Risk Management Plan

**Revised July 13, 2011**

**Risk Management Philosophy**

Partnership for Strong Families embraces a collaborative, strategic approach to risk management, which includes identifying and addressing threats and opportunities the organization faces at every level. PSF seeks to operate in a manner that is protective of the health, safety and security of its clients, staff and affiliates while carrying out the organization’s mission and safeguarding assets required for mission-critical programs and activities.

**Risk Management Goal**

Partnership for Strong Families seeks to involve personnel at all levels of the organization in mitigating risk the agency faces. PSF staff will be led by the board of directors and senior management team to ensure every staff member understands their roles and responsibilities in protecting the mission and assets of the organization to ensure clients receive the highest level of services possible. The primary goal of the risk management plan is to protect the organization and its ability to accomplish its mission, promote its vision and adhere to its values.

**Risk Management Committee**

The Risk Management Committee shall be comprised of members of the senior management team of PSF and committee members from the Quality Assurance Committee of the board of directors.

The current organizational flow chart delineating members of the senior management team may be found in Appendix A.

**Risk Management Plan**

PSF is committed to protecting itself against activities or situations that jeopardize the organization’s ability to complete its mission. The organization has developed extensive policies and procedures to aid in the fulfillment of its mission. The risk management plan is designed not to supersede the policies and procedures, but to be an added layer of protection and to delineate activities and safeguards necessary to reduce risk to tolerable levels. This plan is created with input from the risk management committee and is to be approved by the board of directors. This plan is to be revised and updated annually or more often as needed.

PSF recognizes that it is the responsibility of every employee and partner to recognize and mitigate risk within their own sector of the agency. For this reason, the risk management plan has been structured according to the structural makeup of the agency; with each member of the senior management team having their own section to monitor.

As an agency, to reduce risk to acceptable levels, PSF:

* Complies with all applicable local, state and federal laws and regulations
* Screens and trains all volunteers, staff and board members
* Creates and enforces policies and procedures
* Maintains safe and secure facilities
* Protects confidential information
* Limits systems access to authorized users
* Maintains clear communication channels
* Purchases insurance coverage for certain risks
* Has opted to keep all confidential data behind the State of Florida firewall

**I. Governance**

As set forth in the Articles of Incorporation and Bylaws of Partnership for Strong Families, the Board of Directors shall transact all business of the agency, manage the agency’s affairs, determine the policies of the agency and assume responsibility for the guidance and affairs of the agency. The board will ensure the agency’s Articles and Bylaws continue to be legally sound and consistent with the agency’s mission. The board will review and adopt Policies of Procedure for the organization on an ongoing basis. The board will also review the agency’s insurance programs and risk management plans on at least an annual basis to ensure continued quality and effectiveness of these tools.

In fulfilling this role, the Board of Directors has three duties to the agency: the Duty of Loyalty; the Duty of Obedience; and the Duty of Care, which will be further explored below. With these duties, the Board of Directors both faces risks and bears the responsibility of mitigating risk faced by the agency as a whole. Top risks faced by the board of directors include:

* Making decisions on behalf of the agency with limited understanding of the organization or the current issue being determined
* Lapses in insurance coverage that expose directors to liability
* Internal conflicts or conflicts of interest that jeopardize directors’ ability to make unbiased decisions on behalf of the organization

*Duty of Loyalty*

Directors have a duty to maintain clear and unquestioned loyalty to the agency. Directors should put the interests of the organization above any personal interest and should avoid activities that could be construed as a conflict of interest. Directors should also keep board matters and agency business confidential.

PSF shall ensure its board members understand the PSF conflict of interest policy and require that all directors sign a Conflict of Interest Statement annually to ensure directors are protected from transactions deemed to be a private inurement. Should a conflict arise, board members have a duty to disclose said conflict to the rest of the board for determination of appropriate action. Directors may be asked to abstain from any vote on the conflictive matter or resign from their duties if the conflict cannot be overcome.

Board members shall also demonstrate their duty of loyalty by supporting the majority decision on any matter that comes to a vote. Board meeting materials and discussions occurring at board meetings shall be kept confidential, particularly if involving client or employee identities.

*Duty of Obedience*

The board of directors has a duty to ensure the agency is in adherence with any federal, state or local laws it is subject to. As needed, the board shall rely on the input of an outside consultant or legal counsel to ensure it is operating in accordance with applicable legislation. The board shall also ensure PSF and its senior executives are operating in compliance with the mission, articles of incorporation and bylaws of the organization.

*Duty of Care*

The board of directors has a duty to exercise reasonable care in ensuring that actions taken on behalf of the agency are in the best interest of the organization. This includes exercising prudence over financial matters related to the agency to ensure there are funds available to fulfill the organization’s mission. Board members shall bear the responsibility of approving the annual capital budget in adherence to risk management principles. Directors will also ensure the agency is in compliance with guidelines and standards set forth by national and state organizations and accrediting bodies.

In order to exercise this duty, directors must be provided with a comprehensive background of the agency, its mission and vision and all necessary information that is required to make decisions for the agency. In accordance with PSF bylaws, incoming board members will receive a comprehensive board orientation prior to initiating their service. At this time, all requirements of board directors and conflict of interest policies shall be discussed and directors will be provided with a board manual. To ensure directors are prepared for meetings, board packets will be sent to the directors 5-7 days in advance of the meeting.

Internal Evaluation and Monitoring

PSF seeks to have sound internal monitoring within the board and senior management team. The board of directors will undertake annual evaluation of the chief executive in order to provide support and guidance to the leadership of the management team. This shall provide an opportunity for the board to clarify the organization’s mission and objectives as well as enable them to meet their legal duty of care by conducting staff oversight. This will also serve as an objective means for making decisions about the CEO’s compensation and benefits.

The board of directors will also conduct a self-evaluation every three years. This will provide an opportunity for the board to re-evaluate its composition, terms of service, types of committees, expectations of directors, frequency and length of meetings and related items to ensure that the focus and effectiveness of the board are on track for continued success.

Liability of the Board

PSF seeks to provide its directors and officers with liability insurance coverage to protect against the financial ramifications of suits filed against them or the organization. As provided in the organization’s bylaws, PSF shall purchase and maintain Directors and Officers Liability and Employment Practices Liability insurance coverage for directors and officers of the agency.

**II. Human Resources**

Issues surrounding employment practices and procedures are one of the chief areas organizations face liability. Key risks facing the organization through the human resource department include:

* Death or immediate and unexpected absence of an employee
* Litigation risks due to negligence in hiring, discrimination, wrongful discharge, etc.
* Lapses in employee safety or health
* Loss of intellectual capital when employees leave the organization

To reduce the likelihood and potential impact of these risks, PSF has developed sound policies and procedures surrounding the hiring, employment and termination of employees.

*Pre-Employment*

The PSF Human Resource department maintains written job descriptions on every position within the agency. Vacancies and employment opportunities are advertised on the agency’s Web site, complete with a posting of the job description and minimum requirements for employment. Applicants are interviewed by a committee to ensure impartiality. Once an incumbent has been chosen, they are required to undergo reference checks, drug testing, FDLE screening and fingerprints for Level II federal criminal background checks. New hires will also complete a security awareness training before they are given access to PSF computer systems. Refusal to complete any of these pre-employment activities or prohibitive results on any of these screening measures will result in revocation of the offer for employment.

New PSF staff undergoes an employment orientation where they are provided an Employee Handbook and complete benefit package information. New hires will be instructed that as staff of the organization they become the face of the organization to the public. Any unacceptable behavior or conduct outside of business hours that jeopardizes the image and mission of the organization could affect their continued employment. Staff will also be oriented and trained as to the specific requirements of their position and supervision to be anticipated. At this time, policies such as sexual harassment, random drug screening, zero tolerance for fraud and whistleblower protection are discussed with the new hire.

*Ongoing Employment*

Staff shall receive a 90-day performance evaluation and annual performance reviews on the anniversary of their employment, completed by their immediate supervisors, as a re-assessment tool for maintaining a strong workforce. The training department shall make available various trainings on an ongoing basis for staff to have the opportunity to improve their skills and garner new skills to be the most effective at their positions. Certain positions shall also be afforded the opportunity to attend conferences and seminars to improve the skill-base of the agency as a whole. Any staff member hired in a position that requires a professional license shall be expected to maintain that license throughout their employment unless expressly determined it is no longer necessary for the position.

Employees will be expected to complete security awareness training on an annual basis for continued access to the PSF computer systems. Fingerprints will also be completed every five years, with negative results affecting continued employment. Random drug screens will be required of any employee if there is suspicion the employee may be utilizing illegal substances or prescription substances that affect their ability to perform their job duties.

The human resource department shall maintain a confidential file on each staff member, to be secured in a locked file cabinet so as to protect privacy of personal information. This file shall include the employee’s application, resume, annual reviews, any written reprimand or discipline actions as well as any performance awards received. The file shall also contain the employee’s benefit package information, including Paid Time Off accrued, and documentation of any required certification or licensure required for the position.

*Termination of Employment*

At the end of an individual’s employment with PSF, whether anticipated or unanticipated, steps will be taken to ensure a smooth transition and to limit the loss of intellectual capital the departing individual offers the organization. Immediately upon learning of the staff member’s departure, the human resource department shall notify the Information Technology department to ensure the individual’s access to computer systems is ended. The employee’s supervisor will ensure they have knowledge of and access to key data files necessary for the position. The supervisor or human resource department will also secure the employee’s badge, keys and any PSF-owned property such as phone or laptop. The human resource department will conduct an exit interview with the departing staff to garner information on their perceptions of the agency and their overall satisfaction with their employment experience.

The vice president of human resources shall notify the board of directors of any employee termination that could potentially have a negative impact on the agency, such as through lawsuits or media and community exposure. Steps will be taken to minimize the effects of this termination and notification to outside legal counsel shall be made as necessary.

Immediate Absence of Key Personnel

PSF seeks to ensure continuity of services and mission-critical functions even during crisis or unanticipated loss, whether temporary or permanent, of key personnel. Each member of the senior management team, including the chief executive officer, shall designate an individual who will take their place and gain full acting authority of their position should they become incapacitated in any way. If the CEO becomes unable to fulfill the duties of the office, the chairman of the board shall notify the designated senior management executive of their temporary appointment to this position. If a member of the senior management team becomes unable to fulfill the duties of their office, the CEO shall notify the designated staff member of their temporary appointment to the position. The designee shall be trained in advance on the duties of the position and any necessary access codes or helpful contacts that would be required to conduct the business of the position. The designated staff member may also be chosen to be the acting supervisor for normal and planned absences, such as vacation or medical leave.

Health and Well-Being of the Workforce

PSF strives to create an environment that promotes the health and wellness of employees. The human resource department shall seek out employee wellness programs to be offered to staff members, either through their medical insurance coverage or an outside program or provider. These employee assistance programs should also provide for mental health and crisis services to staff members on an as-needed basis.

**III. Information and Technology Management**

Information Technology (IT) resources are vital to furthering PSF’s mission, vision and values. The PSF IT risk management plan component identifies and assesses risks associated with IT resources and takes steps to reduce these risks to acceptable levels.

PSF is committed to protecting its office technology assets. The most notable risks facing the organization’s IT department include:

* Damage to systems and equipment due to power fluctuations, water damage, dust extreme temperature change and other environmental factors
* Threats due to viruses, worms, malicious software and hackers
* Compromising of confidential data due to breaches of firewall or employee actions

PSF IT resources are tools provided to employees and partners to enhance productivity and job performance. The agency has published policies and procedures that address issues concerning the production and preservation of electronically stored information. Please see PSF Policy Series 900 for specific information. These policies also describe the acceptable use of resources. Employees who violate these policies may be subject to disciplinary actions, up to and including termination. Partners violating PSF policies risk losing systems access and may be found in breach of contract.

Training and Coaching

PSF understands that every employee and partner plays an integral role in a successful risk management strategy and that effective training is one way to engage everyone in the effort. Both PSF and partner employees are trained and coached regularly on how to minimize the risks associated with using IT resources. All employees attend New Employee IT Training soon after they are hired. This class reviews IT Policies and Procedures and proposes strategies to reduce risk.

Each user, along with their immediate supervisor, must sign a DCF Security Agreement Form and attend an on-line Security Awareness Training class before gaining access to any confidential information. The form and training review the risks associated with the use of IT resources, describe the penalties for non-compliance and offer strategies for reducing risk. Both the training and signature of the form must be updated annually.

Any user who wishes to access PSF systems from outside the PSF domain must attend Web Portal Training. This class describes how to use the Remote Access Portal and discusses risks associated with accessing confidential data from remote and/or public terminals.

All users receive regular coaching whenever new risks are identified and to remind everyone of their role in managing risk, threats and confidential data. This includes being notified when new risks (viruses/malware/etc.) are discovered as well as receiving regular reminders on what constitutes good IT “health” to ensure that agency resources remain protected.

Facilities Safeguards

All PSF facilities are staffed with a receptionist, and all public areas are separated from work areas containing confidential data by locked doors. All PSF facilities carry adequate property insurance and are heated and air conditioned.

Safeguards for Hardware

Hardware is the foundation of the network, and a large portion of the IT budget is dedicated to ensuring that all equipment in use remains under warranty and operates at peak efficiency. PSF has standardized with Dell computer hardware to reduce support requirements. The agency employs a Dell Certified Systems Expert to reduce downtime when problems occur. Some measures implemented to reduce risk to hardware include:

* Server rooms remain locked at all times, even when in use. Keys are dispensed only with the approval of the IT department.
* To avoid water damage, servers do not sit directly on the floor.
* Server rooms are air-conditioned to prevent overheating.
* A fire extinguisher is kept in or near each server room.
* Food and beverages are not allowed in the server room. Cigarettes and the use of tobacco products of any kind are prohibited.
* When funds are available, PSF replaces 25% of the inventory annually. This strategy ensures that most, if not all, equipment remains under the manufacturer’s warranty. In certain instances (servers, specialized equipment), it is cost effective to purchase extended warranties.

PSF has purchased Partner Protection Plans for all phone systems in use at agency locations. This ensures that when repairs or modifications are needed, they are completed timely and with reduced cost to the agency.

Safeguards to Software

PSF uses industry-standard software that is supported with updates, patches and technical assistance resources. The agency has standardized with Windows 2003 Server, MS Office 2007, Oracle for databases and ImageNow for document imaging. Computers containing confidential client information are also encrypted with Nextop operating systems. The agency pays maintenance fees annually to ensure that upgrades and patches are available when needed for all software requiring this.

Access to Systems and Data

Due to the nature of PSF programs, the agency maintains client files with confidential information as well as business records that are proprietary. Therefore, it is essential to limit access to certain records to personnel whose positions require access. Confidential information in paper form is stored in locked file cabinets and in a locked room during non-working hours. All personnel should use good judgment and common sense in protecting confidential information while in use during business hours. The Director of Information Systems oversees a system that limits access to electronic records based on duties and responsibilities in the organization. Access is also protected through the use of passwords. Any employee who intentionally obtains unauthorized access to records shall be subject to discipline, up to and including termination.

No individual is granted access to any PSF system until they have signed the DCF Security Agreement Form and shown proof that they have completed the online Security Awareness Training. All workstations remain “locked down,” preventing any user who is not also a system administrator from installing any software on the system. When a user terminates employment or becomes unqualified to view confidential data, IT department staff is notified electronically to immediately lock every account associated with the terminated user. Additionally, user passwords expire at regular intervals, and then must be changed.

Data Backup Strategy

PSF has a four-tiered strategy to ensure that data can be retrieved in the event of system failure or data loss:

* Workstations are configured to store user-created documents on servers, rather than on the workstation itself.
* Windows “Shadow Copy” is utilized to enable a quick restoration of any deleted or damaged files.
* All server data is backed up daily to an attached USB drive
* Microsoft’s Data Protection Manager software is used to manage incremental, bit level continuous backups from all servers to a Store Area Network (SAN) device located in Greenville. The Greenville server’s data is backed-up to the Lake City server.

All servers, phone systems and other essential devices are protected by uninterruptible power supplies (UPS). PSF will also establish an out-of-state backup of all server data when budget allows.

Protection on Portable Devices

PSF encrypts all laptop hard drives to strengthen the ability to protect confidential data on resources that are more easily lost or stolen. Please see PSF Policy 917 – Acceptable Laptop/Portable Device Use for protective measures already in place for these devices.

Selected users and agency partners are issued Blackberry devices. These devices can be wiped of all data from a central location if one is lost or stolen.

Asset Control

PSF tightly controls IT inventory utilizing a portable scanner that tracks each device listed in inventory and matches it to its current location. Non-functioning devices are disposed of properly. Older devices that are no longer under warranty and have been made obsolete by current standards are delivered to needy non-profit organizations via a DCF-compliant surplus property procedure. All hard drives are “wiped” or overwritten at least 7 times before being disposed of or recycled, in keeping with DCF and US Department of Defense standards.

Conforming Applications

PSF has authored several web-based applications that are essential to the conduct of agency business. All such applications comply with DCF requirements for the security of “field developed applications.”

Disaster Preparedness/Recovery

PSF has published a detailed plan on what steps would need to be taken in the event of a disaster affecting one or more agency locations. Please see Appendix F of the PSF Continuity of Operations (COOP) Plan. Additionally, PSF has purchased a wireless router that will enable the agency to restore network connectivity quickly should one of the locations experience an outage. The device can restore a server’s connection to the public internet by utilizing a cellular network. PSF has partnered with Line1 Communications of Tallahassee to provide several important telephone services to help PSF and its clients in the event of a disaster or emergency:

* *Virtual Office* – PSF can re-route service center telephones to personal cell phones so callers would still be able to get through in the event the service center’s land lines become nonfunctional
* *Voice Broadcasting* – PSF can upload lists of clients/foster parents and send them a mass telephone message. This has been used successfully in preparing for hurricanes approaching the area. PSF has been able to instruct foster parents on what steps to follow to ensure the safety of children under PSF care
* *Remote Answering* – This is a toll-free line where PSF can post emergency messages for callers. PSF’s established 800 numbers can be redirected to this line as needed.

Remote Access

PSF has a portal server than enables authorized users to traverse the state firewall to access files and systems. There are stringent requirements for utilizing this system that include having up-to-date anti-virus software and Windows patches running on the client computer. All users must attend portal training before being granted access.

Server Virtualization

PSF has virtualized most agency servers to cut down on hardware and energy costs, improve server management and enable quicker recovery from system malfunctions.

Spam/Viruses/Malware

PSF has a significant investment in industry standard, high-performing tools that reduce threats from other networks and external sources. All servers and workstations run up-to-date anti-virus and anti-malware solutions. The PSF MS Exchange server runs anti-virus and spam-reducing software. Users who are not network administrators are prevented from installing software on their workstations.

Web Sites

PSF maintains both an internet and intranet site. No confidential data is kept on either site. The intranet site is password protected and access is limited to employees and certain partners. There are only two authorized persons able to upload documents to the public-facing internet site. The Director of Information Services is the only user authorized to change any of the other content of the internet site.

In order to protect personal information, PSF uses technologies and processes such as encryption, access control procedures, network firewalls and physical security. These measures increase the security and privacy of information traveling to, from and within our Web site.

Data Management and Integrity

PSF is committed to improving the accuracy of data contained in our systems and records. PSF has established policies and procedures that provide the checks and balances needed to identify data integrity issues. PSF also staffs a Data Integrity Unit responsible for mitigating risk system-wide. Discrepancies are reviewed regularly, along with strategies for improvement, by Quality Operations, Data Integrity and the Senior Management Team.

Monitoring

IT staff regularly monitor to ensure IT resources are being utilized for business purposes only and in accordance with acceptable use policies. This includes reviewing user browsing history for appropriateness; ensuring users are securing their workstations before leaving them and sampling email messages looking for inappropriate content and violations of policies protecting confidential data.

Throughout the execution of all risk management processes, monitoring will be performed through the risk management committee, the IT Department, internal audit by Quality and Risk Management Personnel and, when funds allow, periodic external security audits by a qualified vendor.

**IV. Clinical and Community Services**

PSF’s Clinical and Community Services department is responsible for Utilization Management, Prevention and Diversion Services, implementation of the Family Connections Grant, processing of Specialized Therapeutic Foster Care and Statewide In-Patient Psychiatric Program referrals, the Library Partnership and Neighborhood Resource Center and Community Relations for the agency. This department interacts with a wide range of publics and PSF community partners. The top risks faced by Clinical and Community Services include:

* Gaps in timely authorization of quality, needed services for clients served by the agency that elevates risk to children served
* Self-harm or death of a client who was in need of higher level of care
* Failure to follow requirements of the Family Connections Grant that jeopardizes funding or compromises research results
* Loss of funding from legislative cuts and end of non-recurring funds received from grants and community partnerships
* Negative media attention generating poor public image of PSF

PSF’s Clinical and Community Services department is fluidly developing as a result of external and internal forces of change such as PSF being chosen as an Innovation Site by DCF, a shift to family-centered practice and solutions-based casework and guidelines that flow from being awarded the Family Connections grant and funding from Casey Family Foundation to enable PSF to be a recognized leader in child-welfare.

Frequent changes to the system in an effort to achieve a higher quality of care also creates a risk in that practices change and staff must be ready to adapt without losing sight of mission-critical functions. This risk is mitigated by staff composition including a diverse background of case management, clinical services and nonprofit management personnel who are able to recognize and respond to risk in different areas.

Additionally, there is risk when a new program is undertaken without recurring funding or without knowledge of whether or not the benefit will outweigh the start-up costs. The Clinical and Community Services department undergoes a payback period calculation to determine if initiating a program is fiscally responsible and how much time will be required to see results and pay back initial costs. Alternate sources of funding are also continually sought in order to ensure sustainability of programs that are initiated. Data analyses are used as an indicator of program success and to secure additional funding streams. PSF also seeks to improve methods of forecasting funds required to finance service needs and increase fiscal stability irrespective of legislative funding levels.

Utilization Management

The Utilization Management (UM) department is responsible for approving service referrals for clients of partner agencies and also for prevention and diversion services offered to families before risk is elevated and a case must be initiated through a partner agency. This must be done in a timely manner and without oversight to any requests so as to quickly engage services for families and reduce risk to the children. The UM department requires referrals to be processed within two days of receipt and tracks timeliness of service delivery through a PSF-developed database.

The UM team understands that risk is mitigated when a strong rapport with quality service providers is cultivated. Service providers contracted with PSF contribute consistent service and are familiar with the aspects of risk associated with working with vulnerable populations of children and families. The UM department utilizes satisfaction surveys as a means to determine providers’ feelings toward the agency and their contractual relationship in order to improve relations and quality of service provided to clients.

UM is responsible for staffing all cases where children are recommended for a higher level of care, such as Specialized Therapeutic Foster Care and Statewide Inpatient Psychiatric Program. While eligibility is determined by the Medicaid funding source (Agency for HealthCare Administration and Magellan), a PSF staff member with clinical training acts as the Single Point of Access to advocate for children who require heightened services. This individual is encouraged to utilize their clinical skills to advocate for funding for children who are in need of additional treatment and for decisions that are in the best interest of the children.

UM is also responsible for carrying out the requirements of the Family Connections Grant, which provides $1.2 million in funding over three years for PSF to conduct a research project on best practices related to Family Team Conferencing. Risk is involved in ensuring all requirements of the grant are carried out so as not to jeopardize the research data or requirements for funding. The UM team has fidelity measures in place to ensure minimal drift from the scope and requirements of the grant. The grant is also outcome-based, meaning that decisions pertaining to future funding of the current positions will be made once initial results are obtained. PSF will then address the risk of losing intellectual capital if the positions are lost to decide whether to fund the staff from General Revenue or to obtain an external funding source with an eye to sustainability of the positions.

Decision Team Consultant

PSF embraces a partnership approach with DCF and seeks to ensure cases are transferred from investigations to services in the most effective and efficient manner attainable. PSF staffs a Decision Team Consultant in Alachua County who is co-located with Child Protective Investigations and is available to staff cases to determine current risk level to the children and aid in determining if court involvement or removal should occur. This model has proven highly effective in determining if children can be safely maintained in the home and what services need to be immediately put in place to ensure child safety before a case elevates to removal.

Library Partnership and Neighborhood Resource Center

PSF collaborates with the public library and multiple community providers to operate a neighborhood resource center where families who recognize their need for services may request them prior to DCF involvement through the abuse hotline. PSF secured funding from Casey Family Foundation for much of the start-up and ongoing costs of running this facility. Funding is set to expire at the end of 2010 but may be renewed until 2012. 95% of services provided through this facility are offered at no-cost to PSF, with the intent of reducing the amount of involuntary services required after DCF becomes involved.

This focus on front-end services requires documentation of results relating to usage volume and recipient satisfaction to secure consistent funding and reduce the risk of losing this program. The Clinical and Community Services department is also engaged in marketing efforts and efforts to bolster community support so as to demonstrate continued need for this program and funding stream.

Community Relations

PSF strives to maintain a positive image within the community and remain prepared to address any incidence of media attention in a timely fashion. The community relations coordinator will maintain ready press releases and prepared statements that contain all of the agency’s demographic and contact information, provide a commitment to follow-up on the situation and have gaps to quickly plug in specific information on the incident. Confidential information on clients and investigations will never be released to the media.

In addition, PSF will seek to further the organization’s positive community image by involvement in community related events and routine service announcements. PSF seeks to educate the community on PSF’s function, role and services so as to cement a positive image and community support should a negative media event occur. Success stories of families and positive community involvement are also highlighted in the media on an ongoing basis. This is in an effort to reduce the risk of negative media coverage of an incident having a significant impact on the agency.

PSF understands the importance of streamlining all media contacts through one individual and in designating an agency spokesperson. All staff is instructed to not speak to the media under any circumstance, but refer them to the community relations coordinator. The CEO of the organization shall act as the face of the organization and be the designated spokesperson. This may also be delegated to the community relations coordinator under certain circumstances.

**V. Finance**

PSF seeks to protect its financial resources in order to ensure its ability to accomplish the mission of the agency in the communities served. The top risks faced by the Finance department include:

* Theft or embezzlement of the organization’s financial resources
* Failure to follow IRS laws and regulations that jeopardize the agency’s not-for-profit status
* Poor accounting practices that lead to poor financial health of the organization and even jeopardize continued funding and contracts
* Gaps in funding or delays in receipt of funding from state and federal sources that create disparities in accounts or inabilities to fund agency operations

PSF mitigates risk in each of these areas by adhering to the agency’s policies and procedures. Please see series 1000 for specific policy information. PSF also contracts with James Moore Accounting Firm for financial oversight.

Loss Prevention

PSF understands that loss prevention efforts are important to mitigating risk in this area and ensuring the organization has funds available to accomplish its mission. PSF maintains zero petty cash on site, which abates risk associated with reconciling cash and keeping it secure. The agency’s checkbook is kept in a secure, locked location that is changed periodically and known to a select few individuals within the finance department. Offices within the finance department are contained to one corridor of the building, and clients are not permitted to be in this area even when coming to obtain a check.

When donations are received, one staff member collects the donation and completes the deposit slip. Another staff member then takes the deposit to the bank. The agency’s accounting firm, James Moore, is also made aware of the donation and watches for the deposit to be made.

Any payments or donations received by the agency are required to be deposited within three business days, thus preventing checks from being left on desks and reducing the risk of loss by theft or misplacement. Any outgoing payments require various levels of securing depending upon the amount being dispersed. Amounts greater than $1,000 require two signatures for authorization. Very large checks require manual signatures by the CEO, the Vice President of Finance, the Senior Vice President of Programs or the Senior Vice President of Clinical and Community Services.

Each member of the senior management team and select few high-level managers are provided a corporate credit card. There are strict guidelines as to what may be charged on a corporate card and invoices are reviewed monthly by the Vice President of Finance. Each time a purchase is made, a receipt must be provided to the finance department as soon as possible. Lost cards are reported immediately so accounts can be frozen and new cards issued.

Payroll documentation is reviewed by the Vice President of Finance after submitted by human resources. This additional layer of oversight prevents inaccuracies in payments or the potential for fraud from “nonexistent” employees being paid. Lists of newly hired staff are checked for accuracy as well.

Payment requests for licensed placements, residential treatment facilities and children in Independent Living are received from both the placement staff and the contract unit. Occasionally, payments are made before documentation is updated to reflect changes in placement or eligibility. If overpayment occurs, fees must be recouped from foster parents, treatment providers or Independent Living youth. This creates risk if providers are unable or uncooperative in reimbursing the agency, particularly if a foster parent is no longer licensed. The agency assumes the risk of overpayment under the commitment to pay providers and caregivers timely. Risk is mitigated by efforts to increase speed by which placement changes are documented.

Auditing and Oversight

In compliance with IRS requirements of nonprofit agencies, PSF undergoes a year-end audit performed by an independent CPA firm within 180 days after the close of the fiscal year. Financial reporting is in accordance with Financial Accounting Standards Board (FASB) 117 and OMB Circular A-133. At the time of this writing, PSF has had three years of clean audits from Osbourne Henning and Co., an independent auditor located in Orlando, FL.

Due to PSF’s largest funding stream coming from the state contract, the agency is also audited annually by fiscal monitors from DCF. DCF’s Contract Oversight Unit occasionally chooses the finance department as one of their audited areas in conducting annual oversight.

As PSF manages client trust funds, the agency is also audited by Social Security Administration on an annual basis.

Reserve Funds and Contingency Planning

PSF receives advance funding from DCF for services provided. This ensures funds are available when services are needed and delivered. The passage of the child welfare conforming bill in the 2010 legislative session also enables PSF to carry forward unused funds at the end of a fiscal year. This creates a reserve of approximately $600,000-$700,000 at the beginning of the fiscal year when a large amount of payments are due. PSF also maintains approximately $300,000 in reserve funding that came from unused start-up cost funds and some private contracting PSF has engaged in.

PSF’s monthly operating costs are $2.1 million. PSF’s banking provider, M&S Bank, extends the agency a $2 million line of credit for one month of emergency funding should an emergency occur or a problem arise with a funding stream.

PSF is currently exploring the needs and benefits of an Operational Reserve Policy that would provide the agency with guidelines pertaining to how much reserve funding to allocate and what it could be used for. PSF would like to maintain reserve funds for 3-6 months, however, this may not be possible with current funding needs and restrictions.

Financial Staff

Risk is incurred any time there are changes or disruptions to staff in the finance department as new staff must be screened and trained on protocol. The finance department mitigates this risk by cross-training staff on one another’s job duties to ensure coverage in the event of brief interruptions in employment. The agency’s accounting firm, James Moore, also offers to assume the responsibilities of staff members for longer periods of absence, such as extended leave. This eliminates the risks associated with training temporary staff or having current staff take on the extra workload. The Vice President of Finance also maintains job function sheets on each employee to ensure knowledge of their day-to-day responsibilities.

**VI. Program Operations**

Risk is inherent when providing services to children and families in vulnerable populations. PSF engages in risk-sharing with both DCF and sub-contracted partner agencies who provide direct services to clients. The Operations department is responsible for foster care recruitment and licensure, child placements in out-of-home care, the adoptions program, missing child reporting, interstate placement of children and oversight of operations at each service site. The main risks facing this department of the organization include:

* Abuse that occurs at the hands of a foster parent whom PSF has licensed
* Failure to report a missing child in accordance with time requirements
* Placement of children with foster parents who are a poor match for the child’s specific needs that results in additional placement moves
* Failure to follow legal guidelines for adoptions or failure to properly screen potential adoptive parents
* Poor oversight at service sites that leads to children being left in potentially risky circumstances

Foster Home Recruitment and Licensing

PSF is diligent to ensure all state laws regarding foster parent licensure are closely followed. PSF seeks to recruit foster parents from a variety of backgrounds to ensure the diverse needs of the children served are met. Foster parents are required to successfully complete a 40-hour Model Approach to Partnership and Parenting training course. They also undergo extensive background checks, including federal, state and local criminal records checks and Florida Abuse Hotline Information System checks. Foster parents must also undergo a detailed home study and receive positive recommendation letters from their friends and family members to be considered. Additional training requirements are ongoing once licensure is obtained. Please see policy and procedure series 700 for additional information.

When PSF receives a foster home complaint or a report is made to the Florida Abuse Hotline to report abuse by a foster parent, a No New Placement Hold is immediately placed on the home until allegations can be investigated or concerns are addressed. If child protective investigations take the lead on an investigation, PSF licensing stands ready to provide additional support or information. Often, the case will be assigned directly to a PSF licensing analyst to investigate.

These reports are then staffed with the quality assurance team and licensing supervisor at a monthly incident report meeting. Concerns that rise to a level of DCF involvement are staffed at a monthly Foster Care Review Committee meeting with the DCF licensing analyst. If reports are verified for abuse or inappropriate behavior on behalf of the foster parent, a Corrective Action Plan may be initiated or DCF and PSF may initiate revocation of the license. Revocation requires agreement with the Circuit Administrator of DCF and the DCF legal team to ensure foster parents are treated fairly and the risk of litigation is reduced.

Out-of-Home Care Placement

PSF placement staff makes every effort to place children in a family-like setting, as close to their family of origin as possible, in a home that reflects the cultural and religious values of the child’s birth family. This is to reduce the risk of children disrupting placements due to being a poor match with the foster family. However, often there are children with behavioral or mental health problems that jeopardize placement stability.

If a foster parent requests a child be moved, the placement staff conducts a pre-disruption staffing with the parent to see if there are any services that can be offered to maintain the child in the home and reduce the risk of children bouncing from place to place. Children who demonstrate adverse behaviors beyond what a standard foster placement can provide receive evaluations for a higher level of care, such as Specialized Therapeutic Foster Care, therapeutic group homes or residential treatment facilities. If a child demonstrates high risk behaviors, such as fire-setting, frequent elopements or sexual acting out, they are given a “yellow flag” in the placement system to ensure foster parents are informed of the behaviors and are prepared to mitigate risk. A safety plan is always required for placement of a child with a yellow flag.

A member of the PSF placement staff are available 24 hours a day, 365 days a year for foster parents in need of emergency support. While foster parents are asked to provide 2 weeks notice for any child they wish removed from their home, they may call and request an immediate removal at any time. This reduces the risk of foster parents becoming overwhelmed and causing harm, whether physical or emotional, to a child in their care. Placement staff can also arrange for respite care for a child should a foster parent experience a personal emergency, need to leave town without the child or simply need a break.

Placement staff also handles emergency foster care intakes that result from child protective investigations where PSF has not yet assumed case management responsibility. In this case, placement staff work with the CPI to ensure all critical information on a child, such as allergies or medications, is obtained from the family of origin to ensure continuity of care for the child.

Please see PSF policy series 400 for additional information.

Missing Child Reporting

Timely reporting of missing children is necessary to ensure they are safely located and all notifications to law enforcement and the children’s parents occurs quickly and consistent with state guidelines. The PSF missing child specialist serves as the single point of contact to coordinate all efforts on tracking and reporting missing children. Once a child has had an unauthorized absence for more than 4 hours, it must be reported to law enforcement and DCF.

Case managers are required to make weekly, if not daily, efforts to locate a missing child. PSF also partners with DCF’s regional child locator specialist to ensure children are recovered quickly and safely. Upon their return, a debriefing interview is conducted with the child to assess whether they were abused or involved in any harmful activities while missing. This ensures necessary services are provided to the child upon their return. Counseling is offered to the child at this time. The child is also asked if there are any relatives who may be able to care for them in an effort to obtain a placement they are less likely to run away from in the future.

Please see PSF policy series 500 for additional information.

Interstate Placement of Children

PSF prioritizes placing children with relatives if they must be removed from their family of origin. If no relatives can be located in Florida, a search will often uncover relatives in another state who are willing and able to care for the children. A request is then made in accordance with federal Interstate Compact for the Placement of Children (ICPC) requirements for the agency’s counterpart in the receiving state to conduct a home study and background checks on the family. Care is exercised to ensure all federal and state requirements of this process are closely followed and that supervision of the children by a local agency can occur if the courts authorize placement out-of-state. The same protocol is followed for requests from other states to place children in Florida.

Adoption Program

PSF is committed to obtaining permanency for every child with as few delays as possible. If a child cannot return to the care of their biological parents because their rights are terminated or they are deceased, adoptive homes are sought. PSF’s shares risk associated with placing children in adoptive homes with a partner adoption agency. Requirements of becoming approved to be an adoptive parent are nearly the same as that of a foster parent. Please see PSF Policy Series 600 for additional information on adoption program requirements.

Before a child is moved into a pre-adoptive placement, a Match Staffing occurs with individuals from case management, the adoptions agency and the PSF adoption department. Families who are not chosen have the opportunity to request a re-match staffing.

After selecting the family, the child is gradually moved into the pre-adoptive placement, beginning with visits, progressing to overnight and weekend stays and ending with full placement. This ensures a smooth transition for the child and reduces the risk of disrupting the placement because the family was unprepared for what to expect. The case must remain open for six months once the child is placed before adoption can be finalized and the case closed. This ensures the family receives as much pre-adoptive services and counseling as possible and that the child is well-adjusted for a successful permanent placement.

Quality Operations Site Management

Although PSF subcontracts with partner agencies to provide case management services, the associated risk is shared, not transferred. PSF assumes an oversight role with these partner agencies and proves a Quality Operations Manager (QOM) to cover each service site. This QOM is responsible for assessing risk at multiple junctures in case planning and ensuring the agency’s interests are safeguarded and decisions are made in congruence with the mission.

*Case Transfer Staffings*

PSF exercises great care and oversight when cases are transferred from child protective investigations to PSF to provide case management services. The QOM is responsible for ensuring the case file is prepared and complete prior to case acceptance. At the case transfer staffing, information is shared about the family and abuse that occurred with the case management unit assuming responsibility for the case. All contact information for the family, identified problems and key information on the family’s needs are discussed.

At this time, the QOM assigns a deadline for an initial contact to be made with the family (24 hours via phone and 72 hours face-to-face), Initial Family Assessment and Family Team Conference. This ensures a family is quickly engaged and there are no gaps or delays in services upon case transfer. Please see policy series 100 for additional information on case acceptance requirements.

*Red Flag Staffings*

Cases that are deemed high risk are designated as red flag cases. These cases require weekly or biweekly home visits to ensure child safety and re-assess the risk level in the home. They also require weekly or biweekly staffings with the case manager, case management supervisor, children’s legal services, service providers, investigations and the QOM. Please see policy series 500 for additional information.

*Case Progression Staffings*

Cases are staffed at four, seven and nine months to assess their progress toward permanency. The QOM chairs these staffing, which also include the case management agency, service providers, children’s legal services and often the family themselves. Difficult decisions are often made about the direction of a case at this juncture and whether or not to continue to work toward reunification of children who have been removed from their biological parents. The risk associated with this decision making process is mitigated by utilizing assessment tools such as Structured Decision Making to reduce the weight of individual opinion in decisions. Risk is also mitigated by the presence of the case attorney to provide input on the legal issues surrounding changing case goals.

*Reunification Staffings*

Before a child can be reunified with the caregiver they were removed from, the case must undergo a reunification staffing. Reunification staffings require input from the QOM and children’s legal services. This decision must also be brought before the court as an additional layer of protection to ensure children can safely return home. At the time of this staffing, the QOM may also recommend additional services to put in place during the reunification process, or additional input that is required from providers working with the family to assess the safety of the child if they are placed back in the home.

*Targeted Quality Management Meetings*

PSF’s QOM team also conducts targeted quality management meetings between operations staff and case management staff wherein risks and problems experienced at each service site are discussed in a team-based approach to mitigate risk and provide direction for follow-up actions. Issues frequently addressed are separation of siblings placed in out-of-home care, placement disruptions, high risk cases, pregnant teenagers and length of stay in out-of-home care. These meetings occur on a monthly basis.

**VII. Administration and Quality Management**

PSF’s Administration and Quality Management department encompasses all contract negotiations for the agency, facilities management for all service sites maintained and quality assurance and accreditation. The top risks faced by this area of the organization include:

* Breach of contractual agreements with partner agencies exposing PSF to lawsuits
* Hazards related to workplace safety at PSF service sites that pose a threat of harm to clients and employees
* Loss of accreditation which would jeopardize funding and harm the agency’s reputation
* Critical incidents or client grievances that did not receive necessary follow-up and exposed the organization to liability
* Lack of oversight and monitoring creating poor standards of practice and jeopardizing the agency’s ability to fulfill its mission

PSF’s Administration and Quality Management department operates with a high degree of partnership and oversight with DCF’s contract and quality assurance departments. PSF has maintained its accreditation from the Council on Accreditation (COA) for the past 4 years and is in the process of re-accreditation at the time of this writing.

Contracts and Facilities

PSF employs a contract management unit that is responsible for negotiating all contracts with service providers and partner agencies that are contracted to provide case management services. Contracts are renegotiated on an annual basis and are tied to performance measures and cost analysis. Contracts maintained with case management agencies are closely monitored as there is significant risk-sharing with these agencies that interface directly with children and families. If an agency has significant lapses in their contract or underperforms according to standards, they may be asked to complete a Corrective Action Plan or risk losing their contract to provide case management services. PSF also renegotiates its contract with DCF as the lead case management agency for judicial circuits three and eight every three years.

Oversight and guidance are provided from DCF’s contract negotiators. PSF receives annual audits from the Contract Oversight Unit (COU) that evaluates the agency’s performance on various measures and protocols. In addition, the Administration and Quality Management department participates in the licensing audit and independent audit and assists in gathering information for the fiscal monitors.

PSF maintains six service sites and an additional office space that houses the training and IT departments. These facilities are leased properties with lease terms of three years. At the time of this writing, PSF is in the process of transitioning some of these service sites to facilities that offer better space and rental rates for the agency’s needs. Bids are sought from several property owners and an outside consultant is used to evaluate the best option to achieve PSF’s mission.

PSF maintains all facilities where case management agencies serve clients as part of the contractual agreements with these agencies. All facilities are kept to code and repairs and maintenance are handled on a timely basis by the property landlord to ensure no hazards to clients or employees are present. Property insurance is also maintained on all PSF-owned and leased property to ensure protection against accidents and natural disasters. If a service site must be temporarily closed for hazards or repairs, staff is able to move to a temporary work site or work from home until the office may safely reopen.

PSF maintains a fleet of vehicles for employee use and for transporting clients. These vehicles are kept up-to-date with regular service and maintenance that is tracked by the facilities manager. Insurance coverage is maintained on each vehicle and every driver is required to carry their own current liability insurance. Each vehicle is equipped with a fuel card and authorized drivers are provided a pin code to purchase fuel. An insurance card and motorist assistance card are kept in each vehicle, along with emergency procedures in case of accident or other emergency.

Drivers must possess a clean driving record for three years prior to employment, which is checked with FDLE prior to their hiring. Any moving violations, lapses in insurance coverage or loss of license must be reported immediately and will result in revocation of driving privileges.

Complaints and Grievances

PSF provides a link on the organization’s Web site whereby clients may submit complaints to the quality assurance department. Complaints are also received by the governor’s office and sent to the quality assurance monitor for follow-up. All complaints carry a deadline for investigation and resolution, but verbal contact with the individual making the complaint must be made within 48 hours of receipt.

Foster Care Exit Interviews

In accordance with Florida statute, PSF conducts exit interview with children who have been in a licensed foster care placement for more than 30 days. Any concerns are documented and follow-up is generated through either the foster care licensing department or by a report to the Florida Abuse Hotline. These records are centrally maintained for review, analysis and auditing purposes.

Incident Reports

PSF requires incident reports to be completed for any occurrence that creates risk for clients or employees, as broken into 12 distinct categories such as client injury, elopement, abuse or neglect, etc. These categories are in alignment with the DCF and Florida statute and code requirements for critical incident reporting. Seven of these categories of incidents are also submitted to DCF upon receipt and processing for inputting into the DCF tracker. There are strict timeline requirements for reporting of these incidents to the case supervisor and to PSF. Upon review by the quality assurance monitor, incident reports are sent back out to all parties involved in a case to complete additional follow-up to ensure child safety. Incident reports are maintained as data files and are inputted into a PSF-created database for easy reference.

Stakeholder Surveys

PSF seeks to maintain positive relationships with community partners and to improve the satisfaction of clients receiving services. Stakeholder surveys are mailed out to a randomly selected sample of clients (both adults and children), partner agencies and service providers. Surveys may either be completed anonymously or with request for follow-up from PSF. The survey results are analyzed and posted on the PSF Web site for increased transparency.

Case File Reviews

As part of PSF’s contract to provide case management services, PSF must complete 25 case file reviews every quarter from a randomly selected pool of cases provided by DCF. Eight of these reviews are conducted side-by-side with a DCF quality assurance reviewer. The results of these reviews are used to identify areas of strength and opportunities for improvement in the services provided by the agency in comparison to federal and state requirements for child welfare service provision.

If lapses are identified when a case is reviewed that pose a negative threat to child safety, a Request for Action is generated to resolve the matter and bring the case into compliance. RFA’s are tracked until they are completed and approved by both the PSF Director of Quality Assurance and Accreditation and the regional DCF Quality Assurance Manager.

In addition to the 25 reviews quarterly, PSF conducts two special reviews annually in collaboration with DCF. Examples of past special reviews include file reviews of children prescribed psychotropic medications and children in the Independent Living program. Determination of special reviews comes through the DCF quality assurance unit on a state level.

Accreditation

PSF is accredited by a national accrediting body, the Council on Accreditation. The agency must undergo a re-accreditation process every four years to maintain this distinction. COA is provided a wide breadth of documentation and data files from the agency as part of the re-accreditation process. Each member of the senior management team is responsible for ensuring their department maintains compliance for continued accreditation.

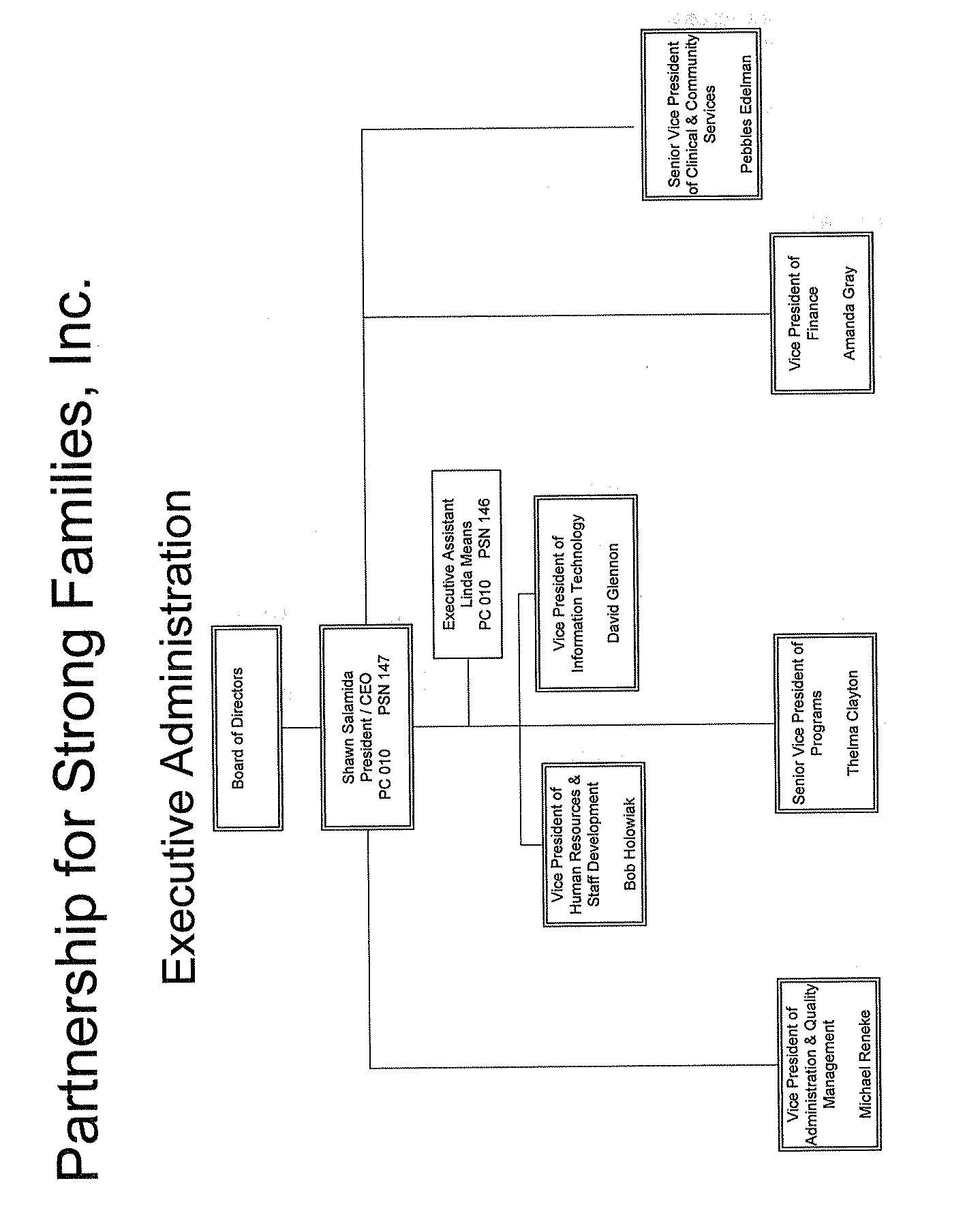
Litigation

PSF understands that even with the best risk management protocols in place, the organization may still face a risk of litigation. PSF contracts with a legal firm that is familiar with the unique issues facing a large nonprofit providing child welfare services. As soon as PSF becomes aware of a potential or filed lawsuit, the attorneys and, in certain circumstances, the insurance agencies are notified. PSF seeks to be a transparent agency and requested documents are made available to litigators in a timely manner that is consistent with confidentiality laws.

Emergency Procedures

In compliance with contractual agreements with DCF, PSF has procedures and protocol in place for handling emergency and disaster situations. If the nature and extent of the disaster or emergency require closure of facilities, efforts will be taken to swiftly restore function of those facilities and reopen offices with prioritization given to mission-critical functions. Please see the Emergency/Disaster Preparedness, Response and Recovery Guidelines found in the Continuity of Operations Plan (COOP) for detailed information on PSF’s emergency planning efforts.

**Appendix A: Organizational Flow Chart**

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