

Risk Pool Peer Review Committee

Executive Summary Report

Fiscal Year 2021 - 2022

Executive Summary:

The department established a Risk Pool Peer Review Committee (the Committee) pursuant to Ch. 409.990 (8), Fla. Stat. (2021), for state fiscal year (FY) 2021-2022. The Risk Pool application process was informed by lessons learned from prior year reviews as well as the availability of extensive additional information from reports developed pursuant to proviso language included in the General Appropriations Act (Specific Appropriation 321) for FY 2021-2022. In compliance with this proviso language, the department (DCF) completed a comprehensive, multi- year review of the revenues, expenditures, and financial position of all Community-Based Care Lead Agencies (CBCs) including a comprehensive system of care analysis. This submission also included a financial viability plan from all lead agencies.

The Committee conducted a review virtually in October 2021 and February 2022 with relevant information available from multiple sources to make recommendations. The documents reviewed are below:

- Risk Pool Funding Application FY 2021-2022
- Financial Viability Plan FY 2021-2022
- Budget Projections provided by the CBC
- [The Child Welfare Dashboard](#)
- [CBC Contract Monitoring Reports](#)
- [Previous Risk Pool Reports](#)
- CBC Contract Monitoring Data Packets
- [The Child Welfare Key Indicators Monthly Report](#)
- Florida Safe Families Network (FSFN) Aggregate Payment Data
- Status Update on CBC Contract Oversight Unit (COU) monitoring
- Status Update on Prior Risk Pool Recommendations (if any)
- Most recent Single Audit (CPA Audit)

Additional information was requested and follow up provided by the CBCs which allowed the team to make a recommendation without an on-site visit for any applicant.

The Committee consisted of:

Barney Ray, DCF Director of Revenue Management and Partner Compliance (Team Leader)

Nadereh Salim, CEO, Children's Network of SW Florida, LLC

Donna Eprifania, CFO, ChildNet, Inc.

Mohamed Ghalayini, CFO, Citrus Family Care Network

James Weaver, DCF Director of Protective and Supportive Services

Charles Scherer, DCF Central Region, Regional Managing Director

While the specific areas of review and analysis varied based on the unique needs and circumstances of each Region, Circuit and CBC, the risk pool framework provided an outline for organizing the work of the Peer Review Committee. Areas of greatest need were a consideration in the recommended allocation of funding.

The committee reviewed statewide and individual CBC data related to efforts to maximize federal funding opportunities under the traditional Title IV-E program such as licensing relative and non-relative placements as Level I foster homes, Title IV-E child eligibility rate and Title IV-E traditional foster care candidates. The committee also reviewed data from CBCs for the placement settings eligible and ineligible under the Family First Prevention Services Act (FFPSA) for federal funding.

Applicant Summary:

The amount of appropriated risk pool funding is \$13,054,312 and five lead agencies applied for risk pool funding requesting a total of \$15,656,033 which exceed the funding available. All funds are proposed to be allocated. An evaluation of progress of each financial viability plan should be a consideration for the allocation of any additional funding in addition to factors beyond the control of the lead agency.

Contract #	Lead Agency	Circuit	Requested Amount	Secretary Approved Allocation
AJ495	Lakeview Center Inc dba Families First Network	1	\$ 2,750,000	\$ 2,704,878
BJ102	Big Bend CBC dba Northwest Florida Health Network	2 and 14	\$ 1,608,696	\$ 1,495,617
GJ401	CBC of Brevard, Inc. dba Brevard Family Partnerships	18 (Brevard County)	\$ 885,651	\$ 528,962
QJ2B0	Safe Children Coalition	12	\$ 2,280,486	\$ 1,600,534
QJ014	Family Support Services of Suncoast	6	\$ 8,131,200	\$ 6,724,321
Total			\$ 15,656,033	\$ 13,054,312

The peer review team made recommendations based upon the requirements established in Ch. 409.990 (8), Fla. Stat. (2021), FS below.

(8)(a) The department, in consultation with the Florida Coalition for Children, Inc., shall develop and implement a community-based care risk pool initiative to mitigate the financial risk to eligible lead agencies. This initiative must include:

- 1. A risk pool application and protocol developed by the department which outlines submission criteria, including, but not limited to, financial and program management, descriptive data requirements, and timeframes for submission of applications. Requests for funding from risk pool applicants must be based on relevant and verifiable service trends and changes that have occurred during the current fiscal year. The application must confirm that expenditure of approved risk pool funds by the lead agency will be completed within the current fiscal year.*
- 2. A risk pool peer review committee, appointed by the secretary and consisting of department staff and representatives from at least three nonapplicant lead agencies, which reviews and assesses all risk pool applications. Upon completion of each application review, the peer review committee shall report its findings and recommendations to the secretary, providing, at a minimum, the following information:*
 - a. Justification for the specific funding amount required by the risk pool applicant based on the current year's service trend data, including validation that the applicant's financial need was caused by circumstances beyond the control of the lead agency management;*
 - b. Verification that the proposed use of risk pool funds meets at least one of the purposes specified in paragraph (c); and*
 - c. Evidence of technical assistance provided in an effort to avoid the need to access the risk pool and recommendations for technical assistance to the lead agency to ensure that risk pool funds are expended effectively and that the agency's need for future risk pool funding is diminished.*

(b) Upon approval by the secretary of a risk pool application, the department may request funds from the risk pool in accordance with s. 216.181(6)(a).

(c) *The purposes for which the community-based care risk pool shall be used include:*

- 1. Significant changes in the number or composition of clients eligible to receive services.*
- 2. Significant changes in the services that are eligible for reimbursement.*
- 3. Continuity of care in the event of failure, discontinuance of service, or financial misconduct by a lead agency.*
- 4. Significant changes in the mix of available funds.*

Risk Pool Distribution Allocations and Recommendations:

Lakeview Center, Inc dba Families First Network. (FFN) – DCF Contract # AJ495 for Circuit 1

Request: \$ 2,750,000

Allocation: \$ 2,704,878

Summary of Findings:

Based on an analysis of FFN's budget and the information provided, the Committee found that FFN qualifies for risk pool funding.

Based on the information reviewed the Committee was able to affirm the following:

- FFN is funded at 75.5% of optimum funding based on the Florida Funding for Children model (FFFC) which placed them 13 out of 19 CBC contracts in optimum funding.
- FFN has kept a low administrative rate and has reduced their rate almost every year. Most recent decrease from 2.9% in FY 2019-2020 to 2.6% in FY 2020-2021.
- According to the annual adoptions report, FFN had a record year with 318 adoptions in FY 2020-2021 which was 31 or (11%) more than FY 2019-2020.

Recommendations for FFN:

The Committee review found that Families First Network does qualify for risk pool funding.

1. While FFN did increase the number of adoptions finalized last year, there is still many children waiting for adoptive placements or adoption finalization. FFN needs to focus on reducing the time to permanency for adoptions.
2. FFN should place a stronger emphasis on the reduction in the number of children in residential group care to an appropriate placement setting.

Big Bend Community Based Care, Inc. dba NWF Health Network (NWFHN) – DCF Contract # BJ102 for Circuits 2 & 14

Request: \$1,608,696

Allocation: \$1,495,617

Based on the information reviewed the Committee was able to affirm the following:

- NWFHN is funded at 91.4% of optimum funding which is 5th of 19 CBC contracts based on the Florida Funding for Children model.
- NWFHN achieved the 40% goal of all relative and non-relative placements as child specific licensed Level I foster homes in July 2021 and has maintained that level since.

- NWFHN funded Level 1 licensing specialist positions at a total cost of \$706,799. This is above the funding provided by DCF in the amount of \$471,902.
- NWFHN has higher case manager turnover and average caseload currently than last year.
- In FY 2020-21, NWFHN implemented many successful strategies that made a positive impact on reducing the number of children in group care by 37% from 102 to 64.
- NWFHN reduced their administrative costs to below 5% in FY 2020-21.

Recommendations for NWFHN:

Based on an analysis of the NWFHN's budget and the information provided, the Committee found that NWF Health Network qualifies for risk pool funding.

The following three recommendations are made:

1. NWFHN should continue its efforts to stabilize and improve the case manager and supervisor retention and reduce caseloads.
2. NWFHN should continue efforts to lower group care placements which is trending in right direction.
3. NWFHN should continue to focus on efforts to find the appropriate setting in foster homes for children.

Community Based Care of Brevard, Inc. dba Brevard Family Partnerships – DCF Contract # GJ401 for Brevard county in Circuit 18

Request: \$ 885,651

Allocation: \$ 528,962

Based on the information reviewed the Committee was able to affirm the following:

- BFP is funded at 88.8% of optimum funding based on the Florida Funding for Children model (FFFC) which placed them 9th out of 19 CBC contracts in optimum funding.
- BFP did experience an increase in removals during FY 2019-2020 which exceed their ability to exit children from care which created and an increase in the number of children in out-of-home care. The net of removals above exits was 152 that year which creates a bubble of clients that normally takes 18 to 24 months to move to permanency.
- In their application, BFP said there was an 11% decrease in the number of families referred to Non-Judicial In-Home Services. BFP's budget for prevention services of \$1,087,211 in FY 2021-2022 is reduced from their FY 2020-2021 expenditures of \$1,568,967.

- In partnership with DCF, BFP is piloting the Substance Exposed Newborns (SEN) units with the goal of timelier reunification and decreased length of stay to permanency. Brevard County will implement an Early Childhood Court in January 2022 if not sooner.
- BFP said that there was a backlog of judicial reviews impacting case closures and case movement which was impacted by delays in trials during the pandemic. They reported that a new judge began in January 2021. BFP is working with the judge to help address delays.

Recommendations for BFP:

The Peer Review Committee found that Brevard Family Partnership qualifies for risk pool funding.

The following three (3) recommendations are made:

1. BFP should hold permanency staffings more frequently, at least every three (3) months or more frequently if possible. These staffings may occur in conjunction with multidisciplinary team (MDT) staffings as required in Senate Bill 80.
2. BFP should determine where in home cases are converting to out-of-home cases are coming from (in-home, relative or community) to ensure proper supports and services are in place and adjust resource allocation appropriately so the capacity to provide case management and services are based upon the needs of the child and their family.
3. BFP should continue to support and assist judiciary with clearing backlog of cases.

Safe Children Coalition, Inc. (SCC)- DCF Contract # QJ2B0 for Circuit 12

Request: \$2,280,486

Allocation: \$1,600,534

Based on the information reviewed the Committee was able to affirm the following:

- SCC is at 74.7% of optimum funding according to the Florida Funding for Children Model; they are the third lowest funded CBC in the state.
- SCC has been one of the most underfunded CBCs in the state for many years, despite this, they have managed to perform above statewide average for the most part.
- SCC had some of the highest removal rates in the state for several years, but most recently, the number of removals is trending down. The recent downward trend may be Covid-19 related.
- Despite record removal rates for several years, between June 2020 and June 2021 SCC has reduced average monthly in-home cases by 25 children and out-of-home cases have stayed relatively stable and not increased significantly.
- SCC has maintained steady discharge rates that are above the statewide average; albeit a slight decline in FY 2019-2020.
- SCC made a significant reduction in group home census since June 2020 from 95 to 67 placements in January 2022, although their daily rate has gone up. Over the last 4 years they have reduced group care costs by \$1 million.
- SCC has had several major events in their recent history (3 years) that created additional challenges and opportunities:
 - Separated from Sarasota YMCA and established their own entity (SCC)
 - One of their case management organizations or CMOs (Family Preservation Services) gave them a 30-day notice to terminate their contract for family preservation services
 - SCC began providing CMO services in-house for Sarasota and DeSoto Counties
 - One CMO was changed due to poor performance and Lutheran Services Florida was selected to serve Manatee County.
 - DCF closed a local group home (Everyday Blessings), SCC stepped up and opened their own group home for their most challenging youth.
 - SCC was asked to take over diversion services in Manatee County, funded by Manatee County Government. Removals in Manatee County have gone down drastically.
- SCC has sought and received more than \$3.7M in additional funding for a variety of local grant programs.
- SCC has a strong management team which has overcome many obstacles including significant under funding.

- SCC has kept a low admin rate and reduced their rate every year.
- SCC has successfully implemented previous Risk Pool recommendations.

Recommendations for SCC:

The Committee found that Safe Children Coalition qualifies for risk pool funding. The Risk Pool funding is approved to be used to offset out of home care costs.

The expenditure of approved risk pool funds is based on relevant and verifiable service trends and changes that have occurred during the current fiscal year. The applicant's financial need is caused by circumstances beyond the control of the lead agency management. The use of risk pool funds meets at least one of the purposes specified in section 409.990 (7)(c), F. S.

1. SCC has implemented many strategies and initiatives to reduce entries, maintain and increase exits, reduce group care placements, and manage costs while maintaining good performance. SCC continuing these efforts should produce long term positive effects on their system, including finances.
2. SCC should continue to seek additional community and grant funding.

Family Support Services of Suncoast (FSSS)– DCF Contract # QJ014 for Circuit 6

Request: \$ 8,131,200

Allocation: \$ 6,724,321

Based on the information reviewed, the Committee was able to affirm the following:

- DCF gave notice of contract cancellation to the previous lead agency, Eckerd Connects, in November 2021.
- FSSS was awarded the contract as lead agency in Judicial Circuit 6 and assumed operations on January 1, 2022, under a shortened time frame for transition.
- In October 2021, Eckerd Connects projected a \$14 million deficit for State Fiscal Year 2021-2022 and had received risk pool and additional budget for operation deficits every year since State Fiscal Year 2017-2018.
- Circuit 6 is funded at 70.9% of optimum funding based on the Florida Funding for Children model (FFFC) which is the lowest percent of funding of any CBC in the state.
- Although removals have recently trended slightly downward, there is a lag time between removals and exits from care. Therefore, it will likely take up to 24 months before those reductions will be realized and the number of kids served declines.
- The previous CBC has struggled with meeting their performance measures over the past several years.
 - Placement moves per 1,000 bed days is the lowest in the state.
 - The second lowest in the state in placing siblings together.
 - Did not meet 7 of the 12 Scorecard goals.
- There has been a significant increase in total population served, and more importantly a significant increase in out-of-home care, which is more costly than in-home care.
- The previous CBC experienced an increase in residential group care especially for the teen population. They are the second highest in the state.
- Circuit 6 has experienced a decrease in exits under the previous CBC. Their months to discharge and their time to permanency have been steadily going up. Their Average Length of Stay is 21.31 months which is higher than the State Average of 18.53 months and it is trending upward.
- Front end services seem substantial in financial funding however there is a question as to the cost effectiveness of these programs.

Recommendations for FSSS:

The Peer Review Committee found that Family Support Services of Suncoast qualifies for risk pool funding. The Risk Pool funding is approved to be used to offset out of home care costs.

The expenditure of approved risk pool funds is based on relevant and verifiable service trends and changes that have occurred during the current fiscal year. The applicant's financial need is caused by circumstances beyond the control of the lead agency management. The use of risk pool funds meets at least one of the purposes specified in section 490.990 (7)(c), F.S. (2020).

1. Place an emphasis on the reduction in the number of children in residential group care to a more appropriate placement.
2. Examine and review for effectiveness front end services with providers since number of families served is going down but the cost remains the same.
3. Explore rapid permanency reviews and/or other targeted reviews to move cases to permanency.
4. Review in-home placements over 6 months (including post placement supervision) to assess for continued service needs or safe case closure. 142 out of 493 children have been in in-home placements more than 6 months.
5. Focus on reducing the caseload ratio (as recommended in prior risk pool reports).
6. Focus on addressing case manager turnover.