

Risk Pool Peer Review Committee Summary Report
Fiscal Year 2019-2020
November 2019

Executive Summary:

The department established a Risk Pool Peer Review Committee pursuant to section 409.990(7), Florida Statutes, for state fiscal year (FY) 2019-2020. The Risk Pool application process was informed by lessons learned from the 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 326) for FY 2019-2020. 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.

Due to the early application process this fiscal year, the Risk Pool Review Committee conducted a review with relevant information available from multiple sources to make recommendations. The documents reviewed are below:

- Risk Pool Funding Application FY 2019-2020
- Financial Viability Plan (FY 2019-2020)
- Budget Projections provided by the CBC
- CBC Financial Viability Integrated Data Report
- [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)

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 Risk Pool Peer Review Committee consisted of:

Barney Ray, Team Leader, DCF Director for Revenue Management and Partner Compliance

Larry Rein, CEO, ChildNet

Lauren Hahn, CFO, Communities Connected for Kids

Catherine Macina, CFO, Embrace Families

Walter Sachs, DCF Suncoast Regional Managing Director

Eric Emery, DCF Staff Director of the Office of Child Welfare

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.

Applicant Summary:

The amount of appropriated risk pool funding is \$8,054,312 and five lead agencies applied for risk pool funding requesting a total of \$17,454,778 which exceed the funding available. An allocation of a total of \$4,371,354 would leave a total of \$3,682,958 remaining for allocation later in the fiscal year in order to evaluate trends at that time. 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.

Lead Agency	Circuit	Requested Amount	Recommended Allocation
Families First Network	1	\$950,000	\$0
Big Bend Community Based Care	2 & 14	\$1,200,000	\$776,003
Safe Children Coalition	12	\$3,704,778	\$1,168,948
Eckerd Connects (Pasco & Pinellas)	6	\$7,400,000	\$1,592,997
Eckerd Connects (Hillsborough)	13	\$4,200,000	\$833,406
Total		\$17,454,778	\$4,371,354

The peer review team made recommendations based upon the requirements established in 409.990 (7), FS below.

(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:

Families First Network (FFN)

Initial Request: \$950,000

Initial Round Allocation: \$ 0

Based on the information reviewed, the Risk Pool Peer Review Committee was able to affirm the following:

- SFY 2014-2015 was the year with the highest number of removals. The total number of removals has decreased every year since then with the exception of SFY 2017-2018 which did have a slight increase; however, SFY 2018-2019 was the lowest number of removals since SFY 2013-2014. The removal rates per 100 alleged victims for investigations closed have been at or below the statewide average.
- FFN discharges had been relatively flat the last four years. The total number of discharges have not kept up with the declining number of removals. The Discharge rate per 100 children in out-of-home care has been at or below the statewide average.
- FFN has increased both the number and percentage of children served in-home in SFY 2018-2019 and exceeds the statewide average.
- FFN case manager caseload and turnover has improved from March 2019 but could improve further.
- FFN continues to place a high number and percentage of children in group care; especially those in the 6-12 age group. FFN spent about \$2.7M for this age group in SFY 2018-2019. A significant reduction in group home placements especially from this age group would significantly improve their financial viability.
- FFN continues to struggle with children whose parents' parental rights have been terminated (TPR'd), have placements identified, and are six or more months post TPR.
- Improvement in permanency measures would reduce caseloads and costs improving their financial viability.

Recommendations:

Based on an analysis of the FFN budget and the information provided, the Peer Review Committee found that FFN does not qualify for risk pool funding at this time due to decreases in entries into care and factors within their control such as whether to approve across the board cost of living salary increases of \$203,700. They also have not made improvements on getting children in adoptive placements and getting those cases closed out to permanency. Despite decreases in entries into out-of-home care, FFN has not been able to increase their number of exits from out-of-home to reduce their overall caseload. FFN also has a historical over reliance on residential group care for children ages 0-12. FFN could significantly affect their overall financial viability by aggressively following their financial viability plan and the recommendations listed below:

1. FFN should request and accept the Department's assistance in the form of sending experienced employees and/or contractors to help with one or more areas of specific need which could help improve case manager stability, discharges to permanency, placement stability, and reduce time to adoption and the number of children ages 0-12 in licensed residential group care (RGC).
2. Risk Pool funding provides a stopgap (non-recurring) resource intended to mitigate unanticipated changes in the number of clients and/or services needed for clients; it is not designed to annualize expenses. With this being FFN's fourth risk pool application, the agency should develop a plan to meet existing and trending client needs while reducing costs more in-line with their recurring core services funding allocation in anticipation of being financially viable by the end of the fiscal year.
3. FFN must continue efforts to reduce the number of children in RGC, especially those under the age of 13. By safely placing almost all of these children from these age groups in licensed foster homes, FFN could reduce their total licensed care expenditures by at least \$2M annually and reduce the need for additional funding.
4. FFN should analyze the issues surrounding high placement moves as this speaks to placement stability. Questions such as who is initiating the change and drilling down to the root cause of the high rate of placement moves should help develop countermeasures. The COU on-site monitoring report references insights that may be helpful on this item.
5. FFN should continue to place a strong emphasis on prevention/diversion, decreasing use of RGC, increasing use of relative/non-relatives, foster home recruitment, and use of foster homes.
6. FFN should identify a new cohort of Rapid Permanency Reviews for the 188 children in pre-adoptive placements longer than six months (53.4% of children who have been TPR'd). Lessons learned from this new cohort of Rapid Permanency Reviews should be incorporated for all children who are TPR'd in the future and placed for adoption to ensure barriers are identified and actively addressed. These placements are costing FFN an average of \$90,973 per month based upon FFN's average foster home board rate of \$16.13/day. Reducing this number will help improve performance measures around permanency and reduce costs to core services. FFN has been on a Corrective Action Plan for this measure since FY 2017-2018.
7. FFN should develop a plan to improve permanency which should include reunification, guardianship, and adoptions to increase discharges from out-of-home care overall.

Big Bend Community Based Care (BBCBC)

Initial Request: \$1,200,000

Initial Round Allocation: \$ 776,003

Based on the information reviewed, the Risk Pool Peer Review Committee was able to affirm the following:

- BBCBC's service area has experienced an increase in children entering out-of-home-care.
- BBCBC has seen an increase in the total paid for residential group care.
- Removals (entries) into out-of-home care continue to outpace discharges from out-of-home care and a decline in permanency within 12 months
- Due to the rural nature of most of the service area diversion services are not widely available.
- BBCBC continues to struggle with high turnover which has a negative effect on service delivery.
- Hurricane Michael (category 5) made landfall on October 10, 2018 and severely impacted the area served by BBCBC. The impacts are still affecting this area today.
- BBCBC requested and DCF staff from headquarters and region office have provided technical assistance since August 2019 to provide training to supervisors and mentoring to new case managers in Circuit 14. The assistance also includes conducting case management activities and support in training and quality assurance through November 1, 2019. BBCBC has requested continued assistance.

Recommendations:

Based on an analysis of the BBCBC's budget and the information provided, the Peer Review Committee found that BBCBC does qualify for risk pool funding based upon an increase in the number of clients served and factors beyond their control related to communities still impacted by Hurricane Michael and recommends a distribution of \$776,003. A distribution of risk pool funds would fund service interventions identified by BBCBC to decrease case management turnover and increase the number of foster home licensing staff. In addition, the following eight recommendations are made:

1. BBCBC should continue to request and accept the Department's assistance in the form of sending experienced employees and/or contractors to help with one or more areas of specific need which could help improve case manager stability, discharges to permanency, the effectiveness of frontend services, and reduce the number of children ages 6-12 in RGC.
2. Risk Pool funding provides a stopgap (non-recurring) resource intended to mitigate unanticipated changes in the number of clients and/or services needed for clients; it is not designed to annualize expenses. BBCBC should develop a plan to meet existing and trending client needs while reducing costs more in-line with their recurring core services funding allocation in anticipation of being financially viable by the end of the fiscal year.
3. BBCBC should continue initiatives itemized in last year's Risk Pool Report.

4. BBCBC must focus on its corrective action plan for children discharging from foster care to a permanent home within twelve months of entering care.
5. BBCBC should reduce their reliance on group care with an emphasis on reducing the number of children over the age of 5 in residential group care.
6. BBCBC should continue monthly, or more frequent, formal case reviews of all children placed in group care to identify children who could be moved to a less restrictive placement. Reviews should include placement and licensing staff to ensure newly licensed homes, with or without enhanced supports, are explored as safe placement options.
7. BBCBC should collaborate with the department to increase utilization of diversion services as a safe alternative to removals.
8. BBCBC should increase efforts to stabilize the workforce and reduce case manager turnover.
9. BBCBC must continue to work on their financial viability plan.

Safe Children Coalition (SCC)

Initial Request: \$3,704,778

Initial Round Allocation: \$ 1,168,948

Based on the information reviewed, the Risk Pool Peer Review Committee was able to affirm the following:

- The total number of removals by fiscal year has decreased each of the last three years and last year was about the same level as four years ago.
- The total number of discharges from out-of-home care declined 3% last year from the previous year.
- SCC experienced four consecutive months in the current fiscal year of a significantly higher number of removals (78 per month) which was 20 per month greater than the 12-month average of 58 removals per month last fiscal year.
- The number of relative/non-relative placements declined 11% in SFY 2018-2019 but the percentage of out-of-home care in these placements was still at or above the statewide average.
- The number of foster home placements increased 25% in SFY 2018-2019.
- SCC has done a good job of adding front end services as a concerted effort to help decrease the number of children entering care. They are currently rated a "3" on their family support services and safety management services. This rating indicates that the CBC is providing the services consistently as defined, with no capacity issues as demonstrated by no waiting lists and access across all service areas.

Recommendations:

Based on an analysis of the SCC budget and the information provided, the Risk Pool Peer Review Committee found that SCC does qualify for risk pool funding based upon a significant increase in entries into out-of-home care and recommends a distribution of \$1,168,948. A distribution of risk pool funds would fund service interventions identified by SCC to reduce the percentage of children entering care, increase relative and non-relative placements, increase the percentage of children reunified, and increase the percentage of foster homes retained and licensed. In addition, the following three recommendations are made:

1. SCC should request and accept the Department's assistance in the form of sending experienced employees and/or contractors to help with one or more areas of specific need which could help improve case manager stability and discharges to permanency.
2. SCC must continue to follow the recommendations of the previous risk pool report.
3. SCC should increase efforts toward timely permanency.

Eckerd Connects Community Alternatives – Circuit 6 (ECA-P/P)

Initial Request: \$ 7,400,000

Initial Round Allocation: \$ 1,592,997

Based on the information reviewed, the Risk Pool Peer Review Committee was able to affirm the following:

- While ECA-P/P's service area did experience a 10% increase in removals in SFY 2016-2017, the number of removals did decline in the following two years.
- The total number of discharges have also decreased over the past three years and the discharge rate per 100 children in out-of-home care is consistently below the statewide average. The lack of improvement in this area is a significant contributing factor to the increased caseloads, case manager turnover, and high out-of-home care costs.
- ECA-P/P's service area has experienced a decrease in children receiving in-home services, children receiving family support services, and the number of young adults receiving services when compared to the prior FY. Despite these decreases from the prior FY, and a decrease in the number of children entering out-of-home care for the past two FYs, the number of children in out-of-home care has increased due to fewer discharges from out-of-home care.
- ECA-P/P has implemented some, but not all, of the recommendations from the previous risk pool review committee reports.
- ECA-P/P has increased the number of children placed in foster homes over the past three years from 583 to 753.
- ECA-P/P continues to rely on residential group care for some children ages 6-17.
- ECA-P/P should continue to engage the sheriff's offices to improve the use of diversion services as a safe alternative to removals.
- High caseload and case manager turnover continue to be an issue for case management agencies and has not improved in the last year. Average caseloads increased from 20.5 to 25.3 between August 2018 to August 2019 and turnover exceeds 100%.
- According to their SFY 2019-2020 Financial Viability Plan (FVP), ECA-PP could reduce their projected deficit of \$7.4M from their risk pool application by \$2.9M by meeting their goals in the plan. ECA-P/P needs to resolve the apparent conflicting goals of two actions in their plan on foster home placements. They should seek to increase them in lieu of group home placements.

Recommendations:

Based on an analysis of the ECA-P/P budget and the information provided, the Risk Pool Peer Review Committee found that ECA-P/P does qualify for risk pool funding based upon an increase in the number of children in out-of-home care and recommends a distribution of \$ 1,592,997. A distribution of risk pool funds would fund service interventions identified by ECA P/P to stabilize youth sheltered, identify relatives or non-relatives for children in group care, provide services and security to youth during the day, provide emergency foster home placement, increase diversion services, and increase pre and post

reunification support. In addition, the following seven recommendations are made:

1. ECA-P/P should request and accept the Department's assistance in the form of sending experienced employees and/or contractors to help with one or more areas of specific need which could help improve case manager stability, discharges to permanency, the effectiveness of frontend services, and reduce the number of children ages 6-12 in RGC.
2. Risk Pool funding provides a stopgap (non-recurring) resource intended to mitigate unanticipated changes in the number of clients and/or services needed for clients; it is not designed to annualize expenses. ECA-P/P should develop a plan to meet existing and trending client needs while reducing costs more in-line with their recurring core services funding allocation in anticipation of being financially viable by the end of the fiscal year.
3. ECA-P/P must continue to follow their FVP and show measurable and substantial progress in meeting their goals.
4. ECA-P/P must reduce the cost of out-of-home care as identified in their FVP by reducing the number of children in residential group care in total but especially those ages 6-12.
5. ECA-P/P should develop an action plan in conjunction with the sheriff's offices to improve the utilization of diversion services as a safe alternative to removals.
6. ECA-P/P must increase efforts toward timely and safe permanency in order to reduce the total number of children in care.
7. ECA-P/P should continue to focus on addressing case manager turnover to improve retention.

Eckerd Connects Community Alternatives – Circuit 13 (ECA-H)

Initial Request: \$ 4,200,000

Initial Round Allocation: \$ 833,406

Based on the information reviewed, the Risk Pool Peer Review Committee was able to affirm the following:

- While ECA-H's service area did experience a significant increase in removals (entries) in SFY 2015-2016 and 2016-2017, and experienced a higher removal rate per 100 alleged victims for investigations closed than the statewide average and the highest in the state in the last quarter of SFY 2018-2019, there was a decrease in Hotline calls and removals/entries into out-of-home care over the last two fiscal years.
- For the first time in the last five years, ECA-H discharges of 1,377 were essentially equal to the removals of 1,375 in SFY 2018-2019.
- The total number of children receiving in-home services, out-of-home care, and the number of young adults receiving services all decreased and children receiving family support services increased when compared to SFY 2017-2018. The increased use of family support services appears to be successfully diverting children from being removed.
- ECA-H is placing a percentage equal to or greater than the statewide average in relative/non-relative placements.
- ECA-H has increased the number of children placed in foster homes over the past three years from 599 to 739.
- ECA-H is placing a greater percentage in residential group care than the statewide average both in total and by age group. The number increased over last three years from 211 to 230.
- ECA-H is currently under significant oversight due to an extensive corrective action plan stemming from the Hillsborough County Peer Review Report of June 2018.
- According to their SFY 2019-2020 Financial Viability Plan (FVP), ECA-H could significantly reduce their projected deficit of \$4.4M from their risk pool application by \$3.2M in meeting their goals in the plan.

Recommendations:

Based on the analysis of the ECA-H budget and the information provided, the Risk Pool Peer Review Committee found that ECA-H does qualify for risk pool funding based upon an elevated number of children in out-of-home care that has not decreased, despite fewer children entering out-of-home care over the past two fiscal years, and recommends a distribution of \$ 833,406. A distribution of risk pool funds would fund service interventions identified by ECA-H to identify relatives or non-relatives for children in group care, provide services and security to youth during the day, provide emergency foster home placement, support foster care and adoption, and increase the number of

transports to assist case managers. In addition, the following eight recommendations are made:

1. ECA-H should request and accept the Department's assistance in the form of sending experienced employees and/or contractors to help with one or more areas of specific need which could help improve case manager stability, discharges to permanency, the effectiveness of frontend services, and reduce the number of children ages 0-12 in RGC.
2. Risk Pool funding provides a stopgap (non-recurring) resource intended to mitigate unanticipated changes in the number of clients and/or services needed for clients; it is not designed to annualize expenses. ECA-H should develop a plan to meet existing and trending client needs while reducing costs more in-line with their recurring core services funding allocation in anticipation of being financially viable by the end of the fiscal year.
3. ECA-H must continue to follow their FVP and show measurable and substantial progress in meeting their goals.
4. ECA-H must continue to follow the recommendations from the Hillsborough County Peer Review report and subsequent Corrective Action Plan.
5. ECA-H must reduce the cost of out-of-home care as identified in their FVP by reducing the number of children in residential group care in total but especially those ages 0-12.
6. ECA-H should explore ways to increase the use of in-home services.
7. ECA-H must increase efforts toward timely and safe permanency in order to reduce the total number of children in care.
8. ECA-H should continue their partnership efforts with Hillsborough County government to reduce the number of children coming into care and work on solutions to help children achieve permanency.