

Risk Pool Peer Review Committee Report
Eckerd Community Alternatives – Circuit 13 (Hillsborough County)
Fiscal Year 2018-2019
October 2018

Executive Summary:

Eckerd Community Alternatives as known as Eckerd Connects submitted an application for risk pool funding on August 13, 2018 for their Hillsborough contract (ECA-H). The application was subsequently reviewed by the Suncoast Region and with the concurrence of the Regional Managing Director was submitted to the Office of the Deputy Secretary.

The department established a Risk Pool Peer Review Committee pursuant to section 409.990(7), Florida Statutes, for state fiscal year (FY) 2018-2019. 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 322) for FY 2017-2018. In compliance with this proviso language, the department 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 Risk Pool Protocol provided for priority consideration for any CBC with increased removals based on a 12-month moving average from May 2016 to May 2018. This criterion was based on the experience from prior year reviews that found that significant increases in removals were a key indicator of financial vulnerability for a lead agency. Tier one for priority consideration was lead agencies with an increase in removals of 10 percent or more. ECA-H was in Tier three for priority consideration with a 15.74% decrease in removals.

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

- Risk Pool Funding Application FY 2018-2019
- Financial Viability Plan (FY 2017-2018 and FY 2018-2019)
- Budget Projections provided by the CBC
- CBC Financial Viability Integrated Data Report
- [The Child Welfare Dashboard](#)
- [CBC Contract Monitoring Reports](#)
- ECA-H [Previous Risk Pool Reports](#)
- CBC Contract Monitoring Survey Data
- CBC Contract Monitoring Data Packets
- [The Child Welfare Key Indicators Monthly Report](#)
- Hillsborough County System of Care Peer Review Team Report
- Florida Safe Families Network (FSFN) Aggregate Payment Data

As a part of the preliminary review, the team evaluated all available information from previous on-site visits, current data, and monitoring reports to make a recommendation without an additional on-site visit by this team. Additionally, the Risk Pool Peer Review Committee took advantage of the recent Hillsborough County System of Care Peer Review report. To resolve any outstanding questions, additional information was requested of the CBC.

The Risk Pool Peer Review Committee for ECA consisted of:

- Lee Kaywork, Team Leader
- Glen Casel, CEO, Community Based Care of Central Florida
- Carol DeLoach, CEO, Communities Connected for Kids
- Naomi McGowan, CFO, Family Support Services of North Florida
- Catherine Macina, CFO, Community Based Care of Central Florida
- JoShonda Guerrier, Assistant Secretary for Child Welfare
- Barney Ray, Office of CBC/ME Financial Accountability
- Billy Kent, Northeast Region Family and Community Services Director
- April May, Suncoast Region Community Development Director
- Alissa Cross, CBC Contract Monitoring Team
- Melissa Stanley, CBC Contract Monitoring Team
- Megan Wiggins, CBC Contract Monitoring Team

While the specific areas of review and analysis varied based on the unique needs and circumstances of each Region, Circuit and CBC, the following framework provided an outline for organizing the work of the Peer Review Committee.

Application Summary:

ECA-H’s application for risk pool funding requested \$3.14 million (of which approximately \$2.4 million was directly attributed to payments for youth in licensed substitute care settings and \$378 thousand attributed to Case Management Organization (CMO) provider projected deficits):

Name of CMO agency	Projected Deficit
Directions for Living	\$112,000
Devereux	\$175,000
Gulf Coast Jewish Family and Community Services	\$91,000

ECA-H noted that the total of \$4.7 million in “back of the bill” funding that was received in FY 2017-2018 was used to offset the deficit for that fiscal year. In budget planning for this fiscal year, ECA-H met with stakeholders to look for ways to reduce expenditures without impacting the safety of the children served and were able to find savings through the elimination of CBC positions and the elimination of non-critical contracted support services. As part of their plan to reduce CBC expenses, they transferred additional responsibilities for background screening to their CMO agencies which contributes to the deficits above identified by CMOs.

The primary causes ECA-H attributed to their current financial challenges are outlined below:

- ECA-H has experienced a 40% increase in the number of children placed in foster care in the past three fiscal years.
- As a result of that increase there has been increases in caseloads and case management turnover, and decreases in placement capacity for the children with high acuity needs.
- ECA-H’s removal rates are on the high end compared to the statewide average.
- ECA-H has the highest number of youth served in the state.

Findings:

After review of the information provided, the Peer Review Committee was able to reach the following findings:

1. Findings related to the need for services and commitment of resources

- Sources: ([The Child Welfare Key Indicators Monthly Report](#), [The Child Welfare Dashboard](#), [CBC Contract Monitoring Reports](#))
- Summary below; see CBC Contract Monitoring Report, sections 2, 11, and 12 for more details

- 1.1. *What is the relevant community context within which the child welfare system operates?***
- 1.2. *This may include incidence of calls to the hotline, child poverty in the area, local factors that influence the need for services, etc.***
- 1.3. *Factors may also include community resources available to meet the needs of children and families such as Children’s Services Councils, local governmental resources or other unique factors.***

ECA-H operates in Circuit 13, serving Hillsborough County. Child Protective Investigations are performed by the Hillsborough County Sheriff’s Office (HCSO) and the Office of the Attorney General provides the Children’s Legal Services functions.

Hillsborough County has a slightly higher poverty rate than the statewide average of 14.7%. The county has a higher population of adults with a college degree and the median income is slightly higher than the state average. Hillsborough County is on par with the statewide average of adults with a high school diploma.

The number of reports accepted for investigation and the number of children entering out-of-home care increased for two straight fiscal years since FY 2014-2015, with a decrease in both occurring in FY 2017-2018. Similarly, the number of children receiving in-home services and out-of-home care increased two straight fiscal years since FY 2014-2015. The number receiving in-home services decreased in FY 2017-2018 but the number receiving out-of-home care stayed about the same as the previous fiscal year. Children receiving family support services and the number of young adults receiving services has increased slightly overall.

Type	Measure Name	FY 2014/2015	FY 2015/2016	FY 2016/2017	FY 2017/2018
Child Protective Investigations and Child Removals (Hillsborough County)	Reports accepted for Investigation by DCF (Initial & Additional Reports) ¹	11,686	11,913	12,344	12,055
Child Protective Investigations and Child Removals (Hillsborough County)	Children Entering Out-of-Home Care ²	1,432	1,171	1,768	1,505
Children Served by Eckerd Hillsborough	Children Receiving In-Home Services	2,470	2,951	3,251	2,686
Children Served by Eckerd Hillsborough	Children Receiving Out of Home Care	3,179	3,554	3,853	3,831
Children Served by Eckerd Hillsborough	Young Adults Receiving Services	333	283	322	342
Children Served by Eckerd Hillsborough	Children Receiving Family Support Services	1,629	697	814	1,152

The local Children’s Board focuses on delivery of prevention services to non-dependent children. While Hillsborough County has a wide array of services available, there is needed improvement in the coordination of services between ECA-H, the Children’s Board, and the Managing Entity.

2. Findings related to protective services including removals, referrals for post-investigative services, activities to protect children without removal and use of resources focused on prevention and intervention.

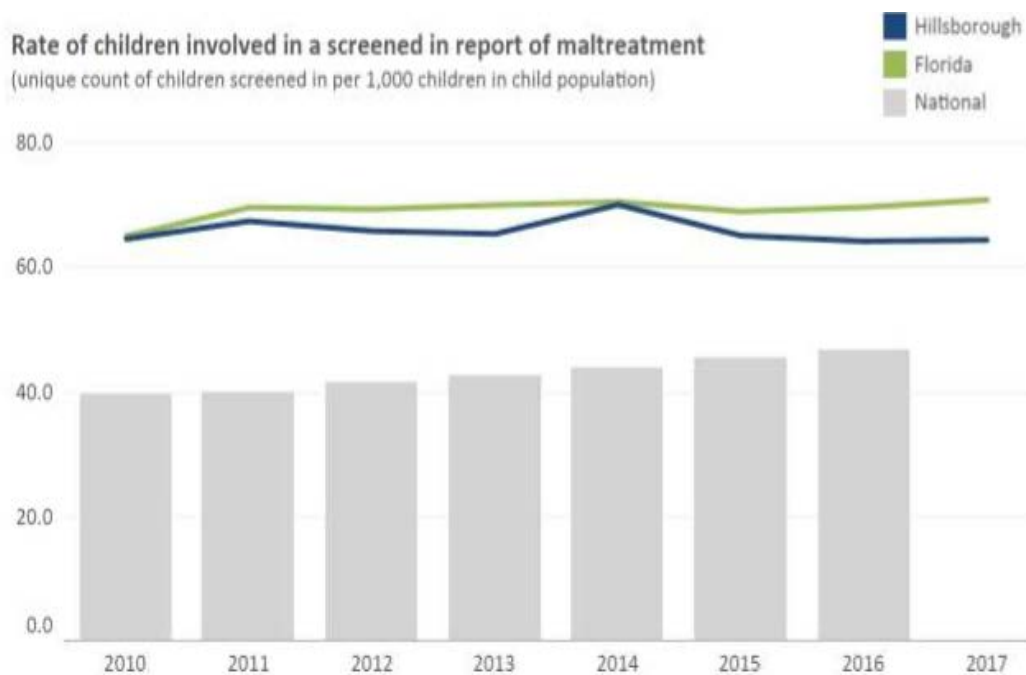
- Sources: ([The Child Welfare Key Indicators Monthly Report](#), [The Child Welfare Dashboard](#), [CBC Contract Monitoring Report](#), [Hillsborough Peer Review Report](#))
- Summary below; see CBC Contract Monitoring Report, sections 5, 9, and 11 for more details

2.1. What are the rates of removal, rates of verification, and other measures from protective investigations that affect the need for child welfare services? How have these measures changed over time and how do they compare with other areas of the state?

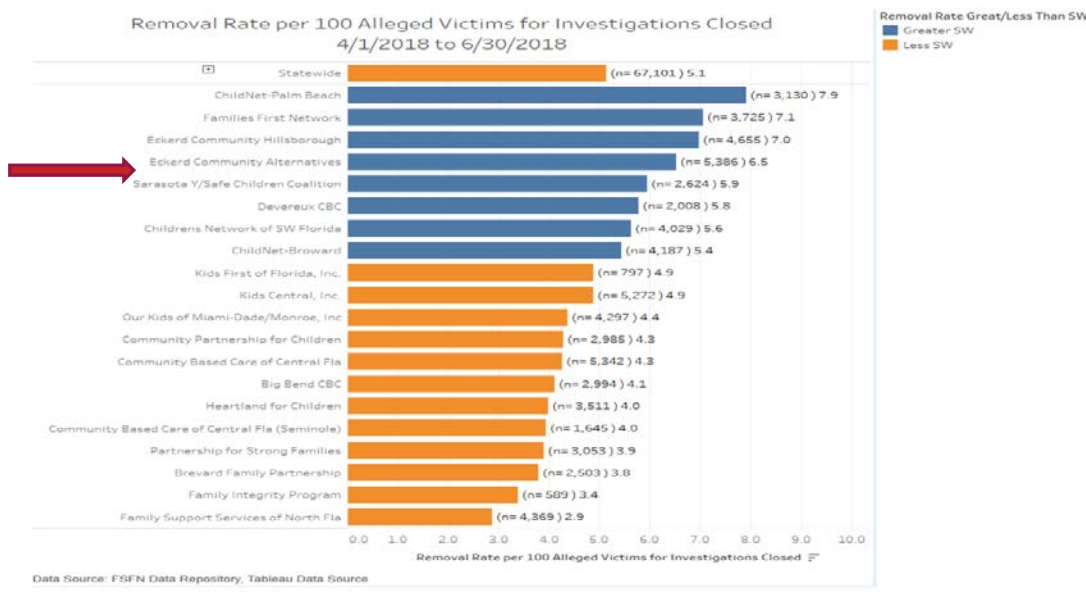
- 2.2. *What activities are in place to provide support to child protective investigators (CPI) and families to permit children to remain safely in their homes? What services are provided with funds used for prevention and intervention?*
- 2.3. *How well integrated are the CPI, safety management and intervention services components? Are there case transfer issues that affect performance?*

In FY 2017-2018, the Florida Abuse Hotline screened-in 12,344 reports of child maltreatment for investigation in Hillsborough County.

This represents a 5.6% increase in the number of reports (11,686) screened in for investigation in FY 2015-2016. As shown in the chart below, between FY 2010-2011 and FY 2017-2018 the rate of children (per 1,000 child population) involved in a screened-in report of alleged maltreatment in both Florida and Hillsborough County has been significantly higher than the national rate. Over that same time period, Hillsborough County's screen-in rates have remained fairly steady and, with the exception of federal fiscal year (FFY) 2014-2015, have been lower than the Florida statewide rate.



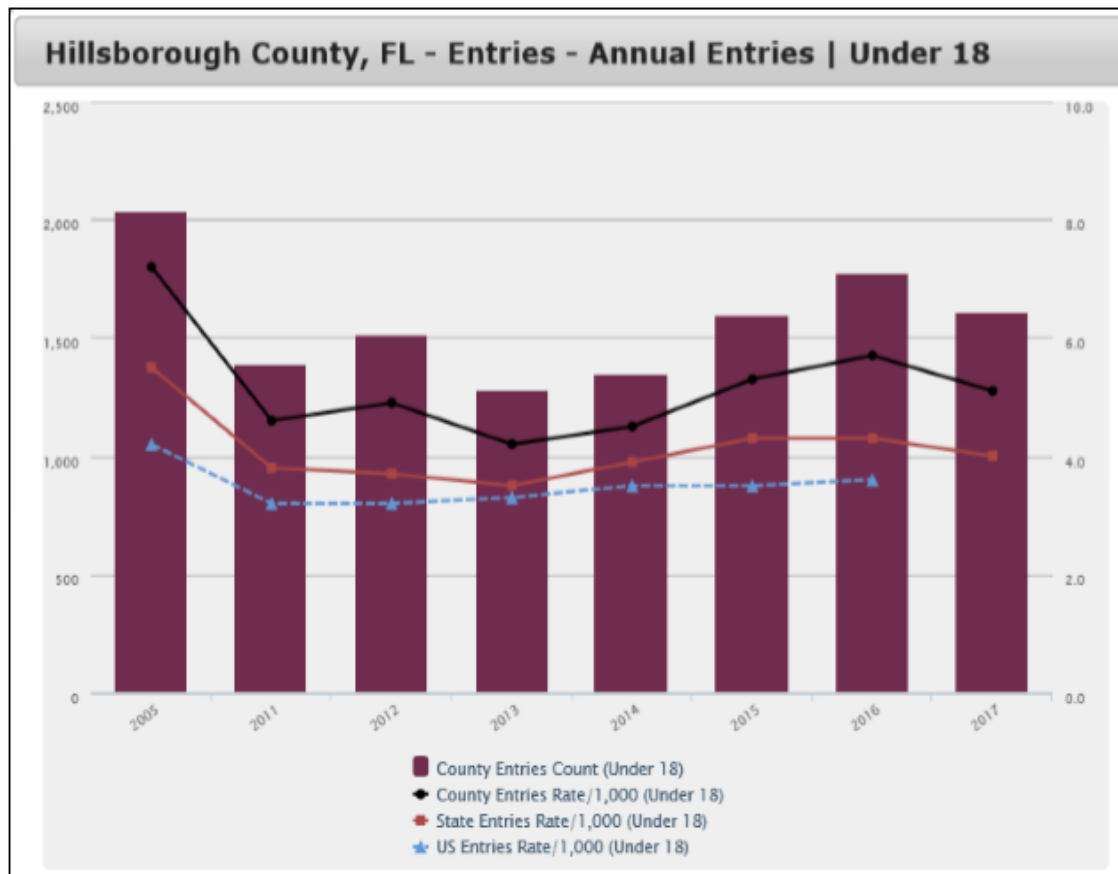
As indicated in the application, HCSO maintains a higher rate of removal per 100 alleged victims than the statewide average and is the third highest in the state.



*Sep 2017 - Measure changed from per 100 children investigated to per 100 Alleged Victims.

As a part of the Peer Review conducted at ECA-H in March 2018, the team looked at removals from the standpoint of entry rate, the investigations to entry, and removals per all alleged victims. All three measures indicated that Hillsborough County’s removals are higher than state and national averages.

In FY 2017-2018, child protection investigations resulted in 1,610 Hillsborough County children being removed from their homes and placed in out-of-home care. As shown below, in FFY 2017-2018 the Hillsborough County rate of entry into care was 5.1 per 1,000 child population. This compares to a 4.0 Florida statewide rate during the same period and a 3.6 national rate in FFY 2016-2017 (the most recent national data available).



In July 2016, the Office of Child Welfare initiated a [Service Array Assessment](#) with each CBC across the state. The assessment focuses on evaluating the availability, access and application of services for families involved with the child welfare system.

ECA-H provides an array of frontend services designed to allow children to remain safely in their homes. ECA-H's diversion program, which includes both family support services (FSS) and safety management services (SMS), is an intensive in-home service program that encompasses coordinated individualized service delivery, with the purpose of maintaining a child safely in their home while services are provided to the family to improve the family condition. The program currently has a rating of "3" for both FSS and SMS by the Office of Child Welfare.

If a family moves from one frontend service to another, the same counselor initially assigned to work with a family remains with them. This is clearly a strength since it provides continuity of care that enables the family to progress more rapidly. ECA-H subcontracts with Gulf Coast Jewish Services (Safe at Home) and Gracepoint Family Net to provide in-home diversion services. Of the 728 families served in the seven months between July 1, 2017 and February 28, 2018, 90.1% did not require judicial action.

While these are good outcomes, the Hillsborough County's removal rate per 100 alleged victims of child maltreatment was the highest in the state in calendar year 2017. This may indicate that CPIs do not refer some families, who may have been able to keep their children safely at home with safety management and other in-home services.

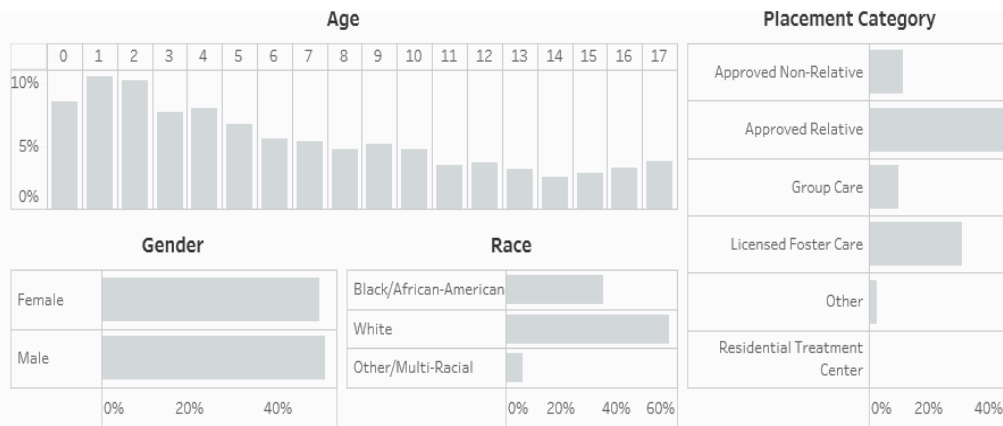
Additionally, the Hillsborough County System of Care Peer Review conducted in March 2018 addressed the relationships in the community.

3. Findings related to provision of services for children in care (both in-home and out-of-home)

- Sources: ([The Child Welfare Key Indicators Monthly Report](#), [The Child Welfare Dashboard](#), [CBC Contract Monitoring Report](#), CBC Financial Viability Report, CBC Financial Viability Integrated Data Report, CBC Budget Projections, and Florida Safe Families Network (FSFN) Aggregate Payment Data)
- Summary below; see CBC Financial Viability Integrated Data Report, CBC Budget Projections, CBC Financial Viability Report, and [CBC Contract Monitoring Report](#) for additional details.

- 3.1. *What is the composition of the children in care including age cohorts, placement types, use of specialized higher costs settings, use of congregate care, etc.*
- 3.2. *What is the cost of various placement types? To what extent are the rates paid for foster care (including care with various rates of intensity), and congregate care consistent with statewide norms (considering community context)? Have these rates remained relatively consistent over the past few fiscal years?*
- 3.3. *What is the cost for dependency case management? Is this consistent with norms for such services? Have these rates remained relatively consistent over the past few fiscal years?*
- 3.4. *To what extent is the CBC appropriately utilizing non-child welfare funding for services (such as DCF SAMH Funds, Medicaid, and other non-DCF funding sources).*
- 3.5. *What evidence exists that case management services are well-managed by the CBC? (see overall management section for response)*

The data below is a breakdown of the children in out-of-home care as of July 2018 by age, race, gender and placement type. In FY 2017-2018, ECA-H saw a slight increase in the number of children in out-of-home care in both the 0-5 and the 6-12 age groups and a steady rate of entry in the 13-17 age group.



Based upon the payment data from the Florida Safe Families Network (FSFN) system, ECA-H had significant increases in the number (27%) and total expenditures (48%) for children ages 6-12 in licensed facility-based residential group care.

Eckerd – Hillsborough (Contract # QJ3E0) Total \$ of FSFN Payments to Licensed Residential Group Care (OCA LCRGE)				
Ages	FY2016-2017	FY2017-2018	Increase/(Decrease)	% Increase/(Decrease)
0-5	\$824,180	\$847,448	+\$23,268	+3%
6-12	\$2,943,084	\$4,356,566	+1,412,482	+48%
13-17	\$6,008,216	\$6,598,216	+590,000	+10%

Eckerd – Hillsborough (Contract # QJ3E0) Total Number of Unique Clients in Licensed Residential Group Care (OCA LCRGE)				
Ages	FY2016-2017	FY2017-2018	Increase/(Decrease)	% Increase/(Decrease)
0-5	63	40	-23	-37%
6-12	198	252	+54	+27%
13-17	314	323	+9	+3%

Eckerd – Hillsborough (Contract # QJ3E0) Median Daily Rate \$ in Licensed Residential Group Care (OCA LCRGE)				
Ages	FY2016-2017	FY2017-2018	Increase/ (Decrease)	% Increase/ (Decrease)
0-5	\$98	\$115	+\$17	+17%
6-12	\$110	\$115	+\$5	+5%
13-17	\$115	\$130	+\$15	+13%

Eckerd – Hillsborough (Contract # QJ3E0)				
Total \$ of Payments by FSFN Service Type in Licensed Residential Group Care (OCA LCRGE)				
FSFN Service Type	FY2016-2017	FY2017-2018	Increase/(Decrease)	% Increase/(Decrease)
Group Home	\$8,757,771	\$10,728,884	+\$1,971,113	+23%
APD Daily Rate Service	\$306,886	\$343,177	+\$36,291	+12%
Specialized Therapeutic Group NL	\$249,802	\$351,635	+\$101,833	+41%
Group Home Bed Hold	\$187,873	\$155,909	-\$31,964	-17%
Residential Treatment – CBC Funded	\$101,827	\$60,391	-\$41,436	-41%
APD Group Home Placement	\$92,427	\$118,843	+26,416	+29%

Source: FSFN Payments via Tableau software (OCA Disposition Dates through 8/31/2018)

4. Findings related to exits from care including exits to permanence.

- Sources: ([The Child Welfare Key Indicators Monthly Report](#), [The Child Welfare Dashboard](#), [CBC Contract Monitoring Report](#), Financial Viability Integrated Data Report, Hillsborough County Peer Review Report)
- Summary below; see [The Child Welfare Key Indicators Monthly Report](#), [The Child Welfare Dashboard](#), Financial Viability Integrated Data Report, [CBC Contract Monitoring Report](#) – Sections 4 and 11, for more details.

- 4.1. ***What is the performance of the CBC in the recognized measures of children achieving permanence? Do these findings indicate that children are not remaining in care for longer than necessary? Are these permanency achievement rates consistent across placement settings?***
- 4.2. ***What contextual factors (such as Children’s Legal Services, dependency court dynamics, etc.) influence time to permanence for children served by the CBC?***
- 4.3. ***Has there been a change in the number of exits or time to exit that is materially influencing the cost of out-of-home care?***

During FY 2017-2018, 1,484 children exited out-of-home care in Hillsborough County.

Additionally, 65% of these children were reunified with a parent or parents, 18.7% were adopted, and 10.5% obtained permanency through legal guardianship. Also, 71 youth (4.7%) aged out of care without achieving legal permanency.

In FY 2018-2019 (to date), ECA-H has seen a slight decrease with approximately 1,430 children exiting out-of-home care. Additionally, 56.22% of the children were

reunified with a parent, 19.93% were adopted, 17.55% obtained permanency through guardianship, and 6.15% aged out of care without achieving permanency.

ECA-H has met the measures associated with achieving timely permanency for the past two fiscal years. However, they have not met the measures for placement moves nor have they met the measures for children not re-entering care after achieving permanency. Additionally, these measures have deteriorated over this period of time.

According to the Hillsborough County System of Care Review:

Six judges and two magistrates in Circuit 13 are responsible for hearing all dependency and termination of parental rights cases. The three key players at the removal and shelter stage of any dependency case are the CPI, Children's Legal Services (which is performed by the Office of the Attorney General in Hillsborough County) to represent the state in dependency proceedings, and a dependency court judge. CBCs and CMOs are not parties in dependency cases. Although they provide evidence, opinions, and recommendations to the court, they lack the same rights, privileges and powers granted by law to the parties. Additionally, the judiciary suffers a lack of enforcement power over the non-parties (CBCs and CMOs). Some judges interviewed expressed that some case managers (CMs) regard court orders as mere suggestions. At the shelter hearing following the removal of a child from their home in Hillsborough County, a CPI Court Worker, rather than the CPI who removed the child, presents the facts of the situation to the court.

Additionally, CMs indicated that they often locate relatives who were identified at the time of removal but were not explored, or were explored but denied by CPIs for initial placement without just cause. In the eight months between July 1, 2017 and March 23, 2018 CMs found relative placements for 132 children within the month following their initial placement into licensed out-of-home care by CPIs. Also, during this period, CMs placed 57 additional children with relatives 60 to 90 days following their initial placement into licensed out-of-home care.

As of March 7, 2018 Hillsborough County had the highest number and percentage of in-home judicial post-placement supervision cases of any circuit in the state. Almost 36% of these cases are open more than nine months after reunification with 17% open more than 12 months; that is the highest in the state. Unnecessary over-extension of post-placement without a focus on parental behavior change consumes time, energy, and resources that might be better utilized elsewhere in the system of care.

Additionally, Hillsborough County is also trending negatively in the timely closure of non-judicial cases, demonstrating a pattern of delays within the system of care to reach safe closures. In-home judicial cases account for 48.2% of the caseload and represents 294 Hillsborough County families that were open for over 12 months on March 7, 2018. This is the highest percentage of cases of any CBC in the state.

Despite the challenges highlighted above, ECA-H has consistently met the performance measure associated with achieving timely permanency.

5. Findings related to funding, fiscal trends and fiscal management.

- Sources: ([The Child Welfare Key Indicators Monthly Report](#), [The Child Welfare Dashboard](#), CBC Financial Viability Report, CBC Financial Viability Integrated Data Report and CBC Budget Projections)
- Summary below; see CBC Financial Viability Integrated Data Report, CBC Budget Projections and CBC Financial Viability Report for additional details.

- 5.1. *How has core services funding changed over time? (Financial) How has the CBC managed these changes? What adjustments to the available array of services have been made?* (For service array response see section1)
- 5.2. *How has any changes to core services funding contributed to any projected deficits for SFY 2018-2019?*
- 5.3. *In what ways are funding dynamics in the CBC unique or atypical of funding in other CBCs?*
- 5.4. *What is the amount of the anticipated deficit for the current year? How reliable and valid are these projections?*
- 5.5. *Are their options other than Risk Pool funding available to reduce the deficit?*
- 5.6. *If the Lead Agency meets the criteria for Risk Pool funding, but the amount of funding available is insufficient to cover the projected deficit, what other options are available?*
- 5.7. *Are there fiscal practices that could be completed with greater efficiency in order to reduce the projected deficit?* (None were identified.)
- 5.8. *Has the most recent CPA audit indicated any issues that would affect the financial health of the organization?*

Total Funding

DCF Contract Funds Available at Year End (by Fiscal Year)	FY13-14	FY14-15	FY15-16	FY16-17	FY17-18	FY18-19
Core Services Funding	\$49,809,812	\$50,307,347	\$51,150,751	\$51,950,806	\$55,584,469	\$55,647,111
Risk Pool Funding	\$0	\$0	\$0	\$0	\$169,256	\$0
CBC Operations "Back of the Bill" Funding	\$0	\$0	\$0	\$1,026,682	\$4,757,189	\$0
Other Amendments to Initial Allocations	\$13,086	\$70,332	\$708,559	\$64,683	\$23,275	\$0
Amended Core Services Funding	\$49,822,898	\$50,377,679	\$51,859,310	\$53,042,171	\$60,534,189	\$55,647,111

Core services funding increased by ~\$3.6 million in FY 2017-2018, and by about \$62,000 in FY 2018-2019.

ECA-H received additional funding for deficits each fiscal year beginning in FY 2016-2017. They received a total of \$4.9 million in risk pool and "back of the bill" funding for their deficit last fiscal year.

Funding not defined as Core Services Funding						
Independent Living (IL and Extended Foster Care)	\$1,848,532	\$1,848,532	\$1,848,532	\$1,848,532	\$2,010,922	\$2,642,628
Children's Mental Health Services (Cat 100800/100806)	\$728,973	\$728,973	\$728,973	\$728,973	\$728,973	\$728,973
PI Training, Casey Foundation or other non-core svcs	\$352,464	\$0	\$0	\$0	\$0	\$0
Safety Management Services (Nonrecurring)	\$0	\$0	\$0	\$708,225	\$0	\$708,225

Projected Revenues

The due date for risk pool applications for FY 2018-2019 from CBCs to the department was mid-August which was before the final FY 2017-2018 expenditures were completed by CBCs and submitted to the department. Therefore, applicant CBCs had to make some assumptions about their FY 2017-2018 carry forward surplus or deficit and any excess federal earnings as part of their revenue projections.

The total projected revenues by ECA-H was \$79,322,255 which included \$836,044 of revenues from other funders. ECA-H did include the initial allocations but underestimated their full IL allocation by \$31,706 which includes an additional allocation from Title IV-E funding for changes to the Extended Foster Care program effective January 1, 2019. ECA-H also included an estimated amount of carry forward deficit. The estimated carry forward deficit is understated by \$199,017. ECA-H did not include an estimate for prior year excess federal earnings which has been identified as \$658,543. Adjusting for these three corrections, the total revenues were \$79,843,297.

Projected Expenditures

The total projected FY 2018-2019 expenditures by ECA-H was \$82,185,413. This included a total of \$555,529 in expenditures charged to other funders. The total expenditures were \$687,221 less than the FY 2017-2018 actual expenditures reported of \$82,872,634. ECA-H did not include a Maintenance Adoption Subsidy (MAS) deficit in the projection.

The projection includes the following:

Expenditures	FY18-19 Budget	FY17-18 Actuals	Increase /(Decrease)	% of Inc/-Dec
Lead Agency Related	\$ 7,509,281	\$ 7,661,656	\$ (152,375)	-2%
Client Related	\$ 1,808,377	\$ 2,330,781	\$ (522,404)	-22%
Contracted Services	\$25,078,805	\$25,816,497	\$ (737,692)	-3%
Independent Living	\$ 2,612,965	\$ 2,581,253	\$ 31,712	1%
Out-of-Home Care	\$21,919,744	\$20,847,874	\$ 1,071,870	5%
MAS	\$18,950,935	\$18,961,219	\$ (10,284)	0%
Support Center Alloc	\$ 3,749,777	\$ 4,034,470	\$ (284,693)	-7%
Subtotal - DCF Contract	\$81,629,884	\$ 82,233,750	\$ (603,866)	-1%
CBC-IH	\$ 267,129	\$ 326,505	\$ (59,376)	-18%
Wendy's Wonderful Kids	\$ 140,000	\$ 135,593	\$ 4,407	3%
DCF Enhanced Prevention	\$ 148,400	\$ 176,786	\$ (28,386)	-16%
Subtotal – Other	\$ 555,529	\$ 638,884	\$ (83,355)	-13%
Total Expenditures	\$82,185,413	\$ 82,872,634	\$ (687,221)	-1%

The risk pool application stated that ECA H “ met with stakeholders and providers to identify additional opportunities to reduce overall expenditures without compromising the safety of the children served.” The application identified a total cost savings of \$1,541,621 of which \$260,803 was from “ Elimination of 5 Lead Agency Specialist Positions”, \$629,736 was from “ Elimination of Lead Agency Secondary Adoption Workers (10 FTEs) and \$651,081 was from “ Elimination of Non-Critical Contracted Support Services.” The entire amount of the cost saving amounts stated could not be clearly identified when comparing the FY 2018-2019 budget to FY 2017-2018 actuals in the table above and could have been partially offset by increases in other expenses.

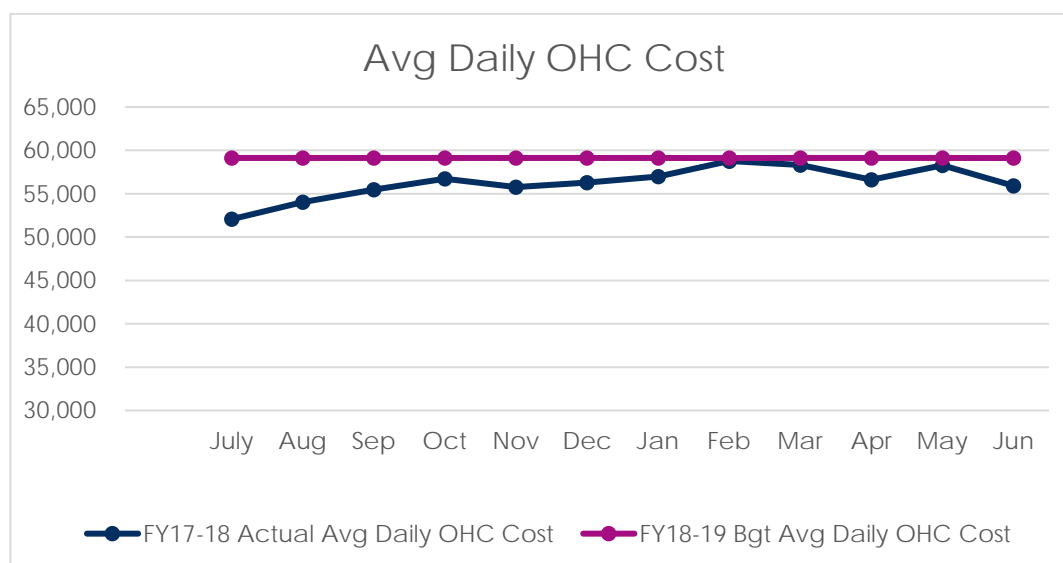
Part of the elimination of CBC expenses was shifting additional responsibility to CMO contracts with additional funding which contributes to their projected deficits.

Despite the overall total budget projection less than actual expenditures from last fiscal year, the **Out-of-Home Care** line is projected to increase by \$1,071,870 (or 5%).

This line includes expenditures related to children placed in licensed family foster homes and facility-based residential group care homes.

After adjusting for the total of initial and annual clothing allowances, the average daily rate for this line in FY 2017-2018 was \$56,247 per day. However, the average daily rate trend was increasing throughout last fiscal year from \$52,061 per day in July 2017 to \$58,271 per day in May 2018.

The FY 2018-2019 projection used \$59,117 per day for the entire year based upon cost information at the time of the risk pool application in mid-August 2018. The projection assumed that the average daily rate would not continue to increase in FY 2018-2019 but also doesn't assume that it will decrease; rather, hold about the same as it was in May 2018. **Given the increasing trend, it is unclear as to whether this assumption will materialize and whether or not the projected deficit could possibly increase throughout the year.**



FY 2018-2019 Financial Viability Plan

In their design and instruction for the Financial Viability Plan (FVP) templates, the department requested that CBCs identify their actions to address three primary cost drivers:

1. Factors related to entries into care
2. Factors related to the cost of children while in care
3. Factors related to exits from care

ECA-H's FVP contains actions to address the three primary cost drivers affecting their financial position. The actions include:

- o Reduce the number of children placed in licensed care at the time of shelter by increasing the percentage placed with relatives or non-relatives from 31% to 35%.
- o Reduce the number of youth place in residential group care from 241 to 225 (Cost Savings of \$326,271).
- o Increase the number of traditional licensed foster home beds to gain a net increase of 44 beds (Cost Savings \$576,944).
- o Reduce the number of children entering licensed out-of-home care from relative/non-relative placements by 20 (Cost Savings \$118,707).
- o Increase the number of children placed in non-licensed out-of-home care (relative/non-relative placements) by 60 (Cost Savings \$367,711).
- o Reduce the number of children who have been in out-of-home care through reunification prior to 15 months in care by 40 (Cost Savings \$364,786).
- o Reduce the number of children in care under the jurisdiction of the court 15 months or more with a goal of reunification by 25 (Cost Savings \$183,853).

The actions in the FVP does contain specific measurable performance numbers. Some actions contain cost savings projections. The cost savings identified in their plan is not reflected in their budget projections. Depending upon the success of these actions, the projected deficit could be reduced this year.

Projected Deficit

The Risk Pool application requested \$3.14 million which included \$378,000 in projected CMO deficits. The detailed projection provided was for \$3,241,158.

Based upon the adjustments identified to revenue for IL, prior year federal excess earnings, and the SFY 2017-18 carry forward deficit, the adjusted deficit is \$2,720,116 **or 3.4% greater than their projected revenues.**

Hillsborough County has a taxpayer funded Children’s Services Council that funds prevention services for non-dependent children.

No unique or atypical funding was found in this lead agency as compared to other lead agencies. No findings were identified in the most recent CPA audit of June 30, 2017.

6. Findings related to overall management.

- Sources: (Financial Viability Plan, Hillsborough County Peer Review Report, [Previous Risk Pool Report](#))
- Summary below; see Financial Viability and [Previous Risk Pool Report](#) for more details.

6.1. To what extent is there clear and effective communication between and among the Region, the CBC, the Sheriff (if applicable), case management organizations and other key community partners?

- 6.2. ***How actively and effectively does CBC management track programmatic performance and fiscal performance?***
- 6.3. ***What actions have been taken by the Region and/or the CBC to resolve the fiscal issues without accessing the Risk Pool? What further actions are planned?***

According to the Hillsborough county System of Care Review Report:

Over the past three years, leadership turnover at the highest levels of the CBC, HCSO, and the Region has negatively affected the system's ability to move forward in a consistent manner. This, coupled with the fact that the Region does not have a direct role in the system, puts a greater burden on ECA-H to provide this leadership. Over the past six months, Eckerd Connects has hired a new Chief of Community-Based Care and the department rehired the Suncoast Region Managing Director.

Reportedly, ECA-H has tried to remedy some key concerns, such as placement instability, without sufficient input from key stakeholders and, in some instances, has quickly abandoned strategies that did not work. This has left the system with ongoing gaps and an inability to respond to system shortcomings in an organized and informed manner. The recent placement crisis has eroded the system's ability to move forward. Some of those interviewed reported that they have lost trust in ECA-H. However, nearly all interviewed expressed confidence that with consistent leadership and true collaborative efforts, the system in Hillsborough County can recover and become successful. The Eckerd Connects Hillsborough Board of Directors is currently composed of four members from the larger Eckerd Connects Board; it is not representative of the community as a whole. Broader community representation on the Board would provide needed guidance, oversight, and insight into the community.

An overwhelming theme in interviews with key stakeholders, staff within ECA-H, the Region, and CMOs is that there has been no one person or entity taking the "lead" to drive system of care improvements.

ECA-H has been actively working on recommendations from the FY 2017-2018 Risk Pool Report. Their efforts are outlined below:

Recommendation	Action/Update
ECA-H should work to reduce turnover in leadership positions.	Eckerd Connects has maintained a retention rate of 88.88% (8 of 9) of their senior leadership positions. In addition, we have successfully recruited an Executive Director (Genet Stewart) and an Associate Executive Director (Dr Eliza McCall-Horne). Both positions have been on board 10 months and 2 weeks respectively.
ECAH and Region should work collaboratively on utilizing conditions of return.	Initial efforts to educate the SOC occurred In April 2018 when ACTION 4 Child Protection provided a 1 day workshop for GAL staff/attorneys and the OAG for overview of Florida Practice Model and Conditions for Return. The GAL office also partnered to hold a Judicial Review training focused on CFR. The webinar was attended by over 400+ GAL program members. Efforts to continue training/education on practice model is being discussed. Including Cross Agency trainings and workshops. The emphasis on workshops being in-person learning circle format of real cases within the System. Part of the Peer Review recommendations was to also implement system protocols for CFR. Initial steps were to re-evaluate CTS conversations. Including the staffing format and documentation. CPID created a CFR worksheet for Investigators to continue educating their staff.
ECA-H and the Region should refine reporting on Financial Viability including considering reducing the number of initiatives, identifying specific reports to be utilized in assessing progress, and more clearly stating tasks and objectives.	Beginning in Quarter 3 of FY18, Eckerd Connects reduced the number of initiatives to 8. In Quarter 4 of FY18, Eckerd Connects more clearly stated tasks and objectives. Beginning in the FY19 Financial Viability Plan, Eckerd Connects has identified specific reports being utilized to assess progress.
The Lead Agency continue the actions outlined in the Financial Viability Plan.	Throughout the remainder of FY18, Eckerd Connects continued the actions as outlined in the Financial Viability Plan, reducing the number of initiatives to 8 elements. After evaluating progress made during FY18 and reviewing the Drivers to Impact Financial Viability and the recommendations made by the Peer Review Report, Eckerd Connects has identified the action items for FY19.
The April 2017 risk pool report recommended that the Lead Agency expand prevention contracts to increase their capacity to meet the increased demand.	Eckerd Connects is working with the Diversion Providers to make it possible to bill Medicaid for Medicaid billable services. This will allow the program to serve more families. Eckerd Connects has also entered into an MOU (no cost) with Bethany Christian Services to assist in the triage of the service needs of families identified by HCSO CPID as safe but high/very high risk. After receiving the referral from HCSO CPID or the Eckerd Connects Diversion Department, a FSFN review is conducted prior to engagement with the family. Once the family is engaged via telephone and a face to face visit if necessary, it is determined if the family can be served by community partners or if the family needs to be engaged with one of Eckerd Connects' 2 subcontracted Diversion Providers for Family Support Services (FSS).

Recommendation	Action/Update
<p>The report also recommended that That the Lead Agency continue to improve and maintain communication with community resources to ensure appropriation utilization of resources available in the community. In discussion with ECA-H leadership, as well as Hillsborough County Sheriff's Office (HCSO) leadership, the decision was made to focus on ensuring that the appropriate families were receiving appropriate services (either funded by ECA-H or within the community) as opposed to increasing services.</p>	<p>Eckerd Connects has adjusted the Lead Agency's weekly Leadership Meeting, previously attended by Eckerd Connects Leadership Only. Beginning in May 2018, this meeting has been inclusive of the following system partners: Case Management Organizations, Diversion Providers, Family Reunification Provider, Kinship Provider, Foster Parent Liaison, Office of the Attorney General, and Guardian ad Litem's Office. The Case Management Organizations have also begun to participate in the monthly Children's Committee Meeting, providing an opportunity for them to meet with community providers. Eckerd Connects executed an agreement with the Hillsborough County Children's Board effective July 1, 2018 for the administration of client related funds for the Case Management Organizations. the Children's Board Provider Network greatly expands the number of community providers and additional funding sources available to the families being served. Access to this provider network will also expedite service availability for families as a greater number of providers are accessible. Eckerd Connects has also worked together with the Diversion providers and CPID to identify any additional needs and how to identify what community programs can be offered to families. CPID has been referring families to programs like the CHS program Promoting Stability to work with families with teens who are at high risk of entering the dependency system. This program is an intensive in home program. Eckerd Connects continues to use the Diversion criteria created to help insure that the appropriate families are being served by the Diversion Providers.</p>
<p>The Lead Agency and the Hillsborough County Sherriff's Office continue their efforts to facilitate improved communications between from line CPIs and child welfare staff. Per discussion with ECA-H and HCSO leadership, the relationship at the manager level is strong but they are still working together to find ways to strengthen the relationships amongst front-line staff. In fact, ECA-H requested any technical assistance / best practice ideas from CBC peers that could be utilized.</p>	<p>Eckerd Connects has continued to include HCSO and other community stakeholders to group trainings provided by Casey Foundation. HCSO has engaged with Eckerd Connects to work on learning circles for the CPIs and front line diversion staff to improve communication and partnership.</p>
<p>The Lead Agency continue with the corrective actions underway to resolve issues identified in the CPA audit and that the Region continue to monitor this corrective action plan. The new audit has not been completed yet so we were unable to follow-up on this recommendation.</p>	<p>The audit for FY18 will be complete by 12/31/18</p>
<p>ECA-H review the cost effectiveness of continuing to contract with Child Placing Agencies and consider performing this function as is done in Circuit 6.</p>	<p>Eckerd Connects has evaluated the consolidation of the foster parent recruitment and licensing process so that it is directly aligned with placement and to minimize the disruption of current foster parents and or children placed. In order to give the community an opportunity to provide input on the provision of placement and licensing services, Eckerd Connects posted an ITN in August 2018. A recommendation based on the proposals submitted will be made by the evaluation team in September 2018.</p>
<p>ECA-H should review their process and assumptions for their monthly spending plan to ensure accurate and reliable projections on-going.</p>	<p>Eckerd Connects spending plan process is reviewed continuously and tweaked, if necessary, to ensure process and assumptions generate the most reliable projections. Our final variances compared to projected variances have been immaterial.</p>
<p>ECA should analyze and implement a plan to prudently reduce their administrative costs which have increased each year since SFY13/14.</p>	<p>One of the major reasons the administrative expenses have increased was the outsourcing of the IT functions. The cost to properly staff this department would have been more than the cost to outsource this function. IT is allocated based on the number of employees which includes the case management staff. We have been working with an expense reduction consultant and have identified savings in the areas of cell phone, records storage and copier leases. These savings will benefit all departments and programs of Eckerd. We are continuing to work with this firm to identify other areas of savings. It should be noted that the administrative expenses as a percentage of total revenue has not increased</p>

Summary of Findings:

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

- ECA-H is dealing with many systemic issues that impact their ability to effectively manage fiscal challenges.
- ECA-H is currently under significant oversight due to an extensive corrective action plan stemming from a placement crisis.
- In an effort to diligently address the challenges identified in the Peer Review, ECA-H is still in need of financial relief.

Recommendations:

The Peer Review Committee review found that ECA H qualifies for risk pool funding with a full distribution of \$2,720,116 based on a cash flow analysis completed by the Office of CBC/ME Fiscal Accountability. The distribution should include consideration for any additional responsibilities assigned to them. Due to the significant challenges experience by the Hillsborough County system of care, the risk pool review committee has recommended funding this request.

1. ECA-H must continue to follow their financial viability plan.
2. ECA-H must continue to follow the recommendations from the Hillsborough County System of Care Peer Review report and subsequent Corrective Action Plan.
3. ECA-H should strive to control the cost of out-of-home care.