

**STATE OF WEST VIRGINIA**

**FULL PERFORMANCE EVALUATION OF THE  
DEPARTMENT OF HEALTH AND HUMAN RESOURCES**

**FOSTER CARE AND ADOPTION:  
Review of Foster Home Approval**

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**Noncompliance with Home Study  
Procedures Fails to Assure Protection of  
Foster Children**

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PE98-09-101

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September 1998

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Antonio E. Jones, Ph.D.  
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September 13, 1998

The Honorable Edwin J. Bowman  
State Senate  
129 West Circle Drive  
Weirton, West Virginia 26062

The Honorable Vicki V. Douglas  
House of Delegates  
Building 1, Room E-213  
1900 Kanawha Boulevard, East  
Charleston, West Virginia 25305-0470

Dear Chairs:

Pursuant to the West Virginia Sunset Law, we are transmitting a Full Performance Evaluation of the Department of Health and Human Resources Foster Care and Adoption - Review of Foster Home Approval, which will be reported to the Joint Committee on Government Operations on Sunday, September 13, 1998. The issue covered herein is "Noncompliance with Home Study Procedures Fails to Assure Protection of Foster Children."

Sincerely,

A handwritten signature in black ink, appearing to read "Antonio E. Jones".

Antonio E. Jones

AEJ/wsc

\_\_\_\_\_ *Joint Committee on Government and Finance* \_\_\_\_\_



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## Executive Summary

*West Virginia Code* § 49-2-1 requires the Department of Health and Human Resources (DHHR) to provide care for neglected children who are committed to its care for custody or guardianship. The DHHR provides this care through foster homes which have met certain standards set by the Department. The Legislative Auditor reviewed files containing documentation of the foster home approval for a sample of 292 homes.

### **Issue Area: Noncompliance With Home Study Procedures Fails To Assure Protection Of Foster Children.**

The Department of Health and Human Resources manual sets forth the policies and procedures that are to be followed by the Foster Care and Adoption Unit. The manual includes those policies and procedures, with the necessary forms, to be used for the entire home study process. It is this process that leads to approving individuals and homes to provide foster care services. The following are the section topics and a brief statement of what the topics cover:

**INTAKE PROCESS;** Includes the intake process and the pre-service orientation.

**STANDARDS FOR SELECTION OF FOSTER\ADOPTIVE FAMILY HOMES;** Includes the basic data such as personal qualities, marital status, age, health status and income status.

**FOSTER PARENTS TRAINING REQUIREMENTS;** Provides the reason for the pre-service training and the requirement for 4 hours of in-service training annually.

**HOME ENVIRONMENT;** Includes fire safety and health standards including home inspection, food and nutrition and medical care.

**FAMILY ASSESSMENT EVALUATIONS;** Includes the approval of the home by an evaluation team.

**FOSTER OR ADOPTIVE FAMILY ANNUAL EVALUATION;** Discusses the reasons for an annual evaluation.

**DENIALS AND CLOSURES OF HOMES;** Reasons for denial or closures which include failure to attend the annual in-service training.

### **Noncompliance In All Of The Steps For Approval**

The Legislative Auditor's review of approved foster homes files found workers either did not complete or did not document the necessary steps for approving foster homes. Based on the data collected in our field work, we found the following missing documents in the 292 approved homes sampled.

- **22 or 8% of the homes did not receive the initial home inspection;**
- **20 or 7% of the homes did not receive the face-to-face interviews;**
- **35 or 12% of the approved homes did not have an application in the file;**

- **77 or 13% of the individuals lacked the required criminal investigative background checks;**
- **47 or 8% of the individuals did not have medical examinations completed;**
- **56 or 19% of the homes failed to complete the pre-service training;**
- **28 or 10% of the homes did not provide outside references;**
- **121 or 41% of the homes did not receive the annual inspection for health and safety; and**
- **145 or 50% of the homes did not maintain the annual in-service training needed for license renewal.**

The Department of Health and Human Resources should not approve foster homes without basic information about the individuals living in the home. Children who are in foster care may have been sexually abused, physically abused, or neglected by their natural parents or relatives. The law and the courts have empowered DHHR to provide these children with individuals and homes who will provide a loving, safe and healthy environment free from abuse and neglect. DHHR has set policies, procedures and documents for achieving this objective prior to approving foster homes. Each standard required to be met by prospective foster parents is intended to increase the confidence of DHHR in meeting its responsibility to protect the health and safety of children in foster care. **At the very minimum, when the state terminates parental rights to protect children, it should at least be certain that it does not place the child in an equal or worse environment.**



## Review Objective, Scope and Methodology

### Objective and Scope

This full performance review of the Department of Health and Human Resources Foster Care and Adoption is required and authorized by the West Virginia Sunset Law, Chapter 4, Article 10, Section 11 of the West Virginia Code, as amended. A full performance audit is used to determine whether or not an agency is operating in an efficient and effective manner and the need for continuation of the agency. The agency is mandated to provide care for neglected children who are committed to its custody.

The objective of this review was to determine that children in the state's custody are being placed in safe environments. The scope of this report focused on how thorough the agency is in establishing safe homes for children.

### Methodology

The Legislative Auditor requested a list of all foster home applications returned to the agency after July 1, 1995. The Department of Health and Human Resources provided this information from each of the four regions located in the state. The population for our sampling of foster homes was compiled from the approved homes, applications, inquiries and closed home files. We selected 456 individuals from the population of 1102 for testing. The sample produced 292 homes that had been approved and 164 homes that were either inquiries, closed or were not approved. Sample sizes were calculated using population rate of study characteristics equal to five percent with a tolerance rate of five percent and a reliability rate of ninety-nine percent. The sample size for each region is as follows: Region 1: 157 Region 2: 123 Region 3: 85 Region 4: 126. Each family chosen from the random sample were then assigned a confidential number to be used on the collection instrument.

Interviews were conducted with Department of Health and Human Resources at both the state and local level. A phone survey of 23 states was conducted to determine similarities in practice. This performance evaluation is in compliance with **Generally Accepted Auditing Standards**.



**Issue Area: Noncompliance With Home Study Procedures Fails To Assure Protection Of Foster Children.**

The Department of Health and Human Resources (DHHR) is required by the WV Code §49-2B-8(c) to complete an investigation of all individuals prior to approval to provide foster care services. WV Code §49-2B-8(c) states:

*“Before issuing a license, certification or approval, the commissioner shall investigate the facility, program and persons responsible for the care of children. The investigation shall include, but not be limited to, review of resource need, reputation, character and purposes of applicants, a check of personnel criminal records, if any, and personnel medical records, the financial records of applicants, and consideration of the proposed plan for child care from intake to discharge.”*

The Department of Health and Human Resources has a manual which sets forth the policies and procedures that are to be followed by the Foster Care and Adoption Unit. The manual includes those policies and procedures, with the necessary forms, to be used for the entire home study process. It is this process that leads to approving individuals and homes to provide foster care services. The following are the section topics and a brief statement of what the topics cover:

**INTAKE PROCESS;** Includes the intake process and the pre-service orientation.

**STANDARDS FOR SELECTION OF FOSTER/ADOPTIVE FAMILY HOMES;** Includes the basic data such as personal qualities, marital status, age, health status and income status.

**FOSTER PARENTS TRAINING REQUIREMENTS;** Provides the reason for the pre-service training and the requirement for 4 hours of in-service training annually.

**HOME ENVIRONMENT;** Includes fire safety and health standards including home inspection, food and nutrition and medical care.

**FAMILY ASSESSMENT EVALUATIONS;** Includes the approval of the home by an evaluation team.

**FOSTER OR ADOPTIVE FAMILY ANNUAL EVALUATION;** Discusses the reasons for an annual evaluation.

**DENIALS AND CLOSURES OF HOMES;** Reasons for denial or closures which include failure to attend the annual in-service training.

These sections provide the necessary guidance and documents to be completed for a home to be approved. The process requires the completion of home inspections and personal interviews, criminal investigative background, verification of medical and mental health of the individuals, training completed, and references from three individuals. The documents verifying each of these steps should have been completed and in the file.

## Noncompliance In All Of The Steps For Approval

Our test of approved foster homes found workers either did not complete or did not document the necessary steps for approving foster homes. The population for our sampling of foster homes was compiled from the approved homes, applications, inquiries and closed home files. We selected 456 individuals from the population of 1102 for testing. The sample produced 292 homes that had been approved and 164 homes that were either inquiries, closed or were not approved. Based on the data collected in our field work, we conclude of the 292 approved homes tested for all necessary documents for approval, that;

- **22 or 8% of the homes did not receive the initial home inspection;**
- **20 or 7% of the homes did not receive the face-to-face interviews;**
- **35 or 12% of the approved homes did not have an application in the file;**
- **77 or 13% of the individuals lacked the required criminal investigative background checks;**
- **47 or 8% of the individuals did not have medical examinations completed;**
- **56 or 19% of the homes failed to complete the pre-service training;**
- **28 or 10% of the homes did not provide outside references;**
- **121 or 41% of the homes did not receive the annual inspection for health and safety; and**
- **145 or 50% of the homes did not maintain the annual in-service training needed for license renewal.**

Each of these conditions are addressed in detail in the report. **Table 1** summarizes the types of missing documents by the four regions in the state.

**Table 1  
Types Of Documents Missing By Region**

Type of Document Missing	Region 1	Region 2	Region 3	Region 4	Total	Percent
Application	16	9	6	4	35	12%
Certificate of Pre-Service Training	11	25	10	10	56	19%
Doctor's Medical Examination	14	19	12	2	47	8%
Inspection of the Home	6	3	11	2	22	8%
Family Interviews ( Face-to-Face)	6	1	11	2	20	7%
Criminal Background Check	11	4	12	15	42	14%
Outside References	11	4	2	11	28	10%
Annual Home Inspection	17	20	46	38	121	41%
Certificate of In-Service Training (Annual)	14	45	61	25	145	50%

### Home Inspection, Personal Interviews And Applications Not Completed

The DHHR Social Services Manual, section 13310 states:

*“It is obvious that a responsible child placing agency must have adequate knowledge of the people to whom it entrusts the care of children. Certain requirements as to the physical setup of an acceptable foster home have been established and the gathering of facts to determine whether the foster home meets such requirements is a relatively simple task. Getting to know the members of the foster family as individuals; whether their relationships to each other and the community are wholesome...It is recognized that the study of a foster home is an exacting, refined process but the worker who remembers that the agency has every right to know well the foster parents to whom a child is entrusted and that through this knowledge that right child may be selected for them, will feel more comfortable and secure about making the study.”*

**We found no evidence that 20 or 7% of the approved homes had the face-to-face**

**interview documented in the file and 22 or 8% of the approved homes did not have any documents confirming the home was inspected for fire and safety conditions and adequate sleeping and living space for a foster child. Also, we also found that 12% of the 292 approved homes tested or 35 homes did not have the required application form in the file.**

The Family Resource Development Application (Form SS-FC-9B) can also be completed at the time of the home inspection and personal interviews are completed. This form provides the home finder with basic information on the individuals applying to become foster parents. The information required on the form includes the names of both individuals, social security numbers, date of birth for each individual, telephone numbers, directions to the home, demographics of the family including the race, religion, educational level, occupation, number of children and other individuals that reside in the home.

The DHHR requested that data be entered into the Families and Children Tracking System (FACTS) beginning in October, 1997 and be completed by December 1997. We referenced the applications in our sample to a list of approved homes provided by the FACTS as of March 1, 1998, to determine that the homes had been entered into the system which also provides the data for payments to the foster families. The data on the application form provides the basic information to be entered into the FACTS system to begin a case file of foster homes and parents. We found that 38 of the approved homes in our sample did not have the birth date of the foster parents tested and 23 of the parents did not have a social security number in the system. We could not determine if the lack of the application document directly contributed to the birth dates and social security numbers missing in the FACTS system; however, without the basic information supplied on the application, the data base being constructed may become flawed or inaccurate.

### **Criminal Background Checks Not Completed**

**We found no evidence that Criminal Identification Bureau Checks (CIBs) had been completed on thirty-eight of the males and thirty-nine of the females. The seventy-seven individuals represent forty-three foster homes that had been approved without a criminal background check. Nineteen of these foster homes had a total of twenty-eight children.** We sampled 292 approved foster homes files and found that approximately 14% of the homes sampled were missing criminal background checks. **Table 2** summarizes the criminal background checks not found in our test of approved foster homes files.

**Table 2**  
**Summary of Data on Files Without Background Checks**

<b>Region</b>	<b>Males</b>	<b>Females</b>	<b>Total</b>	<b>Number of Homes</b>	<b>Homes with Children</b>	<b>Children Placed In Homes</b>
<b>Region 1</b>	10	11	21	11	3	5
<b>Region 2</b>	2	2	4	2	0	0
<b>Region 3</b>	12	11	23	14	7	11
<b>Region 4</b>	14	15	29	18	9	12
<b>Total</b>	38	39	77	45	19	28

The department has made each region aware of the policy of criminal background checks; however, we could not determine why the CIBs were not completed or in the files. Based on interviews with a home finders, the CIB cards are completed during the pre-service training so that they have a can be returned prior to approval of the home; however, homes are being approved without the required training, and similarly without completed CIBs. The lack of CIBs in the files also could mean that homes are being approved without the supervisor reviewing the file for all the necessary documents, new workers are not being properly trained or their work not being reviewed by the management, and workers believing the process for CIBs takes too long so they fail or ignore to complete the form.

### **Confirmation of Current Approved Foster Parents and Homes**

We requested confirmation of current approved foster parents criminal records from the West Virginia State Police. The confirmation test provided the Legislative Auditor with 1. The time frame for turn around for CIB requests, and (2) The confirmation that existing approved homes met the CIB criteria of "No Convictions". The request was made in the middle of March 1998 and the test results were returned on April 2, 1998. The WV State Police randomly chose 151 individuals from approximately 1,115 individuals. The 151 CIBs tested found 141 foster care parent records had "No Convictions." Five of the remaining ten had arrests with no convictions, of which one was recently arrested for domestic battery and burglary with no disposition. The other five had some form of misdemeanor convictions.

### **Criminal Background Checks Need To Be Completed on The Federal and State Level**

Since local law enforcement agencies do not always transmit arrest and convictions to the state police, and the federal law enforcement agencies are not required to report to the state police, the

need for federal and state CIBs are needed to assure that the agency is alerted to an applicant who has a federal conviction. The federal and state criminal background checks would increase the agency's reliance that any potential foster parents who have been arrested and convicted of serious crimes on the federal level would be exposed. A case occurred in Region IV where the files of an approved foster home revealed a DHHR worker placed the child in a home for over two months prior to its approval, finding afterward that the individual had been convicted of a drug crime. The homefinder relied on a CIB completed by day care staff, where the individual worked. Although the CIB came was returned as a "No Convictions", during interviews the homefinder determined that the in fact did have a criminal record. The homefinder made a request through the local prosecutors office to have a CIB processed through the National Crime Information Center (NCIC), which is the only national criminal database. The CIB from the NCIC showed that the individual had been convicted of possession with the intent to deliver cocaine and served six months in a federal prison. The worker was reprimanded by the region director for not following the procedures for placing a child; however, the regional director allowed the approval of the individual for the one child. As of this date the child remains in the home.

Criminal background checks are processed for the Department of Health and Human Resources (DHHR) through the West Virginia State Police Criminal Identification Bureau (CIB) at a cost of \$10 per person. It is the responsibility of the DHHR to request background checks on all individuals living in the homes who are over the age of 18. The information provided by the state police is on crimes that have been committed in West Virginia. In a letter from the State Police, limitations of the CIB are outlined as follows: *"The West Virginia State Police Criminal Identification Bureau does not maintain or control the national records for arrest and conviction. The only mechanism to receive this information without being specifically identified within state law as a governmental agency is through a governmental agency with the statutory authority to acquire and provide this information."*

The cost for FBI CIBs is \$24 dollars per person and DHHR is able to access criminal information on a federal level, via the State Police. The fingerprint cards would be completed by the DHHR and sent to the state police, who would then forward the card to the appropriate Federal agency. The total cost to DHHR per individual who applies to become a foster parent for CIBs would be \$34.

We surveyed twenty-three states on what agencies are used to provide the criminal background checks. Ten use the Federal Bureau of Investigation Fingerprint Clearinghouse to check records of their potential foster parents, and twelve use State or Local Police. The remaining state does no criminal background checks, and only requires that their foster parents signed a form that says they have no criminal convictions. In addition, one state requires that a criminal record check be completed each year.

The need for a more comprehensive CIB is critical, to assure that foster parents have no record of criminal behavior, particularly child abuse or sexual crimes. Two actions need to be taken regarding CIBs and foster care. First, a comprehensive CIB must be obtained, whatever it takes, without regards to cost. The risk of placing a child in the care of a sexual predator or drug offender



cannot be taken. Second, the CIB needs to be required periodically, possibly every two years. Some foster homes were caring for children for as long as 20 years. Foster care is a continuous process, therefore, approval should not be a one time event.

### **Certification of Medical And Mental Health**

Another important step required by DHHR in providing safe homes and capable foster parents is the documented medical examination of each of the parents. Social Services Manual, Chapter 13000-A, Family Resource Development, 13150-A.5, titled Health Status, states:

*“The following health factors should receive special consideration and attention:*

**1. Physical Examinations**

*Applicants including their children and other household members, shall possess good mental and physical health and be free from communicable diseases, specific illnesses or disabilities which interfere with the family’s capability to care for children. Each applicant shall provide the Department with a report of a recent physical examination, using the Medical Report.*

*The physician’s report shall be considered as part of the total evaluation of the home.*

The Department requires the initial medical certification and a follow-up medical examination every five years. Follow-up medical examinations are paid by the department and provide the department and foster parents the assurance they are physically and mentally capable to continue as foster parents. The state is responsible for the safety and well being of each child placed in its custody. The medical examinations and follow-up examinations are another step in the process to assure the state is meeting this requirement.

**The Legislative Auditor found 47 foster parents did not have the required medical certification from a physician in the home study file.** Demographic data on foster parents indicates that 307 individuals or at least 28% of foster parents are in the age range of 50 to 80 years of age and are responsible for 26% of the children in foster care. By completing the medical forms, workers are at least determining that the foster parents meet the medical requirements at the time of the approval. The number of approved foster parents reviewed and the number of foster parents without medical examinations on file is listed by region in **Table 3**.

**Table 3**  
**Summary of Medical Examinations Documented**

Region	Number of Individuals Tested	Number of Parents Without Medical Examinations
1	104	14
2	142	19
3	117	12
4	188	2
<b>Total</b>	<b>551</b>	<b>47</b>

**Medical Examinations Needed As Age Increases**

The importance of medical examinations and examinations can be seen based on the demographics of the current foster parents age. Based on the data provided by Family and Children Tracking System (FACTS), we found that 218 children in foster care are residing in 307 homes where the age of the foster parent exceeds fifty years of age. Medical problems increase usually as an individual ages and the need for medical examinations and the frequency of the examinations should increase accordingly.

We completed a summary of approved parents age and number of children in their care based on data provided by the FACTS. **This means that children are being raised in homes where the parent is above the average parenting age, and more susceptible to illness and even death.** Table 4 summarizes age of foster parents and number of children placed in those homes.

**Table 4**  
**Summary of the Age Ranges of Foster Parents And**  
**Number of Children in Their Care**

<b>Age Range</b>	<b>Number of Foster Homes</b>	<b>Percentage of Foster Parents Population</b>	<b>Number of Children Housed in Their Care</b>	<b>Percentage of Children In Care</b>	<b>Number of Homes Being Used</b>
<b>21-30</b>	<b>55</b>	<b>5%</b>	<b>31</b>	<b>4%</b>	<b>15</b>
<b>31-40</b>	<b>281</b>	<b>25%</b>	<b>183</b>	<b>22%</b>	<b>98</b>
<b>41-50</b>	<b>349</b>	<b>32%</b>	<b>263</b>	<b>31%</b>	<b>133</b>
<b>51-60</b>	<b>174</b>	<b>16%</b>	<b>133</b>	<b>16%</b>	<b>61</b>
<b>61-70</b>	<b>68</b>	<b>6%</b>	<b>46</b>	<b>5%</b>	<b>19</b>
<b>71-80</b>	<b>36</b>	<b>3%</b>	<b>17</b>	<b>2%</b>	<b>13</b>
<b>Undetermined</b>	<b>139</b>	<b>13%</b>	<b>177</b>	<b>21%</b>	<b>93</b>
<b>Total</b>	<b>1102</b>	<b>100%</b>	<b>850</b>	<b>100%</b>	<b>432</b>

\* Percentages have been rounded to the nearest whole number

### **Homes Without Pre-Service Training**

The DHHR has recognized the need for the training as required in Section 13140-A.2 of the Social Services Manual. According to policies and procedures of foster care ... The goals of the orientation are: (1) To orient the applicants to the philosophy and process of the Department's adoption and foster family care programs; (2) To develop greater self-awareness on the part of the applicants to determine their strengths, weaknesses, emotional status and personality characteristics; (3) To prepare applicants by sensitizing them to the kinds of situations, feelings, and reactions that are apt to occur with placement; and (4) To effect behavior so that applicant will better fulfill the function of their role as parents of an adopted child or foster child; and, (5) To allow the home finding staff to begin the family assessment process. ... all applicants shall complete Units 1-5 of Pre-service Orientation based on material developed by the Regional Home Finding Unit.

The Child Welfare League of America is the predominant authority on national foster care issues. It was established to offer continuing improvement of services for children. According to the League, it is the responsibility of the foster care agency to provide opportunities for prospective

foster parents to participate in some type of pre-service training program. The training ... should provide the foster parents knowledge and skills to: Protect and nurture children in a safe, healthy environment with unconditional positive support; support relationships among children and their parents, siblings and kin; meet the developmental needs of the child...”

The Legislative Auditor’s Office found that of the 292 approved foster homes tested, 19% or 56 homes did not have the required pre-service training. Table 1 summarizes by region the homes without pre-service training.

**Table 5  
Summary of Homes Without Pre-Service Training**

<b>Region</b>	<b>Approved Homes Tested</b>	<b>Homes Without Pre-service Training</b>	<b>% Homes Without Pre-service Training</b>
<b>1</b>	<b>58</b>	<b>11</b>	<b>19%</b>
<b>2</b>	<b>74</b>	<b>25</b>	<b>34%</b>
<b>3</b>	<b>61</b>	<b>10</b>	<b>16%</b>
<b>4</b>	<b>99</b>	<b>10</b>	<b>10%</b>
<b>Total</b>	<b>292</b>	<b>56</b>	<b>19%</b>

**Outside References Not In The Files**

DHHR requires four testimonial references from individuals who know the prospective foster parents. Two of the four references must be personally contacted by the worker and the other two may be contacted by telephone or by a letter. The references should support the moral character of the individual and support the prior information collected which is needed for the approval of the home.

We found that 28 homes did not have the required references in file. In one case, we found an approved home where the individual refused to submit references.

**RENEWAL PROCESS**

**Annual Home Inspection For Fire and Safety Hazards**

The DHHR Social Services Manual, Section 13370 requires the annual re-evaluation of the foster home. The policy states: *“An annual re-evaluation of all foster homes, except permanent foster homes is required. Such re-evaluations can be done either by the home finder or the social*

*service worker currently working with the family. The re-evaluation of the foster home should be used to assess the level of care afforded foster children; to determine whether or not there are additional ways in which the agency could be of help to the family and the child in placement. These inspections also provide DHHR with any changes that may have occurred, both with the home and members of the home."*

The Child Welfare League of America also provides guidance in this area in section 3.36, Staffing Family Foster Care Services. The standard states: Re-licensing studies should be conducted as frequently as required by state licensing law, but should take place at least once every two years." The standard further states, "...Evidence that the home is in compliance with licensing requirements, including those concerning health and safety. A study that identifies any changes in the family or physical facilities since the previous study was completed."

**The Legislative Auditor's Office found that 41% or 121 approved foster homes had missed the yearly inspection during their tenure as foster parents. The annual home inspections missing ranged from 2 yearly inspections to 7 yearly inspections.** The inspections were calculated by using the initial approval date and calculating the number of inspections that should have been completed versus the actual number of inspections completed.

**Table 6** summarizes by region the number of homes missing at least two yearly inspections.

**Table 6  
Homes Missing Yearly Inspections**

<b>Region</b>	<b>Homes missing Yearly Inspections</b>
<b>Region 1</b>	<b>17</b>
<b>Region 2</b>	<b>20</b>
<b>Region 3</b>	<b>46</b>
<b>Region 4</b>	<b>38</b>
<b>Total</b>	<b>121</b>

**These individual foster homes are exempt from inspection by the State Fire Marshal's Office for fire and safety hazards. Since these homes are exempt from the authority of the Fire Marshal and the home finder or social worker does not complete the annual home inspection for health and safety hazards, this places children at risk to possible fire and safety violations which would have been noted during the inspection of the foster home. The worker would have required the foster parent to correct the violation in a certain amount of time**

and the home would have been revisited to assure the state that the violation was corrected.

The policies for re-evaluations of foster care allow for the inspection to be completed by the home finder or the social services worker during routine visits. According to their policies, monthly listings of homes overdue for yearly inspections were to be produced. The decision as to who would complete the yearly inspection was to be made by the home finding supervisor and social service worker supervisor. We could not determine why the yearly home inspections were not kept up-to-date.

### Homes Required To Have Yearly In-Service Training

In addition to the pre-service training, the approved homes must complete at least 4 hours of in-service training each year. **Our test indicated that 50% or 145 of the approved homes did not complete the required annual 4 hours in-service training.** The home finders that we spoke with cited several reasons that they did not offer hours to current foster parents, other than the videos and regional newsletters. One of these reasons included the vast distance that was covered in their section of the region, and because of this the lack of participation from the foster parents. Some of these home finders attempt to do in-service training in the homes of foster parents when they are unable to hold group meetings. **Table 7** summarizes by region the of approved homes that have not completed their in-service training.

**Table 7**  
**Approved Homes That Failed to Complete In-Service Training**

Region	Approved Homes Tested	Homes Without Yearly In- service Training	% Homes Without Yearly In- service Training
1	58	14	24%
2	74	45	61%
3	61	61	100%
4	99	25	25%
<b>Total</b>	<b>292</b>	<b>145</b>	<b>50%</b>

The Legislative Auditor's office was able to obtain the number of in-service training given in some counties for 1997. As **Table 8** shows, some of the regional home finders offer a variety of in-service training for their foster parents to attend, while others offer none.

**Table 8**  
**In-Service Offered, by County**

Counties	Number in-service training offered in 1997
Grant, Hardy, Hampshire, Mineral, Pendelton	1
Wood, Wetzel	0
Randolph, Tucker	4
Brooke, Ohio, Tyler, Marshall, Hancock	2
Calhoun, Gilmer, Ritchie	0
Harrison, Doddridge	8
Lewis, Upshur	3
Total	18

**Summary of Conditions**

Children who are in foster care may have been sexually abused, physically abused, or neglected by their natural parents or relatives. The law and the courts have empowered DHHR to provide these children with individuals and homes who will provide a loving, safe and healthy environment free from abuse and neglect. DHHR has set policies, procedures and documents for achieving this objective prior to approving foster homes. Each of the steps in the process provides the home finder with a maximum degree of certainty the home is safe and clean, the individuals are healthy and mentally sound, they will meet the emotional, physical and developmental needs of the child placed in their home and provide stability for the child during a traumatic period of life. The foster care programs policies and procedures for safety and protection of foster children requires all homes and individuals meet all the strict criteria required for their approval. **The commitment and degree of certainty for a home to be safe and healthy for the child is diminished with each step of the approval process that is not completed or omitted.**

**The summary of homes with one or more documents missing is 49%.** These documents are the evidence that the worker has completed each of the necessary steps for the home's approval to provide foster care services. When documents are missing from the file, the worker increase the risk a child may be exposed to further abuse and neglect and exposes the worker and the state to any future liabilities which can happen if the child is injured or abused by the foster parents. **Table 8** provides a summary by regions of the number of homes with missing

documents required by DHHR to be an approved home.

**Table 9  
Approved Homes With No Missing Documents And Missing Documents**

<b>Homes With</b>	<b>Region 1</b>	<b>Region 2</b>	<b>Region 3</b>	<b>Region 4</b>	<b>Total</b>	<b>Percentage of Approved Tested</b>
<b>No Missing Documents</b>	19	37	29	64	149	51%
<b>1 Missing Document</b>	15	28	11	21	75	26%
<b>2 Missing Documents</b>	11	7	9	10	37	13%
<b>3 Missing Documents</b>	7	0	6	2	15	5%
<b>4 Missing Documents</b>	1	2	3	0	6	2%
<b>5 Missing Documents</b>	1	0	2	2	5	2%
<b>6 or more Missing Documents</b>	4	0	1	0	5	2%
<b>Total Tested</b>	58	74	61	99	292	100%

**Contributing Causes for Noncompliance**

The basic manual is dated March 1978 with up-dates released in 1985 dealing with general foster care issues, 1991 dealing with Title IV-E funding and September 1, 1995, which covers the consolidation of the home finding functions. Section 13000 and 13000A of the Social Services Manual provides home finder workers with guidelines for the approval of foster parents and homes. PERD attempted to document the flow of the home study process from the manual when determining our testing methodology. We were provided with three voluminous notebooks which we found to be very confusing and overwhelming. The manual should be clear and concise with the flow and documentation needed for approval of homes.



The criminal background check procedures vary from region to region. Interviews with the home finding staff revealed that some staff will have the local police department complete the background check, some will go through the Prosecuting Attorney's Office and some will have the West Virginia State Police complete the criminal background search. The reasons for such variances were the state police CIBs take too long, state police CIBs do not cover the local police, magistrate records ( Domestic Violence Restraining Orders are filed with Magistrate Court) are not always forwarded to the State Police and CIBs for potential foster parents who admitted to having a criminal record were returned "No Conviction".

We found in Region 1 that six of the approved homes had only a local background check completed. The home finder's reason for the variance from the policy was the local checks were free of charge and it helps with any charges that were filed in magistrate court. In Region 4 the variance was the use of the Prosecutor's Office on occasion. The home finder stated the reason for not following procedure was sometimes CIBs reported no convictions when they were returned but the applicant admitted to a prior conviction.

### **Child Placed In The Home Of A Convicted Felon**

DHHR gave conditional approval to an individual based solely on the individual being approved to work in a day care facility. One of the requirements for employment at a day care facility is the individual must complete a criminal background check (CIB). The individual's CIB completed for the day care facility was returned. No Convictions by the State Police. The child was in the home for two months awaiting the completion of the home study. When the worker began the home study process, the individual acknowledged to the worker that she had been convicted of drug charges on the Federal level. The worker was given a formal reprimand by the Regional Director; however, the child was not removed from the home. The Regional Director approved the home on the condition that it be monitored on a regular basis and the individual could only provide foster care services to that one particular child.

### **Complaints and Closing Of Homes**

The Legislative Auditor's Office also found 40 complaints, including sexual abuse, physical abuse, and non-compliance with policy in these homes resulting in 9 homes being closed, children being removed from 4 homes which homes remained open for future placements. **In the 40 complaints mentioned, the Legislative Auditor's Office found only one case in which children were removed at the onset of the investigation.** Table 10 summarizes the types of complaints and resolution.

**Table 10**  
**Complaints against foster families**

Type of Complaint	Complaints	Corrective Action Plan	Closed	Child Removed	Complaint Not Substantiated
Sexual Abuse	5	0	1	0	4
Physical Abuse	17	2	2	1	12
Non-Compliance	8	3	3	2	0
Other	10	1	1	1	7
<b>Total</b>	<b>40</b>	<b>6</b>	<b>7</b>	<b>4</b>	<b>23</b>

### Conclusion

Each step of the foster home approval process that is violated or not documented increases the risk level that a child could be exposed to further abuse and neglect while in the state's custody. The Code has mandated that an investigation be completed prior to a home being approved to provide foster care services. In addition, the Department of Health and Human Resources has established policies and procedures to comply with Code. **The process is in place to ensure the State is meeting its responsibility to ensure the child is protected while in its custody.**

The failure to complete one or more of the steps in the approval process yearly home inspection does not assure the worker or the department that the home is meeting the necessary safety and health standards required at the time of approval. The DHHR worker's failure to complete a yearly inspection of a home decreases the level of confidence that the child continues to be placed in a safe home. The Department of Health and Human Resources should never in its responsibility to care for children in its custody.

### Recommendation 1

*The DHHR should produce a manual with the current policies, procedures and documents needed for the workers to follow for foster home approval. The manual should be followed with training for the home finding staff.*

### Recommendation 2

*The DHHR should have an individual from the Charleston Office conduct periodic reviews of the Foster Home files to insure that the policies are being followed by all home finders and managers.*

### **Recommendation 3**

*The DHHR should implement a policy requiring all criminal background checks be processed through the West Virginia State Police and Federal Bureau of Investigation Clearinghouse.*

### **Recommendation 4**

*The supervisor of the home finders be required to review and initial all files prior to the home's approval and require the supervisor's approval prior to issuance of a medical card or support payment.*

### **Recommendation 5**

*The supervisors should not approve any foster parents as a certified home unless the individuals have been examined and a report issued by the physician that the individual physically and mentally sound.*

### **Recommendation 6**

*Training of foster parents should be required prior to the home's approval. Supervisors and home finders should provide the regional director with times and places that the training will be available for foster parenting orientation and yearly un-dating. Each region should submit the schedule to the Charleston Office for dissemination to local newspapers and support groups.*

### **Recommendation 7**

*The DHHR should require yearly inspections be completed by either the home finder or the social services worker assigned to the child's case. The homes that do not have children in their placement should be inspected to assure that the standards for a safe and healthy environment exists for future placements.*

### **Recommendation 8**

*The supervisors for the home finders and the social services workers should coordinate workers schedules to assure that each approved foster home receives a yearly inspection.*



**Appendix A**  
**Regional Home Finders**



## Appendix A

	<b>Counties</b>	<b>Number of Workers</b>
<b>Region I</b>	Calhoun, Gilmer, Ritchie, Pleasants	1
	Harrison, Doddridge	1
	Marion, Monongalia	1
	Wirt, Wood	1
	Brooke, Ohio, Marshall, Hancock	1
	Wetzel, Tyler	1
<b>Region II</b>	Clay, Boone	1
	Kanawha	1
	Putnam, Mason, Cabell, Wayne	2
	Jackson, Roane	1
	Lincoln, Logan, Mingo	1
<b>Region III</b>	Berkeley, Jefferson, Morgan	1
	Randolph, Tucker	1
	Taylor, Barbour, Preston	1
	Grant, Hardy, Hampshire, Mineral, Pendelton	1
	Lewis, Upshur	1
<b>Region IV</b>	Mercer	1
	Raleigh, Fayette	1
	McDowell, Wyoming	1
	Braxton, Nicolas, Webster	1
	Greenbrier, Monroe, Pocahontas, Summers	1





**Appendix B**  
**Type of Criminal Background Check(s) by State**



STATE	State Police Check	FBI Check
Arizona	Yes	Yes
Conneticaut	Yes	Yes
Deleware	Yes	Yes
Florida	Yes	Yes
Georgia	Yes	No
Idaho	Yes	Yes
Indiana	Yes	No
Iowa	Yes	No
Kentucky	Yes	No
Massachusetts	Yes	No
Michigan	Yes	No
Minnesota	No	Yes
Mississippi	Yes	No
New Hampshire	Yes	No
New Jersey	Yes	Yes
North Dakota	No	No
Ohio	Yes	No
Oklahoma	Yes	No
Oregon	Yes	No
Rhode Island	Yes	No
South Dakota	Yes	Yes
South Carolina	No	Yes
Tennessee	Yes	Yes



**Appendix C**  
**Agency Response**





STATE OF WEST VIRGINIA  
DEPARTMENT OF HEALTH AND HUMAN RESOURCES

Cecil H. Underwood  
Governor

Office of the Secretary  
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Joan E. Ohl  
Secretary

September 10, 1998

Antonio E. Jones, Ph.D., Director  
Performance Evaluation and Research Division  
Office of the Legislative Auditor  
State Capitol Building, Room 314-W  
Charleston, West Virginia 25305-0610

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SEP 11 1998

RESEARCH AND PERFORMANCE  
EVALUATION DIVISION

Dear Dr. Jones:

The Department of Health and Human Resources accepts the Preliminary Performance Evaluation of the Department of Health and Human Resources, Foster Care and Adoption: Review of Foster Home Approval done by the Office of the Legislative Auditor. The recommendations outlined by the analysis and contained in the report have and will continue to be thoroughly reviewed by the Department for areas in need of further evaluation and improvement. Where specific examples of problems were identified and referenced in the report, the Department would like case names and county offices so that these problems can be addressed as soon as possible.

#### General Comments

The Department's Families and Children Tracking System (FACTS) was developed to support the application of the casework practice as defined in policy and implemented by the Department in January 1998. Since that time, individual workers in each county have converted existing paper files to the FACTS system and all cases opened after January 1, 1998 have been entered directly into the FACTS system. All policy and process requirements for the Homefinding procedure are contained in FACTS. Where there are important decision points in the process, a Supervisor's approval is required by the system at the time the case is assigned, when the study is completed, etc. It is the Supervisor's responsibility to ensure that all requirements are met. The FACTS system is relatively new to the Department and as staff receive additional training and technical assistance with the system, continuing improvements in the information contained in FACTS will be recognized. FACTS gives the Department the opportunity to review cases for compliance through its ability to track all the transactions and approvals that take place for each individual case such as all training, CIB and CPS checks, all contacts with the family, documents and forms, any noncompliance issues, etc. This permits Quality Assurance to recreate the entire case record for review. The Department is committed to and will ensure compliance with the policies and procedures established for foster care and adoption including certification of each step in the approval process.

The Department will be implementing a pilot project in Region IV in October that will change the foster care system to match the level of care a child needs with the level of care provided to that child by a foster family. This pilot project is directed toward the goal of providing quality services to children who are placed in family foster homes. This system involves redefining the levels of family foster care, utilization of an assessment tool which will determine the level of family foster care a child needs, establishment of rates which will compensate private agency providers for the delivery of care and supervision as well as ensure a minimum payment which must be passed on to the foster parents, the adoption of a uniform training curriculum for all prospective foster and adoptive parents and the development of a set of core standards for practice that will help to make services uniform and consistent throughout the state. The departmental goal is to implement this program on a statewide basis by January 1, 2000.

**Issue Area: Noncompliance With Home Study Procedures Fails To Assure Protection of Foster Children**

**Home Inspections and Personal Interviews And Applications Not Completed**

The report indicates that seven percent (7%) of the approved homes did not have the required personal interviews or documentation that the home was inspected for fire and other safety concerns. This information is to be gathered and evaluated by the Homefinder as a part of the determination of the suitability of the family to provide foster care services. Generalizations as to these issues should be included in the Foster Family Assessment since there is no actual document for this information. The home study may also include the outside references that are required rather than being separate in the case record. FACTS allows the Department to store these documents in the system. The Department agrees with the Office of the Legislative Auditor that absence of this documentation creates flawed and inaccurate information.

The Department regards these issues as very important in the assessment of the family's ability to provide foster care to the children in the state's custody. All cases will be review for the necessary information. For any provider who has not had the home inspection or the required interviews, corrective action plans will be instituted to get the home into compliance with policy by January 1, 1999.

**Criminal Background Checks**

There are two policies that govern criminal background checks. Chapter 6,000 of the Social Services Policy Manual requires CIB results to be filed separately from the provider file in a locked administrator's file cabinet. After Chapter 13,000A was issued in 1995, the CIB results were required to be filed in the providers record. This change in policy may account for some of the 42 provider case records which are missing the



CIB documentation. However, the Department will examine all cases in which the CIB documentation is lacking for an immediate determination of cases for which the CIB check must be completed. In these cases, fingerprints will be taken and sent to the State Police for processing by October 15, 1998.

There has been a lengthy study of the issue of requiring FBI criminal record checks. It is a complicated matter involving additional cost, potential delays in the home study process, incomplete and/or inaccurate information obtained from the checks, and the skill required for the fingerprint procedure. Out of the seven surrounding states, only three routinely require FBI checks for foster parents.

A meeting was held that included: Otis Cox, Secretary of the Department of Military Affairs and Public Safety; Sergeant Tom Barrick, State Police; Lt. Colonel Robert Blankenship, State Police; Joan Ohl, Secretary of the Department of Health and Human Resources; David Forinash, Deputy Secretary of the Department of Health and Human Resources; Susan Settle, General Counsel to the Secretary; John Wilkinson, Director of the Office of Health Facility Licensure and Certification; Edgar Van Camp, Inspector General; Anita Arnold, Office of the Inspector General; Jack Frazier, Commissioner of the Bureau for Children and Families; Claire Leviner, Office of Social Services; and Mary Jo Thomas, Director of the Office of Social Services. At this September 8, 1998 meeting, discussion centered on CIB and other clearances which help ensure the safety of children.

A central registry for abuse and neglect and sexual offenders as well as state and federal criminal record checks were discussed. Special challenges were noted for checks on residents of border counties. In addition to types of background checks, frequency was another topic of discussion. A suggestion was made for rechecks every three years if there is any suspicion of a problem and every five years if routine. The quality of the information contained in the checks and the amount of time to complete them were issues raised. To continue the discussion and resolve issues and questions related to criminal background checks, Deputy Secretary Forinash will convene an internal work group.

### **Certification of Medical and Mental Health**

While the Department believes that the physical and mental health of potential foster parents is very important, it is only one consideration in determining if a person is willing and able to be a foster parent. Having a medical condition does not prevent a person from being a good foster parent. Many people, including biological parents, who have heart disease, diabetes, glaucoma, and many other disabilities or illnesses are capable of providing the necessary care, supervision, and love to parent a child. However, the Department agrees with the Office of the Legislative Auditor on the importance of these medical examinations.

The age of the foster parents are also not as relevant to this decision as their ability to parent. Simply being over the age of 50 does not preclude a person from being a good foster parent. Additionally, many of the relatives that are foster care providers are grandparents who are over 50 years old. The report points out, and the Department concurs, that when children are placed in homes where the foster parents are above the average parenting age, the medical exam becomes increasingly important.

Current foster parents without the necessary medical evaluation will be identified and physical exams scheduled on or before January 1, 1999. As policy requires, all new potential foster parents must submit the mandatory medical report signed by a physician before they are opened as a foster home.

### **Homes Without Pre-service Training**

The requirement for foster and adoptive parents to have pre-service training is essential. Since old records may have been reviewed as well as new records, some of the missing documentation regarding completion of pre-service training may be attributed to the fact that several years ago certificates were not given out for the completion of training. This does not mean that foster and adoptive parents were not trained, but simply that older records would not necessarily have documentation to the fact that the parents completed training. The Department, without the benefit of documentation, must assume that the pre-service training did not take place.

All cases will be reviewed. Any foster parents who have not had the mandatory pre-service training will be required to complete all five of the necessary sessions by April 1, 1999. Current policy will continue to require any new potential foster or adoptive parents to successfully complete pre-service training.

The Department of Health and Human Resources is in the process of purchasing the Child Welfare League of America's PRIDE pre-service training curriculum as part of the Region IV Foster Care Pilot Project. PRIDE is a comprehensive, competency-based training model that will be utilized for all potential foster and adoptive parents.

### **Outside References Not In The Files**

The report indicates that twenty-eight families did not have the required references in their case records. This information is to be gathered and evaluated by the Homefinder as a part of the determination of the suitability of the family to provide foster care services. Generalizations as to these issues should be included in the Foster Family Assessment. The home study may include the outside references that are required rather than being separate in the case record. FACTS allows the Department to store these documents in the system. The Department agrees with the Office of the Legislative Auditor that absence of this documentation creates flawed and inaccurate information.

The Department regards these issues as very important in the assessment of the family's ability to provide foster care to the children in the state's custody. All cases will be reviewed for the necessary information. For any provider who has not had the required references, corrective action plans will be instituted to get the home into compliance with policy by January 1, 1999.

## **RENEWAL PROCESS**

### **Annual Home Inspection For Fire And Safety Hazards and Yearly Re-Evaluation**

Due to the need to conduct quarterly reviews, administrative reviews, Multidisciplinary Treatment Team meetings, visitation, permanency reviews, and other aspects of the casework process, workers have continuous contact and interaction with the foster family throughout the year. Some of this contact is conducted in the foster home. Although a formal annual home inspection and re-evaluation may not have been conducted, workers have sufficient contact with the foster family in the home to confirm that the home is safe, determine if the care provided by the foster family is acceptable, provide an opportunity for an update on any changes that may have occurred in the home, allow for the exchange of information that may help the family care for the child placed in the home, as well as foster a good relationship between the family and the Department. The Department will assure that each home is in compliance with licensing requirements including those which concern health and safety.

Staff will be required to update the record on any home which has not had a formal yearly home inspection by January 1, 1999.

### **Homes Required To Have Yearly In-Service Training**

The report finds that many foster families do not complete the necessary four hours of in-service training required each year. The Department will review all foster parent case records. Any foster parents who have not had the mandatory in-service training will be required to complete four hours of in-service training by April 1, 1999. Current policy will continue to require foster parents to successfully complete the required in-service training. The Department will also make more sessions on a variety of topics available to foster parents across the state as well as continue to reimburse families for the ongoing training requirements.

### **Summary of Conditions**

Each issue of noncompliance is serious and must be corrected. Some of the cases reviewed by the Office of the Legislative Auditor may be court ordered or relative

placements in which a provisional approval is given until the Department can complete the family assessment. Current policy requires the completion of the foster home application and medical forms, contact with a minimum of two references, one office interview and one home visit are required before provisional approval may be granted. Provisional approval expires at the end of 90 days. As discussed during the September 4<sup>th</sup> meeting, this policy will be reviewed as to the feasibility of reducing the provisional approval period from 90 days to 30 days.

The report indicates that 77 percent of the homes reviewed had no missing documents or one missing document. As stated previously, each case of noncompliance will be reviewed. The documentation for the annual home inspection and certification of annual in-service training, while important, are not as vital as the initial inspection of the home or the interviews conducted with the family. As shown in the report, the percentage of homes missing this type of information is much less than those missing the annual home inspection and certification of in-service training.

### **Complaints and Closing of Homes**

The Department takes complaints of sexual and physical abuse, neglect and other noncompliance issues very seriously. They are investigated, as are all other allegations, by the policies that govern child protective services. While the Legislative Auditor's Office found one case in which a child was removed at the onset of the investigation in their sample population, the removal of a child from a home is dependent on the necessary policies and procedures that must be followed with any allegation of abuse or neglect. If the Department's policy was to immediately remove foster children if any complaint was issued without substantiation of the allegation, this would be a violation of the parents' civil rights and detrimental to the stability of a child's life which is already seriously jeopardized by the initial removal from his/her biological parents.

### **RECOMMENDATIONS**

***Recommendation 1: The DHHR should produce a manual with the current policies, procedures and documents needed for the workers to follow for foster home approval. The manual should be followed with training for the home finding staff.***

The Department issued the Family Resource Development policy (Chapter 13,000A) in September 1995. This policy includes the necessary information and forms for homefinding activities. The Office of Social Services is currently in the process of combining and updating policy which will be available to all staff on-line through the FACTS system. Several sections are already on-line with the remainder of the policy to be available through FACTS by April 30, 1999.

***Recommendation 2: The DHHR should have an individual from the Charleston Office conduct periodic reviews of the Foster Home files to insure that the policies are being followed by all home finders and managers.***

The Department is instituting a Quality Assurance/Program Review Unit whose responsibility will be to conduct program reviews of field offices. This will include case record reviews for compliance with policy and procedure. Several of these program reviews have already been conducted in various local offices across the state. All county offices will be reviewed by June 30, 1999.

***Recommendation 3: The DHHR should implement a policy requiring all criminal background checks be processed through the West Virginia State Police and Federal Bureau of Investigation Clearinghouse.***

The Department of Health and Human Resources has a comprehensive policy on criminal record checks. There has been a lengthy study of the issue of requiring FBI criminal record checks. It is a complicated matter involving additional cost, potential delays in the home study process, incomplete and/or inaccurate information obtained from the checks and the skill required for the fingerprint procedure. Out of the seven surrounding states, only three routinely require FBI checks for foster parents.

A meeting including Secretary Cox, Sgt. Barrick, Col. Blankenship, Joan Ohl, David Forinash, Susan Settle, John Wilkinson, Danny Van Camp, Anita Arnold, Jack Frazier, Claire Leviner, and Mary Jo Thomas was held on September 8, 1998. Discussion at this meeting centered on CIB and other clearances to ensure the safety of children. Various possibilities including the frequency for background checks were discussed. An internal meeting will be scheduled by Deputy Secretary Forinash to discuss the feasibility of these options.

***Recommendation 4: The supervisor of the home finders be required to review and initial all files prior to the home's approval and require the supervisor's approval prior to issuance of a medical card or support payment.***

Current policy requires the Regional Homefinding Supervisors to review and approve all homes prior to payment being made. This will continue to be the process. The importance of the need to completely review each home for all the necessary requirements will be strongly emphasized to the Regional Homefinding Supervisors and staff by the Department administration immediately. Quality Assurance reviews will be utilized to identify any cases of noncompliance in this area and where corrective action must be taken. This is a basic supervisory responsibility and the Department will work quickly to ensure compliance.

***Recommendation 5: The supervisors should not approve any foster parents as a certified home unless the individuals have been examined and a report issued by the physician that the individual is physically and mentally sound.***

Current policy requires that potential foster and adoptive parents have a medical check by a physician before a home is approved as a foster care or adoptive home. All current foster parents without the necessary medical evaluation will be identified and physical exams scheduled on or before January 1, 1999. All future approvals will include the mandated examinations. Quality Assurance reviews will be utilized to identify any cases of noncompliance in this area and where corrective action must be taken.

***Recommendation 6: Training of foster parents should be required prior to the home's approval. Supervisors and home finders should provide the regional director with times and places that the training will be available for foster parenting orientation and yearly updating. Each region should submit the schedule to the Charleston Office for dissemination to local newspapers and support groups.***

Current policy requires pre-service training of all potential foster and adoptive parents prior to their approval. There are circumstances in which a home may be provisionally approved for foster care before the parents complete the training. As cases are reviewed, any foster parents who have not had the mandatory pre-service training will be required to complete all five of the necessary sessions by April 1, 1999. Quality Assurance reviews will be utilized to identify any cases of noncompliance in this area and where corrective action must be taken.

***Recommendation 7: The DHHR should require yearly inspections be completed by either the home finder or the social services worker assigned to the child's case. The homes that do not have children in their placement should be inspected to assure that the standards for a safe and healthy environment exists for future placements.***

Current policy requires annual home inspections. Staff will be required to update any home which has not had the necessary formal yearly home inspection or annual recertification by January 1, 1999. Quality Assurance reviews will be utilized to identify any cases of noncompliance in this area and where corrective action must be taken.

***Recommendation 8: The supervisors for the home finders and the social services workers should coordinate workers schedules to assure that each approved foster home receives a yearly inspection.***

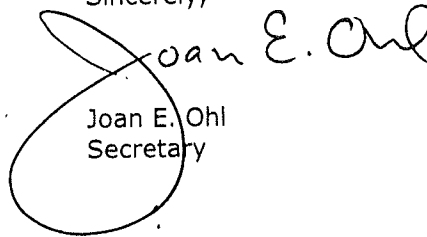
All foster homes will have an annual inspection. This recommendation will be shared with the Regional Directors, Community Services Managers, and Regional Homefinding Supervisors for their review and consideration as an option for complying with this requirement.

### **Conclusion**

The Department of Health and Human Resources would like to thank the Office of the Legislative Auditor for the information contained in this report. It identifies areas for further review and possible correction. As indicated earlier in the response, while reading a record is important, it does not always give an entire picture of the case or a complete indication of the foster parent's ability to provide the love, support, and supervision needed by the children in the custody of the state.

The Department would like to express its appreciation for the opportunity to respond to this evaluation report prior to its release. We are committed to improving services to children and families and will use these findings to continue our efforts to improve foster care and adoption in West Virginia.

Sincerely,



Joan E. Ohl  
Secretary

JEO/cc

