

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Child and Family Services Agency



Administrative Issuance: CFSA-09-07

TO: All CFSA Congregate Care Program Monitoring Staff

FROM: Winifred Wilson, Deputy Director for Community Services

DATE: April 24, 2009

RE: Congregate Care Program Monitoring

The purpose of this administrative issuance is to set forth standard procedures and guidelines that a Child and Family Services Agency (CFSA) congregate care program monitor in the Congregate Care and Home Study Contract Monitoring Division (CCHSCMD) of CFSA's Contract Monitoring and Performance Improvement Administration (CMPPIA) shall follow to conduct program monitoring activities and multi-tiered assessments, inspections, and evaluations of congregate care contractors who operate under the authority of CFSA and the District of Columbia (DC). Additionally, this issuance establishes that a CFSA program monitor shall monitor programs that provide congregate care services to children, youth, or families entrusted to the care of CFSA regardless of the established funding source or payment mechanism (e.g., private contracts, grant funded, intergovernmental agreements, negotiated *per diem* rates, etc.).

CFSA CMPPIA supervisory staff and employees shall follow a standardized monitoring system to implement annualized program-monitoring plans aimed at increasing the safety and well-being of children and youth entrusted to the care of the District. These plans shall guide monitoring personnel on how to examine and issue statements of findings related to the quality and sufficiency of services that a CFSA-contracted, licensed, granted, or other provider renders to children, youth and families. A program monitor shall report immediately to his or her supervisor and program manager any material findings. The program monitor shall direct the program to submit and implement a Program Improvement Plan (PIP) in response to each finding that may result in a harmful condition for an individual having contact with a program, including but not limited to each facility or office location. CFSA program monitoring activities shall include but are not limited to evaluation of a program's delivery and coordination of care, education, physical and mental health, and substance abuse services; sanitary and environmental facility inspections; on-going announced and unannounced onsite visits during regular and off business hours; youth and staff satisfaction interviews, program observations, program improvement planning & follow-up; use of standardized tools and instruments that document specific findings; annual review of performance outcomes and a program's level of compliance with fiscal, public and life safety, legal and other contractual requirements.

PROGRAM OBJECTIVES

1. Program monitoring staff shall have clear guidelines and protocols for conducting routine monitoring activities aimed at improving out-of-home services to CFSA children, youth and families.

2. Program monitors shall follow a clear process that requires contractors to operate in such manner that is consistent with applicable federal and state statutes, District of Columbia Municipal Regulations, contract deliverables, and applicable CFSA policy and performance standards.
3. Program monitors shall monitor contracts according to an annualized monitoring plan and schedule that outlines the cycle of program visits a program monitoring staff will implement to ensure sufficient monitoring of contracts during each shift of operation, including weekdays, nights and weekend hours, as determined by the monitoring plan.
4. Program Monitors shall use standardized tools, instruments, and a clear methodology to produce a monitoring report of findings that documents completion of required monitoring activities and contractor performance.
5. A program monitor's assignment to monitor a specific contract shall not exceed a two-year term without the authorization of the CMPIA administrator or designee.

GENERAL REQUIREMENTS

Congregate Care and Home Study Contract Monitoring Division staff shall implement and follow Standard Operating Procedures (SOP) to monitor programs that provide a service to children, youth and families served by CFSA. The SOP shall include, but not be limited to the following components:

1. Monitoring Plan: CCHSCMD program monitors shall complete all of the following tasks:
 - a. Create an initial monitoring plan for each assigned program no later than 30 days after receiving an assignment.
 - b. Include in the monitoring plan the level, frequency and scope of contract monitoring activities necessary to assess a program's rate of performance and compliance in all of the following areas:
 - i. Public and Life Safety Risk
 - ii. Legal and Policy Mandates
 - iii. Contract Requirements
 - iv. Unusual Incident and Grievance Reports
 - v. Staffing and Post Coverage
 - vi. Program and Service Delivery (e.g., independent living, educational, vocational, physical and mental health, substance abuse, transportation, child care, food, and nutrition)
 - vii. Expenditure of Funds
 - viii. Employee Qualifications, Background Checks, Training & Duties
 - ix. Emergency Preparedness
 - x. Physical Plant Maintenance
 - xi. Community Integration
 - xii. Management and Organizational Structure
 - xiii. Decide which monitoring activities need to be completed for each program as assigned.
 - xiv. Determine the number and type of staff and other resources required to carry out the program monitoring plan.
 - xv. Perform, at minimum, quarterly reviews of each monitoring plan and make revisions as necessary to provide comprehensive program monitoring of each assigned program.
2. Monitoring Instruments: CCHSCMD program monitors shall complete all of the following tasks:
 - a. Develop standardized program monitoring instruments to monitor all congregate care contracts (e.g., standard pay, intergovernmental, or per diem).

- b. Use these same standardized instruments to document the completion of each program monitoring activity in accordance with a program's existing program monitoring plan.
 - c. Develop additional instruments if directed by a supervisory program monitor to conduct specialized reviews or address significant contract modifications during a contract period.
3. Monitoring Activities: CCHSCMD program monitors shall conduct the following monitoring activities as necessary to implement an annual monitoring plan, address a specific concern, and to maintain a clear picture of a vendors' level of program performance requirements:
- a. Contract Delivery of Services, including but not limited to the following:
 - i. Timeliness of responding to placement and referrals
 - ii. Development and maintenance case plans/service plans for children and families
 - iii. Adequacy of resident clothing
 - iv. Rendering and coordination of physical health, mental health, substance abuse and dental services
 - v. Submission of discharge and termination information and other reports required by CFSA
 - vi. Adherence to the CFSA Client Grievance Procedure
 - vii. Program performance outcomes
 - viii. Compensation, incentives and liquidated damages issues
 - ix. Program description
 - x. Admission and termination procedures
 - xi. Adherence to program staffing requirements and levels
 - xii. Thorough criminal background investigations
 - xiii. Training and staff development requirements
 - xiv. Record keeping and reporting requirements
 - xv. Physical plant sanitation and hygiene requirements
 - xvi. Practice of safety and emergency procedures
 - xvii. Life Skills Training
 - xviii. Provision/coordination of education services
 - xix. Adequate supervision of residents
 - xx. Use of discipline with residents
 - xxi. Program Evaluation and Quality Improvement
 - xxii. Level of cooperation with CFSA monitoring requirements
 - b. Public and Life Safety Reviews
 - c. Emergency Preparedness Inspections
 - d. Employee Qualifications, Training and Duties Reviews
 - e. Performance Measure Evaluations
 - f. Programs and Services Observations
 - g. Policy and Procedure Reviews
 - h. Entrance and Exit Interviews
 - i. Fiscal Reviews
 - j. Youth, Family, Staff, and Management Interviews
 - k. Youth Case File Reviews
 - l. Personnel File Reviews
 - m. Community Integration Reviews

4. Announced and Unannounced On-Site Visits: CCHSCMD program monitor shall complete all of the following tasks:
 - a. Conduct announced and unannounced on-site visits as required to monitor a program's risk of public or life safety, level of contract compliance, legal requirements, community concerns, and to complete each monitoring activity as outlined in the program's annual monitoring plan.
 - b. Conduct on-site visits to observe each shift of a program's operation in accordance with the annual monitoring plan.
 - c. Schedule on-site visits so that program monitoring takes place during each shift of operation, including weekdays, nights and weekend hours, as determined by the monitoring plan.
5. Monitoring Teams
 - a. The CCHSCMD program manager shall designate an individual to function as a team leader and to coordinate the completion of each monitoring activity.
 - b. The program manager, administrator or designee may request an individual from another CFSA administration to serve on a monitoring team to complete a monitoring activity involving a "specialty area" (e.g., Office of Youth Development, Office of Clinical Practice, and Licensing).
6. Program Reports
 - a. Supervisory program monitors shall ensure that programs operating under the authority of CFSA submit a monthly report to CFSA that includes but is not limited to the youth's name, date of birth, ward, as well as the type of service (e.g., program roster) provided for each youth accepted into a congregate care program contracted by CFSA.
 - b. Supervisory program monitors shall ensure that programs operating under the authority of CFSA submit a copy of the report referenced in section 6.a directly to the Placement Services administrator for review and FACES reconciliation.

MONITORING IMPLEMENTATION PROCESS

The CMPIA program monitor and monitoring team shall conduct all of the following activities:

1. Initial Planning Meetings: The assigned team leader shall convene a meeting (or teleconference) with the monitoring team no less than 15 business days before the start of a monitoring review (or one program monitor in lieu of a monitoring team) to discuss and establish all of the following:
 - a. Rationale for monitoring a particular program.
 - b. Staff responsibilities for reviewing written information submitted to CFSA from a program.
 - c. Specific section(s) of the monitoring report to be completed by team members.
 - d. Deadlines for team members to complete a review of background information submitted by a program, conducting the on-site monitoring visits and holding subsequent meetings.
 - e. Guidelines for staff to follow when sending notification to a program about staff assignments, site visit dates and times, entrance/exit conferences, and the list of resources needed before and during a program visit.
 - f. Authority of each team member.
 - g. Program area(s) requiring special concentration and focus.
 - h. Sample sizes for conducting monitoring activities (e.g., number of interviews and file reviews).

2. On-Site Monitoring Activities

- a. Program Entry Interview: The assigned program monitor shall complete all of the following tasks:
 - i. Arrive to the program site within the specified time as determined during the initial planning meeting.
 - ii. Present official DC government identification upon arrival.
 - iii. Conduct an entrance conference with the management personnel and clearly explain the purpose, objectives, and specific agenda for each visit.
 - iv. Observe each program location as necessary to perform a monitoring activity.
 - v. Communicate immediately to the CMPIA program manager if a program refuses admittance to a site or location.
- b. Collecting and Analyzing Written Material: The assigned program monitor shall complete all of the following tasks:
 - i. Review program documents and maintain copies of support documentation used to substantiate a finding.
 - ii. Reference important documents and other information on standardized instruments and tools.
 - iii. Examine program memoranda, guidelines, procedures, policy statements, previous audit findings and other reports.
 - iv. Label, number and date documentation to allow clear identification and retrieval.
 - v. Summarize team findings and seek consensus on issues, findings, recommendations, conclusions, and items of clarification or explanation that should be presented during the program exit interview.
- c. Completion of Monitoring Activities: The assigned program monitor shall perform the monitoring activities outlined in the annual monitoring plan and include sufficient information on each instrument and tool to provide a comprehensive briefing of the issues at the program exit.
- d. Program Exit Interview: The assigned program monitor shall complete all of the following tasks:
 - i. Convene a meeting with program management and the monitoring team members at the conclusion of a monitoring exercise.
 - ii. Report each material finding, conclusion and recommendation resulting out of team consensus.
 - iii. Maintain a professional, courteous demeanor with program personnel at all times.
 - iv. Limit his or her feedback to relatively straightforward interpretations of the requirements and recommended resolutions to problems without making guarantees unless the CFSA director or designee grants authorization to do so.
 - v. Communicate the projected time for submitting a CFSA final report of findings if it is not prepared for issuance at program exit

3. Off-Site Monitoring Activities

- a. Post-visit Team Meeting: The assigned program monitor shall hold a meeting with the monitoring team within 15 business days of conducting a program exit to complete each of the following tasks:
 - i. Review the format requirements for the monitoring report and identify any additional information needed to complete each section of the report.
 - ii. Instruct team members of the necessity to correctly record in the report each material finding, recommendation, and conclusion resulting from a monitoring visit.

- iii. Instruct team members to review personal notes and work papers resulting from the site visit and to edit them for clarity and completeness.
 - iv. Discuss each material observation and finding.
 - v. Differentiate team member recommendations from actual violations noted.
 - vi. Discuss resolutions for each conclusion or recommendation not supported by team consensus.
- b. Monitoring Report: The assigned program monitor shall complete all of the following tasks:
- i. Coordinate the submission of information compiled by team members during the monitoring visit and post-monitoring team meeting(s).
 - ii. Outline the method and criteria used to determine the level and scope of monitoring activities, sample sizes, and program areas selected during a program monitoring exercise.
 - iii. Prepare a computer generated (typed) report of monitoring information in a clear and understandable manner, supported by sufficient, relevant and competent evidence.
 - iv. Include all of the following information in each report:
 - a) An executive summary outlining each material finding, conclusion, recommendation and corrective action time frame
 - b) General demographic information about the program
 - c) Annual monitoring plans
 - d) Copy of the instruments/tools noting each finding, recommendation, and conclusion
 - e) Monitoring correspondence to and from a program
 - f) Fiscal statements, Certified Public Accountant reports
 - g) Statistical tables and charts
 - h) Organizational flow charts and diagrams
 - i) Monitoring work papers and any exhibits attached to the report
 - v. Secure the signature of each member of the monitoring team and the CCHSCMD program manager before routing the report to the administrator, director, or external source.
 - vi. Maintain the official file of each report and supporting documentation to be consistent with CFSA and District policy.
- c. Unit Reports and File Management: Supervisory program monitors shall complete both of the following tasks:
- i. Maintain comprehensive monthly reports in the program file that summarize the monitoring activities completed at each assigned program.
 - ii. Conduct an annual review of each program monitor's files to ensure that they contain the information required by this issuance, and they are organized in accordance with unit protocols.

CFSA CONTRACTED PROGRAM TYPES

1. CFSA Licensed Programs: The assigned program monitor shall complete all of the following tasks:
 - a. Conduct visits to CFSA non-contracted licensed programs when requested by the director or designee.
 - b. Seek licensing feedback concerning each CFSA licensed program from the Facility Licensing Division within the Office of Planning Policy and Program Support.
 - c. Maintain a copy of a program's license in the monitoring file.
2. CFSA Contractual Programs: Licensed by another DC Agency: The assigned program monitor shall complete both of the following tasks:

- a. Conduct monitoring activities at non-CFSA licensed contractual programs in accordance with the annual monitoring plan and contract agreement.
 - b. Conduct no less than quarterly monitoring activities at each congregate care facility that is outside of the DC metropolitan area (e.g., National Center on Institutions and Alternatives or NCIA, located in Baltimore, MD) in accordance with an annual monitoring plan and the CFSA contract.
3. Out-of-State Contracts: The CCHSCMD supervisory program monitor or designee may:
- a. Serve as the CFSA representative for any out-of-state Inter-Agency Monitoring Team as requested by the director or mayor. Other team members may come from the Department of Youth and Rehabilitation Services, DC Public Schools, or the District's Department of Mental Health.
 - b. Submit reports as requested and approved by the CCHSCMD program manager.

CONFIDENTIALITY AND PRIVACY

It is the policy of the Child and Family Services Agency to ensure that all client records and information are kept confidential and protected from public or unauthorized disclosure. Client information collected, created and/or maintained by, or on behalf of, CFSA shall only be released in accordance with the federal and District privacy and confidentiality laws and regulations. (See *the CFSA policy on [Confidentiality](#) for more information.*)

Attachment A Definitions

1. **Congregate Care Program** – An out-of-home placement service that provides 24 hours, seven days a week group home and or ILP level of care housing, supervision and services to CFSA children, youth and families.
2. **Material Finding** – An observation or result that indicates a program has committed a substantial violation of law, regulation, or contractual agreement that creates actual harm or potential of harm, or substandard conditions for children, the community or program.
3. **Monitoring Plan**- A standardized document completed by a program monitor as documentation of comprehensive monitoring activities planned to ensure contractor delivery of services consistent with each contract.
4. **Monitoring Team** – Two or more program monitors or other CFSA staff assigned to perform program-monitoring activities during a CFSA program monitoring exercise or review.
5. **On-going Program Monitoring** – The process that a program monitor implements to observe, collect data, perform analysis and report on a program's overall performance and services delivered to children, youth and families served by CFSA.
6. **Per Diem Contract**- A written agreement in which CFSA agrees to pay a vendor for services rendered based upon an agreed upon daily rate as established by a level of care or other rate setting process.
7. **Program** – A CFSA contracted, licensed, granted or other provider that renders services to children, youth and families served by DC CFSA.
8. **Program Improvement Plan (PIP)** - A document that CFSA requires a program to submit that outlines specific plans, time frames, responsible people and methods that a program shall set forth to correct a violation, deficiency, or public concern cited for correction.
9. **Program Manager of Congregate Care and Home Study Contract Monitoring** – An individual assigned to manage the activities of the Congregate Care and Home Study Contract Monitoring Division as outlined within this document.
10. **Program Monitor** - An individual assigned by the CCHSCMD program manager or designee to carry out the duties, responsibilities and activities relative to on-going program monitoring. This definition may incorporate a specialty monitor as requested from another CFSA Administration (e.g., Office of Youth Development or Office of Clinical Practice).
11. **Specialty Monitor** - An individual requested by the CCHSCMD program manager or designee to be utilized from another CFSA administration to serve on a program monitoring team to conduct program monitoring activities in a specialty area (e.g., licensing, education, dietary, or health).
12. **Standard Payment Contract** – A written agreement where CFSA agrees to make monthly payments to a vendor for services rendered in accordance with an agreed upon price or rate.
13. **Supervisor of Program Monitoring** – An individual assigned by the CCHSCMD program manager to oversee and approve the job duties, responsibilities and activities conducted by a program monitor charged with performing on-going monitoring according to this administrative issuance.