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February 11, 2014

The Honorable John Allen, Chair
Joint Legislative Audit Committee

The Honorable Chester Crandell, Vice Chair
Joint Legislative Audit Committee

Dear Representative Allen and Senator Crandell:

Our Office has recently completed a 24-month followup of the Department of Economic Security, Division of Children, Youth and Families—Child Protective Services—In-Home Services Program regarding the implementation status of the 8 audit recommendations (including sub-parts of the recommendations) presented in the performance audit report released in April 2012 (Auditor General Report No. CPS-1201). As the attached grid indicates:

- 3 have been implemented;
- 3 are in the process of being implemented; and
- 2 are not yet applicable.

Unless otherwise directed by the Joint Legislative Audit Committee, this concludes our follow-up work on the Department's efforts to implement the recommendations from the April 2012 performance audit report.

Sincerely,

Dale Chapman, Director
Performance Audit Division

DC:ss
Attachment

cc: Clarence Carter, Director
Department of Economic Security

Charles Flanagan, Director
Division of Child Safety and Family Services

**Department of Economic Security—Division of Children,
Youth and Families—Child Protective Services—
In-Home Services Program
Auditor General Report No. CPS-1201
24-Month Follow-Up Report**

Recommendation	Status/Additional Explanation
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Finding 1: Division can strengthen in-home services program by continuing to move toward the use of evidence-based practices

<p>1.1 The Division should require the use of evidence-based practices in the next contract solicitation for in-home services.</p>	<p>Implementation in process According to an August 24, 2012, Department of Economic Security (Department) letter posted on its Web site, the Department’s next in-home services contract solicitation, scheduled for 2016, will require contractors to provide evidence-based in-home services to their urban area clientele. The letter indicates that the contract will not require contractors serving rural communities to use evidence-based service-delivery models if the models will not work in a rural community setting. However, in such a case, the contractor will be required to identify all of the evidence-based models it considered and explain the reasons why the models would not work. Further, the contractor will be required to meet performance measures included in the contract.</p>
<p>1.2 In the meantime, the Division should communicate its intent to its stakeholders, including existing and potential contractors, for requiring the use of evidence-based practices to allow time for existing and potential contractors to develop or expand their capacity to provide evidence-based, in-home services.</p>	<p>Implemented at 6 months</p>
<p>1.3 The Division should use the time until the next contract solicitation for in-home services to:</p> <p style="margin-left: 20px;">a. Develop its in-house expertise so it may effectively support contractors’ implementation of evidence-based, in-home services;</p>	<p>Implementation in process The Division reported that it has an interim in-home services state-wide coordinator with knowledge of in-home evidence-based practices and that it plans to make this position permanent as part of its reorganization efforts. The Division also reported that it plans to further support the use of in-home evidence-based practices by assigning its in-home services policy specialist to develop in-home services policies and practices based on evidence-based practices and train staff on their implementation, and using contract monitoring staff to monitor contractors’ adherence to the requirement to use evidence-based practices.</p>

Recommendation

Status/Additional Explanation

- b. Develop and make available through the Department's Web site well-defined, written criteria for identifying evidence-based practices, and;

Implementation in process

The Department's Web site lists the criteria for evidence-based practice as "... best research, best clinical expertise, and consistent with client and family values." The Division indicated that the criteria was developed using various Web-based registries of child and family services, such as California's Evidence-Based Clearinghouse for Child Welfare. These registries rate both the level of evidence available for assessing a program or practice and the effectiveness of the program or practice for achieving specific outcomes based on that evidence. According to the Division, in general, if a program or practice is listed on one or more of these registries as evidence-based, then it will qualify as an acceptable in-home service in the future contract award process. However, because these registries include programs and practices that span all levels of evidence and degrees of effectiveness, this strategy may not be sufficient without further clarification. The Division reported that it plans to fully operationalize the criteria after the 2016 contract award.

- c. Maintain and make available through the Department's Web site an updated inventory of evidence-based practices.

Implemented at 24 months

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- 1.4 The Division should expand its monitoring of in-home services contractors to:

- a. Ensure the contractors are implementing evidence-based practices as designed, and
- b. Ensure that contractors have procedures to correct deviations from evidence-based practices' design.

Implemented at 24 months

Not yet applicable

The Division reported that it will include in its In-Home Services contract solicitation scheduled for 2016 a requirement for potential contractors to describe how their internal quality assurance programs will ensure that deviations from evidence-based practices are corrected.

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- 1.5 The Division should require contractors modifying evidence-based practices to provide written justification for the modifications to verify that essential components are not being modified without approval of the developer(s).

Not yet applicable

The Division reported that it will include in its In-Home Services contract solicitation scheduled for 2016 a requirement for potential contractors to provide written justification for modifications to evidence-based practices so that the Division can verify that essential components are not being modified without approval of the developer(s).