

Department of Health and Human Services

**OFFICE OF  
INSPECTOR GENERAL**

**SOME OKLAHOMA GROUP HOMES DID  
NOT ALWAYS COMPLY WITH STATE  
REQUIREMENTS**

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# *Office of Inspector General*

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## Report in Brief

Date: September 2017

Report No. A-06-16-07004

U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES  
**OFFICE OF INSPECTOR GENERAL**



### Why OIG Did This Review

Congress has expressed concerns about the safety and well-being of children in foster care. These issues were highlighted in a media report that provided several examples of children who died while in foster care. Additionally, in a recent series of OIG health and safety audits of State-monitored childcare facilities, we found that the majority of childcare providers in various States had instances of potentially hazardous conditions and noncompliance with State health and safety requirements, including criminal records checks requirements.

Our objective was to determine whether Oklahoma's monitoring ensured that foster care group homes complied with State licensing requirements related to the health and safety of children in foster care as required by Title IV-E of the Social Security Act.

### How OIG Did This Review

Using the minimum standards required by the Oklahoma Administrative Code, we created a health and safety checklist, reviewed background check supporting documentation, and conducted site visits on all 22 foster care group homes in Oklahoma. After each site visit, we informed the group homes' management of any issues found during our visit. Additionally, upon completion of our review of all the group homes, we provided Oklahoma with a summary of all issues found during our review.

## Some Oklahoma Group Homes Did Not Always Comply With State Requirements

### What OIG Found

Although Oklahoma performed the required onsite monitoring at all 22 group homes, this onsite monitoring did not ensure that foster care group homes complied with State licensing and Federal requirements related to the health and safety of children in foster care. We determined that 17 of the 22 group homes did not comply with 1 or more State health and safety requirements. Specifically, we found that 12 of the group homes did not comply with transportation requirements; 12 of the group homes did not comply with building, utilities, and grounds requirements; 10 of the group homes did not comply with fire safety requirements; 4 of the group homes did not comply with food service requirements; 4 of the group homes did not comply with safety and emergency preparedness requirements; and 1 group home did not comply with physical facility and equipment requirements. In addition, Oklahoma's requirements for monitoring vehicles is inadequate to ensure the safety of all vehicles used to transport children.

We note that certain issues of noncompliance found during our review can frequently occur between State monitoring visits. However, other issues of noncompliance represent a prolonged period of noncompliance and should have been corrected if those issues had been documented and resolved during the State's monitoring. These instances of noncompliance with health and safety requirements indicate that Oklahoma and group homes need to take additional measures to ensure that all issues of noncompliance are documented and resolved in a timely manner and that the group homes clearly understand what is required to safeguard and protect the children in their care.

The State completed background checks on all 229 of the employees at the group homes we reviewed.

### What OIG Recommends and Oklahoma Comments

We recommend that Oklahoma (1) ensure that monitoring staff document and resolve all issues of noncompliance of group homes in a timely manner, (2) require group home staff to complete specific training requirements related to health and safety regulations, and (3) revise the State licensing requirements for the monitoring of vehicles used to transport children to ensure that Oklahoma monitors all vehicles annually.

Oklahoma concurred with the first and second recommendations but did not concur with the third recommendation. Oklahoma did not agree that State licensing requirements need to be revised for the monitoring of vehicles.

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## INTRODUCTION

### WHY WE DID THIS REVIEW

The Children's Bureau within the Administration for Children and Families (ACF) awards grants to States to fund the Federal Foster Care Program, which provides safe foster care placements for eligible children and youth who cannot remain in their homes. Congress has expressed concerns about the safety and well-being of children in foster care. These issues were highlighted in a media report<sup>1</sup> that provided several examples of children who died while in foster care. Additionally, in a recent series of audits of State-monitored childcare facilities in various States,<sup>2</sup> we found that the majority of childcare providers had instances of potentially hazardous conditions and noncompliance with State health and safety requirements, including criminal records checks requirements. To determine whether similar vulnerabilities exist in foster care group homes, we are performing reviews in several States, including Oklahoma. In Oklahoma, the Department of Human Services (State agency) is responsible for administering the Title IV-E foster care program.

### OBJECTIVE

Our objective was to determine whether the State agency's monitoring ensured that foster care group homes complied with State licensing requirements related to the health and safety of children in foster care as required by Title IV-E of the Social Security Act (the Act).

### BACKGROUND

#### Federal Foster Care Program

Title IV-E of the Act established the Federal Foster Care Program, which helps States to provide safe and stable out-of-home care for children who meet certain eligibility requirements until they are safely returned home, placed permanently with adoptive families, or placed in other planned arrangements. At the Federal level, the Administration for Children and Families administers the program. The State agency is responsible for administering the program at the State level.

The Act requires an approved State plan that designates a State agency that will administer the program for the State (the Act § 471(a)(2)). The State plan also provides for the establishment or designation of a State authority or authorities that are responsible for establishing and maintaining standards for foster family homes and childcare institutions, including standards

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<sup>1</sup> Mother Jones, "The Brief Life and Private Death of Alexandria Hill." Available online at <http://www.motherjones.com/politics/2015/01/privatized-foster-care-mentor>.

<sup>2</sup> All 20 audit reports in the OIG series Child Care Providers: Compliance with State Health and Safety Requirements can be viewed at <https://oig.hhs.gov/oas/child-care/text-map.asp>.

related to safety, and requires that the State apply the standards to any foster family home or childcare institution receiving funds under sections IV-E or IV-B of the Act (the Act § 471(a)(10)).

The Plan must also provide that the State shall have developed and implemented standards to ensure that children in foster care placements in public or private agencies are provided quality services that protect their health and safety (the Act § 471(a)(22)). To be eligible for foster care maintenance payments under Title IV-E, a child must be placed in a foster family home, a private childcare institution, or a public childcare institution accommodating no more than 25 children, which is licensed or approved as meeting the standards established for licensing by the State licensing authority (the Act §§ 472(b) and (c)).<sup>3</sup>

### **Foster Care Program in Oklahoma**

In Oklahoma, the State agency is responsible for administering the Title IV-E foster care program. Oklahoma Child Care Services (OCCS) is a division of the State agency and is responsible for licensing the childcare facilities. OCCS is required to conduct three monitoring visits annually (two unannounced and one announced) of residential childcare facilities.<sup>4</sup> During each monitoring visit, licensing staff observe the entire facility, including outdoor play space and vehicles used for transportation (the Oklahoma Administrative Code (OAC) 340:110-1-47(a)(1)(A)). Additionally, at each visit, licensing staff checks resident files, facility staff background checks, fire and health inspection within the past 12 months, and other documentation that requires renewal (OAC 340:110-1-47(a)(3)(B)).

A group home is a community-based residential service provider that provides program support management for the care and treatment of youth in Oklahoma Department of Human Services custody who are determined to be deprived and whose treatment needs can no longer be met in their own home, in a relative's home, or in traditional foster family care. The State agency entered into contracts with 22 group homes to provide foster care services. The contractors are licensed by the State agency. The contract includes a provision that contractors are subject to all applicable State and Federal laws, rules, and regulations and all amendments.

### **State Requirements**

The OAC<sup>5</sup> requires the State agency to develop minimum requirements for the care and protection of children in residential childcare facilities operated and certified by the State agency. These minimum standards include regulations on transportation; building, utilities, and grounds; fire safety; food service; safety and emergency preparedness; and physical facility and

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<sup>3</sup> Foster care maintenance payments may also be made on behalf of a child who is 18 or older living in a supervised independent living situation.

<sup>4</sup> "Residential childcare facility" means a 24-hour residential program where children live together with, or are supervised by, adults other than the child's parents or relatives (OAC 340:110-1-41).

<sup>5</sup> OAC 340:110-1-42(a)(1).



equipment. In addition, the State agency must take corrective action as authorized by the Oklahoma Child Care Facilities Licensing Act and stated policy on noncompliance with the minimum requirements.

## **HOW WE CONDUCTED THIS REVIEW**

We reviewed all 22 group homes under contract for June 2016 with the State agency to provide care to Title IV-E eligible children in foster care.

We reviewed background check supporting documentation for group home employees at the Oklahoma Department of Human Services—Office of Background Investigations (OBI) office in Oklahoma City in July 2016. We reviewed the national criminal history records completion date of each group home employee to ensure the checks were completed.<sup>6</sup>

After each site visit, we informed the group home provider of any issues found during our visit. In addition, upon completion of our review of all group homes, we provided the State agency a summary of all issues found during our review.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix A contains the details of our audit scope and methodology, Appendix B contains instances of noncompliance at each home, and Appendix C contains photographic examples of noncompliance found at some of the group homes.

## **FINDINGS**

Although the State agency performed the required onsite monitoring at all 22 group homes that we reviewed, this onsite monitoring did not ensure that foster care group homes complied with State licensing requirements related to the health and safety of children in foster care. We determined that 17 of the 22 group homes did not comply with 1 or more State health and safety requirements. Specifically, we found that 12 of the group homes did not comply with transportation requirements; 12 of the group homes did not comply with building, utilities, and grounds requirements; 10 of the group homes did not comply with fire safety requirements; 4 of the group homes did not comply with food service requirements; 4 of the group homes did not comply with safety and emergency preparedness requirements; and 1 group home did not comply with physical facility and equipment requirements.

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<sup>6</sup> Because of difficulty in determining whether a group home employee had supervised or unsupervised access to children, we evaluated whether the background check was completed.

Appendix B shows the number of instances of noncompliance at each provider we reviewed.

The State agency completed background checks on all 229 of the employees at the group homes we reviewed.

## **GROUP HOMES DID NOT ALWAYS COMPLY WITH TRANSPORTATION REQUIREMENTS**

### **State Requirements**

The OAC requires that residential childcare facilities ensure that vehicles used to transport residents are maintained in a safe operating condition (OAC 340:110-3-154.5(a)(2). In addition, the OAC requires residential childcare facilities to maintain written documentation of regular maintenance of all facility vehicles, including quarterly inspection of tire wear and pressure, brakes, lights, and functioning seat belts (OAC 340:110-3-154.5(a)(2) and (3)). The OAC requires (OAC 340:110-3-154.5(c)(1), (2) and (8)) that facilities comply with safety practices to include:

- keeping the interior of each vehicle in a clean, safe condition with clear passage to operable doors;
- ensuring residents who are transported are properly secured in a child passenger restraint system or individual seat belt; and
- ensuring a first aid kit is available in the vehicle at all times.

### **Group Homes Did Not Always Comply With Transportation Requirements**

At 12 group homes, we found 18 instances of noncompliance with transportation requirements. Examples of noncompliance included:

- low tire tread (Appendix C, photograph 1)
- missing gas caps;
- a shattered window;
- a broken signal light, broken passenger side mirror, and unbolted driver's side mirror;
- a broken seat belt tied to the door (Appendix C, photograph 2)
- unclean interiors (Appendix C, photograph 3);
- extremely worn seats with exposed foam (Appendix C, photograph 4);

- exposed wiring near the rear exit door (Appendix C, photograph 5); and
- missing first aid kits.

In addition, three group homes did not maintain documentation of regular maintenance of all facility vehicles to include quarterly inspection of tire wear and pressure, brakes, lights, and functioning seat belts.

## **GROUP HOMES DID NOT ALWAYS COMPLY WITH BUILDINGS, UTILITIES, AND GROUNDS REQUIREMENTS**

### **State Requirements**

The OAC requires that residential childcare facilities comply with buildings, utilities, and grounds requirements. These requirements state that facilities must maintain the exterior and interior surfaces in sound condition, free of holes, peeling paper, and peeling paint. In addition, windows and doors should be in good repair, and free of broken glass or hazards (OAC 340:110-3-163(1)(A) and (B) ). The code also requires that floors be cleanable and in good repair (OAC 340:110-3-163(1)(C)) and that premises are maintained free of hazards to children (OAC 340:110-3-163(2)(C)). Furthermore, all areas used by residents should be well lighted (OAC 340:110-3-163(6)).

### **Group Homes Did Not Always Comply With Buildings, Utilities, and Grounds Requirements**

At 12 group homes, we found 19 instances<sup>7</sup> of noncompliance with buildings, utilities, and grounds requirements. Examples of noncompliance included:

- peeling paint on interior walls (Appendix C, photograph 6);
- numerous holes in walls, including one hole with exposed wiring (Appendix C, photograph 7);
- cracked tiles on the bathroom wall and loose bathroom fixtures;
- multiple windows with cracked or broken glass (Appendix C, photograph 8);
- loose floor tiles;
- hazardous cleaning materials within reach of children;

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<sup>7</sup> Two of the twelve group homes shared a common area in which the noncompliance occurred.

- a 12-inch diameter swimming pool pump cover missing (Appendix C, photograph 9); and
- a dimly lit hallway (Appendix C, photograph 10).

## **GROUP HOMES DID NOT ALWAYS COMPLY WITH FIRE SAFETY REQUIREMENTS**

### **State Requirements**

The OAC requires that residential childcare facilities comply with fire safety requirements. These requirements include that evacuation plans be posted in prominent locations on all floors in each building and that emergency telephone numbers be posted conspicuously at the telephone (OAC 340:110-3-165(3)(B) and (C)). The OAC also requires that exits not be blocked and fire extinguishers be inspected, serviced, and tagged annually by a trained individual and that disposable fire extinguishers are prohibited (OAC 340:110-3-165(4)(A) and (5)(B)). The use of temporary wiring or extension cords as permanent wiring is strictly prohibited (OAC 340:110-3-165(7)(E)). Additionally, exterior areas must be free of trash and tall grass (OAC 340:110-3-165(8)).

### **Group Homes Did Not Always Comply With Fire Safety Requirements**

At 10 of the group homes, we found 17 instances of noncompliance with fire safety requirements. Examples of noncompliance included:

- evacuation plans not posted in prominent areas;
- emergency telephone numbers not posted at the telephone;
- an emergency exit blocked by a bed;
- fire extinguishers that were expired, missing inspection stickers, or that were prohibited disposable extinguishers (Appendix C, photograph 11);
- extension cords used to power a TV (Appendix C, photograph 12); and
- trash and broken glass on the patio behind the facilities (Appendix C, photograph 13).

## **GROUP HOMES DID NOT ALWAYS COMPLY WITH FOOD SERVICE REQUIREMENTS**

### **State Requirements**

The OAC requires food service equipment used for storage to be maintained in a sanitary condition (OAC 340:110-3-164(1)(B)). In addition, frozen food must be kept at 10 degrees Fahrenheit or below except when being thawed at a refrigerator temperature of 41 degrees

Fahrenheit; under cool, potable running water at 70 degrees Fahrenheit or below; or microwaved as part of the cooking process (OAC 340:110-3-164(4)(J)).

### **Group Homes Did Not Always Comply With Food Service Requirements**

At four group homes, we found four instances in which group homes failed to comply with food service requirements. All four of the group homes had a refrigerator that was not maintained in a sanitary condition, including one refrigerator that contained celery that had turned brown and partially liquefied (Appendix C, photograph 14). In addition, one home's freezer had a temperature reading 14 degrees above the required temperature of 10 degrees Fahrenheit.

### **GROUP HOMES DID NOT ALWAYS COMPLY WITH SAFETY AND EMERGENCY PREPAREDNESS REQUIREMENTS**

#### **State Requirements**

The OAC requires that residential childcare facilities comply with safety and emergency preparedness requirements. These requirements include that residents participate in fire exit drills performed at least six times per year on a bimonthly basis, with a minimum of two drills conducted at night during normal sleeping hours (OAC 340:110-3-165.1(1)). In addition, the OAC requires that residents participate in tornado drills each spring (OAC 340:110-3-165.1(2)).

#### **Group Homes Did Not Always Comply With Safety and Emergency Preparedness Requirements**

At four of the group homes, we found four instances of noncompliance with safety and emergency preparedness requirements. Examples of noncompliance included:

- group homes were unable to provide support for required fire drills and
- group homes were unable to provide support for a tornado drill in the spring of 2016.

### **GROUP HOMES DID NOT ALWAYS COMPLY WITH PHYSICAL FACILITY AND EQUIPMENT REQUIREMENTS**

#### **State Requirements**

The OAC requires that residential childcare facilities comply with physical facility and equipment requirements, including that bathrooms be maintained in a clean and sanitary condition (OAC 340:110-3-157(h)).

## **Group Homes Did Not Always Comply With Physical Facility and Equipment Requirements**

We found that 1 of the 22 group homes had an instance of noncompliance with physical facility and equipment requirements. Specifically, one group home had multiple bathrooms used by children that contained mold, mildew, and calcium buildup (Appendix C, photograph 15).

## **GROUP HOMES COMPLIED WITH EMPLOYEE BACKGROUND CHECK REQUIREMENTS**

### **State Requirements**

Before an employee may be allowed unsupervised access to children, the facility must have received a background check for the employee, including, among other checks, a national criminal history records search based upon the submission of fingerprints (Oklahoma Statutes §§ 10-404.1.A.3.c and 10-404.1.A.10).<sup>8</sup>

### **Group Homes Complied With Employee Background Check Requirements**

We reviewed the national criminal history records search of all group home employees who were hired on or after January 1, 2014. We found that the group homes had received the results of the national criminal history records search for all employees prior to the date of our review. We were unable to determine whether the employees had unsupervised access to children before the facility received the national criminal history records search results; therefore, we only reviewed whether the criminal history records search had been completed and received.

## **CAUSES OF NONCOMPLIANCE WITH HEALTH AND SAFETY REQUIREMENTS**

The noncompliance with State health and safety requirements occurred because the State agency did not document certain instances of health and safety noncompliance and did not have procedures in place to ensure that group homes received adequate training on health and safety requirements. Although the State agency performed monitoring as required, group homes had instances of noncompliance that were not documented. Certain issues of noncompliance found during our review, such as holes in the wall or broken tiles, can frequently occur between State monitoring visits. However, other issues of noncompliance, such as vehicles with low tire tread (Appendix C, photograph 1) and bathroom fixtures with mold, mildew, and calcium buildup (Appendix C, photograph 15), represent a prolonged period of noncompliance and should have already been corrected if those issues had been documented and resolved during the State's monitoring.

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<sup>8</sup> This requirement became effective per statute on November 1, 2013, but the implementation was delayed until January 1, 2014.

These instances of noncompliance with health and safety requirements indicate that the State agency and group homes need to take additional measures to ensure that all issues of noncompliance are documented and resolved in a timely manner and that group homes clearly understand what is required to safeguard and protect the children in their care.

The State agency includes licensing requirements as part of the orientation of group home staff who work with residents, prior to being assigned as the primary staff, but it does not require additional or ongoing health and safety training (OAC 340:110-3-153.1(l)).

In addition, the State agency's requirements for monitoring vehicles is inadequate to ensure the safety of all vehicles used to transport children. The requirement does not ensure that the State agency monitors every vehicle but only requires licensing staff to monitor the vehicles used for transportation "if available" (OAC 340:110-1-47(a)(3)(A)).<sup>9</sup> If the vehicle was not at the group home at the time of the monitoring inspection, such as when it was out transporting children, the vehicle was not inspected.

## **RECOMMENDATIONS**

We recommend that the State agency:

- ensure that monitoring staff document and resolve, in coordination with group home staff, all issues of noncompliance of group homes in a timely manner;
- require group home staff to complete specific training requirements related to health and safety regulations; and
- revise the State licensing requirement for the monitoring of vehicles used to transport children to ensure that the State agency monitors all vehicles at least annually.

## **STATE AGENCY COMMENTS AND OFFICE OF INSPECTOR GENERAL RESPONSE**

### **STATE AGENCY COMMENTS**

In written comments on our draft report, the State agency concurred with our first and second recommendations but did not concur with our third recommendation. The State agency did not agree that State licensing requirements need to be revised for the monitoring of vehicles. The State agency stated that licensing staff are trained to monitor vehicles annually, and maintenance logs are monitored at each monitoring visit.

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<sup>9</sup> We note that as of November 1, 2016, after the period in which we conducted our inspections, the language of the provision was revised from "if available" to "when available" (33 Ok. Reg. 1683). We maintain that this revision does not alter our analysis, as it still could be interpreted to allow for exceptions to the monitoring requirement.

The State agency's comments are included in their entirety as Appendix D.

#### **OFFICE OF INSPECTOR GENERAL RESPONSE**

After reviewing the State agency's comments, we maintain that our recommendation is valid. We agree with the State agency that it requires vehicle maintenance logs to be reviewed at each monitoring visit. However, the requirement to review maintenance logs on its own – without conducting a visual inspection of the vehicle – does not provide adequate assurance of the vehicle's safety.

We also take no issue with the State Agency's statement that licensing staff have been trained to annually monitor vehicles to determine compliance with vehicle requirements. Our recommendation addresses our concern that the language of the provision regarding inspection of vehicles during monitoring visits is unclear. During the period of our audit, licensing staff were required to "observe" vehicles "if available." As we noted previously (see Footnote 9), the provision has been revised to "when available." We believe that both the prior and current language could be read to mean that if a vehicle is off-site or otherwise inaccessible, the inspection is not required to occur. Without a physical inspection, the licensing staff would have no way of knowing the condition of the vehicle. Thus, unsafe conditions like the ones that we observed could exist regardless of the current monitoring requirement.

By requiring the language of the provision to clarify that all vehicles must undergo an annual inspection regardless of availability, the State agency will strengthen its monitoring process and promote the safety of children transported in vehicles.



## **APPENDIX A: AUDIT SCOPE AND METHODOLOGY**

### **SCOPE**

We reviewed all 22 group homes under contract for June 2016 with the State agency to provide care to Title IV-E eligible children in foster care.

We reviewed background check supporting documentation for group home employees at the OBI office in Oklahoma City in July 2016. We reviewed the national criminal history records completion date of each group home employee to ensure the checks were completed.<sup>10</sup>

We performed fieldwork at the State agency office in Oklahoma City, Oklahoma, in July 2016. In addition, we conducted site visits from June 27 through 30, 2016, at all 22 group homes located throughout Oklahoma.

We did not assess the State agency's overall internal control structure. Rather, we limited our review of internal controls to those applicable to our audit objective.

### **METHODOLOGY**

To accomplish our objective, we:

- reviewed Federal and State laws and regulations related to health and safety for group homes,
- reviewed the State agency's procedures for monitoring group home facilities,
- interviewed State agency officials regarding the State's monitoring of group homes,
- developed a health and safety checklist as a guide for conducting site visits,
- reviewed the monitoring reports of all 22 group home providers,
- conducted site visits at all 22 group home providers to determine whether they met State requirements for health and safety,

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<sup>10</sup> Because of the difficulty in determining whether a group home employee had supervised or unsupervised access to children, we evaluated whether the background check was completed.

- interviewed group home providers to obtain a list of all employees who worked at the homes to determine whether their background checks were completed, and
- discussed the results of our review with each of the selected providers.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

## APPENDIX B: INSTANCES OF NONCOMPLIANCE AT EACH GROUP HOME<sup>11</sup>

Group Home Number	Transportation	Buildings, Utilities, and Grounds	Fire Safety	Food Service	Safety and Emergency Preparedness	Facility and Equipment	Total Number of Instances	Date of Last State Monitoring Prior to Our Site Visit <sup>12</sup>
1								4/20/2016
2		2					2	4/12/2016
3								5/05/2016
4	3	1	4		1	1	10	4/15/2016
5	1				1		2	6/28/2016
6	4	1					5	3/30/2016
7		1					1	5/03/2016
8	1		1				2	5/03/2016
9		1	1				2	4/08/2016
10 <sup>13</sup>	1	5	1	1			8	5/05/2016
11								
12		2	1				3	6/24/2016
13		1	2				3	3/16/2016
14	1	1		1			3	3/30/2016
15								6/15/2016
16	1	2	3		1		7	3/16/2016
17	3	2	3	2	1		11	3/16/2016
18	1						1	6/16/2016
19								6/16/2016
20								3/2/2016
21	1						1	3/2/2016
22	1		1				2	4/27/2016
<b>Total</b>	18	19	17	4	4	1	63	

**Note:** We provided to the State agency under a separate cover the names of the providers that we reviewed.

<sup>11</sup> We identified instances of noncompliance during unannounced site visits from June 27 through 30, 2016.

<sup>12</sup> We compared issues of noncompliance identified by the State agency on the home's last monitoring report to our findings. We did not find any repeat instances of noncompliance.

<sup>13</sup> Group homes 10 and 11 had shared common areas; instances of noncompliance were counted only one time.

**APPENDIX C: PHOTOGRAPHIC EXAMPLES OF NONCOMPLIANCE WITH  
OKLAHOMA HEALTH AND SAFETY REQUIREMENTS**



**Photograph 1: Low tire tread on vehicle used to transport children.**



**Photograph 2: A broken rear seat belt tied to the door of a van used to transport children.**



**Photograph 3: Unclean interiors of vehicles.**



**Photograph 4: Extremely worn and damaged bus seats.**



**Photograph 5: Exposed wiring at rear exit door of van.**



**Photograph 6: Cracked or peeling paint found in various bedrooms at one facility.**





**Photograph 7: Holes in facility walls, including one with exposed wiring.**



**Photograph 8: A window next to the entrance of a group home and one kitchen window were cracked.**



**Photograph 9: One of the covers at a swimming pool (about 12 inches in diameter) was missing. During our walkthrough, five children were using the pool.**

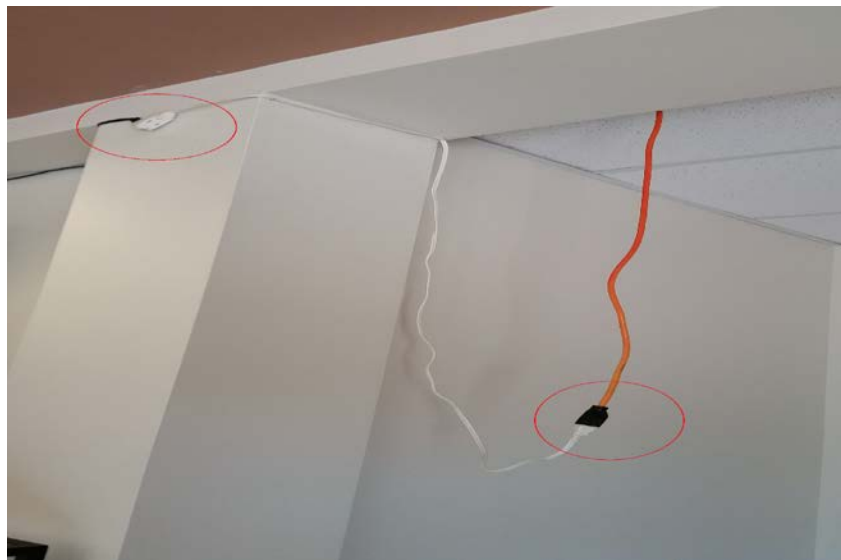


**Photograph 10: A dimly lit hallway in a group home.**





**Photograph 11: An expired fire extinguisher and a fire extinguisher without a fire safety tag.**



**Photograph 12: Extension cords hanging from the ceiling used to power a television set at one group home.**



**Photograph: 13: Broken glass on the patio behind a group home.**



**Photograph 14: Celery in a refrigerator was turning brown and starting to liquefy.**



**Photograph 15: Mold, mildew, and calcium buildup found in multiple bathrooms of one group home.**

## APPENDIX D: STATE AGENCY COMMENTS



**Oklahoma Department of Human Services  
Child Care Services**

PO Box 25352, Oklahoma City, OK 73125

(405) 521-3561 Fax: (405) 522-2564 Toll-Free: (800) 347-2276  
[www.okdhs.org/childcare](http://www.okdhs.org/childcare)



**Child Care  
Services**

June 21, 2017

Patricia Wheeler  
Regional Inspector General for Audit Services  
Office of Inspector General  
1100 Commerce Street, Room 632  
Dallas, TX 75242

Re: Report Number A-06-16-07004

Dear Ms. Wheeler:

I am responding on the behalf of Director Lake as I am the Statewide Licensing Coordinator.

In regard to the recommendations in the report:

- (1) Although the majority of the issues documented in the report could have occurred since the last monitoring visit conducted at the program, Oklahoma concurs and has already provided training to licensing staff regarding the documentation of non-compliances and appropriate notices to comply.
- (2) Oklahoma concurs. Licensing staff will monitor and document that all programs make the licensing requirements available to their staff and assure their knowledge of them.
- (3) Oklahoma does not concur that requirements need to be revised as there are requirements in place regarding the monitoring of vehicles. Licensing staff have been trained to annually monitor each vehicle to determine compliance with requirements. The program's written maintenance logs are monitored at each monitoring visit.

If you have any questions regarding our response, please do not hesitate to contact me at (405) 521-3823.

Sincerely,

Kristi Simpson  
Statewide Licensing Coordinator

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*"Assuring Oklahoma's families have access to licensed, affordable, quality child care"*