM and to better monitor the implementation of the FGDM family plan through the agency family service plan. As noted above, it would be recommended that the agency focus on improvement strategies to better search, engage and involve the non-custodial parent in all areas of case practice.</p>
<p>Practice Area: Permanency Activities</p> <p>QSR Indicator: Stability</p> <p>QSR Indicator: Living Arrangement</p> <p>QSR Indicator: Permanency</p> <p>QSR Indicator: Academic Status</p> <p>QSR Indicator: Pathway to Independence</p> <p>QSR Indicator: Parent and Caregiver Functioning</p> <p>QSR Indicator: Efforts to Timely Permanence</p>	<p>Permanency is another area where continued effort is being noted in Erie County. The county continues to see an increase in child permanency. Over the past year however, the county has also seen a noticeable increase in the number of children in out of home care. There may be many drivers that contribute to this increase, including safety planning, an increase in referrals and increased drug use in the county.</p> <p>In regards to concurrent planning, the agency is asking for concurrent goals of reunification and adoption as early as at the time of the dispositional hearing. Adhering to the Fostering Connections Act, workers are seeking kinship placements which may be permanent in nature. Review hearings statutorily are to be held every 6 months, however, workers are routinely asking for hearings within a 60 or 90 day period so as to achieve the permanency path more quickly. The agency continues to evolve in achieving the goal of permanency through legal custodianship.</p> <p>The agency has mostly relied on the Independent Living Program for many of the transitional IL services, including the actual transition plans. The agency has begun working with the adult MR system and the adult MH system to transition those services as kids reach adulthood. There are often team meetings as services get transitioned from the child welfare system to the adult systems. Caseworkers have also assisted kids in applying for social security benefits and welfare benefits as well as transporting adolescents to their driver's permit test and assisting in obtaining state ID's. After it has been identified that a child is planning to leave care (usually about 2-3 months before turning 18 or before high school graduation), workers and the ILP workers get together with the child (sometimes together and sometimes individually) and start planning for where the child will be living and how expenses are covered.</p> <p>The agency has been making attempts at having more visits in the community or in the family or kinship homes. A visitation room in Corry is available to make it easier for South County residents to visit which is also cost/time efficient. Visits between siblings have also increased and are occurring regularly.</p> <p>RECOMMENDATION</p> <p>Erie county has shown noticeable improvement in this area and it would be recommended that the agency continue to place concerted efforts toward permanency activities and continue to monitor and assess permanency at all stages of a case.</p>
<p>Practice Area: Placement Settings</p> <p>QSR Indicator: Living Arrangement</p>	<p>Erie County OCY has seen a noticeable increase in placement numbers. Typically, when it has been determined through a safety assessment that a safety threat exists and the child cannot be maintained in the family home safely without a safety plan, the agency will secure custody and remove the child. At the time the decision is made to secure custody, the agency begins to develop a placement plan that is individualized to meet the specific needs of the child to include emotion needs, physical location as well as stability and permanency goals. The agency initiates a diligent search to locate any and all possible kin that may be an appropriate placement option for the child. Kinship caregivers are given priority over out of home providers, when they safely and appropriately meet the needs of the child. The county works</p>

conscientiously to also keep children in their home school or school district. If a child is placed at a shelter or in temporary foster/kinship care the agency makes every effort to have the child attend their home school (i.e. relatives or school district transports, caseworker speaks to McKinney Vento liaison, etc).

RECOMMENDATIONS

It is recommended that the agency continue monitoring placement policy and practices in order to ensure necessary placements are utilizing kinship caregivers and least restrictive setting options.

The following chapters 3350, 3700, 3130, 3490, CPSL and Chapter 20 were reviewed during the annual licensing review. Based on violations with regard to chapters 3130 and 3490, the Department of Human Services, Office of Children, Youth and Families is issuing the following citations which require a plan of correction.

REGULATORY FINDINGS REQUIRING PLAN OF CORRECTION

1. 55 PA CODE CHAPTER	2. NON-COMPLIANCE AREA	3. CORRECTION REQUIRED	4. REQUIRED CORRECTION DATE	5. PROVIDERS PLAN OF CORRECTION OR RESPONSE	6. STATUS OF CORRECTION
3490.232 (c)	<p>The agency failed to show efforts in locating the older children for at least one case. 1). The GPS came in on 02/03/2015 due to home conditions, lack of food, and other adults living in the home. 2). The case was assigned a 5-day response time. 3). The 1st attempted home visit was 02/09/2015 (correct address was confirmed), the next attempted home visit was not until 02/12/2015 and not again until 02/24/2015 (children ages 3, 5, 6). There was an attempt made to locate the child at school on 02/26/2015. The child was not in school and another attempt to see the child was made again 03/02/2015. 4). Home visit completed 03/05/2015 and child was finally seen. The documentation does not appear to show that the allegations were adequately addressed</p>	<p>The agency shall develop a plan that ensures assertive efforts are made to meet assigned response times and that the agency is making every effort to see children in order to ensure the safety.</p>	December 7, 2015	<p>Supervisors meet every morning to discuss new referrals. They determine the response times and assign to their units appropriately.</p> <p>Caseworkers are required to make contact within the assigned response time. If contact is not able to be made, the intake worker will notify the supervisor and the case will be floated. When a case is floated, there is a requirement that someone on each shift will make attempts to contact the family in person. The worker is also required to attempt to see the children daily until all children are seen.</p>	<p>Ongoing</p> <p><i>plan accepted</i></p>

<p>3130.21(b) Per Fostering Connections</p>	<p>The agency failed to complete the due diligence process to find kin within 30 days of placement. Paperwork to support the attempts to locate kin was not able to be located within the file for two cases.</p>	<p>The agency shall submit a plan to ensure that within 30 days of the placement of a child, kin is being identified and explored as possible placement options. This shall be clearly documented and detailed in each case record.</p>	<p>December 7, 2015</p>	<p>Supervisors will ensure that each caseworker has a copy of the Fostering Connections Special Transmittal by reviewing with their units and making sure that they understand their responsibilities.</p> <p>Supervisors will review and document in supervision due dates for completing genograms, social histories, and sending kinship notification letters.</p> <p>Supervisors will keep track of due dates and caseworkers' compliance.</p> <p>Supervisor will monitor and review in supervision the need to re-send kinship letters and continuing family finding efforts.</p> <p>Caseworkers will complete a genogram with the family when children are removed from the home.</p> <p>Family Finding efforts will be documented in the Shelter Care Application, Dependency Petition, and on every court summary for review hearings.</p>	<p>Ongoing</p> <p><i>Plan accepted</i></p>
<p>3130.21(b) Per Act 119</p>	<p>Child Grievance policy was unable to be located in at least two cases.</p>	<p>The agency shall review Act 119 that establishes that all children in placement must have the grievance process explained to them. The agency shall develop a plan to ensure this documentation exists in the appropriate files. If the child is deemed to be too young to sign the grievance form the agency must</p>	<p>December 7, 2015</p>	<p>The administrators of the ongoing and intake departments will review with their assigned supervisors the requirements and expectations of Act 119 by January 15, 2016.</p> <p>The supervisors will review and</p>	<p>In process</p> <p><i>Plan accepted</i></p>

indicate that on the form within the child's file.

document in supervision that the child grievance forms were completed at the time of placement.

Erie County's child grievance forms, policies, and procedures will be reviewed and revised by the management team by January 15, 2016.

The supervisors will review Act 119 with all of their caseworkers by January 31, 2016 including a review of the changes made to the forms and policies.

THE LEGAL ENTITY REPRESENTATIVE MUST COMPLETE COLUMN 5, SIGN ON THE SIGNATURE LINE AT THE BOTTOM AND DATE ALL PAGES OF THIS DOCUMENT.
RETURN THIS ENTIRE DOCUMENT TO YOUR REGIONAL OFFICE BY: December 7, 2015

SIGNATURE OF LEGAL ENTITY REPRESENTATIVE

TITLE

DATE

TELEPHONE NUMBER

[Handwritten Signature]

12/7/15