



Auditor General
MANITOBA

Report to the Legislative Assembly

Management of Foster Homes

Independent Audit Report



November 2019

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November 2019

The Honourable Myrna Driedger
Speaker of the House
Room 244, Legislative Building
450 Broadway
Winnipeg, Manitoba R3C 0V8

Honourable Ms. Driedger:

It is an honour to submit my report titled, *Management of Foster Homes*, to be laid before Members of the Legislative Assembly in accordance with the provisions of Sections 14(4) and 28 of *The Auditor General Act*.

Respectfully submitted,

A handwritten signature in black ink, reading "Norm Ricard".

Norm Ricard, CPA, CA
Auditor General

Glossary of terms

Child maintenance funding provides for the care and supervision of children placed in care.

The 2 main pieces are:

1. **Basic maintenance** is intended to cover the basic costs of caring for a child. It includes the:
 - a. Rate paid directly to caregivers (for food, clothing, transportation, personal care etc.).
 - b. Agency allowance (cover gifts, education, sports/rec).
2. **Special rates** are intended to support caregivers of children with additional needs. Special rates include one or more of the following:
 - a. Service fees paid to caregivers.
 - b. Respite fees incurred by the caregiver.
 - c. Support worker fees for services provided to the caregiver.

CFS – Child and family services

Emergency placement resources are designed for short-term use until the child returns home or an appropriate longer-term placement can be arranged. These resources are either homes (used most) or shelters.

External agencies are third party service providers that manage foster homes licensed by mandated agencies. External agencies may be not-for-profit or for-profit organizations and may provide a number of different services. Examples of external agency service providers are B&L Resources for Children and Ma Mawi Wi Chi Itata Centre.

A **foster home** is a home, other than the home of the parent or guardian of a child, licensed by an agency to provide care and supervision of no more than four children in care (unless siblings), but not for the purposes of adoption.

Mandated agencies are agencies mandated by the 4 CFS Authorities to provide services under section 17 of the *Child and Family Services Authorities Act*.

A **place of safety** is a place (often a home) used for the emergency temporary care and protection of a child where the child often has a pre-existing relationship with the caregiver before being placed in the home (for example the home of the aunt of the child). Placements in these homes are not to exceed one month unless the caregiver applies for a foster home licence or guardianship.

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An abbreviated version of this report has been translated to French.
In the event of an inconsistency, refer to the English version.

Auditor General's comments

The Department of Families' 2017/18 annual report notes that there are 10,328 children in care in Manitoba. When children are taken into care, it is critically important that they be placed in a loving, nurturing, safe and culturally appropriate environment. More than 9,600 (93%) of the children in care are in foster homes and places of safety. To ensure the safety and well-being of these children, it is imperative that foster homes and places of safety be properly managed by CFS Agencies and that children are placed in homes that can appropriately deal with their identified needs.

In examining the management of foster homes, we found inadequate systems for ensuring compliance with foster home standards. For example, we noted that workers overseeing foster homes conduct limited home visits and rarely make unannounced visits. We also found inadequate processes for assessing and monitoring places of safety; and noted that while places of safety are intended for short-term placements, this was often not the case.

We found that the Department had taken some steps to address foster home supply issues, but risks to the system remain. Some officials noted that child placement decisions were sometimes being made out of desperation rather than best fit and that the supply issue had also led to a reliance on more expensive placements.

In our 2006 report, *Audit of the CFS Division Pre-Devolution Child In Care Process and Practices*, we concluded that the CFS funding model in place at that time did not ensure fair and equitable funding to agencies consistent with the expected services. We have again found many concerns with the funding approach used. We found that although the Province had set standards for the licensing and case managing of foster homes, the agencies that perform this work were not explicitly funded for foster home case management. Agencies must then redirect funding earmarked for other areas. We also found different approaches for assessing a child's needs and setting special rates at each of the agencies we examined. This results in inequities between caregivers caring for children with similar needs.



In February 2019 the Province announced it would begin implementing single-envelope funding of Authorities. It is important to note that some of our recommendations relate to strengthening the funding model in existence at the time of our audit. Nonetheless, we believe that these recommendations will be valuable to the Department and Authorities as they move forward with implementing the single-envelope funding approach.

This report includes 43 recommendations. Our first follow-up of these recommendations will be as at September 30, 2021.

I would like to thank the dedicated staff members from the Department, the Authorities and the Agencies that we met with during our audit for their cooperation and assistance.

I would especially like to thank my audit team for their dedication, insights and exceptional work.



Norm Ricard, CPA, CA
Auditor General

Other audits we conducted specifically related to children

- Improving Educational Outcomes for Kindergarten to Grade 12 Aboriginal Students – January 2016
- Manitoba Early Learning and Child Care Program – January 2013
- Animikii Ozoson CFS Agency – January 2012
- Special Needs Education – January 2012
- CFS Division Pre-Devolution Child In Care Process and Practices – December 2006

Other audits conducted related to licensing and inspection processes:

- Management of Provincial Bridges – July 2016
- Food Safety – January 2012

Management of foster homes

What we looked at:

- Funding of agencies and foster homes
- Licensing and monitoring of foster homes and places of safety

43
recommendations

What we found

Consequences

Inadequate systems to ensure sufficient funding for foster home services

Agency funding model does not include a component for foster home case management p. 36

Different approaches for assessing a child's needs and setting related funding rates for caregivers p. 44

Funding rates for caregivers not supported p. 47

Agencies must use funding earmarked for other purposes causing higher than planned caseloads in other areas

Variations in rates paid to foster parents for similar circumstances = inequities

Rates that can be manipulated to meet foster parent demands

Inadequate systems to ensure compliance with foster home standards

Limited processes to lessen shortages of suitable foster homes p. 96

Limited home visits by foster care workers p. 72

No annual quality assurance reviews p. 88

Many places of safety not short-term placements p. 81

Noncompliance with licensing requirements; limited assessment of places of safety p. 61, 67, 78

Children in ill-suited placements; reliance on more expensive placements

Children in care are in homes that do not meet (or may not meet) standards.

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Main points

What we examined

We wanted to determine the adequacy of the systems and processes for funding foster home services and ensuring compliance with foster home standards. To do this we examined the operations of:

- The Department of Families (the Department).
- Child and Family Services (CFS) Authorities.
- CFS agencies.

We chose to examine the operations of 4 CFS agencies delivering foster home services, one from each CFS Authority, as follows:

CFS Agency	Related CFS Authority
Awasis Agency of Northern Manitoba (Awasis)	First Nations of Northern CFS Authority
Metis Child, Family and Community Services (Metis)	Metis CFS Authority
Southeast Child and Family Services (SECFS)	Southern First Nations Network of Care
Winnipeg Child and Family Services (WCFS)	General CFS Authority

We also examined the oversight and support provided by the Department and the 4 CFS Authorities related to foster home services.

What we found

We concluded that there were inadequate systems and processes to ensure the sufficiency and appropriateness of funding for foster home services and that there were inadequate systems and processes to ensure compliance with foster home standards.

Our report includes 43 recommendations. A summary of our findings is as follows:

FUNDING FOR FOSTER HOME MANAGEMENT

Funding model does not include funding for foster home case management (Section 1)

Agencies are to comply with the Foster Homes Licensing Regulation, which includes standards for the licensing and case management of foster homes. But the agency funding model does not include a component for foster home case management. To comply with the standards, agencies must finance this work using funds (either from the federal or provincial government) designated for other purposes. Segregating foster home case management would promote greater transparency regarding the intended use of agency funding amounts.

Between July 1, 2016 and June 30, 2017 there were 69 staff in the 4 agencies we examined, who were for a period of time during the year responsible for the licensing and case management of nearly 1,100 foster homes.

As there is no separate funding component for foster home case management, we sought

to assess whether the agency funding model properly supported agency core operations including foster home case management. We found a number of issues as follows:

- Assumptions used to set core funding amounts were unexplained, with some agencies twice the size of others receiving the same core funding.
- Worker caseload assumptions used in the funding model to determine child protection staffing levels were unsupported; actual caseloads were higher than the assumptions used.
- The bases for incremental funding for northern and remote agencies was not fully explained.
- WCFS was funded for higher salaries than the other 3 agencies, which may lead to inequities.

Caregiver funding rates not adequately supported (Section 2)

Agencies provide funding to foster parents and place-of-safety caregivers (both referred to in this report as caregivers) for the care and supervision of the children placed in their care. There are many components to this funding, but the main pieces are basic maintenance and special rates.

Basic maintenance provides for the everyday care of a child. It is intended to cover the basic costs of living such as food, clothing, transportation, health and personal care.

Special rates may also be paid to caregivers, in addition to basic maintenance, when an assessment shows the needs of the child are beyond those deemed age-appropriate. Special rates include one or more of the following fees: service fees, respite fees and support worker fees. Service fees make up the largest portion of special rates paid. In 2017/18, the Department reported that 73% of the days paid to support children in care included a service fee. These fees, for children in foster homes and places of safety, totalled an estimated \$64 million in 2017/18.

In examining the child maintenance funding model and related agency approval and payment processes, we found:

- The rationale for the basic maintenance rates were unknown, with rates unchanged since 2012.
 - No assessment had been done to support the adequacy of basic maintenance rates.
 - No assessment had been done to support the adequacy of northern and remote rates.
- Special rates were not set consistently within or across agencies, with approved rates often unsupported.
 - Each agency we examined used a unique needs assessment process to determine service fees.
 - Children's assessed needs and related fees were not fully justified, leading to inconsistent services fees for children assessed as having similar needs.
 - There was a lack of guidance for setting respite and support hours and rates; we found there was often no justification for hours or rates approved.
 - Special rates were initially properly approved, but not annually thereafter.
- Child maintenance payments were accurate and timely with some exceptions.

Use of external agencies' foster home programs not sufficiently managed (Section 3)

In addition to foster homes licensed and managed by the 23 agencies mandated by the CFS Authorities, there are also specialized foster homes managed by external agencies (e.g. B&L Resources for Children, New Directions, and Knowles Centre). We identified the following concerns regarding the use of external agencies:

- Service purchase agreements for the management of specialized foster home programs were not in place with 4 of the 8 external agencies, and all 4 agreements in place had expired.
 - For 3 of the 4 external agencies with service purchase agreements, placements by internal agencies into external agency specialized foster home program beds were managed by the Department's Provincial Placement Desk. But, for the 4 external agencies without an agreement, and one agency with an agreement, internal agencies

worked directly with the external agencies to place children in their specialized foster home program beds. We found gaps in how well these placements were managed.

- For the direct placements, the Province approved fixed daily rates ranging from \$108 to \$315 per day per bed but support for the various rates was not well documented.
- We were told by Department and agency staff that lower-needs children were being placed in these external high-fixed-rate beds, intended for higher-needs children.
- There was limited justification for the higher daily rates paid for foster homes managed by external agencies, when compared to rates for internally managed foster homes.

We noted that external agencies are explicitly funded for foster home case management, unlike internal agencies.

COMPLIANCE WITH FOSTER HOME STANDARDS

Inadequate processes for approving new foster homes (Section 4)

The Foster Homes Licensing Regulation sets out the standards agencies must follow in licensing foster homes. The Department sets out additional policies and guidelines in its Child and Family Services Standards Manual. Foster care workers and their supervisors are to ensure foster home applicants meet these standards and policies before licensing the homes. In examining the standards and guidelines, as well as agencies' licensing practices, we noted the following concerns:

- Foster home standards were outdated. The Regulation was last amended in 2003 and it does not distinguish between kinship homes and regular foster homes, nor does the Regulation consider close family ties (i.e. cousins) other than siblings.
- There was minimal direction for workers on how to assess the suitability of foster home applicants.
- Some foster homes were licensed even though regulatory and policy requirements were not met.

- While we recognize that licensing a home with minor exceptions can be justified, for 8 (20%) of the 40 newly licensed foster home files examined, we concluded that the decision to issue the licence was not justified based on the number and/or type of licensing requirements not met.
- The licensing process was lengthy. In the files examined, the median time it took to complete the entire licensing process was about 9 months. The median time ranged by agency from 71 days in Metis to 743 days in Awasis. This was likely due, in part, to limited

resources being available for licensing new foster homes. The impact of the lengthy licensing process is intensified given the shortage of suitable foster homes.

- Licences were not always issued in accordance with the Regulation.
 - Some physical copies of licences were missing required information such as the gender and number of children permitted, and some were issued for more than one year.
 - Approvals for exceptions to licensing requirements were not obtained.

Ongoing management of foster homes inconsistent and insufficient (Section 5)

Foster care workers monitor licensed foster homes, provide ongoing support to foster parents, and complete annual foster home licence renewals. According to the Foster Homes Licensing Regulation, foster home licences cannot be issued for more than one year. The Regulation requires agencies to review the operations of a foster home annually, before the licence expires, to see if the home is complying with standards and to decide if the licence should be renewed. We examined 75 foster home files and found the following issues related to the case management and relicensing of foster homes:

- Foster home licences were renewed despite gaps when conducting annual reviews resulting in licensed homes not meeting certain requirements.
 - Annual reviews were not always done. For 14 (19%) of the 75 files, over the past 3 years, annual reviews were not always completed.
 - Annual review forms were frequently incomplete.
 - Security checks were not done as required.

- Home inspections were not thorough, allowing non-compliance in some areas.
- Non-compliance with licence terms and conditions that were not addressed by the licensing agency.
- Subsequent follow-ups were not done for items of non-compliance and actions were not escalated for repeat offences.

- Many foster homes were periodically operating with an expired licence as only 35% of annual reviews in our sample were done before the licence expired. We found it was common for agencies to issue new licences well after the old licence had expired, often months later.
- There was no requirement for home visits by foster care workers, other than annual relicensing visits.
 - The frequency of foster care worker home visits varied widely across agencies. The number of home visits in the files examined ranged from 1 to 9 with the majority being 1 home visit per year.
 - There was no requirement for periodic

unannounced home visits. From our review of a sample of files we noted this occurred on an exception basis only.

- The support provided to foster parents varied across agencies.
 - We surveyed foster parents of the 4 agencies examined. Many foster parents do not believe they are adequately supported. Only 65%

of respondents reported receiving enough support from their foster care worker (from a high of 76% of respondents licensed by WCFS to a low of 41% of respondents licensed by Awasis).

- Support for new placements was inconsistent across agencies.
- There were gaps in, and access challenges with, the training available to foster parents.

Inadequate processes for assessing and monitoring places of safety (Section 6)

Places of safety are intended to be temporary, short-term placements for children in care (until the child can be safely returned home or a longer-term plan is developed). The caregiver is often a relative of the child or identified by the child or child's parent as a place of safety.

Unlike foster homes, there are no regulatory requirements for the screening, approval, and monitoring of places of safety. However, the Department's CFS Standards Manual includes policies for approving and initially monitoring places of safety. We examined 50 place-of-safety files from the 4 agencies and found the following:

- There were weaknesses in assessing places of safety for suitability.
 - There was limited guidance for assessing suitability.
 - Required documents were not always prepared or obtained.
 - Assessments, using the gathered documentation, to assess suitability were frequently not done, with only 20% of the

homes in our sample of 50 with a thorough assessment on file.

- Management approvals of places of safety were not always in place before placement and sometimes were not documented. Evidence of approvals were missing for 12 (24%) of the places of safety in our sample, and 27 placements were approved after placement.
- Home visits following placement were not timely.
- Places of safety were often not short-term placements as intended. We examined reports for each agency as of June 30, 2017. At that point, nearly 400 (of roughly 600) places of safety had been operating beyond the 6 month time-limit, with the median time being more than 2 years in 2 of the 4 agencies.

Weaknesses with complaints follow-up and appeals process (Section 7)

When agencies receive complaints about foster homes or places of safety, foster care workers must look into these matters and ensure the concerns are adequately addressed. If the safety of children placed in a home is in question, an agency can decide to remove the children from the home, and to possibly close the home. Legislation allows decisions to remove children from foster homes to be appealed by the foster parents. We noted weaknesses in the follow-up taken when concerns or complaints were raised about a home and with the appeals process as follows:

- Follow-up of complaints was not always thorough and well documented. In examining a sample of 20 complaints about foster homes, we found only 11 (55%) had the details of the complaint, follow-up done, and resolution well documented.
- Decisions to close homes were approved by management, but follow-up of care concerns needs improving.
- There were problems with the appeals process for the removal of children from foster homes.
 - The appeals process was not timely.In examining an appeal in each agency,

we found that agencies, CFS Authorities and the Department did not always meet time frames set in regulation. The entire appeal processes took 7 to 16 months. We estimated, based on regulation and policy requirements, that the maximum time the appeals process should take is approximately 4 ½ months. Undue delays are a disservice to the foster parents and ultimately the child(ren) whose future is being decided by the appeals process.

- Only 2 of the 4 agencies had guidance (as required by the CFS Standards Manual) on how their alternative dispute resolution process should be conducted.
- We also noted that agencies raised concerns about the Foster Parent Appeals Regulation including the ability for foster parents to appeal the removal of a child regardless of the reason for removal (including substantiated abuse). As well, some viewed the regulation as favouring foster parents over biological parents as foster parents can appeal the decision to remove a child, including to an independent adjudicator, whereas biological parents have to go to court.

Limited quality assurance processes (Section 8)

Quality assurance reviews provide feedback to workers, note common issues, and identify staff training needs. We expected supervisors within agencies and CFS Authorities to regularly complete quality assurance reviews of a sample of foster care workers files. We also expected the Department to monitor the quality assurance work done by the CFS Authorities. As another way to help ensure quality service, agencies need to hire properly qualified staff. In our review of quality assurance practices we found the following:

- Agency quality assurance processes did not include annual reviews of foster home files.
- There was limited monitoring by CFS Authorities and the Department. None of the CFS Authorities did regular quality assurance reviews of foster home files and the Department did not monitor the quality assurance work done by the Authorities.
- As permitted in policy, one agency used unqualified foster care workers known as “field staff 1”, but the agency did not properly mentor or supervise these workers as required in policy.

Child and Family Services database not complete and accurate (Section 9)

The Department expects agencies to maintain foster home and place-of-safety records on the provincial Child and Family Services Information System (CFSIS). CFSIS, which was put in place in 1993, operates as a registry for children in care, licensed foster homes, and places of safety. It is also a case management system for recording and managing services provided to children and families, but excludes financial information.

In our 2006 CFS audit report, we indicated that not all agencies used CFSIS and that CFSIS information was out-of-date and inaccurate. We noted that updating CFSIS in a timely manner was important to ensure that reliable information was available for system planning, resource coordination and performance analysis. In our 2012 follow-up report, we noted that the Department issued a letter to CFS Authorities in April 2010, stating it was a requirement that all cases be entered in CFSIS. The Minister of the Department issued another letter to Authorities in 2014 with the same direction. As part of our current audit work,

we tested the extent to which CFSIS is now used by the 4 agencies for foster home management and whether related information in CFSIS is accurate. Unfortunately many of the issues noted in our 2006 report remain.

Our key findings are as follows:

- Information in the CFSIS database was not accurate. We found that for less than half of the files examined (47%), the information recorded in CFSIS accurately reflected the file contents.
- CFS Authorities and the Department did little to monitor whether foster home information in CFSIS was accurate, and the Department did not provide enough CFSIS support to agencies.
- System-wide access to certain information may improve overall licensing efficiencies. Access to case information in CFSIS is commonly restricted to the agency that managed the case. WCFS management viewed this lack of access as a significant barrier to efficiently vet foster home and place-of-safety applicants.

Steps taken to address foster home supply issues, but risks remain (Section 10)

When agencies remove children from their home and take them into care, it is imperative that they be placed in a loving, nurturing, and safe environment. Therefore it is critical that there be an adequate supply of suitable foster homes. Suitability relates to the location of the home (for example, ideally in the child's original community), whether the home is culturally appropriate, and whether the foster parents are willing, able and supported to care for a particular child, since each have unique needs.

The majority of management and staff interviewed said there is a chronic shortage of suitable foster homes. Some said this was resulting in agencies making some placement decisions out of desperation rather than best fit.

An inadequate supply of suitable foster homes has substantial negative impacts on the children in care. Siblings may be separated, or a child may be placed in a group home or in a foster home not best suited to meet their needs. These less-than-ideal placements can lead to placement breakdowns, and ultimately more trauma for the child. From a financial perspective, it could also have a negative impact for the Province due to forced reliance on more expensive placements.

The types of shortages that agencies and Authorities described were for homes willing and able to care for large sibling groups (to prevent siblings from being separated from each other), children with complex needs, and young children (as often there was no daycare plan in place). Some officials also raised concerns that agencies with foster home vacancies were not always willing to take children under the responsibility of other agencies.

Some CFS Authorities and agencies said the shortage of foster homes was due to a lack of staff resources at the agency level to recruit, license, and support foster parents. We found the following related to the impact of the shortage of suitable foster homes and the work being done to ensure an adequate supply of suitable foster homes:

- Shortages of suitable foster homes are leading to the reliance on more expensive emergency foster home placements in non-emergency scenarios. The average cost of provincially approved emergency foster home placements is \$175 per day per bed while the estimated average provincial child maintenance cost for a child in a foster home (or place of safety) is \$73 per day.
 - Some children remained in emergency placement resources (EPR) far beyond the intended 30-day maximum. A Department report on these placements showed that 181 of 377 (48%) children in EPR beds had been there for 90+ days as of May 31, 2018. In reviewing one Authority's EPR report, we noted 11 of the 87 children on the report had been in emergency placements for a year or more.
- Minimal monitoring and reporting of foster home supply challenges was being done by CFS Authorities and the Department.
- The Department provides some support to address foster homes shortages but more needs to be done.

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Responses from officials

We requested responses from officials of each of the entities we audited. For those that provided summary responses, the response is included below. Responses provided specific to recommendations have been included in the Recommendations section of the report.

The Department of Families

The Department of Families would like to thank the Office of the Auditor General (OAG) for its review of the management of foster homes in Manitoba. We have reviewed the report, findings and recommendations. The findings will assist current and ongoing efforts to improve policy, planning, and oversight of foster home management as well as the delivery of foster home services by Child and Family Services (CFS) Authorities and agencies. Each entity is committed to responding to those recommendations that fall within their legislative scope of responsibility.

It is recognized that the audit was conducted at a point in time and was focused on the management of foster homes, which is a single component of a large and complex system in place to serve children and families in Manitoba. Actions have been underway to support a broader shift in the child welfare system that will help create a continuum of care that places communities and extended families as the foundation of support for families in need and reduces reliance on the foster family system when responding to and addressing those needs.

The Department acknowledges that the review findings reinforce the need for transforming child welfare in Manitoba. Much work remains underway that will address the issues raised in the report, while shifting demand from traditional foster care to family and community-based care.

Since the time of Audit, the Department is partnering with CFS Authorities on implementing a single envelope funding approach to create flexible funding that can better support the needs of children and families through a focus on prevention, family and community-based supports, and reunification.

A Legislative Review Committee provided over sixty recommendations to government to modernize the CFS Act and support a shift in practice to enable communities and families to have more influence on decisions. A new Act will require regulatory and policy changes that will further support a fundamental shift in CFS practice. Customary Care amendments create a framework for Indigenous communities to create plans for children that recognize and reflect unique customs, and allow greater extended family and community involvement in care and upbringing. The Department is also working with community-based agencies to pilot innovative approaches to working with families, including:

- Collaborating with Ma Mawi Wi Chi Itata Inc. to pilot a family group conferencing model.

The model is an Indigenous based and Indigenous led process that shifts decision-making regarding the care and protection of children to the entire family and community.

- Partnering with the Health Science Centre's Child Protection Centre to pilot an interdisciplinary service model to provide more timely and relevant medical, psychological and parental-capacity assessments and case consultations with CFS agencies. This supports the ability of agencies to develop more timely plans for reunification and decreases the amount of time children are spending in out of home placements.
- The Province has worked with the Southern First Nations Network of Care (SFNNC) in securing \$2.6 M in funding through the first Social Impact Bond to initiate a two-year pilot project to support up to 200 high risk expectant mothers. SFNNC will lead the project and work with the doula service provider, Wiji'idiwag Ikwewag, to provide traditional cultural support to expectant mothers.

Where a child is deemed to require an out of home placement, the objective is for agencies to continually work with the child's family and extended family or community towards establishing a stable, safe and permanent home for the child. The Department continues to work with partners to improve foster home regulation and policy. Examples include the amendments to the foster parent appeals process introduced in May 2018, which provided time limits for Authority-level decisions.

The Department is working collaboratively with our CFS Standing Committee and external agency partners to finalize a "Foster Care Communication Protocol", which will improve communication during the placement referral process. This new protocol will assist CFS agencies in ensuring a comprehensive child profile is provided to the external agency, and will assist external agencies in ensuring only appropriate referrals are accepted.

The Department is also reviewing how best to move forward with the Legislative Review Committee's recommendations that the placement of children into care be culturally safe, that training be provided to foster parents on caring for children in ways that respects and promotes their culture, community, heritage and traditions, and that the foster parent appeal process be replaced with an alternative dispute resolution process. Significant collaborative work related to policy, planning and oversight of foster homes is underway and will continue in response to the OAG's recommendations and broader legislative reform activities.

The Department is committed to working with the Authorities to identify and implement best practices that will ultimately improve outcomes for the children and families receiving CFS services, reduce the number of children in care, and result in fewer days in care while creating lifelong connections through reunification and permanence. Balancing our roles and responsibilities within the existing governance framework is crucial to achieving the goals and vision of devolution, and empowering Indigenous communities and agencies to shape the supports and services provided to their children and families.

Finally, the Government of Canada's recently proclaimed Act respecting First Nations, Inuit and Métis children, youth and families signals a foundational change in how services to children and families will be delivered in the future. Manitoba is committed to working with the Authorities and our First Nations, Inuit and Métis partners as we embark together on this journey.

The First Nations of Northern Manitoba Child and Family Services Authority:

The First Nations of Northern Manitoba Child and Family Services Authority (NA) would like to thank the Office of the Auditor General (OAG) for its review of the Management of Foster Homes. The NA continues the commitment of working with internal and external collateral service providers toward services that are culturally sensitive in meeting needs of children, families and communities. NA is at the forefront and will continue to be the conduit by which constructive outcomes are realized by working with the seven northern agencies.

NA is responding to the 43 recommendations made. NA expects to continue to have the discussions around Management of Foster Homes at all levels of the CFS system. It is important for NA and the seven agencies to realize long-term actions stemming from the review of Management of Foster Homes versus one-time or non-action.

The performance audit was focused on the Management of Foster Homes. This is one component in a dynamic system of interrelated parts that serve children, families and communities in Northern Manitoba. NA continues to work toward a transformative shift in practice with the Northern CFS system to bring closer realization between current practice and the NA transformation for an increased emphasis on support, research, and development of outcomes to benefit children, families, agencies and communities. In this work, it is hoped that the continued presence of the Department will increasingly be toward supporting versus policing NA and lending a 'hand-up' in realizing the Aboriginal Justice Inquiry – Child Welfare Initiative outcomes, including:

- Children should and must always be connected to family or community, children have the right to know their history and community;
- The province should provide more funding in training agency workers on and off reserve; and
- Federal government should provide more funding for agency workers to train dealing with high-risk youth as part of continuous training.

The General Child and Family Services Authority:

The General Authority concurs with the Departments response. We are of the opinion that as we move to Single Envelop Funding (SEF) that includes Child Maintenance dollars many of the items in the report can be addressed. The Authority through the work of its agencies in implementing our Practice Model has seen a significant decrease in days care as we continue to strive to support and strengthen families to care safely for their children. The ability to direct funds to support families through a variety of services is a key element in maintaining children in their own home or in facilitating a return sooner. The use of Safety Networks guided by our agency staff is a critical component. Foster Care will of course continue to be a valuable required resource but it is always a last option that we consider. We do support the need for a standard of care and continue to monitor this with our agencies.

The Metis Child and Family Services Authority:

Section 1: Funding Foster Home Case Management

The Metis Child and Family Services Authority has long advocated for adequate funding for foster home case management workers. In order for agencies to support kinship homes and foster homes making every effort to ensure safety and quality care for our children in care, funding for family service workers is shifted to foster care resource workers. This shift reduces the number of family service workers at the agencies and adds to increased family service caseloads.

Section 2: Funding Caregivers

With the anticipation of Single Envelope Funding, most of the recommendations under Section 2: Funding Caregivers will assist in remedying this.

The Metis Authority has a mechanism in place to track compliance for annual review as well as Special Rates. A new system has recently been developed to be certain that expiry dates are flagged and follow up can occur at the Authority level.

Section 3: Use of External Agency Foster Home Programs

The Metis Government has made it clear to the Metis Authority that the use of third party foster home services should **only** be used as a last resort. The Metis Authority, along with its agencies has developed a vision for the future of temporary care for our children. This vision includes an assessment phase, stabilization phase and a reunification and longer term planning phase. All three phases would include culturally appropriate care, with an emphasis on finding family who can care for the children.

This Metis resource would meet recommendations 9 and 10 as the Authority would have a role in ensuring that children coming into care could access our resource while making sure that children are receiving the services they require.

Section 4: Processes for Approving New Foster Homes

The Metis Authority has already begun developing checklists for agency supervisors to use when reviewing license packages (new and renewals).

Currently, the Metis Authority tracks and monitors all exceptions (variances) at the Authority level.

Section 5: Ongoing Management of Foster Homes

The Metis Authority has an existing policy for care providers and other adults living in the home and updated security checks. Care providers are to re-submit their security checks annually when the licensing review is completed.

The Metis Authority is currently in the process of developing curricula specific for our caregivers. This training will be mandatory for all caregivers and will provide a mentoring component to ensure transfer of knowledge. Part of the curriculum development will look at gaps and inconsistencies as well as improving supports to caregivers.

Section 6: Assessing and Monitoring Places of Safety

The Metis Authority is in the process of developing Métis-specific training for staff in the areas of documentation and assessments. This training will be mandatory for all front line workers and foster resource workers.

Section 7: Complaints Follow-up and Appeals Process

The Metis Authority has been very diligent in ensuring that timelines are met when reviewing Foster Parent Appeals. Both agencies under the Metis Authority have very clearly defined Alternative Dispute Resolution Processes and comply with these processes.

Section 8: Quality Assurance Processes

In February 2019, the Metis Authority embarked on two Quality Assurance Reviews related to Foster Home Management files. The Reviews are looking at Alternative Care Standards Compliance and Places of Safety, Agency Foster Homes and Third Party Providers' Homes. The final reports for both Reviews will be completed by September 30, 2019. The Authority will assist both agencies in implementing any recommendations coming from the Reviews.

Section 9: Child and Family Services Databases

The Metis Authority is in the process of developing annual Quality Assurance Reviews for all files to ensure that the information on both the electronic and the physical files match.

Section 10: Foster Home Supply

The Metis Authority tracks the number of licensed foster homes by type to ensure we do not have empty beds and can avoid EPR use.

There has been discussion at the Standing Committee table about long-term foster care recruitment strategies. The Metis Authority will be implementing a foster care recruitment strategy at the Manitoba Metis Federation's Annual General Meeting in September 2019.

The Southern First Nations Network of Care:

The Southern First Nations Network of Care has reviewed the Management of Foster Home Report and agrees with all recommendations set forth by the Auditor General of Manitoba. This is of course with the understanding that recommendation number one must be addressed in order for many other recommendations to be met. In saying this, we feel that all recommendations are positive and could be practicable.

There are a number of recommendations that the Southern First Nations Network of Care and our agencies have begun to implement such as the creation of a variance check list for agencies to utilize when they are requesting a variance to the foster home regulations from the authority. We also ensure a database of all requests is kept to track and monitor each variance received at the SFNNC (Recommendation #18).

The development of the Kinship Care licensing process and specific standards by SFNNC and agencies has been successfully managed since 2015. This way of licensing has enhanced the ability of the agencies to gather more relevant information when licensing a family member. It can also help speed up the licensing process and possibly reduce the number of Places of Safety an agency could have (Recommendation #14).

We have recently worked on the development of best practice suggestions for agencies when they are completing an Alternative Dispute Resolution with foster parents. We hope this will encourage each agency to enhance this process enabling it to become a more efficient tool (Recommendation #32).

The SFNNC is also working with our agencies in filling and reducing empty bed spaces in agency foster homes. This continues to help agencies in reducing the number of children they could have in Emergency Placement Resources. This process also ensures the information on empty bed spaces on CFSIS is not over inflated and is as accurate as possible (Recommendation #42).

The SFNNC and agencies will work towards reviewing the recommendations further and making changes in collaboration with the other authorities and Department.

Awasis Agency of Northern Manitoba:

Awasis Agency of Northern Manitoba would like to thank the Office of the Auditor General for their thorough review of the Foster Care system within Manitoba that highlights a number of issues that have been raised by Awasis Agency for many years. Awasis agrees with the majority of recommendations. Awasis does not agree with Recommendations #7, the requirement for agencies to apply for special rate funding on an annual basis; and #41, province-wide access to CFSIS to assess caregivers.

Awasis agrees with the recommendations specific to funding. Awasis has consistently documented and reported to both funders, but in particular the Province, the funding shortfalls and inequities; not only since the new funding model of 2009, but since AJI-CWI. The current funding model does not adequately reflect the realities and needs of Awasis which necessitates the use of federal funding for provincial responsibility services. Awasis is funded as a “Large” agency, however, based on the criteria, should be funded equivalent to two (2) large agencies. In addition to the lack of core positions, the Agency receives no funding for Foster/Alternative Care Workers, Adoption services, IT personnel, and grossly underfunded in the areas of Board/governance costs, travel, insurance, training, and employee benefits. The claw-back of Children’s Special Allowance (CSA), while not discussed in this report due to the Province’s recent discontinuance of this practice, equates to approximately \$2 Million dollars per year for Awasis.

Awasis has significant concerns related to the proposed new ‘single envelope’ funding model that includes block maintenance funding as reported to be in effect April 1, 2019. Agencies have not yet been advised what funding they will receive, six months into the fiscal year, or how the Province is determining core funding for agencies. There is no rational reason to fund agencies based on historical data, other than as a cost-saving measure for the Province. The Province has the mechanisms to determine caseloads at any given time due to the requirement of agencies to enter into CFSIS. The Province has also remained silent on funding for Customary Care, yet expects agencies to be prepared for when it comes into force.

Throughout the audit report there are examples of inadequate funding for staffing and challenges for agencies to meet the provincial regulations and standards. An alternative to Recommendation #7 would be the requirement of agencies to reassess special rate funding through the Director’s Annual Review to ensure it has been completed and which can be monitored through CFSIS by the Authorities and Division. The requirement to complete the process of re-applying annually for funding simply adds to the workload of social workers, financial staffing, Authority staffing, and Division staff.

A significant aspect of AJI-CWI was the devolvement of Group 2 resources which comprises of the external agencies. The commitment to proceed with this as the ‘next step’ has not occurred. Agencies are not funded for, nor have the additional funds to create specialized resources, yet, as highlighted in this audit report, exorbitant funding is provided to these external agencies, some of whom are for-profit organizations.

The Foster Parent Appeals Legislation and Regulations respecting the removal of children has been opposed since introduced to Legislation as part of AJI-CWI. The implementation of the Appeals has caused additional workload and significant costs to agencies, with no funding for agencies to comply with any components of the process.

Awasis does not agree with Recommendation #41, system wide access to all records in CFSIS. Awasis does agree that agencies who hold the records of potential caregivers must provide information necessary to agencies who are assessing them. Agencies who do not have the records should not have to use their already stretched staff to try to find out historical information through CFSIS as it is not designed to readily provide that information.

Awasis has consistently worked in a collaborative manner throughout the many initiatives and provincial changes despite the funding shortfalls. We will continue to advocate for our First Nations children and families.

See the **RECOMMENDATIONS** section of the report for the responses received related to specific recommendations.

Responsibility for foster home management

THE DEPARTMENT

The child and family services (CFS) system aims to ensure that families and communities provide for the safety and well-being of their children. There are a number of provincial laws in place to help achieve this. Child and family services in Manitoba are governed by:

- *The Child and Family Services Act.*
- *The Child and Family Services Authorities Act (the CFSA Act).*
- *The Adoption Act.*

The Department of Families (the Department) is responsible for administering and enforcing provisions under these Acts.

Section 4(1) of *The Child and Family Services Act* sets out duties for the Director of CFS, which include:

- *Ensuring the development and establishment of standards of services and practices and procedures to be followed where services are provided to children and families.*
- *Ensuring the development of appropriate placement resources for children.*

The *CFSA Act*, proclaimed in 2003, established 4 CFS Authorities (the Authorities). This transferred some powers and duties of the Director of CFS to the CFS Authorities.

The CFS Division of the Department provides funding and oversight to the 4 CFS Authorities, and their 23 mandated CFS agencies (in this report, also referred to as internal agencies).

The Strategic Initiatives and Program Support branch of the CFS Division, is responsible for coordinating strategic initiatives and providing program and policy direction for the CFS system.

The Child Protection branch (the Branch) is responsible for administering centralized services such as provincial investigations and risk assessments, IT training for caseworkers, and provincial placement services.

THE CFS AUTHORITIES

The 4 CFS Authorities responsible for administering and providing child and family services are as follows:

- **First Nations of Northern Manitoba Child and Family Services Authority (Northern Authority)** oversees 7 agencies and generally serves people who are members of, or who identify with, northern First Nations. Manitoba Keewatinowi Okimakanak Inc. appoints the board of directors.
- **Metis Child and Family Services Authority (Metis Authority)** oversees 2 agencies and generally serves Métis and Inuit people or people who identify with them. The Manitoba Metis Federation Inc. appoints the board of directors.
- **Southern First Nations Network of Care (SFNNC)** oversees 10 agencies and generally serves people who are members of, or who identify with, the southern First Nations. Southern Chiefs' Organization Inc. appoints the board of directors.
- **General Child and Family Services Authority (General Authority)** oversees 4 agencies and serves all persons other than those receiving services from the other 3 Authorities. The Minister of the Department appoints the board of directors.

The CFS Authorities do not deliver services directly. They are responsible for oversight of their combined 23 mandated agencies. The Authorities mandate the agencies to deliver prevention, child protection (including foster care), and reunification services to children and families throughout Manitoba, including First Nations communities.

The CFS Authorities are not limited by geographic boundaries. Rather they are expected to provide services cohesively, to their specific population, throughout Manitoba. In Manitoba, families can choose which Authority to receive services from.

Section 19 of *The CFSA Act* sets out duties of Authorities, which include:

- Ensuring that culturally appropriate standards for services, practices and procedures are developed.
- Ensuring that its mandated agencies are following the practices and procedures in accordance with its standards.
- Ensuring the development of appropriate placement resources for children.

In June 2019 the federal government passed *An Act respecting First Nations, Inuit and Métis children, youth and families*. The Act affirms the rights and jurisdictions of Indigenous peoples in relation to child and family services and sets out principles applicable, on a national level, to the provision of child and family services in relation to Indigenous children, such as best interests of the child, cultural continuity and substantive equality. The Department advises they are currently developing plans for a path forward given the new legislation.

Foster home governing legislation and standards

Section 8(1) of *The Child and Family Services Act* states no person shall operate a foster home without a licence from an agency, issued in accordance with the legislation.

The Foster Homes Licensing Regulation under *The Child and Family Services Act* sets out standards for foster homes. Along with these standards, the Department sets out additional standards and guidelines in its Child and Family Services Standards Manual.

Children in care and placement types

Sometimes children are unable to remain in their family home and are taken into care. Children come into care either through a court order or on a voluntary basis with parental consent. The Department's 2017/18 Annual Report showed that as of March 31, 2018, there were 10,328 children in care in Manitoba. Eighty-seven per cent (87%) of these children were Indigenous.

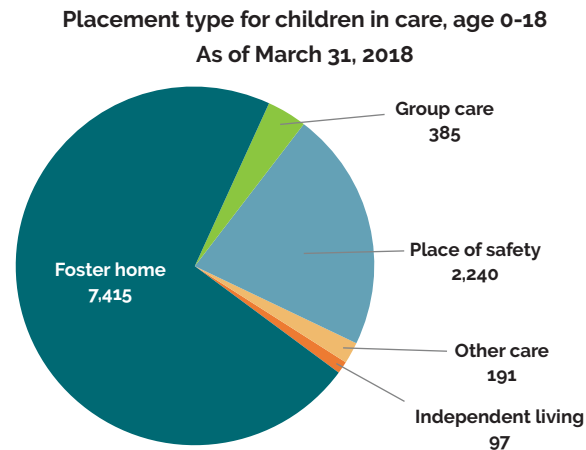
Children in care need a safe and supportive place to live. The best place for these children to live is with another family until they can be returned home, adopted (if re-unification is not an option), or they reach the age to live independently. As **FIGURE 1** shows, 9,655 (93%) of the 10,328 children in care were placed in home-like settings: either foster homes (7,415) or places of safety (2,240).

A **foster home** is a home, other than the home of the parent or guardian of a child, licensed by an agency to provide care and supervision of no more than four children in care (unless siblings), but not for the purposes of adoption.

A **place of safety** is a place (often a home) used for the emergency temporary care and protection of a child where the child often has a pre-existing relationship with the caregiver before being placed in the home (for example the home of the aunt of the child). Placements in these homes are not to exceed one month unless the caregiver applies for a foster home licence or guardianship.

The Department does not monitor the number of foster homes or places of safety in the province. In doing our audit we found that the 4 agencies in our scope had nearly 1,100 foster homes and 600 places of safety in total.

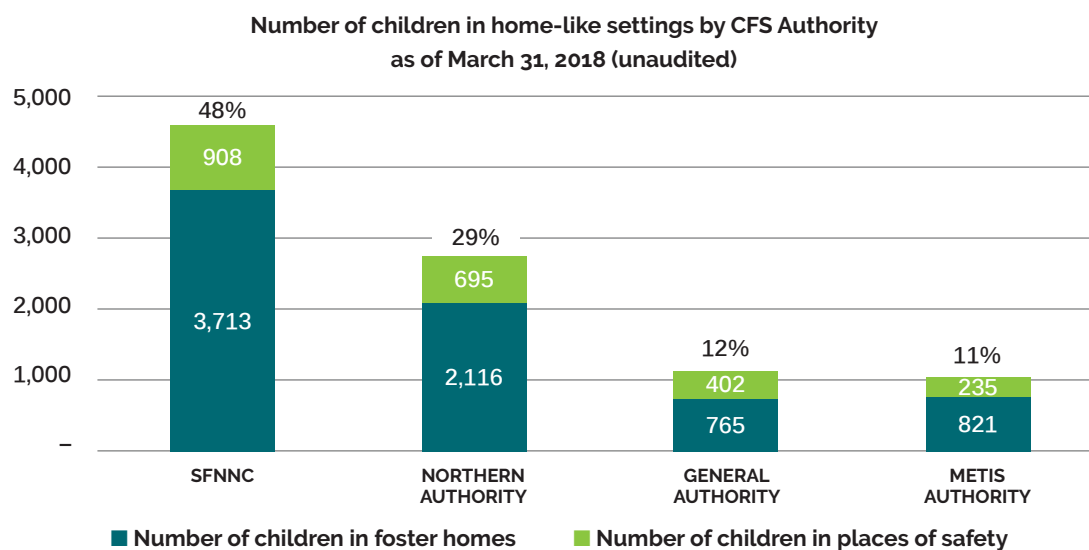
Figure 1: 93% of children in care in home-like settings—foster homes or places of safety



Source: Department of Families 2017/18 Annual Report (unaudited)

SFNNC has the most children in either foster homes or places of safety; the Metis Authority has the fewest. As **FIGURE 2** shows, there are over 4,600 children in home-like settings in SFNNC – roughly 48% of children in care in these home-like settings.

Figure 2: Nearly half of children placed in foster homes or places of safety are the responsibility of SFNNC



Source: The number of children in foster homes was obtained from the Department of Families 2017/18 Annual Report. The number of children in places of safety was obtained from the Department based on data self-reported by the agencies.

Types of foster homes

CFS Authorities mandate agencies to license foster homes under the Foster Homes Licensing Regulation. A foster home licence may include terms and conditions to restrict the children the licensee can care for, the agency the foster home can operate for, and how long placements should last, as follows:

- **Kinship foster homes** are licensed to care for a specific child, based on a family connection or relationship to the child: family ties, common ancestry, or community member.
- **Specialized foster homes** are developed to address specific needs of children in care. Examples are homes for large sibling groups and homes for children in care who have become mothers themselves. Another example is a treatment foster home for children with specialized behavioural or emotional needs, or cognition issues.
- **Respite foster homes** care for children for brief periods of time to give the regular foster parents a break.
- **Emergency foster homes** are intended to provide short-term care until a child can be reunited with his or her family or a longer-term placement can be found. Placement in these homes is not expected to last more than 30 days. There are 2 main types of emergency foster homes: those managed by mandated (internal) agencies, and those managed by external agencies.

In our audit we did not examine respite and emergency foster homes. See the **SCOPE AND APPROACH** section for a more detailed description of our audit scope.

Although all foster homes are licensed by agencies mandated by CFS Authorities, not all are managed by these agencies. Some foster homes are managed by external agencies as a third-party provider. External agencies may be not-for-profit or for-profit organizations and may provide a number of different services. Examples of external agency service providers are B&L Resources for Children and Ma Mawi Wi Chi Itata Centre.

Emergency foster homes vs. places of safety

Unlike emergency foster homes, places of safety are intended to be placements where the caregiver has a pre-existing relationship with the child. And place-of-safety placements commonly lead to the caregiver applying for a foster home licence or guardianship.

Coordination with the federal government

The provincial government is responsible for providing child and family services to all children and families in Manitoba, regardless of where they live – including on First Nations reserves. The federal government funds agency services for First Nations children and families who ordinarily reside on reserve. The provincial government funds these services for children and families off-reserve.

CFS Authority and agency funding

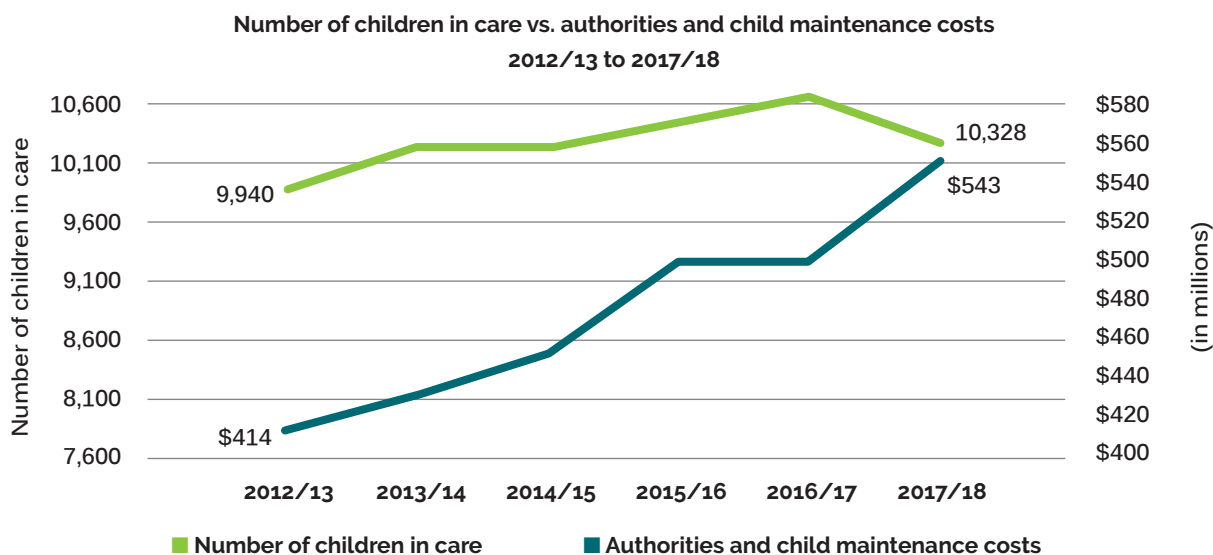
The Department is the sole funder of the 4 CFS Authorities. All provincial funding for agency operations flows from the Department to the CFS Authorities for allocation to their agencies.

Fifteen of the 23 mandated agencies are First Nations Child and Family Services Agencies (mandated by either Northern Authority or SFNNC). Each of these agencies receives 60% of their annual agency core funding from their CFS Authority, and 40% from the federal government. The remaining mandated agencies receive 100% of their annual core funding from their CFS Authority. Core funding includes funding for executive staff, operating costs, information technology, and training (but excludes salaries for social workers).

Child maintenance funding is paid to foster parents and caregivers for the care and supervision of children in care. The federal government is responsible for child maintenance funding for First Nations children whose parents or guardian ordinarily live on reserve. The Department is responsible for child maintenance of all other children in care. The provincial child maintenance cost for a child in a foster home (or place of safety) for one year ranges, with the minimum being approximately \$9,000 and the estimated average being over \$27,000.

The Department reported total expenditures in 2017/18 related to funding CFS Authorities and child maintenance as \$543 million. As **FIGURE 3** shows, this is up 31% from \$414 million in 2012/13. During the same time period, the number of children in care only increased by 4%, from 9,940 to 10,328.

Figure 3: Authorities and child maintenance costs increased by 31% while the number of children in care increased by 4%



Source: Department of Families Annual Reports

Staffing

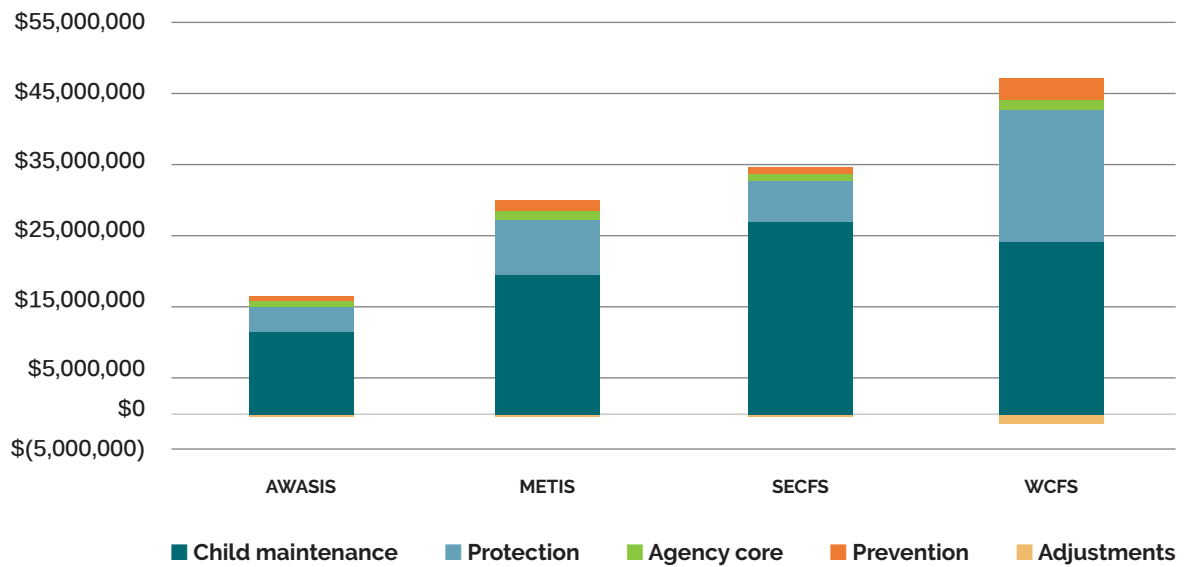
In 2017/18 there was a total of 1,600 provincially funded full-time equivalent (FTE) positions related to the Branch, CFS Authorities and mandated agencies. The Branch had 84 FTEs. The 4 CFS Authorities were funded for a total of 107 positions, and the 23 agencies were funded for a total of 1,409 positions.

There are 2 main workers that interact with foster homes (and places of safety) as follows:

- **Foster care workers** are responsible for licensing foster homes and supporting foster parents and place-of-safety caregivers. In some agencies these workers are called alternative care workers or kinship care workers.
- **Children's workers** (protection workers) are responsible for finding suitable placements for children in care as well as case planning and case managing for those children.

The 4 agencies in our scope were provincially funded for 483 positions, with nearly 80% of these positions relating to protection work. Protection work funding is based on case counts. As **FIGURE 4** shows, the majority of the provincial funding paid to the 4 agencies in 2017/18 was child maintenance funding.

Figure 4: Provincial funding, by type, to the 4 agencies for 2017/18



Source: Department of Families' 2017/18 funding spreadsheets and child maintenance data (unaudited)

Note: This figure excludes child maintenance funding paid to agencies for children in care in non-home-like settings.

Audit objective, scope and approach

Objective

Our objectives were to determine the adequacy of the systems and processes for:

- Funding foster home services.
- Ensuring compliance with foster home standards.

Scope and approach

We examined the operations of 4 CFS agencies, one from each CFS Authority, as follows:

CFS Agency	Related CFS Authority
Awasis Agency of Northern Manitoba (Awasis)	Northern Authority
Metis Child, Family and Community Services (Metis)	Metis Authority
Southeast Child and Family Services (SECFS)	Southern First Nations Network of Care
Winnipeg Child and Family Services (WCFS)	General Authority

We chose to examine these 4 agencies as they each had the most children (of the agencies within their Authority) in foster homes. We also examined the oversight and support provided by the Department and the 4 CFS Authorities related to foster homes services.

We did not examine respite and emergency foster homes or places of safety other than family residences. We also excluded an examination of special needs and exceptional circumstance funding.

The audit included review and analysis of legislation, policies and practices, information systems, records, reports, minutes, correspondence and practices in other jurisdictions. We interviewed staff from the Department, 4 CFS Authorities, 6 CFS agencies and various stakeholders. We also examined files from the 4 agencies: Awasis Agency of Northern Manitoba (Awasis), Metis Child, Family and Community Services (Metis), Southeast Child and Family Services (SECFS), and Winnipeg Child and Family Services (WCFS).

Our audit was primarily based on a random selection of files from the 4 agencies as follows (with additional file samples selected in specific areas as needed):

- 40 newly licensed foster home files (including externally managed homes).
- 75 re-licensed foster home files (including externally managed homes).
- 50 places of safety.
- Child maintenance special rate approvals and payments for 30 children in care.

In addition, we surveyed foster parents licensed by the 4 agencies to get their views on the support they receive from their foster care worker and agency. We used an external firm to administer and analyze the survey results. See **APPENDIX A** for a full discussion of survey methodology and results. Over 400 foster parents provided responses to our survey (38% response rate). We are pleased with this response rate and the interest taken by respondents to our survey. We appreciate the foster parents taking the time to provide us with their valuable input.

Criteria

To determine whether there are adequate systems and processes in place for funding foster home services, we used the following criteria:

Criteria
The agency funding model should support foster home management.
Child maintenance funding for foster parents should be adequate and equitable.

To determine whether there are adequate systems and processes in place to ensure compliance with foster home standards, we used the following criteria:

Criteria
Adequate foster home standards should be in place.
Adequate systems and processes should be in place for the screening, issuing, and renewing foster home licences.
Annual reviews, follow-ups, and complaint investigations should be thoroughly conducted and documented.
Adequate processes should be in place for the screening, approval, and monitoring of places of safety.
Adequate enforcement actions should be taken when non-compliance is noted.
A quality assurance review process should be in place for places of safety, licensing and complaint investigations.
Foster care workers should have appropriate qualifications and receive adequate training.
A database with complete and current information on foster homes should be maintained and used.
The Authorities and Department should work together to ensure an adequate foster home supply.

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Inadequate systems and processes to ensure sufficiency and appropriateness of funding for foster home services

The 23 mandated agencies that deliver foster home services in Manitoba receive annual core funding from the Department through their respective Child and Family Services (CFS) Authority. In our 2006 report, *Audit of the CFS Division Pre-Devolution Child In Care Process and Practices*, we concluded that the CFS funding model in place at that time did not ensure fair and equitable funding to agencies consistent with the expected services. We also found that the assumptions used for the model could not be fully explained. In 2010, the Department of Families (the Department) implemented a new funding model that was supposed to be in effect until 2015/16, but was in effect until April 1, 2019.

As detailed below, we continue to have many concerns with the funding model.

In 2017 the First Nations Child and Family Services Funding Model Working Group initiated a review of the CFS funding model. The group consists of representatives from Indigenous and Northern Affairs Canada, First Nations CFS Authorities and some of their agencies, and the Department. The working group engaged a University of Manitoba economics professor to conduct the review. The objective of the review was to evaluate alternative funding models and develop recommendations for a new funding model for First Nations Child and Family Services. With respect to foster home management the professor's analysis noted several shortfalls including "inadequate funding for recruitment and training of foster parents and alternative care (foster care) positions."

Funding changes underway

At the time of our audit, the Department provided core funding for the agencies to their respective CFS Authorities. The Authorities then generally passed on the same funding to each agency. The agencies made child maintenance payments to foster parents and then submitted monthly billings to the Department to recover these funds. While there were rules around what expenses the Department would pay for, there was no overall cap on the total child maintenance funds paid to agencies.

In 2017/18 the Department began piloting block funding to some agencies for child maintenance. Block funding provided set child maintenance funding to some agencies through a pre-determined budget. With this method, funding was no longer fixed to the number of children in care. The Department stated that this will allow agencies more flexibility on how this funding is spent, while staying within a fixed budget.

Single-envelope funding provides funding upfront, in one lump sum, for the recipient to manage.

In February 2019, the Province announced that as of April 2019 it would begin implementing single-envelope funding (referred to as block funding, in the announcement). With single-envelope funding, the Department will give one lump sum of funding to CFS Authorities. Upon receiving the single-envelope of funding, each CFS Authority will in turn determine how much funding to give each of its agencies, for their core operations and child

maintenance expenses, based on a three-year agreement. Department officials noted that the amount that will be provided to each CFS Authority still needs to be determined, but it is our understanding that amounts will be based on historical funding. We note the tight timelines between the announcement of single-envelope funding and the implementation date.

Our audit work on the core agency funding model and child maintenance funding model in place at the time of our audit is discussed in **SECTIONS 1 AND 2**. We believe our findings will continue to be relevant to the Department and CFS Authorities as they work towards implementing single-envelope funding for the agencies.

In the following sections, we identify concerns with systems and processes for funding foster home services:

- The funding model does not include funding for foster home case management (**SECTION 1**).
- Caregiver funding rates are not adequately supported (**SECTION 2**).
- Use of external agencies' foster home programs not sufficiently managed (**SECTION 3**).

1 Funding model does not include funding for foster home case management

Agencies are to comply with the Foster Homes Licensing Regulation, which includes standards for the licensing and case management of foster homes. But the agency funding model does not include a component for foster home case management. To comply with the standards, agencies must finance this work using funds (either from the federal or provincial government) designated for other purposes. Segregating foster home case management would promote greater transparency regarding the intended use of agency funding amounts.

Between July 1, 2016 and June 30, 2017 there were 69 staff in the 4 agencies we examined, who were for a period of time during the year responsible for the licensing and case management of nearly 1,100 foster homes. SECFS management estimated that it spends over \$1 million per year on salaries for foster care workers managing off-reserve foster homes.



Recommendation 1

We recommend that the Department, in determining funding allocations for CFS Authorities, explicitly include costed resources for foster home case management.

As there is no separate funding component for foster home case management, we sought to assess whether the agency funding model properly supported agency core operations including foster home case management (core funding does not include child maintenance – see **SECTION 2**).

We found a number of issues as follows:

- Assumptions used to set core funding amounts were unexplained, with some agencies twice the size of others receiving the same core funding.
- Worker caseload assumptions used in the funding model to determine child protection staffing levels were unsupported; actual caseloads were higher than the assumptions used.
- The bases for incremental funding for northern and remote agencies not fully explained.
- WCFS was funded for higher salaries than the other 3 agencies, which may lead to inequities.

Details of these findings are discussed below.

ASSUMPTIONS USED TO SET CORE FUNDING UNEXPLAINED, AND MAY NOT ENSURE APPROPRIATE FUNDING

The funding model classified each agency as either small, medium, or large. An agency's assigned size drives the amount of funding provided for core staff positions, benefits and operating costs. The Department assigned sizes to each agency in 2010 based on 3 criteria: staffing (number of full-time equivalent positions), child population (0-18 population served), and caseload data (the number of active cases – both children in care and families). The Department was unable to provide evidence for how the agency size classification criteria were set or for how the related amount of resources (e.g. number of staff positions) were set. For example, no support was available to show how it was determined that a small agency, defined as having less than 500 cases and receiving funding for 10 core staff, was sufficiently funded.

FIGURE 5 shows the thresholds used to place agencies in the size categories and the number of related funded core staff positions. Agency size classifications have not been reassessed since 2010. Agency sizes may have since changed.

Figure 5: Agency size funding criteria and the number of funded core positions

Agency size category	Number of staff (FTEs)	Population served (age 0-18)	Number of open cases	Number of funded core positions
Small	less than 60	less than 1,500	less than 500	10
Medium	60-100	1,500-2,999	500-699	11
Large	100+	3,000+	700+	15

Source: Manitoba Child & Family Services Funding: An Explanatory Guide

As **FIGURE 5** shows, any agency with more than 700 cases was considered a large agency and funded accordingly. This results in an agency with 701 cases being funded the same as an agency with 1,500 cases. This points to a need for a review of the size categories and related criteria to ensure the allotted resources match the workloads of agencies.

WORKER CASELOAD ASSUMPTIONS UNSUPPORTED; ACTUAL CASELOADS WERE HIGHER

Child protection staff funding is set out in the funding model as one worker for every 25 open children in care cases, and one for every 25 open protective family cases. Child protection staff provide case management services for children in care and families. The Department said this ratio was set based on child welfare research and past recommendations. The Phoenix Sinclair Inquiry recommended in 2013 that funding allow agencies to meet the caseload ratio of 20 cases per worker for all family services workers, not 25.

Some agencies' management said funding designated for protection staff is used instead to fund foster care workers—resulting in higher caseloads for protection staff than the 1:25 ratio noted in the funding formula. Given this, we examined caseload data for both protection staff and foster care workers at the 4 agencies. We found that, 3 agencies' average caseloads for protection workers exceeded the ratio of 1:25. Caseloads at that point went as high as 1:78 in Awasis. It was not clear whether the 1:20 ratio recommended in the Phoenix Sinclair Inquiry or the 1:25 ratio in the funding model applied to foster care workers. We noted that at that point the number of foster homes on a worker's caseload exceeded the 1:20 ratio in all 4 agencies and the 1:25 ratio in 3 of the 4 agencies, with the maximum caseload being 1:105 in SECFS.

We examined the Department's 2017/18 agency funding calculations for the 4 agencies. These calculations use case counts to determine, among other things, the number of protection workers and related supervisor positions to fund. We found evidence to support the case counts the Department used in its 2017/18 funding calculations for Awasis and SECFS, and evidence for the case counts supporting the majority of the funding for Metis Agency and WCFS. The Department uses case counts

from March 31st of the prior year (2016) to calculate the next year's (2017/18) funding. Metis Agency management noted that using old statistics when the number of cases is increasing results in challenges.

BASES FOR INCREMENTAL FUNDING FOR NORTHERN AND REMOTE AGENCIES NOT FULLY EXPLAINED

For agencies north of the 53rd parallel, and for agencies operating in southern remote and isolated communities, the funding model sets additional funding at 5% of funded salaries, benefits and operating costs. Department officials said the increase of 5% was determined through union contracts, and noted the federal government has similar parameters. The review of the CFS funding model, initiated by the First Nations CFS Funding Model Working Group, found that this 5% allowance was deficient for many agencies, especially up North. This concern was echoed by staff of Northern Authority and Awasis. The Department was unable to demonstrate that analyses had been done to assess whether this incremental funding was sufficient.

The Northern Authority also noted that the funding model does not take into action the higher operating costs incurred by agencies operating in multiple communities.

WCFS FUNDED FOR HIGHER SALARIES THAN THE OTHER 3 AGENCIES, WHICH MAY LEAD TO INEQUITIES

We examined the 2017/18 funding for the 4 agencies in our audit scope and found the salary rates used for funding WCFS positions were higher than the salary rates used for the other 3 agencies. This resulted in incremental funding of over \$650,000 or 3% to WCFS. The different salary rates were used for WCFS because this agency, unlike the other 3, is part of the Department and therefore its staff must be paid in accordance with the Manitoba Government Employees' Union collective agreement. We note that although WCFS received additional funding for higher salary rates, being part of the Department it had funding reductions of \$1.4 million in 2017/18 that the other agencies did not have. Our primary concern is that funding agencies at different salary rates for the same positions without proper justification can lead to inequities between agencies and unfair competition when trying to hire staff.

Department staff noted that agencies are independent and can make salary decisions. This has led to a lack of standardization of actual salary rates. They added that the resulting staff turnover has historically negatively impacted child and family services.



Recommendation 2

We recommend that the Department, in collaboration with the CFS Authorities, promptly and every 3 to 5 years thereafter, review the CFS funding assumptions, base amounts and calculations, and make the necessary changes to ensure a fair and equitable funding approach for agencies.

2 Caregiver funding rates not adequately supported

Agencies provide funding to foster parents and place-of-safety caregivers (both referred to in this report as caregivers) for the care and supervision of the children placed in their care. There are many components to this funding, but the main pieces are basic maintenance and special rates.

Basic maintenance provides for the everyday care of a child. It is intended to cover the basic costs of living such as food, clothing, transportation, health and personal care. It has 2 pieces: the first is the rate paid directly to foster parents to cover the above noted expenses. The second is the agency allowance. The agency allowance is intended to cover the cost of gifts, education (including school supplies) and sports/recreation. It is paid either directly to foster parents or to the agency to manage as a pool of funds for the children in care.

Child maintenance funding

provides for the care and supervision of children placed in care. The 2 main pieces are:

1. **Basic maintenance** is intended to cover the basic costs of caring for a child. It includes the:
 - a. Rate paid directly to caregivers (for food, clothing, transportation, personal care etc.).
 - b. Agency allowance (cover gifts, education, sports/rec).
2. **Special rates** are intended to support caregivers of children with additional needs. Special rates include one or more of the following:
 - a. Service fees paid to caregivers.
 - b. Respite fees incurred by the caregiver.
 - c. Support worker fees for services provided to the caregiver.

Special rates may also be paid to caregivers, in addition to basic maintenance, when an assessment shows the needs of the child are beyond those deemed age-appropriate. Special rates include one or more of the following fees: service fees, respite fees and support worker fees. Together these three fees make up a child's special rate.

A **service fee** (sometimes called a fee-for-service) is paid directly to the caregiver in recognition of additional time and services they provide and does not relate to any direct costs incurred by the caregiver. Payments for respite and support worker services may also be made to support the care of these children. Respite allows caregivers short amounts of time away from the day-to-day care of the children placed in their home. Support workers work alongside foster parents, either by assisting them or by working one-on-one with a child. Examples of support they might provide are behaviour management, medical intervention and occupational speech therapy.

We analyzed the provincial child maintenance billings data related to foster homes and places of safety for the year ended March 31, 2018. As **FIGURE 6** shows, we found that basic maintenance makes up the largest single portion of expenses at 32%, but that service fees follow closely at 30%. Together the service fees, respite, and support were 49% of expenses, showing that special rates are a significant cost to the system.

**Figure 6: Child maintenance expenses related to foster homes and places of safety
Year ended March 31, 2018 (unaudited)**

	Basic maintenance	Service fee	Respite	Support	Other	Total
Total (millions)	\$68	\$64	\$30	\$9	\$41	\$212
Per cent	32%	30%	14%	5%	19%	100%

Source: Department of Families' data (unaudited)

Note: This table excludes expenses related to the Interlake, Parkland and Northern regions of the Rural and Northern services of the General Authority. The total of these expenses is estimated to be less than \$1 million.

Following our detailed audit work the Department issued a directive effective December 2018 placing special rates on hold and revising the approval process required for these rates. The findings in this section are based on our audit before these changes were put in place.

In examining the child maintenance funding model and related agency approval and payment processes, we found:

- The rationale for the basic maintenance rates were unknown, with rates unchanged since 2012 (**SECTION 2.1**).
- Special rates were not set consistently within or across agencies, with approved rates often unsupported (**SECTION 2.2**).
- Child maintenance payments were accurate and timely with some exceptions (**SECTION 2.3**).

Details of these findings are discussed below.

2.1 Rationale for basic maintenance rates unknown, with rates unchanged since 2012

The Department sets the basic maintenance rates paid to caregivers. As shown in **FIGURE 7**, the rate paid differs based on the age of the child and the geographic location of the caregiver. The rate is higher for children over age 10 and for caregivers living north of the 53rd parallel. The latter is to recognize the higher living costs in remote areas.

Figure 7: Basic maintenance rates						
	South of 53rd parallel		North of 53rd (road access)		North of 53rd (no road access)	
	Age of children					
	0-10	11-17	0-10	11-17	0-10	11-17
Daily rate ^	\$22.11	\$27.45	\$23.60	\$29.29	\$26.14	\$32.50
Monthly rate*	\$ 746	\$ 909	\$ 793	\$ 966	\$ 871	\$ 1,064

Source: Department of Families Chart of Accounts

^ Rates exclude the Agency Allowance, but include the Northern Food Allowance (North of the 53rd).

* Rates include the Agency Allowance and the Northern Food Allowance (North of the 53rd).

In reviewing the basic maintenance rates we found:

- No assessment had been done to support the adequacy of basic maintenance rates.
- No assessment had been done to support the adequacy of northern and remote rates.

Details of these findings are discussed below.

NO ASSESSMENT TO SUPPORT ADEQUACY OF BASIC MAINTENANCE RATES

The basic maintenance rates were first developed prior to 1997 with increases occurring since on an ad hoc basis. The rates have not changed since October 1, 2012. Since then, inflation has occurred in Manitoba at an accumulated rate of 13.6% up to July 2019.

Department, CFS Authority and agency officials expressed concerns that the basic maintenance rates do not adequately compensate foster parents for the costs of caring for children. This was noted by some officials as one of the key risks or challenges facing foster care. Some agency and Authority officials suspected that service fees were used to supplement basic maintenance rates to satisfy foster parents requests. See **SECTION 2.2** for a discussion of special rates, including service fees.

Despite concerns that basic maintenance rates were too low, neither the Department, CFS Authorities nor agencies had done detailed analyses to assess the sufficiency of the rates. We compared basic maintenance rates across Canada to Manitoba's rates (excluding the agency allowance). We obtained rates from the 9 other provinces. Although there may be variations in what items provinces include in payments to foster parents, we found that Manitoba's basic maintenance rates were either the lowest, or 2nd lowest among provinces for all ages of children (except age 11). Generally speaking, Manitoba's regular daily rate of \$22.11 for children under age 11 was second lowest among provinces (with a range of \$20.37 to \$34.88). For children 11 and older, Manitoba's regular daily rate of \$27.45 was also second lowest (with a range of \$23.28 to \$41.82).

Our survey of foster parents indicates they perceive the basic maintenance as insufficient.

- *Only 36% of respondents strongly or moderately agreed with the statement, "The basic maintenance rate I receive is enough to meet the needs of the child(ren) in my care." And 51% strongly or moderately disagreed with the statement.*
- *Respondents expressed concerns that the current compensation does not cover the basic costs of caring for children and fostering can be unaffordable for people.*

Based on the above, there is strong evidence of the need to assess the adequacy of the basic maintenance rates.

NO ASSESSMENT TO SUPPORT ADEQUACY OF NORTHERN AND REMOTE RATES

Manitoba increases the daily basic maintenance rate by 7% for foster parents living north of the 53rd parallel (with road access) and by 18% for foster parents living north of the 53rd parallel, east of Lake Winnipeg (with no road access). Northern Authority and Awasis staff said the higher costs of northern living are not adequately accounted for in these rate increases. But no recent analysis had been done by the Department, CFS Authorities or agencies to assess the adequacy of these rate increases.

We noted an article published online in 2014 by Food Matters Manitoba (a charity that partners with communities to increase access to nutritious food) reported that remote community residents of Lac Brochet and Shamattawa were paying more than double what Winnipeggers pay for food. The cost for a nutritious food basket for a family of 4 was reported as \$187 in Winnipeg, \$411 in Lac Brochet (120% more) and \$448 in Shamattawa (140% more). Yet, we note that the increase to the food portion of the basic maintenance rate was only 85% for these remote communities.

We also checked if other provinces paid a higher rate to foster parents located in northern or remote communities, and if so, how the increase compared to that in Manitoba. We found that Saskatchewan and Newfoundland increased their rates for northern or remote communities.

- Saskatchewan's rate increase was greater than Manitoba's for northern communities with road access, but less than Manitoba's increase for northern communities with no road access.
- Newfoundland's rate increase for remote communities was higher than Manitoba's.
- In the 7 other provinces, some or all of the regular rates were higher than Manitoba's northern/remote rates.

Based on the above, there is strong evidence of the need to assess the adequacy of the increase to the basic maintenance rates for foster parents in northern/remote communities.



Recommendation 3

We recommend that the Department promptly, and regularly thereafter, review the basic maintenance rates to ensure the rates cover the costs incurred by foster parents and place-of-safety caregivers.

2.2 Special rates funding set inconsistently within and across agencies

In addition to the basic maintenance rate, it is common for foster parents to receive additional funding referred to as special rates. Special rates may include service fees, respite fees and support worker fees. Service fees make up the largest portion of special rates paid. In 2017/18, the Department reported that 73% of the days paid to support children in care included a service fee.

In our 2006 CFS audit report, we noted that agencies were using different needs assessment tools for setting service fees (fee-for-service) and that service fees were not consistent between agencies. We recommended that CFS Authorities, in collaboration with the Department and their mandated agencies, develop a standardized needs assessment scoring tool for province-wide use. Our 2012 follow-up report noted that this recommendation had not been implemented. At the time, the Department and CFS Authorities had established a working group tasked, in part, with addressing this recommendation. This work was expected to be completed by January 2013. Unfortunately our audit findings show the same issues remain today.

In examining special rates we found:

- Each agency we examined used a unique needs assessment process to determine service fees.
- Children's assessed needs and related fees were not fully justified, leading to inconsistent services fees for children assessed as having similar needs.
- A lack of guidance for setting respite and support hours and rates; we found there was often no justification for hours or rates approved.
- Special rates were initially properly approved, but not annually thereafter.

EACH AGENCY USED A UNIQUE NEEDS ASSESSMENT PROCESS TO DETERMINE SERVICE FEES

The Department does not set service fees, but rather provides some guidance to agencies to help them set appropriate service fees. According to Department policy, service fee amounts should be based on the child's level of need and the foster parent's ability to meet those needs.

Assessment methods

In 2004, the Department developed an assessment tool called the Child Assessment Format (CAF) for agencies to use to determine a child's level of need. The CAF produces an overall score, which is then to be used to set the level of need. The possible levels range from 1-5 (with an increasing level of need). For each level, there is a range of scores assigned (for example, a total score of 36 equates to level 4 as scores of 35-43 are level 4). Agencies are only required to use this assessment tool when requesting level 5 funding (and therefore requiring Department approval). In examining agency practices, we found that the CAF tool was only used by agencies for some level 5 funding requests, and not at all for lower level requests. Department staff were aware agencies were not using the CAF for lower levels and noted flaws in its design likely impacting its uptake.

As **FIGURE 8** shows, each of the 4 agencies we examined had developed their own unique method of assessing children's needs.

Figure 8: Agencies had each developed their own method of assessing needs	
Agency	Method of assessing children's needs
Awasis	A unique assessment tool, other than the CAF, generates a score. For scores below level 4+, this score directly links to a set service fee.
Metis	For children placed in general and kinship homes, a unique assessment tool, other than the CAF, is used to generate a score. For children in specialized homes (typically level 4 or 4+), a narrative is prepared with no set format and no score.
SECFS	A unique assessment tool is used to generate a service fee. No score or level of need (e.g. level 3) is generated.
WCFS	For children placed in general and kinship homes, a unique assessment tool, other than the CAF, is used to generate a score. For children in specialized homes (typically level 4 or 4+), a narrative is prepared with no set format and no score.

Source: Awasis, Metis, SECFS, and WCFS documents and policies.

With agencies using differing methods of assessing children's needs, different agencies could assess children with the same needs differently, potentially resulting in inconsistent service fees.

Determining service fees

Once a child's needs have been assessed, a service fee needs to be set. The Department did not issue guidance on setting the service fee. But in its 2017/18 annual report, the Department articulated upper limits for each level of need. As **FIGURE 9** shows, the Department's expectation for a child with level 4 needs, for example, is that the service fee could be anywhere from \$19.84 to \$45.43 per day.

Figure 9: Service fee expectations and CAF scoring ranges		
Level of Need	Service fee expectation	CAF score range
Level 1	Basic maintenance rate (BMR) only (no service fee)	1-16
Level 2	BMR plus up to \$5.34 per day	17-25
Level 3	BMR plus up to \$19.83 per day	26-34
Level 4	BMR plus up to \$45.43 per day (in the south)	35-43
Level 4+	BMR plus up to \$90 per day	44+
Level 5	No specified limit – to be set on a case-by-case basis with CFS Authority and Department approval	N/A

Source: Department of Families 2017/18 Annual Report and the Child Assessment Format

Despite these expectations, agencies (together with their respective CFS Authority) are free to set initial service fees for each child as they choose, within the upper limit of \$90 per day, before requiring Department approval. It is not clear why the Department did not extend its guidance on service fees to the specific scores within each level of need range.

CHILDREN'S ASSESSED NEEDS AND RELATED FEES WERE NOT FULLY JUSTIFIED, LEADING TO INCONSISTENT SERVICE FEES

Without Departmental guidance to set service fees using the CAF scoring system, service fees can range significantly for children assessed at the same score and need level (both within an agency and across agencies).

Lack of support for assessed needs

We examined the supporting documentation for the special rates (including service fees) approved for a sample of 30 children in care. We found a completed assessment form, which properly justified the additional service needs, in only 12 of these cases. In the remaining files the information to support the assessed needs was limited or weak. Examples include:

- In 7 cases, assessment forms were not used to determine a child's needs.
 - In one of these cases, an adult in care (on an extension of care), file documentation noted that the person was functioning age-appropriately in most tasks, had maintained part-time employment, and had attended university. The foster parent was paid a service fee of \$45 per day for this adult.
- One child was assessed as having special hygiene needs but elsewhere in the file the child's hygiene was noted as age appropriate. The same child was assessed as having level 4 needs, and approved for a service fee of \$42 per day yet other documentation in the file stated the child "has no medical issues, no mental health issues and no behavioural issues."
- Comments to justify increased service needs sometimes described foster parent responsibilities that were basic expectations for all caregivers outlined in the Department's Foster Parent Handbook. For example, workers gave special needs points for foster parents assisting with visits between the child and their biological family, and assisting with participation in cultural activities. However, both of these were described as basic foster parent responsibilities in the handbook.

Inconsistent service fees across agencies and a lack of support for fees

In examining the 30 files we found that the service fees approved for the same level of need ranged significantly, often with minimal or no justification. Service fees approved by agencies for children with level 4+ needs ranged from \$45 to \$89 per day (equal to payments to foster parents of \$16,425 to \$32,485 per year). This broad range heightens the need to ensure rates are justified and applied consistently. Examples of inconsistencies we found within agencies are as follows:

- Two needs assessments with identical scores for children in the same foster home resulted in different service fees paid to the foster parent: \$45 versus \$41 per day.
- One child whose needs were scored 63 had an approved service fee of \$89 per day. Another child whose needs were scored higher at 69 had an approved service fee of \$50—44% lower.

As well as inconsistencies, we also found that the service fee approved was sometimes unsupported. In two of the files examined the approved service fee was above the acceptable range given the assessed level of need. In another case, the calculated service fee on the assessment form was \$13 per day yet the approved fee was \$60 per day, with no documented explanation.

We noted that the current process for setting service fees could easily be manipulated by workers to get a specific rate. For example, one foster care worker documented in the foster home file that they would look into obtaining a higher service fee to help the foster parent cover the costs of a much more expensive house the foster parent planned to move to. Manipulation is possible, in part, because supporting documentation is not required when requesting a service fee for a child below level 5. Several agency, CFS Authority and Department staff expressed concerns that approved rates may sometimes reflect the demands of foster parents rather than the needs of the child. And rates may be driven up by competition between agencies for foster home beds. Some agencies expressed concerns that not meeting demands for higher rates has caused foster homes to seek licensing by a competing agency.

Despite these concerns regarding inflated rates, our survey of foster parents indicates their perception is that the service fees received are insufficient and that rates were inconsistent.

- Only 36% of respondents strongly or moderately agreed with the statement, "The service fee amount I receive is enough to meet the needs of the child(ren) in my care" and 46% strongly or moderately disagreed.
- Some respondents also commented that they wanted standardized rates and consistent rules across agencies. There were perceptions that foster parents were being treated inconsistently.

Full and proper implementation of **RECOMMENDATIONS 4** and **5** would help resolve the above noted issues.

LACK OF GUIDANCE FOR SETTING RESPITE AND SUPPORT HOURS AND RATES, WITH OFTEN NO JUSTIFICATION FOR HOURS OR RATES APPROVED

In addition to service fees, costs related to respite and support worker hours may be included in a child's special rate. Respite allows caregivers short amounts of time away from the day-to-day care of the children placed in their home. Support workers work alongside foster parents, either by assisting them or by working one-on-one with a child. Examples of support they might provide are behaviour management, medical intervention and occupational speech therapy.

All foster parents receive some funding for respite as part of their basic maintenance (about \$70 per month). Department policy allows agencies to approve more respite for a child. In our survey of foster parents, 89% of respondents reported receiving respite payments (beyond that included in the basic maintenance).

Guidance

There is very limited guidance to help agencies determine the appropriate number of respite or support worker hours to approve for a child given their level of need, or the appropriate hourly rate for each required service. Department policy only specifies the maximum hourly rate of pay: \$15 per hour for respite and \$23 for support workers. The agency decides the initial number of hours of support and respite to provide, if any, and the rates per hour. Only Metis Agency had respite guidelines to supplement Department policy. These guidelines set the hourly rates that should be paid to respite providers based on the number of children being cared for and the needs of the children (for example, \$10 per hour for one child with low to moderate needs). They did not develop guidance for how many hours to approve.

Our survey of foster parents indicates less than half of respondents believe they receive enough respite.

- 48% of respondents strongly or moderately agreed with the statement, "I receive enough respite hours for my needs," while 35% strongly or moderately disagreed with this statement.
- Many foster parents commented on the need for increased respite support and help with finding appropriate respite providers. They spoke of the rewards of fostering but also its demands and the potential for burnout without proper relief or supports.

Rationale for hours approved

Of the 30 files examined, 26 had respite and 12 had support hours approved. In most cases, the worker had not documented a rationale for the amount of hours (or rate) requested. The hours approved per child varied significantly (from 5 to 48 hours per week for respite and 3 to 29 hours for support). Most in

our sample were approved for around 15 hours of each respite and support (30 hours in total). Examples of respite or support hours approved with no rationale are as follows:

- One foster parent with 5 school-age children had \$240 per day approved for respite (or 112 hours per week) and \$252 per day for support workers (113 hours per week). We noted that this foster parent was also paid nearly \$392 per day (the equivalent of over \$143,000 per year, tax-free) in basic maintenance and service fees to care for these 5 children. In this situation the overall cost to the Province (including all fees) is over \$322,000 per year. We did not find adequate justification for the service fees, respite or support payments. Such high fees heighten the importance of proper justification.
- A retired foster parent caring for 3 school-age children was approved for 75 hours of respite per week. File documentation described one of the children (approved for 35 hours) as having special needs, but none were noted for the other 2 children.

In all cases where the hourly rate approved was documented, the rate was within the limit set in policy (\$15 per hour for respite and \$23 for support).



Recommendation 4

We recommend that the CFS Authorities and the Department, in collaboration with the agencies, periodically review and update as necessary the Department's needs assessment scoring tool (the CAF) and special rate setting process, to ensure a robust, culturally appropriate province-wide process. We further recommend that the Department provide related training and support. A robust needs assessment scoring tool and special rate setting process would:

- Link the score resulting from the assessment tool directly to a service fee.
- Consider the skills, abilities, and needs of foster parents to meet the child's assessed needs (including assessing the need for respite and support).
- Capture all of the child's relevant needs.
- Require documentation and justification of any respite and support hours approved.



Recommendation 5

We recommend that the CFS Authorities and the Department enforce and monitor the use of a province-wide standardized needs assessment tool.



Recommendation 6

We recommend that the Department set parameters around the maximum number of respite and support hours per child, based on level of need.

SPECIAL RATES INITIALLY PROPERLY APPROVED, BUT NOT ANNUALLY THEREAFTER

According to Department policy, initial special rates need to be reviewed as laid out in **FIGURE 10** below, and approved annually thereafter.

Figure 10: Levels of approval required for initial special rates and service fees			
	Authorizing body		
Special rate item requiring approval	Agency	CFS Authority	Department
Service fee less than \$45.43	✓		
Service fee between \$45.43 and \$90		✓	
Service fee more than \$90		✓	✓
Total special rate more than \$200*			✓

Source: Department of Families' policy

* Following our detailed audit work the Department issued a directive in December 2018 requiring Department approval for all special rates more than \$130.

There was no guidance on required approvals for respite and support worker fees (other than the \$200 special rate threshold).

In 29 of the 30 files examined, we found the agencies had obtained the appropriate approval for the special rate.

While Department policy requires annual review and approval of special rates, in the sample of files examined, only one of the agencies consistently approved rates for one year or less. For the other agencies, we noted that the terms special rates were approved for varied in length.

- One agency approved rates for terms ranging from one to 13 years (typically until the child would reach 18 years of age).
- 2 agencies did not consistently set expiry dates for rates.

We found that even when end dates were in place, approval for a number of rates had expired. Management at two agencies received direction from their CFS Authority that special rates did not need to be end-dated (and therefore did not need re-approval annually). As noted in the Department's policy requiring annual reviews of special rates, the needs of a child vary over time thereby needing to be reassessed.



Recommendation 7

We recommend that the Department monitor and enforce compliance with its policy for the annual review and approval of special rates by agencies and CFS Authorities.

2.3 Child maintenance payments accurate and timely with some exceptions

For the same sample of 30 files, we examined evidence of payments made to the foster parents for 6 months. We checked whether the service fee and basic maintenance payments to foster parents were at the approved rate, and whether the payments were made on time. We found that the correct amounts were paid in 28 cases. Details of the 2 exceptions are as follows:

- An overpayment of nearly \$14,000 was made to a foster parent by SECFS because a child in care left the foster home but the finance department of the agency was not notified for over 8 months. This overpayment was subsequently recouped from the foster parents.
- An overpayment of nearly \$4,000 was made to a foster parent by Awasis when a child in care went missing from the home but the foster parent continued to be paid for their care for 34 days without the proper approval. The agency did not view this as an overpayment so the funds were not recouped.

We also examined a sample of respite claims and payments. We found that for 11 of 12 files with respite claims, agencies paid the respite at a rate within the maximum allowed in policy. In the one other case, a foster parent was claiming respite hours at a rate equal to \$36 per hour. This respite provider was caring for 3 children in care, in one home, at the same time for \$12 per hour per child. This practice is not allowed. The maximum amount a respite worker can be paid is \$15 per hour, regardless of how many children they are caring for (although the latter was not explicitly stated in policy).

Other issues we noted during our examination of respite payments were:

- Metis agency approved respite being provided by another child in care in the home. This respite provider was age 17 (when respite providers are required to be 18 or older) and was noted by the agency as struggling with alcohol and drug use at the time.
- One person interviewed expressed concerns about children in care being left with respite providers

while their foster family attends Christmas celebrations. When examining respite claims, we noted a few cases where children were being left with respite providers for long periods on Christmas Day. There is no policy disallowing this, but this may be an opportunity for foster care workers to work with caregivers to ensure they are planning the holiday season with sensitivity to the children's feelings and needs.

In general, basic maintenance, service fee and respite payments were timely. We noted 2 cases in Awasis where large back-payments of service fees were paid to foster parents due to the special rate approval process taking time. In fact, in one of these cases the foster parent was not actually paid the service fees until 6 months after the placement had ended. There were also a few cases where respite payments took more than a month to be paid. Respite payments are likely less timely because they require more processing time since agencies only pay respite after foster parents submit claims.

Our survey of foster parents indicates they believe they generally receive their payments on time and for the correct amount, but to a lesser degree for service fee and respite payments.

- *The proportion of respondents that said they receive their basic maintenance, service fee, and respite payments always or often on time were 93%, 82%, and 78% respectively.*
- *The proportion of respondents that said the basic maintenance, service fee, and respite payments they receive were always or often for the correct amount were 90%, 81%, and 81% respectively.*

3 Use of external agencies' foster home programs not sufficiently managed

In addition to the foster homes licensed and managed by the 23 agencies mandated by the CFS Authorities, there are several specialized foster homes licensed by mandated agencies, but managed by an external agency. There are 8 external (non-mandated) agencies that provide specialized foster home programs for children in care (e.g. B&L Resources for Children, New Directions, and Knowles). These programs are expected to offer services over and above those directly provided by internal specialized foster homes. Services offered can include case managing, therapeutic programming, and access to therapists, psychologists and psychiatric consultation.

We identified the following concerns regarding the use of external agencies' foster home programs:

- Service purchase agreements for the management of specialized foster home programs were not in place with 4 of the 8 external agencies.
- The Provincial Placement Desk only makes referrals to external agency foster home programs with a service purchase agreement.
- There are gaps in how well placements are made to external agencies with no service purchase agreement.
- There was limited justification for the higher daily rates paid for foster homes managed by external agencies, when compared to rates for internally managed foster homes.
- External agencies are explicitly funded for foster home case management, unlike internal agencies.

Specialized foster homes are developed to address specific needs of children in care. Examples are homes for large sibling groups and homes for children in care who have become mothers themselves. Another example is a treatment foster home for children with specialized behavioural or emotional needs, or cognition issues.

Details of these findings are discussed below.

SERVICE PURCHASE AGREEMENTS FOR THE MANAGEMENT OF SPECIALIZED FOSTER HOME PROGRAMS WERE NOT IN PLACE WITH MANY EXTERNAL AGENCIES

The Department did not have service purchase agreements for the management of specialized foster home programs with 4 of the 8 external agencies managing these programs. (One of these agencies was a for-profit organization.) We note that the 4 existing agreements expired in March 2016 or earlier, but the Department and external agencies agreed to continue following them. According to Department officials, there were challenges renegotiating the agreements.

Given the new single-envelope funding approach that is being implemented, which places an increased level of responsibility on the CFS Authorities, going forward it may be appropriate for the service purchase agreements to be with the CFS Authorities rather than the Department.



Recommendation 8

We recommend that the Department, in consultation with the CFS Authorities, enter into service purchase agreements with all provincially funded external agencies providing foster home services and that these agreements clearly define:

- Service and program result expectations.
- Reporting requirements for services provided and the results achieved.

PROVINCIAL PLACEMENT DESK ONLY MAKES REFERRALS TO EXTERNAL AGENCY FOSTER HOME PROGRAMS WITH A SERVICE PURCHASE AGREEMENT

Three of the 4 existing service purchase agreements with external agencies require that referrals into external agency specialized foster home programs beds be made by the Provincial Placement Desk. The Placement Desk, which is managed by the Department, assists internal agencies with placing children with higher needs into these specialized foster home programs. The Department pays an admin fee to the external agencies for each child placed in these specialized foster homes. The admin fees ranged from \$24 to \$48 per day per bed. In addition to the admin fee, for each child placed in these beds the internal agency would pay the basic maintenance rate as well as the child's special rate. According to Department officials, children referred to these specialized foster home programs through the Placement Desk should be assessed as having level 4 or 5 needs.

Of particular note is that the Placement Desk only makes referrals to specialized foster homes managed by external agencies that have a related service purchase agreement. There was no rationale for this limited use of the Placement Desk.

GAPS IN HOW WELL PLACEMENTS ARE MADE TO EXTERNAL AGENCIES WITH NO SERVICE PURCHASE AGREEMENT

External agencies without service purchase agreements, and one agency with an agreement, can directly accept placement requests from an internal agency. For these direct placements, the Province approved fixed rates to be paid to the external agencies. The total daily fixed rates varied from \$108 to \$315 per day per bed. Department officials told us the expectation is that children placed in these foster home programs would also be assessed as having higher needs (e.g. level 4 or 5 needs).

We did not specifically examine whether adequate mechanisms were in place at each agency to ensure that children placed in these external beds were at a need level consistent with the fixed rate approved for that foster home program. We found, however, that several Department and agency staff acknowledged that children with lower level needs were being placed in these beds.

There was also no documented rationale for the differences in the fixed rates approved by the Department for the various specialized foster home programs. Department officials stated the range in rates reflected the different services available in each foster home program. For example, they indicated that some rates include clinical services and others do not. However, support for the various rates was not well documented.

The Department also did not monitor the use, by internal agencies, of external agency foster homes to ensure only higher-needs children are placed in these homes.



Recommendation 9

We recommend that the Department, or as applicable given single-envelop funding, the CFS Authorities, require all placements in externally managed foster home programs go through the Provincial Placement Desk (or an equivalent, at the CFS Authority level). We further recommend that the Department, in collaboration with the CFS Authorities, strengthen processes for referring and placing children in care in externally managed homes by ensuring that:

- Placements are justified and made in a consistent manner.
- Only children assessed as having needs consistent with the program's mandate are placed in the program (with potential exceptions for sibling groups, with sibling rates set based on their required level of care).
- Expectations regarding the referral and approval processes are clearly outlined and communicated to all CFS agencies.

LIMITED JUSTIFICATION FOR HIGHER DAILY RATES PAID FOR FOSTER HOMES MANAGED BY EXTERNAL AGENCIES, WHEN COMPARED TO RATES FOR INTERNALLY MANAGED HOMES

To compare the funding of external and internal agency foster homes, we examined listings, obtained from 2 agencies (SECFS and WCFS), of children that were transferred from an external agency foster home to an internal agency foster home. These lists had a total of 48 children. We compared the rates paid for the same child. As **FIGURE 11** shows, the average daily rates for SECFS and WCFS while the children were in externally managed homes were \$211 and \$106 respectively. While the same children were in homes managed by SECFS and WCFS, the average daily rates were \$112 and \$56 respectively—a decline of 47% in both cases. Metis and Awasis provided an example of one transfer each. In each case the daily rate was over \$200 more when the same child was in the externally managed foster home.

Figure 11: Daily rates, for the same children, while placed in externally managed foster homes and internally managed foster homes

Placements	Daily rate while in externally managed foster homes			Daily rate while in internally managed foster homes		
	Low	High	Average	Low	High	Average
SECFS	\$128	\$252	\$211	\$48	\$190	\$112
WCFS	\$55	\$196	\$106	\$22	\$117	\$56

Source: SECFS and WCFS records.

Note: The external agencies managing the foster homes the children were placed with varied within and across the two agencies.

While we acknowledge that the needs of children may change over time, the significant variability we noted in the daily rates paid for the same child would likely not be solely due to changes in needs.

Metis Agency management noted that the higher daily rates in externally managed homes make it difficult to attract those foster parents to internal agencies.

Department staff told us children placed in externally managed foster homes are paid for at higher rates with the expectation that these children are receiving specialized services. But the Department did little to monitor the specialized services, if any, provided.



Recommendation 10

We recommend that the Department, or as applicable given single-envelop funding, the CFS Authorities, ensure the use of external agency foster homes be properly justified based on the high needs of the child(ren) being placed in these homes and the special services provided in these homes.

EXTERNAL AGENCIES EXPLICITLY FUNDED FOR FOSTER HOME CASE MANAGEMENT, UNLIKE INTERNAL AGENCIES

In examining the service purchase agreements between the Province and the external agencies with such agreements, we noted that the external agencies were funded to have one case manager for every 8 to 12 foster home beds (as opposed to homes, that can have up to 4 beds). As noted in **SECTION 1**, internal agencies are not funded for foster home case management. We also noted that the average caseload for a foster care worker in the 4 internal agencies ranged from 23 homes in Awasis to 52 in SECFS. Based on this, the number of beds internal foster care workers manage is considerably greater than that of workers in external agencies.

SECTION 1 includes a recommendation to amend the funding model to explicitly include funding for foster care case management. Reasons for any inconsistencies in funding between internal and external agencies should be clearly justified and documented.



Recommendation 11

We recommend that the Department ensure adequate documentation of the rationale for any differences between foster care worker caseload ratios used in funding external agencies as compared to internal agencies.

Inadequate systems and processes to ensure compliance with foster home standards

4 Inadequate processes for approving new foster homes

The Foster Homes Licensing Regulation sets out the standards agencies must follow in licensing foster homes. The Department sets out additional policies and guidelines in its Child and Family Services Standards Manual. Foster care workers and their supervisors are to ensure foster home applicants meet these standards and policies before licensing the homes. In examining the standards and guidelines as well as agencies' licensing practices, we noted the following concerns:

- Foster home standards were outdated (**SECTION 4.1**).
- There was minimal direction for workers on how to assess the suitability of foster home applicants (**SECTION 4.2**).
- Some foster homes licensed even though regulatory and policy requirements were not met (**SECTION 4.3**).
- Licences were not always issued in accordance with the Regulation (**SECTION 4.4**).

4.1 Foster home standards outdated

The Foster Homes Licensing Regulation was last amended in 2003. Most related policies and guidelines in the Department's Child and Family Services Standards Manual have not been updated since 2009.



Recommendation 12

We recommend that the Department, in collaboration with the CFS Authorities, periodically review and revise the Foster Homes Licensing Regulation and CFS Standards Manual to ensure standards are up-to-date, relevant, and culturally appropriate.

In examining the CFS Standards Manual, we noted concerns. There was not one document with the full manual, but rather different sections were in separate documents. These documents contained many links to other sections, but several links did not work.



Recommendation 13

We recommend that the Department issue one electronic document, containing the full CFS Standards Manual for CFS Authorities and agencies to use, ensuring links in the document are functioning.

We also found there were several gaps in the policies. Noted gaps related to foster home licensing are discussed in detail in **SECTIONS 4.2 AND 5.1**. Numerous agency and CFS Authority staff raised concerns about the absence of standards and policies specifically for kinship homes and to allow for community and cultural differences.

Kinship homes

The Regulation and Department policies do not distinguish between kinship foster homes and other foster homes. Kinship homes are expected to meet all the same standards to be licensed. They are licensed to care for a specific child, based on a family connection or relationship to the child (e.g. an aunt caring for her niece). Staff told us, in practice the high value placed on keeping children with family often overrides meeting standards (for example, square footage requirements and age restrictions for sharing bedrooms). In fact, in the sample of newly licensed homes reviewed, we found that the rate of exceptions was higher in kinship homes, with more homes licensed without proper justification.

SFNNC had implemented standards for its agencies to use specifically for kinship homes. The kinship standards required less detailed personal assessments and a health declaration rather than a medical reference when licensing these homes. One agency's management, in another Authority, noted the need for kinship standards. Staff we spoke with in 2 agencies without kinship standards expressed concerns that there was too much flexibility in practice for kinship homes. These staff felt the expectations for kinship homes need to be raised. Establishing clear and consistent standards for kinship homes would help ensure appropriate parameters around licensing these homes, while recognizing their uniqueness.



Recommendation 14

We recommend that the Department, in collaboration with the CFS Authorities, amend the Foster Homes Licensing Regulation to define kinship foster homes and related requirements. We also recommend that the Department in conjunction with the CFS Authorities provide comprehensive direction for approving, monitoring, and supporting these homes.

Community and cultural differences

Concerns were also raised that existing standards did not reflect or properly account for community differences nor were the standards culturally relevant for Indigenous communities. Indigenous Authorities and agencies, in particular, place high value on keeping children in care in their home community. However, some of the standards in the Regulation did not reflect community norms, making it difficult to license homes on reserve. For example, the Regulation limits the number of foster children to 4 unless they are all siblings. But some agency staff said 4 children in a family would be considered small on reserve and kinship homes sometimes have a group of cousins living together. Indigenous Authorities and agencies felt the definition of a sibling should be broadened to encompass close family ties such as cousins.

The last review of the Regulation was done in December 2016 with input from the 4 CFS Authorities. This review raised many concerns similar to those noted above. Department staff said due to conflicting priorities, this work has not moved forward. They do not plan to make regulatory changes until amendments to the Act, if any, are made as a result of the CFS Legislative Review commissioned by the Province in 2017.

4.2 Minimal direction for workers on how to assess foster home applicants

There are 5 key components to the foster home licence application listed in Section 3(2) of the Regulation:

- A criminal record check (CRC) for all adults living in the home.
- A child abuse registry check (CAR) for all adults living in the home.
- Consent for a prior contact check (PCC) of past involvement with the CFS system, for all adults living in the home.
- A medical reference about the applicant's physical and mental health.
- References from 4 persons about the applicant's ability to protect, nurture, and care for a child.

The Regulation requires agencies to use this information to assess the suitability of the applicant, but does not provide additional guidance. The CFS Standards Manual had minimal further guidance on how to assess each of these pieces of information. It only addresses 2 scenarios when the application cannot proceed: when applicants (or other adults in the home) are listed on the child abuse registry, and when prior contact check or criminal record check information indicates adults in the home pose a 'medium' or 'high' risk to children. But there was no guidance on how the worker is to make this determination.

In lieu of Department guidance, we asked the agencies what guidance they had for their staff. Each of the 4 agencies had forms to document the application and assessment, but no additional guidance. The General Authority also developed a Foster Home Framework guide for its agencies to reference. It mostly summarized the requirements in the Regulation and policies.

In general, there was a lack of guidance in all 4 agencies around how most of the pieces of the application should be assessed. Specifically, there was no guidance for:

- How to assess the level of risk of harm to children when an applicant or other adult in the home has a criminal record (with the exception of WCFS).
- What prior contacts with CFS to consider when doing a prior contact check. Initial checks simply listed codes indicating the type of contact a person had with an agency, but did not give any details. Workers needed to follow-up with the agency involved with the past contact to obtain more information for making an assessment.
- When information obtained as part of a licence application should lead to an application being denied.



Recommendation 15

We recommend that the Department, in collaboration with the CFS Authorities, develop comprehensive guidance for:

- Assessing the suitability of foster home applicants, using all key pieces of licence application information required in the Regulation.
- Documenting this assessment.

4.3 Some foster homes licensed even though regulatory and policy requirements not met

We examined a sample of 40 newly licensed foster home files. We identified issues with respect to:

- Agencies not ensuring compliance with the Regulation or policies prior to licensing.
- The licensing process being lengthy.

AGENCIES NOT ENSURING COMPLIANCE WITH THE REGULATION OR POLICIES PRIOR TO LICENSING

For 8 of the 40 files examined, we concluded that the overall decision to issue a licence was not properly supported. In one case this was because there was no documented resolution for several concerns noted about the foster parent. In other cases it was due to the deficiencies noted below.

Security checks

In the 40 foster home files examined, we found that security checks were not always obtained as required by the Regulation. A total of 84 adults lived in these homes at the time of licensing. We found:

- No criminal record check for 32 adults living in the home (38%).
- No child abuse registry check for 13 adults living in the home (15%).
- No prior contact check for 12 adults living in the home (14%).

For 24 (75%) of the adults missing criminal record checks, criminal risk assessments were done instead. Some agency management noted that criminal risk assessments were used because the results came back more quickly than CRCs and included information about charges (not just convictions). Of note, however, the Department issued a directive, effective January 2016, that criminal risk assessments should not be requested instead of criminal record checks for new licences or licence renewals because they lack other key information captured in a criminal record check.

Department policy requires workers to assign a risk-rating of low, medium or high when the CRC comes back with a criminal record or the PCC shows an adult in the home is, or has been, the subject of a child protection investigation. But in all 23 files with either a positive CRC or a PCC with potential concerns, there was no risk-rating documented.

Of concern, we noted two instances where the foster parent applicant was identified as high risk on the CRA, requiring fingerprints, with no evidence of follow-up. And in several instances old security checks (some from 2011 and 2012) were used to support the licence issued in 2016 or 2017.

References

Applicants are required to provide 4 references speaking to their ability to protect and care for children. In addition, applicants must submit documentation about their physical and mental health. For 42 (69%) of 61 applicants in our sample, we found the required references on file. There were current health related documents on file for all but 4 applicants (all SECFS). We also noted 3 instances where the medical practitioner filling out the form only knew the patient for less than 20 days—one was a walk-in. In these cases we question the value of the health documents accepted because the medical history of the patient would have largely been unknown to the practitioner.

Northern Authority noted that each community may not have an RCMP detachment or a full-time medical presence, making compliance in these communities more challenging.

Assessment of ability to provide appropriate care

After the initial screening, workers complete a home study which includes a personal assessment and a home environment assessment as required in the Regulation.

The personal assessment considers the ability of applicants to provide appropriate care, including their ability to provide a culturally appropriate environment. The Regulation did not define culturally appropriate. In all but 3 files (all SECFS), workers did a personal assessment. For 28 of 40 files, the

assessment considered the applicant's ability to provide a culturally appropriate environment. For 6 of the 12 files without an assessment the licence was child-specific for a relative. The need for such an assessment in these cases is not clear.

We examined the home studies in the 40 files and found:

- For 28 files, the worker documented visiting the home at least twice (as required in policy).
- Only 21 of the home studies were completed thoroughly. This was often because there was no evidence of the worker interviewing other household members (as required in the Regulation).
- In 30 cases the applicants signed the home studies (when the form allowed for it).
- Supervisors signed the licensing package, as having been reviewed, in all but one case.

Home requirements

Foster care workers must also complete an inspection of the foster home using an inspection checklist developed by the Department. This checklist includes roughly 30 health and safety items including some required in the Regulation. Examples of items the checklist directs workers to check for are whether: there is an approved fire extinguisher, the water is of drinking quality, and the medication is stored in a locked box. In reviewing the 40 files we found:

- All but one file had an inspection done.
- 26 inspections had all questions on the checklist answered.
- When questions were left unanswered, it was usually just one question.
- In one instance the basement checklist was not done even though 2 children in care slept in the basement.
- 15 checklists showed all requirements were met. Where requirements were not met, on average it was 3 requirements not met, at most it was 11.

The Regulation lays out specific rules around sleeping arrangements. For example, children in care over age 2 cannot share a room with an adult, and children of different genders over age 5 cannot share rooms. For 6 homes, not all sleeping arrangement requirements were met and for 2 there was not enough information to know if they were met.



Recommendation 16

We recommend that the Department, in collaboration with the CFS Authorities, develop a checklist for supervisors to use when reviewing licence packages (new and renewal) that ensures the thoroughness of the packages and consideration of all regulatory and policy requirements.

LICENSING PROCESS LENGTHY

In the files examined, the median time it took to complete the entire licensing process (from application date to licence issuance) was 269 days (about 9 months). The median time ranged by agency from 71 days in Metis to 743 days in Awasis. Metis Authority told us they provided funding for contract workers to complete home studies on behalf of its agencies. This may have contributed to the quicker licensing time frames in Metis agency. Given the lengthy licensing time frames overall and the need for more foster homes in the province (discussed in **SECTION 10**) this may be a practice that other CFS Authorities could explore to help their agencies process foster home applications in a timely manner. SFNNC management noted that although contract workers could help in completing home studies quicker, a drawback is that contract workers build a rapport and relationship with the foster parents rather than the agency staff.

SECTION 4.2 discusses the need for better guidance for making licensing decisions. We note that the CFS Standards Manual does not provide guidance on how long it should take to license a new foster home. Given the excessive times noted to license homes, it would be beneficial to have guidance around this.

SECTION 8.1 discusses how implementation of a quality assurance review process would help identify and resolve weaknesses in the licence approval process.

4.4 Licences not always issued in accordance with the Regulation

The Foster Homes Licensing Regulation specifies the form licences must be issued in (for example, with an expiry date no more than a year later) and sets limits for the number of people a licensee can care for (for example, no more than 2 infants). It allows for exceptions to some requirements with the right approval. We found:

- Some physical copies of licences were missing required information such as gender and number of children permitted, and some were issued for more than one year.
- Approvals for exceptions to licensing requirements were not obtained.

Details of these findings are discussed further below.

LICENCES ISSUED WITHOUT REQUIRED INFORMATION; SOME ISSUED FOR MORE THAN ONE YEAR

A report of all foster home licences issued by the 4 agencies as of June 30, 2017 showed that agencies issued 4 licences for more than one year, ranging from 12 to 154 days greater than a year.

From our review of 115 licences, we noted 19 cases where the form of the licence did not comply with the standards in the Regulation. Some licences did not have the residential address of the foster home; others did not list the specific terms and conditions of the licence. One licence did not specify the number and gender of children that can be placed in the home, and another had no expiry date.

APPROVALS FOR EXCEPTIONS TO LICENSING REQUIREMENTS WERE NOT OBTAINED

The Regulation sets limits for the number of people a licensee can care for (for example, no more than 2 infants). It requires CFS Authority approval when a licensee wants to provide residential care for adults in addition to caring for children in care, and when a licensee provides care to more than: 2 infants, 3 children under age 5, or 7 people requiring supervision. These approved exceptions are called variances. In the files examined, we found 3 cases where such approval was required, but in all cases it was not obtained.

The Regulation also sets a limit of 4 children in care in a foster home but allows an exception when the children are all siblings. Of the files examined, 2 homes were licensed to care for more than 4 children but in neither case were all of the children siblings, nor was there any special approval. In one other case, 5 children in care (all siblings) were placed in a home only licensed for 4 children.

We obtained listings of recently approved variances from the 4 CFS Authorities. There were 6 instances over 3 years where Metis Authority (5) and Northern Authority (1) approved the placement of more than 4 children in one foster home—one case being the placement of a 6th child (Metis). In none of these cases were the children all siblings. Although the Regulation allows agencies to approve these exceptions, when the children are siblings, it does not permit exceptions to this rule otherwise. We also noted that an agency placed a 7th child in one of these homes, but in that case the agency did not seek approval from the Metis Authority. In another case, Northern Authority approved a home to have more than 7 people requiring supervision, with 5 children in care in the home, but they were not all siblings. One of these children had extremely high medical needs.

In certain situations, the Regulation also allows agencies to exempt licensees from complying with requirements. These approved exceptions are called exemptions. Agencies can grant an exemption from complying with a requirement in legislation, regulation or by-laws governing building construction or fire prevention or safety, but only with approval from the authority enforcing the applicable legislation, regulation or by-law (i.e. Office of the Fire Commissioner). And when the requirement is not laid out in one of these codes, the agency can grant an exemption if, in the opinion of the agency, the requirement is not applicable in the community due to prevailing community standards, and the home is not hazardous to the child(ren) placed in the home. While many files in our sample had standards violations, none were supported by approved exemptions.

We noted some common areas of non-compliance on home inspection checklists that suggest these requirement may be challenging to meet. These requirements included:

- In cases where children in care were sleeping in basements, the requirements to have a window served by a stair landing and the basement exit window hinged on a vertical axis.
- The requirement for homes to have a fire extinguisher. Management in both SECFS and Awasis said sometimes this standard is hard to meet because fire extinguishers are not available in remote First Nations communities. It is hard to get them transported to communities by airplane as they are a dangerous good.

These are areas where perhaps more support is needed to help foster parents comply since factors such as affordability and logistics around purchases become barriers.

We noted that agencies do not report approved exceptions to their CFS Authorities. Such reports would help the CFS Authorities assess the risks being accepted and determine how best to achieve better compliance.

SECTION 8.1 discusses how implementation of a quality assurance review process would help identify and resolve weaknesses in licensing foster homes.



Recommendation 17

We recommend that CFS Authorities require their agencies to regularly report on all exceptions from requirements in the Regulation and policies made by agencies when issuing licences.



Recommendation 18

We recommend that CFS Authorities track and monitor all exceptions being made by their agencies from requirements in the Regulation and policies, and determine if any actions are warranted to achieve better overall compliance.

5 Ongoing management of foster homes inconsistent and insufficient

Foster care workers monitor licensed foster homes, provide ongoing support to foster parents, and complete annual foster home licence renewals. According to the Foster Homes Licensing Regulation, foster home licences cannot be issued for more than one year. The Regulation requires agencies to review the operations of a foster home annually, before the licence expires, to see if the home is complying with standards and to decide if the licence should be renewed. We noted the following issues related to the case management and relicensing of foster homes:

- Foster home licences were renewed despite gaps when conducting annual reviews, resulting in licensed homes not meeting certain requirements (**SECTION 5.1**).
- Many foster homes were periodically operating with an expired licence (**SECTION 5.2**).
- There was no requirement for home visits by foster care workers, other than annual relicensing visits (**SECTION 5.3**).
- The support provided to foster parents varied across agencies (**SECTION 5.4**).

These issues are discussed in detail below.

5.1 Foster home licences renewed despite gaps when conducting annual reviews, resulting in licensed homes not meeting certain requirements

In completing annual foster home licence renewals, foster care workers consider whether the foster home is complying with standards and policies, and they check in with foster families on how placements are going. We examined a sample of 75 foster home files where licences had recently been renewed. We found that for 89% of files in our sample the annual review was not done according to all key policies and procedures. Specifically we found:

- Annual reviews were not always done.
- Annual review forms were frequently incomplete.
- Security checks were not done as required.
- Home inspections were not thorough, allowing non-compliance in some areas.
- Non-compliance with licence terms and conditions that were not addressed by the licensing agency.
- Subsequent follow-ups were not done for items of non-compliance and actions were not escalated for repeat offences.

ANNUAL REVIEWS NOT ALWAYS DONE

In examining our sample of 75 files, we found some annual reviews were not done as required:

- 74 of 75 had a recent, complete annual review. But only 26 of these reviews were done before the licence expired.
- For 14 (19%) of the 75 files, over the past 3 years, annual reviews were not always completed.

ANNUAL REVIEW FORMS FREQUENTLY INCOMPLETE

In completing an annual review, the worker is expected to complete an annual review form. The form directs the worker to consider and document several items including how the family is functioning. For 23 files, the annual review form was not filled out thoroughly. For example, the family functioning section did not discuss the children in the home or the form did not specify where each person in the home sleeps, as required.

We also found most annual review forms did not clearly document compliance with the regulatory requirements related to clothing, personal supplies, and medical appointments. For example, in 56 of the review forms, there was no comment on whether the children in care had adequate, age-appropriate clothing and personal supplies. And 66 review forms contained no comment on whether the caregiver had taken the child(ren) in care to the doctor within the last year. We note that the form does not direct the worker to consider these items.

SECURITY CHECKS NOT DONE AS REQUIRED

In 45 files (60%) security checks (criminal record check, child abuse registry check, and prior contact check) were not done on foster parents and other adults living in the home, as required. Exceptions were:

- Checks not being redone at the frequency set in agency expectations.
- Checks not being done at all for other adults living in the home.
- Criminal risk assessments being done rather than criminal record checks.

There was no direction in the Regulation or Department policy on how frequently checks should be re-done and frequency varied by agency. Each agency had their own differing expectations with some agencies redoing all checks bi-annually and another agency never redoing certain checks.

In our sample of 75 files, we found 51 had a criminal record check with a criminal record or a prior contact check that showed open or closed cases for adults in the home. But none of these 51 files had the required risk rating of either low, medium or high related to the check results.

We also noted that when doing prior contact checks, workers commonly did not have access to detailed case information to make an informed assessment of the risk. Workers often had to send letters to the agency involved with the case. These letters often came back noting the person "may not pose a risk to children" without providing additional details. We question the value of this process given the vague nature of the information obtained.

HOME INSPECTIONS NOT THOROUGH, ALLOWING NON-COMPLIANCE IN SOME AREAS

As part of annual reviews workers are expected to inspect the home using a standard checklist, similar to when licensing a new foster home. See **SECTION 4.3** for a discussion of the inspection checklist used. For the 74 home inspections we examined, we found:

- All questions were answered on 60 inspection checklists.
- In 3 cases the basement checklist was not done, at all, even though children in care were sleeping in the basement.
- On the remaining checklists there was, on average, 2 unanswered questions.
- 27 homes had items of non-compliance noted, with the average being 2 items.

Where there was enough information documented, we found that the sleeping arrangement requirements were met in 56 files. When they were not met, it was often because a child in care was sleeping in a basement that did not meet the requirements on the inspection checklist or was sharing a bedroom with a foster parent even though they were over 2 years of age.

We also noted workers sometimes marked inspection questions as compliant when other information in the file indicated otherwise. For example, in cases where children in care were sleeping in the basement, workers commonly marked 'yes' beside the requirement that the bedroom window be served by a stair and a landing, but made comments of other ways the child(ren) could reach the window (e.g. desk or bed under window). Some annual reviews done in Awasis also included positive comments about the care being provided, with no mention of care issues or complaints documented elsewhere in the file. In these cases, supervisors and agency directors may have been approving licences without being aware of notable concerns in the home. One of these homes was later closed due to care concerns.

NON-COMPLIANCE WITH LICENCE TERMS AND CONDITIONS NOT ADDRESSED

A foster home licence may include terms and conditions. These terms and conditions can restrict, among other things, the number, ages, and gender of children that can be placed in the home. In reviewing the 75 files, we found 10 different licensees were, at some point, not complying with the terms and conditions on the licence, but this was not addressed by the worker during relicensing. In 7 cases, the age of the children in the home fell outside the age range on the licence. In 4 cases the number of children in the home exceeded the number on the licence.

SUBSEQUENT FOLLOW-UPS NOT DONE; ACTIONS NOT ESCALATED FOR REPEAT OFFENCES

We also found that in all 18 of the 27 files with items of non-compliance on the inspection checklist requiring follow-up, none had evidence of follow-up by the worker to address the items. Of these, we found 11 cases where the same items of non-compliance were repeated year-over-year, with no escalated action being taken. The agencies gave foster care workers no guidance on what actions should be taken when foster parents do not comply with safety standards or do not fix safety issues that are repeatedly flagged in annual home inspections.

RECOMMENDATION 16 in **SECTION 4.3** addresses the benefits of implementing a more robust licence package review process by supervisors that would ensure consideration of all regulatory and policy requirements. **SECTION 8.1** discusses how implementation of a quality assurance review process would also help identify and resolve weaknesses in the licence renewal process.



Recommendation 19

We recommend that the Department, in consultation with the CFS Authorities and their agencies, establish and communicate guidance on:

- The expected frequency of completing required security checks on foster parents and other adults living in the home.
- The follow-up actions that should be taken when foster parents do not comply with safety standards.
- The escalating actions that should be taken when there is repeat non-compliance by foster parents.

5.2 Many foster homes periodically operating with an expired licence

When agency staff do not complete the relicensing process before the licence expires, those homes end up operating without a valid licence for a period of time. We found it was common practice for agencies to issue new licences well after the old licence had expired.

Each of the 4 agencies had a process for monitoring expired licences monthly, and all but Awasis also had a process for following up with workers about expired licences.

We examined reports of all foster homes managed by the 4 agencies as of June 30, 2017. These reports showed there were 116 foster homes operating with an expired licence. This was about 9% of the homes on the reports. At that point, the licences had been expired for 420 days on average.

In our examination of 115 foster home files, we found 33 (29%) were operating with an expired licence at the time of our review. The average length of time between licence expiry and licence re-issuance was 82 days. Some agencies' management said delays in relicensing foster homes often result from waiting for foster parents (and other adults living in the home) to complete security check paperwork. While this may contribute to delays, it was common for workers to complete licence renewal visits after, or very close to, licence expiry. Another agency commented that the requirement to relicense all foster homes annually requires a lot of resources making it challenging to relicense homes on time. We note that the approach to annual reviews is not risk-based as it does not consider the type of foster home (e.g. specialized vs. regular) or the history of compliance and complaints. All homes are expected to be reviewed annually, with the same re-licensing process applied to all. A risk-based approach could consider a streamlined approach with a less detailed review for lower-risk foster homes.



Recommendation 20

We recommend that the Department, in consultation with the CFS Authorities, develop a risk-based licence renewal process for foster homes, taking into account the foster home type and history of compliance.



Recommendation 21

We recommend that agencies implement a process that identifies licences that are near expiration and schedule needed reviews prior to the licence expiry date.

5.3 No requirement for home visits by foster care workers, other than annual relicensing visits

Other than annual relicensing visits, home visits by foster care workers are not required by Regulation or Department policy. In contrast, policy requires the child's worker (whose focus is on the child rather than the foster parents) to visit the home monthly. None of the 4 agencies had written policies for foster care worker visits beyond annual relicensing visits, but 3 of the 4 had expectations that foster care workers would periodically visit the homes assigned to them. These visits are dual purpose: to monitor the placement as discussed below, and to support the foster parents, as discussed in **SECTION 5.4**.

We examined 55 foster home files and found the following:

- The frequency of foster care worker home visits varied widely across agencies.
- There was no requirement for periodic unannounced home visits.

THE FREQUENCY OF FOSTER CARE WORKER HOME VISITS VARIED WIDELY ACROSS AGENCIES

The number of home visits (including annual re-licensing visits) agencies expected foster care workers to make annually ranged from one (SECFS) to 4 (Metis and WCFS). Some agencies required more frequent visits in specific cases. For example, Metis required monthly visits for specialized homes and SECFS expected visits beyond annual relicensing visits when there were care concerns.

In the sample of 55 foster home files examined, the frequency of recorded home visits (including annual relicensing visits) by the foster care worker in a year ranged by agency from a median of one in SECFS to a median of 5 in WCFS. The number of home visits by foster care workers in the files examined ranged from 1 to 9, with the majority being 1 home visit per year.

We also examined a report from the Department detailing all recorded face-to-face contacts for the children placed in these homes. Of concern, there was no face-to-face data for 8 children. Of the 118 children in care examined from October 1, 2016 to March 31, 2018 (18 months), there was no record of home visits by any worker for 4 children. For the remaining children there was record of, on average, 7 home visits by a primary worker (foster care worker or child's worker). Given the requirement for monthly home visits by the child's worker, we expected there to be at minimum 18 visits recorded for each child. Some agency's management told us workers did not consistently record face-to-face visits.

There was limited documentation of contact between foster care workers and foster parents so in our survey to foster parents, we asked how often they received visits from their foster care worker. Survey results indicate foster parents licensed by agencies with expectations that workers visit more often received more frequent visits and that newer foster parents wanted more contact from their foster care worker.

- *57% of respondents said their foster care worker visits their home on average 4, or more than 4, times per year.*

- 68% of survey respondents strongly or moderately agreed with the statement: *I am satisfied with the amount of contact, including home visits, I receive from my foster care worker. Individuals who had fostered for 5 years or less were more likely to disagree than those who had been fostering longer.*



Recommendation 22

We recommend that foster care workers and the child's worker collaboratively ensure an appropriate number of home visits occur during the year, while ensuring some of the coordinated home visits are done by the foster care worker to support the foster parents, and that the visits done by each are separately documented.

NO REQUIREMENT FOR PERIODIC UNANNOUNCED HOME VISITS

The Department did not require unannounced home visits. Agency management told us unannounced visits may occur when the agency has concerns about a home. During our examination of a sample of home closures and complaints, in each agency except WCFS, workers sometimes made unannounced visits to homes as follow-up to complaints or concerns raised about the home.

Foster care workers may not get an accurate sense of how a home operates without doing unannounced visits. In the United Kingdom, social workers supervising foster homes are expected to make at least one unannounced visit per year. Family for Every Child, a global alliance of organizations self-described as aiming to build strong child protection systems that promote quality of care for children, published a document called *Strategies for Delivering Safe and Effective Foster Care*. The document suggested effective monitoring to ensure quality of care requires frequent visits to foster families, including unannounced visits. Some agencies' management said unannounced visits were only appropriate when there was cause for concern. They were concerned unannounced visits could negatively impact the relationship agencies had with foster parents, as team members, by creating feelings of mistrust.

We are of the view that unannounced visits provide information that would otherwise not be available.



Recommendation 23

We recommend that agencies establish, communicate, and monitor compliance with written policies on foster care worker contact with foster homes. Policies should require:

- A minimum number of annual visits to foster homes based on assessed risks (and for homes where higher-risk factors are present, include unannounced visits).
- Documenting contact between foster care workers and foster homes using a prescribed form.

5.4 Support provided to foster parents varied across agencies

Foster parents are volunteers, responsible for providing daily care and support for children in care. This can be quite a challenging task. To that end, foster parents need to be properly supported.

In addition to the child maintenance funding discussed in **SECTION 2**, and each foster parent being assigned a foster care worker, other common supports provided to foster parents (when eligible) include: financial supports for daycare, and mileage, as well as offering training on caring for children. Two agencies also reported providing cultural training or support.

In our survey of foster parents, we asked for their perspectives on the level and quality of support they receive from their foster care worker and agency. Results showed that perceptions about the adequacy of support are inconsistent within and across agencies. Some foster parents were quite pleased with the support they receive but the results also highlighted several areas where support could be improved. Specifically we found:

- Nearly one quarter of foster parents do not believe they are adequately supported.
- Support for new placements was inconsistent across agencies.
- Gaps in, and access challenges with, the ongoing training available to foster parents.

NEARLY ONE QUARTER OF FOSTER PARENTS DO NOT BELIEVE THEY ARE ADEQUATELY SUPPORTED

Our survey of foster parents indicates nearly 1/4 of respondents believe they are not adequately supported by their foster care worker, with large variability across the 4 agencies.

- *Only 65% of respondents reported receiving enough support from their foster care worker (from a high of 76% of respondents licensed by WCFS agreeing, to a low of only 41% of respondents licensed by Awasis agreeing).*
- *72% of respondents strongly or moderately agreed that their foster care worker is available to help them manage the needs of the child(ren) placed in their care.*
- *69% agreed (strongly or moderately) that their foster care worker does everything they can to help resolve their concerns.*

SUPPORT FOR NEW PLACEMENTS INCONSISTENT ACROSS AGENCIES

Our foster parent survey results indicate support for foster parents accepting a new placement may not be timely or informative/helpful.

- *When asked, over half of survey respondents said they had a child newly placed in their home in the last 3 years.*
 - *Of these foster parents, half said that in thinking about the most recent child placement, the foster care worker first contacted them to check on how things were going within 1 week.*
 - *Over 1/4 did not agree (strongly or moderately) that they receive the information they need about the medical, behavioural or educational needs of the children placed in their care.*

- Many foster parents also commented on the need for better communication about the needs of the children and strategies for meeting those needs.
- Foster parents also commented about the importance of being treated with fairness and respect, and the desire to be included as part of the team in planning for the children in their care.

The Regulation requires licensing agencies to ensure foster parents have the ability to provide a culturally appropriate environment for the children placed in their home. Our survey of foster parents indicates foster care workers, in general, could do more to support foster parents in meeting the cultural needs of the children placed in their care.

- Of the foster parents that reported having a new placement, 65% also reported having a child placed in their care that came from a different cultural or ethnic background than their own.
 - Nearly 1/3 of these foster parents disagreed with the statement: My foster care worker provides me with support to meet the cultural needs of the child(ren) placed in my care. We note that 42% of respondents licensed by SECFS and 42% licensed by Awasis disagreed with the statement, while only 12% of respondents licensed by WCFS disagreed.

GAPS AND ACCESS CHALLENGES IN ONGOING TRAINING AVAILABLE TO FOSTER PARENTS

The Regulation requires new foster parents to participate in an orientation, except where the child is personally known to them. Department policy requires agencies to provide ongoing training for foster parents. There is no direction on the frequency or type of training a foster parent is expected to receive; this is left up to each agency, and therefore varies.

Our survey results indicate accessibility of training for foster parents could be improved as about half of respondents did not believe the training available was at convenient times or locations.

- Over 70% of survey respondents agreed that they receive the training they need to meet the needs of the child(ren) placed in their care.
- Only 45% agreed training sessions were available at times that work for their schedule.
- 50% agreed the training sessions were held in locations that are easy to travel to.
- Respondents licensed by WCFS and Metis agencies were the most satisfied with the training and those licensed by Awasis were the least.
- Many foster parents provided comments about additional training they would like to see offered. This included better training for foster parents in meeting children's specific needs and better information on agency expectations and the supports available.

For full survey results, including additional questions and responses on agency support to foster parents, see **APPENDIX A** of this report. Discussion of the financial support provided to foster parents, and related recommendations are included in **SECTIONS 2.1** and **2.2** of this report.



Recommendation 24

We recommend that the Department, in consultation with CFS Authorities, establish the minimum supports to be made available to all foster parents. Such supports should include:

- Standardized initial and ongoing training and information on the common needs of children in care and the related agency expectations and supports.
- Initial and ongoing communication about the specific needs of a child placed in their home, including behaviour, medical, educational and cultural needs.
- Initial contact with foster parents within a week of a child's placement to assess how the new placement is going.



Recommendation 25

We recommend that the CFS Authorities review the supports available to foster parents in each of their agencies, identify gaps and inconsistencies, and implement plans where needed for improving support for foster parents.

6 Inadequate processes for assessing and monitoring places of safety

Places of safety are intended to be temporary, short-term placements for children in care (until the child can be safely returned home or a longer-term plan is developed). The caregiver is often a relative of the child or identified by the child or child's parent as a place of safety.

Unlike foster homes, there are no regulatory requirements for the screening, approval, and monitoring of places of safety. However, the Department's CFS Standards Manual includes policies for approving and initially monitoring places of safety. We examined 50 place-of-safety files from the 4 agencies and found the following:

- There were weaknesses in assessing places of safety for suitability (**SECTION 6.1**).
- Management approvals of places of safety were not always in place before placement and sometimes were not documented (**SECTION 6.2**).
- Home visits following placement were not timely (**SECTION 6.3**).
- Places of safety were often not short-term placements as intended (**SECTION 6.4**).

The details of these concerns are discussed further below.

6.1 Weaknesses in assessing places of safety for suitability

In examining a sample of 50 place-of-safety files and the related policies we found:

- Limited guidance for assessing suitability.
- Required documents were not always prepared or obtained.
- Assessments, using the gathered documentation, to assess suitability were frequently not done.

LIMITED GUIDANCE FOR ASSESSING SUITABILITY

The CFS Standards Manual required agencies to assess the suitability of potential places of safety. But there was limited guidance for this assessment. The standards only provided a list of factors to consider (examples included indications of alcohol or drug abuse, marital problems, and health issues) and required the agency to obtain at least one reference concerning the caregiver's ability to protect, nurture and care for a child.

Only 2 agencies had additional guidance for assessing places of safety, and it too was limited. Metis gave direction for reviewing and assessing the results of security checks. WCFS used a *Place of Safety Framework* document created by the General Authority. This guidance was no more expansive than the CFS policies but did note that all placement decisions and related rationale should be documented. What was consistently missing from guidance, for all but Metis, was how to consider the numerous pieces of information gathered (results of security checks, references etc.) and when to decide not to approve a place of safety. And for all agencies except WCFS, there was no direction to record this assessment.

REQUIRED DOCUMENTS NOT ALWAYS PREPARED OR OBTAINED

Department policies set out what documentation agencies must prepare or obtain when approving a place of safety. Workers are to conduct a physical home inspection and complete security checks (criminal record check or criminal risk assessment, child abuse registry check, and prior contact check) for all adults in the home. This is all supposed to be done prior to the child's placement unless the child is placed on an emergency basis. In these cases, the worker can complete this work after placement.

Security checks not always done

In the 50 places of safety examined, 2 homes (both Awasis) were missing some security checks for caregivers and 3 homes were missing some checks for others adults living in the home. Only 16 homes (32%) had all security checks done within the timelines allowed. This was primarily because checks were done after the worker placed the child in the home, in non-emergency situations. In some cases, it was because checks were more than 3 months old, so they were not current.

Physical home inspections often not done prior to placement

Workers also did not always do physical home inspections as required. For 5 homes (10%) reviewed, there was no inspection on file, and for 17 (35%), the worker did not complete the inspection within the timelines allowed in policy.

We determined that in 26 cases (52%), a physical inspection supported the decision to place the child(ren). But there were many exceptions. As noted above, in 5 cases there was no inspection on file. We also found that there were significant health or safety-related concerns noted during the inspections that were not addressed, or that the inspection was done much later, or much earlier, than the placement. The timing of the inspection is important because home situations change.

In addition to obtaining security checks and doing an inspection, the primary caregiver is to sign a form agreeing to provide appropriate supervision, care and discipline for the child(ren) being placed. In 5 cases (10%) there was no signed form on file.

ASSESSMENTS OF SUITABILITY FREQUENTLY NOT DONE

Only 17 homes in our sample (in Metis and WCFS agencies only) had an assessment of the place of safety in narrative form that referenced gathered documents and any implications of the documents for decision makers. Nearly all of these assessments were done after the placement of the child. We considered only 10 (59%) of these assessments to be thorough. For the others in our sample there was no such assessment. We found that 36 files included at least one reference speaking to the applicants' ability to care for children; but roughly half were dated after the placement.

CFS policies stated that if a security check indicates cause for concern, the worker is to immediately remove the children from the place of safety. Yet there was no guidance on what constitutes a cause for concern. For 19 of 91 adults (21%) in our sample, criminal risk assessments or criminal record checks came back positive, and for 63 adults (69%) prior contact checks showed prior contact with CFS. In no case were child abuse registry checks positive. With the exception of WCFS, workers seldom documented the required risk rating related to the check results. And it was often unclear how, if at all, the worker followed up and assessed this information to ensure the suitability of the home as a safe place for children in care.

Agency staff spoke of the importance and value of placing children with familiar caregivers (often kin) in the child's community. The lack of guidance on assessing the suitability of homes and the value put on placing children with familiar caregivers may be leading to higher-risk placement decisions as noted below:

- In one file examined, an agency approved a place of safety where the caregiver had a lengthy (and recent) history with CFS that related to weak caregiving abilities. This caregiver was providing care for 8 children (including 3 children in care), although the limit is 7.
- In another case, an agency approved a place of safety that, due to space limitations, required the single caregiver to maintain and supervise 2 separate households consisting of all minors.
- For 2 homes, the criminal risk assessment came back as "high risk" for an adult living in the home. In these cases the agency noted this was acceptable because these adults (each partners to the caregiver) would not be caregivers themselves. In our view, the risk was not properly mitigated.

In the first two cases noted above, unfortunately the placements ultimately broke down and the children were moved again to different homes.

SECTION 8.1 discusses how implementation of a quality assurance review process would help identify and resolve weaknesses in the assessment and approval of places of safety.



Recommendation 26

We recommend that the Department, in consultation with CFS Authorities, develop written standards and guidance on conducting assessments of places of safety. The standards should include:

- The follow-up and documentation of security check results and related risk-ratings.
- The follow-up and related documentation of items of non-compliance.
- The documentation of whether a placement is done on an emergency basis or not.
- Greater clarity on how to conclude on the suitability of a place of safety, including how to identify and assess factors that indicate a place of safety is unsuitable.

6.2 Place of safety approvals not always documented or in place before placement

CFS policy requires agency managers (supervisors or higher) to authorize the placement of a child in a place of safety. When an agency places a child on an emergency basis, the worker may request approval within one working day following placement. Agencies expected supervisors to document this approval on the *Place of Safety Placement Form*.

For 12 (24%) of the places of safety in our sample of 50 files, there was no evidence of the required approval. Approval was missing in one WCFS file, but the remainder of cases where supervisory approval was missing were Awasis files.

For the 37 files in our sample where the timing of approval was evident, supervisors gave signed approval within one working day of placement in 14 cases (38% of the time). The median time it took supervisors to approve placements was 7 days, ranging from 0 to 148 days. Management in some agencies noted that although signed approval was not obtained, it was common practice for workers to obtain verbal approval before any placement occurred.

Supervisors commonly approved placements before all required information was on file. For example, in 18 cases, the placing worker requested supervisory approval before receiving the results of all security checks. We note however, that 7 of these cases were for children placed on an emergency basis.

SECTION 6.1 discusses the different timelines allowed when the child(ren) are placed on an emergency basis.

SECTION 8.1 discusses how implementation of a quality assurance review process would help identify and resolve weaknesses in managing places of safety.

6.3 Home visits following placement not timely

CFS policy requires the worker responsible for supervising the place of safety to visit the home within 2 days of placement (in non-remote areas). These visits help ensure any issues or challenges with the placement are identified and addressed quickly.

The worker responsible for supervising the placement changes over time. The child's worker (also the placing worker, whose focus is on the child's needs) supervises the placement until the agency assigns the file to a foster care worker (whose focus is on supporting the caregiver). In some cases, we noted it took a long time for the agency to assign the file to a foster care worker (for example 2½ months).

We examined documentation of home visits for our sample of 50 place-of-safety files. In 8 cases we could see no evidence of a home visit following placement, and only 4 files had a recorded home visit by the child's worker or foster care worker within the required time frame. The first recorded home visit following placement was a median length of 50 days ranging from 1 to 377 days following placement.

Agency management said these findings may not reflect what is actually taking place as not all visits are necessarily recorded. While this may be the case, in examining files, we noted instances where it was documented that no visits were made to the home, and in one case a caregiver expressed concerns that they had not received a visit from any worker. In that case it had been 4 ½ months since initial placement. The visit recordings showed visits with children may occur outside the home (for example, at the child's school or in the CFS office) at an earlier date. In some cases we were able to verify that visits in these other settings were recorded prior to the first home visit. While checking in with the child in these other settings is better than not checking in at all, home visits ensure workers are connecting with the child's caregivers and observing the child's home environment.



Recommendation 27

We recommend that agencies monitor whether workers are complying with the Department's policy of conducting initial home visits shortly after placing a child, and that these visits are documented.

6.4 Places of safety often not short-term placements as intended

A place of safety is referred to in *The Child and Family Services Act* as being used for the emergency **temporary** care and protection of a child, but legislation does not set a time limit. CFS policies limit these placements to one month unless the family has applied for a foster home licence or guardianship. Policies also specify that a child should not reside in a place of safety for more than 6 months. This allows an agency time to complete the foster home licensing process if the intent is for the home to become a longer-term placement.

In the 50 places of safety examined, nearly all placements exceeded 30 days and almost half exceeded 6 months. Overall, the average length of placements was 200 days (about 6 1/2 months), with some still active as a place of safety at the time of our audit. Without these placements becoming licensed foster homes, the risk is that these homes are operating with the same responsibilities but without the same safety standards, supervision and supports available to foster homes (for example annual re-licensing reviews and periodic home visits by the foster care worker). In examining a sample of homes (foster homes and places of safety) closed by agencies due to care concerns (see **SECTION 7.2**), we noted the majority of these closures were places of safety operating beyond 6 months.

We also examined reports for each agency on places of safety as of June 30, 2017. **FIGURE 12** shows that at that point in time, nearly 400 places of safety had been operating beyond the 6 month time-limit. The median time was more than 2 years, in 2 of the 4 agencies. The length of time homes had been places of safety ranged from 184 days to 10,707 days (or 29 years).

Figure 12: Hundreds of places of safety operating as longer-term placements				
	Places of safety as of June 30, 2017 (unaudited)			
Operation status	Awasis	Metis	SECFS	WCFS
Number of places of safety exceeding 6 month time-limit	94 homes	92 homes	25 homes	174 homes
Median length of time as a place of safety	792 days	423 days	307 days	823 days

Source: Department of Families based on data recorded in CFSIS (unaudited)

Some CFS Authority officials commented that the 30-day time limit in CFS policies was unreasonable and not achievable.

Some CFS Authority and agency officials noted that while some place of safety homes did not meet the standards set out in the Foster Homes Licensing Regulation and therefore could not be licensed as a foster home, the relationship that existed between the caregiver and the child(ren) (often a kinship relation), led them to believe that this was the best placement for the child(ren).

In our view, such decisions should be supported by regular monitoring and needed support particularly as they become longer-term.



Recommendation 28

We recommend that the Department, in collaboration with the CFS Authorities, review and if needed, revise place of safety time limits.



Recommendation 29

We recommend that for places of safety that become longer-term placements, agencies appropriately monitor the placement and provide the same support offered to foster parents.

7 Weaknesses with complaints follow-up and appeals process

When agencies receive complaints about foster homes or places of safety, foster care workers must look into these matters and ensure the concerns are adequately addressed. If the safety of children placed in a home is in question, an agency can decide to remove the children from the home, and possibly to close the home. Legislation allows decisions to remove children from foster homes to be appealed by the foster parents. We noted weaknesses in the follow-up done when concerns or complaints were raised about a home and with the appeals process as follows:

- Follow-up of complaints was not always thorough and well documented (**SECTION 7.1**).
- Decisions to close homes were approved by management, but follow-up of care concerns needs improving (**SECTION 7.2**).
- There were problems with the appeals process for the removal of children from foster homes (**SECTION 7.3**).

These weaknesses are discussed in detail below.

7.1 Complaint follow-ups not always thorough and well documented

From our review of foster home and place-of-safety files, we selected 20 complaints about caregivers to check whether the follow-up was adequate and well documented. The 3 types of complaints, and how many we examined of each, were:

- Child protection allegations (other than child abuse) - 4.
- Child abuse allegations - 6.
- Other complaints - 10.

In reviewing the complaints, we found only 11 (55%) properly documented the details of the complaint, the follow-up that was conducted, and the resolution. Where we could assess the timeliness because there was adequate documentation, the complaint was followed-up in a reasonable time frame in 11 cases (65%).

The Department has policies for how all types of complaints should be followed-up. We found only 3 complaints examined (15%) were followed-up according to all key policies tested. The most significant exceptions to compliance with policy were as follows:

- In some situations, Department policy requires the complainant to be informed of the results of the complaint follow-up, but this only happened in one case.
- Child protection investigations are supposed to be more extensive than follow-up for other types of complaints. Yet in 3 of the 9 child protection allegations we examined, a child protection investigation was not done.
- None of the child protection investigations were done according to all applicable policies. The two most common exceptions to compliance with policy were not informing the complainant of the results of the investigation, and not recording the complaint in the intake module of CFSIS.

In some cases, the worker did not clearly document the conclusion of the investigation. This was particularly concerning in cases of alleged abuse in one agency. In these cases the children were removed (and not returned), yet the conclusion and supporting rationale regarding the abuse allegation was not recorded and new children were placed in the home.

SECTION 8.1 discusses how implementation of a quality assurance review process would help identify and resolve weaknesses in following up complaints.

7.2 Decisions to close homes approved by management; follow-up of care concerns needs improving

When agencies have care concerns about foster parents, they can remove the children from the home and ultimately close the foster home or place of safety. We expected agencies to record the approval of these decisions and to ensure sufficient appropriate supporting documentation was maintained. In the sample of 8 closures we examined, as a first step, children were removed from the home. Any needed investigations then took place. Closures occurred once a conclusion had been made regarding the concern raised. In all cases, a supervisor approved the decision to close the home. Sufficient documentation to support the closure was on file in all but one case.

In reviewing situations where children were removed by the agency, we also looked to see whether enforcement action was timely. In all but one case we concluded that the agency took timely action in relation to the concern that led to the removal. For the exception, although several care concerns were brought forward over a period of time, from multiple sources, some concerns raised received insufficient follow-up by the agency. Similarly, we noted that sometimes the documentation supporting the removal of a child or home closure noted concerns that had not previously been well documented in the file.

7.3 Problems with appeals process for removal of children from foster homes

Under Section 51 of *The Child and Family Services Act*, foster parents can appeal an agency's decision to remove children in care from their home. The appeals process, including detailed time frames, is outlined in the Foster Parent Appeals Regulation. Foster parents have the right to:

- Request a review of the decision by the agency's executive director.
- Participate in an alternative dispute resolution process, prior to the executive director review.
- Request reconsideration by the agency's Authority.
- Have an independent appeal heard by an adjudicator.

CFS policies provide further guidance on the appeals process.

In reviewing and discussing the appeals process with agencies, we noted the following concerns:

- The appeals process was not consistently followed and was not timely.
- Not all agencies had guidance on how the required alternative dispute resolution process should be conducted.
- Agencies raised concerns about the Foster Parent Appeals Regulation.

APPEALS PROCESS NOT CONSISTENTLY FOLLOWED OR TIMELY

We examined one example of an appeal from each of the 4 agencies. One agency (Awasis) did not offer foster parents all steps of the appeals process. Agencies, CFS Authorities and the Department also did not consistently meet time frames set in regulation for various appeal steps. And where time frames were not set in the regulation, steps were not always done in a timely manner. During our audit the appeals regulation was amended to add a time limit for CFS Authority reviews.

We estimated, based on regulation and policy requirements that the maximum time the appeals process should take (from time of removal of the child(ren) to the decision by the adjudicator) is approximately 4½ months. The appeals we examined took longer—7 to 16 months. In part, this was because:

- CFS Authority reviews took between 6 weeks to 6 months to complete. CFS policies stated these reviews should take a maximum of 30 days.
- The Alternative Dispute Resolution (ADR) process was also not completed in a timely manner, taking 1 to 4 months from time of removal. The delay in scheduling ADR meetings was sometimes because agencies were awaiting the outcome of a child protection investigation (as allowed for in policy). These investigations were not always in their control as outside parties often conduct these investigations.

In the appeals examined, we noted one case where there was an unresolved conflict of interest. In this case, CFS Authority staff were part of the initial decision to remove a child from a foster home. During the appeals process, the CFS Authority then took 6 months to review the decision, deciding in favour of the agency (and themselves). It is important that when the Authority is involved in the initial decision, that it not be involved in the appeals process.

In reviewing the appeals, it was evident that these cases are not straightforward. Sometimes various parties involved in the review process or with the child voiced concerns that agencies and Authorities were not acting in the best interests of the child. Undue delays in the appeals process and executing the appeals process with a lack of neutrality, are a disservice to the foster parents involved and ultimately to the child(ren) whose future is being decided by this process.



Recommendation 30

We recommend that the Department and CFS Authorities monitor the timelines for the conduct of appeals, identify reasons for delays, and amend processes as needed to facilitate the timely completion of appeals.



Recommendation 31

We recommend that in cases where CFS Authorities are involved in the decision to remove a child from a foster home, that the appeals be heard by the Department (rather than the CFS Authority).

NOT ALL AGENCIES HAD GUIDANCE ON HOW ALTERNATIVE DISPUTE RESOLUTION PROCESS SHOULD BE CONDUCTED

The Department had guiding principles for Alternative Dispute Resolution (ADR) processes but while the CFS Standards Manual required agencies to develop ADR policies and procedures, only 2 of the 4 agencies had done so.

ADR as a practice typically involves a neutral party facilitating discussions between conflicting parties to help them come to an agreement. Agency practices did not fully reflect ADR principles. Sessions were led by agency staff rather than a neutral party and some agencies did not facilitate a discussion between all parties involved, instead meeting with each party separately.

At the time of our audit, some agencies and CFS Authorities were considering making, or had implemented changes to improve their ADR processes. Awasis management, for example, noted they were amending their processes to use an independent, outside party experienced in mediation to facilitate ADR.



Recommendation 32

We recommend that CFS Authorities ensure agencies develop appropriate Alternative Dispute Resolution (ADR) processes and that agencies comply with these processes.

AGENCIES RAISED CONCERNS ABOUT THE FOSTER PARENT APPEALS REGULATION

Agencies identified a number of gaps and concerns with the Foster Parent Appeals Regulation, as follows:

- The lack of a provision for place of safety caregivers, operating as longer-term placements, to appeal agency decisions to remove a child.
 - We noted, however, that agencies offered longer-term places of safety the right to appeal. During our audit, the Department revised CFS policies to require agencies to offer caregivers the right to appeal when a place of safety has operated beyond 30 days, but were considering extending this to 180 days.
- The appeals regulation includes strict timelines for some appeal steps, but not others. The appeals regulation, for example, is silent on how long CFS Authority reviews can take.
 - During our audit, the appeals regulation was updated to include a 30-day time limit for CFS Authority reviews. But other timeline gaps in the regulation were not addressed such as how soon after accepting the offer for ADR a meeting should take place and how soon after this meeting a decision should be made.
- Foster parents have the legal right to appeal the removal of a child regardless of the reason for the removal. For example, agencies may remove a child to place them with biological family members, or because child abuse by a foster parent has been substantiated. Some agencies voiced concerns over this as these appeals are time consuming and costly.
- The appeals process for removals was also viewed by some agencies and Authorities as favouring foster parents over biological parents. Foster parents have the ability to appeal the removal of a child first to the agency, then the CFS Authority, and finally to an independent adjudicator whereas, biological parents have to go to court.

In one appeal that we examined, the agency cancelled the foster parent's licence in response to the foster parent's request to appeal the removal decision. This was a legal strategy used by the agency since it would be unlikely that an adjudicator would order the agency to return the child to an unlicensed home. In essence, legislation currently has a loop hole that, if acted upon, predetermines the results of the removal appeals process. While a separate regulation, the Foster Homes Licensing Regulation, gives foster parents the right to appeal an agency decision to suspend or cancel a foster home licence, the foster parent's only recourse is to appeal the agency decision to the CFS Authority (not to an independent adjudicator).

We note that the September 2018 report of the Child Welfare Legislative Review Committee recommended that the current foster parent appeals process be replaced with a new, child-centered conflict resolution process that is led by a neutral and independent party. At the time of our audit, no steps had been taken in response to the Committee's recommendations.



Recommendation 33

We recommend that the Department, in consultation with the CFS Authorities, review and assess concerns raised by agencies and the Child Welfare Legislative Review Committee and strengthen the Foster Parent Appeals Regulation as appropriate.

8 Limited quality assurance processes

Quality assurance reviews provide feedback to workers, note common issues, and identify staff training needs. We expected supervisors within agencies and CFS Authorities to regularly complete quality assurance reviews of a sample of foster care workers' files. We also expected the Department to monitor the quality assurance work done by the CFS Authorities. As another way to help ensure quality service, agencies need to hire properly qualified staff. In our review of quality assurance practices we found the following:

- Agency quality assurance processes did not include annual reviews foster home files (**SECTION 8.1**).
- Limited monitoring by CFS Authorities and the Department (**SECTION 8.2**).
- As permitted in policy, one agency used unqualified foster care workers, but the agency did not properly mentor or supervise these workers as required in policy (**SECTION 8.3**).

These issues are discussed in detail below.

8.1 Agency quality assurance processes lacked regular reviews of foster home files

None of the agencies had a quality assurance process that consisted of a periodic, detailed review of a sample of foster care worker files. Ideally, quality assurance reviews should occur annually, with an emphasis on higher-risk files such as those with a history of complaints and non-compliance with standards. Such reviews should go beyond the examination of foster home licence and place-of-safety packages. They should check whether proper documentation, investigation, follow-up and enforcement actions occurred in response to complaints, and that information in the provincial Child and Family Services Information System (CFSIS) database is up-to-date and consistent with agency file records. And for foster homes licensed by internal agencies but managed by external agencies, each year a sample of homes should be visited by internal agency staff.

We noted that each agency had processes in place for supervisors to review and approve place of safety, new foster home, and foster home annual renewal packages (that is, the collection of documents submitted for review). Our file reviews showed that for the most part, supervisory sign-off of these packages was occurring (with the exceptions being mostly place of safety packages from Awasis).

But our findings also showed that despite these sign-offs, a significant number of place of safety and foster home packages did not comply with all relevant regulatory requirements or CFS policies. And sometimes complaints or other issues recorded elsewhere in the foster home file were not (but should have been) included in annual foster home licence renewal packages. These findings indicate that reliance on supervisory review and sign-offs as the only quality assurance process is insufficient.

Management of agencies cited a lack of resources for quality assurance work as the reason for this work not being done.



Recommendation 34

To provide agency management with proper assurance that foster homes and places of safety are appropriately approved, we recommend that agencies implement a risk-based quality assurance review process over all key processes including:

- Issuing new foster home licences (as discussed in **SECTIONS 4.3 and 4.4**).
- Renewing foster home licences (as discussed in **SECTION 5.1**).
- Assessing and approving places of safety (as discussed in **SECTION 6.1 and 6.2**).
- Managing complaints (as discussed in **SECTION 7.1**).
- Maintaining foster home records in the CFSIS database (as discussed in **SECTION 9.1**).

8.2 Limited monitoring by CFS Authorities and the Department

None of the CFS Authorities did annual, comprehensive quality assurance reviews of their agencies' foster home files, and the Department did not monitor the quality assurance work done by the Authorities. Three of the 4 Authorities had a quality assurance team, but given the broad scope of responsibility of Authorities, the focus of their quality assurance work varied from year to year. At the time of our audit, foster homes was not listed on any current quality assurance work plans; however, General Authority management advised that since then, in early 2019, an external party did an audit of a sample of foster home new licence home studies. Both Northern Authority and SFNNC had previously done detailed reviews of agency foster home files and shared the results of these findings with the agencies. But at the time of our audit, there were no plans to repeat such reviews going forward. Management of all CFS Authorities cited resource limitations for quality assurance work as the reason why more work was not being done.

Some Authorities also monitored foster home performance by reviewing CFSIS reports. Two Authorities (SFNNC and General) reviewed reports that tracked, among other things, how many foster home licences had expired and one tracked how many places of safety had extended beyond 6 months. These Authorities would share this information with their agencies, and one (General) would follow-up with agencies to ensure overdue licences were addressed.



Recommendation 35

To ensure that the agencies under their responsibility are following established foster home standards and practices, we recommend that CFS Authorities:

- Monitor agencies' quality assurance review results related to foster home management and provide feedback, as deemed necessary.
- Develop and implement a risk-based quality assurance review plan that includes a review of each agency's foster home management practices on a regular cycle.
- Report quality assurance review activities and key results to the Department.



Recommendation 36

We recommend that the Department review and monitor CFS Authority reporting of quality assurance review activities and key results.

8.3 One agency used unqualified staff, but did not provide the required mentoring or supervision

Department policies require staff to hold (at minimum) a Bachelor of Social Work (BSW) degree, or meet a specific combination of education and experience requirements. We examined the education and experience of foster care workers employed between July 2016 and June 2017 by the 4 agencies. Staff in 3 of the 4 agencies met the Department's qualification standards. In Awasis, only 4 of 17 staff (24%) were appropriately qualified. Thirteen workers did not have a BSW, 4 had not completed a Grade 12 diploma, and 8 did not have any previous social work or child welfare experience.

We noted that Awasis faces unique challenges in hiring and retaining qualified workers. The agency strives to hire workers from the small, and often remote, communities under its responsibility. This makes it more difficult to find people with the required qualifications and experience. Northern Authority noted that in some cases housing may not be available for qualified potential hires, making hiring qualified staff from outside these communities more challenging. The Agency also experiences high staff turnover in these positions. Department standards allow an agency to hire people who are not qualified if there are no job applicants that are qualified. The Department classifies these workers as "field staff 1". Agencies are required to provide additional mentoring and supervision for these staff. But we found Awasis did not provide the additional mentoring and supervision required for unqualified staff.

For the 4 agencies we examined, we looked at the training offered to new foster care workers. All agencies said their initial training included job shadowing or mentoring by peers or supervisors. Only Awasis provided training sessions specifically designed for new foster care workers.



Recommendation 37

We recommend that the CFS Authorities, with agencies hiring field staff 1, ensure that their agencies develop a formal development program for “field staff 1’s”.

9 Child and Family Services database not complete and accurate

The Department expects agencies to maintain foster home and place-of-safety records on the provincial Child and Family Services Information System (CFSIS). CFSIS, which was put in place in 1993, operates as a registry for children in care, licensed foster homes, and places of safety. It is also a case management system for recording and managing services provided to children and families, but does not include financial information. The Department grants user access to CFSIS and is responsible for providing ongoing application support to agencies and CFS Authorities. Agencies vary in their use of CFSIS. Some agencies used their own case management system and only entered minimal data in CFSIS, while others used CFSIS exclusively (along with paper files).

In our previous 2006 CFS audit report, we indicated that not all agencies used CFSIS and that CFSIS information was out-of-date and inaccurate. We noted that updating CFSIS in a timely manner was important to ensure that reliable information was available for system planning, resource coordination and performance analysis. In our 2012 follow-up report, we noted that the Department issued a letter to CFS Authorities in April 2010, stating it was a requirement that all cases be entered in CFSIS. The Minister of the Department issued another letter to Authorities in 2014 with the same direction. As part of our current audit work, we tested the extent to which CFSIS is now used by the 4 agencies for foster home management and whether related information in CFSIS is up-to-date and accurate. Unfortunately many of the issues noted in our 2006 report remain.

Our key findings are as follows:

- Information in the CFSIS database was not accurate (**SECTION 9.1**).
- CFS Authorities and the Department did little to monitor whether foster home information in CFSIS was accurate, and the Department did not provide enough CFSIS support to agencies (**SECTION 9.2**).
- System-wide access to certain information may improve overall licensing efficiencies (**SECTION 9.3**).

These findings are discussed in detail below.

9.1 Information in the CFSIS database not accurate

We examined a sample of 165 foster home and place-of-safety files across the 4 agencies to determine whether the related case information in CFSIS was accurate and up-to-date. We found that in only 47% (78) of the files examined, the information in CFSIS was complete and accurate.

We found the following information from the files examined was not in CFSIS:

- 9 homes in our sample were not listed on CFSIS at all. These homes were 2 places of safety managed by WCFS and 7 on-reserve foster or place-of-safety homes managed by Awasis.
- 7 children in care in homes managed by Awasis had no record in CFSIS.

Awasis management told us they are aware that not all foster homes, places of safety, or children in care are listed on CFSIS. This is more common for homes and placements on First Nations reserves. The agency indicated it is working toward full compliance for entering children in care cases on CFSIS, but noted that entry of foster homes and place of safety records was less of a priority.

We found the following information was inaccurate:

- The number, gender or age of the child(ren) the home was licensed for in 35 of 156 files (22%).
- The record of other adults and other children living in the home in 33 of 156 files (21%).
- The record of when licences were issued in 23 of 156 files (15%).
- The record of the children currently placed in the home or placement history in 13 of 156 files (8%).

Information gaps and inaccuracies in CFSIS impact the ability of agency management, CFS Authorities and the Department to readily access accurate information about foster homes, places of safety, and the children placed in those homes. It also impacts the accuracy of CFSIS reports relied upon for performance monitoring and reporting purposes.

SECTION 8.1 discusses how implementation of a quality assurance review process would help identify and resolve the lack of accuracy and completeness of CFSIS data on licensed foster homes.

9.2 CFS Authorities and the Department did little to monitor use of CFSIS and the Department did not provide enough CFSIS support to agencies

We assessed whether the Authorities and the Department monitored and supported their agencies to ensure foster home information in CFSIS is up-to-date and complete. We also assessed whether the Department supported Authorities (and agencies) in the use of CFSIS, generally. Overall, we found:

- CFS Authorities did little to monitor whether foster home information in CFSIS was complete and accurate but provided some support to agencies.
- The Department was not monitoring agency use of CFSIS for managing foster homes, and agencies identified shortcomings with the Department's support.

AUTHORITIES DID LITTLE TO MONITOR BUT PROVIDED SOME SUPPORT

CFS Authorities' primary means of monitoring the information agencies recorded in CFSIS was to periodically run CFSIS reports of statistical information from the system. The frequency ranged from monthly, by one CFS Authority, to annually in another. Authorities took note of missing information and relied on agency management to let the Authority know if something looked inaccurate by sharing these reports with their agencies. We noted that 2 of the 4 Authorities' reports contained little information related to foster home management.

CFS Authorities also became aware of information that was missing or inaccurate in CFSIS on a case-by-case basis when doing work on foster parent appeals, investigations, and agency requests for licence variances. In these cases, some CFS Authority officials stated they would follow-up with agency staff to ensure the information was updated. The Northern Authority was also doing a review of one of its agency's foster home programs at the time of our audit. As part of this review, they looked to see if the information in CFSIS was consistent with file information. There were no plans to complete a similar review for other agencies.

CFS Authorities were aware of some barriers to agencies entering information on CFSIS.

- Indigenous agencies with multiple community offices in remote locations cited the most barriers. Most notable was the lack of internet connectivity in certain communities. For example, staff reported it taking half an hour to login, and not being able to login at all in remote communities if it is cloudy outside (as their connectivity is through the use of a satellite). For this reason, Awasis management had not requested CFSIS access for many of their foster care workers in remote communities.
- There was also some agency resistance to using CFSIS due to concerns over how sensitive information was being treated and protected. One agency's management said some First Nations' chiefs voiced opposition to providing community information for storage on a provincial database. We understand how such concerns may stem from the historical treatment of Indigenous peoples in Canada, including the residential school system and the 60's Scoop.

We were told that the Authorities had taken some steps to help support their agencies in updating and maintaining information on CFSIS, as follows:

- SFNNC had begun offering periodic training sessions to agency staff on using the CFSIS application for foster home management.
- The Northern Authority formed a CFSIS Compliance Working Group with representatives from each of its agencies. A goal of the group was to identify and address barriers in achieving and maintaining CFSIS compliance. Awasis management noted that some recommendations made by this working group were not acted on when the government announced a freeze to modifications to CFSIS.
- The Northern Authority also created and updated a CFSIS manual, and had a CFSIS support staff member that provided training in agency offices.

NO MONITORING BY THE DEPARTMENT AND SHORTCOMINGS IDENTIFIED WITH SUPPORT

The Department was not monitoring whether agencies were using CFSIS to manage foster homes. The Department supported CFS Authorities and agencies in using CFSIS, generally, by:

- Providing technical assistance to CFSIS users through the CFSIS Help Desk. Department staff said there were 2.5 full-time staff assigned to the CFSIS Help Desk to assist the 2,400+ users across the province.
- Offering CFSIS training to agency and CFS Authority staff.
- Meeting regularly with CFS Authority representatives through the Child and Family Services Application (CFSA) user group, to discuss and prioritize enhancements for CFSA (which includes CFSIS).
- Assisting Authorities, at their request, to develop CFSIS training manuals.
- Creating new CFSIS reports to assist the Authorities with monitoring, and running reports the Authorities cannot run themselves.

Despite this support, some agencies and Authorities raised concerns related to the support they were receiving as follows:

- Significant delays (for example, up to 3 months) for new users to receive CFSIS access and ongoing difficulties logging in. Accessing adequate training on how to use CFSIS, which was delivered by a separate Department unit, was also cited as a challenge by some Authorities and agencies.
- Provincial manuals and training sessions that were not thorough enough so agencies had been developing their own.
- It was very expensive for agencies with offices in remote communities to participate in Department training due to the costs and time required to travel since Department training was only offered in government buildings (not in agency offices).
- Limited CFSIS reports available for management related to foster care.
- CFSIS was difficult to use and had limited capability as an application.
- Sufficiency of resources to maintain foster home information on CFSIS.

We note that Department officials advised us that since 2017, the Business Transformation and Technology (BTT) branch of the Department of Finance has been managing technical upgrades to the Department of Families' business applications, including CFSIS. In early 2018, BTT announced a freeze on CFSIS system enhancements to prioritize other work. This will significantly limit the impact of the CFSA user group's work of prioritizing enhancement to CFSIS.



Recommendation 38

We recommend that the CFS Authorities periodically verify that key information in CFSIS agrees to agency records.



Recommendation 39

We recommend that agencies with community offices that have unreliable internet access establish a process to periodically send key information for these offices to agency offices with reliable internet, for inputting in CFSIS.



Recommendation 40

We recommend that the Department prioritize system enhancements identified by CFS Authorities and agencies, and act on the most pressing requests.

9.3 System-wide access to certain information may improve overall licensing efficiencies

The Department grants CFSIS access to users at the request of agencies. Users are granted access, based on their position type, to certain information fields at one of the following levels: only those cases assigned to them, all agency cases, or all cases provincially. We did testing to determine whether proper access controls were in place to limit foster care workers' ability to access sensitive information. In general, we found foster care workers only had access to information for their assigned cases. We found no situations where foster care workers had access to sensitive information they did not need to access.

We found access permissions for cases outside a worker's own caseload differed among foster care workers within each agency and across agencies. Agency management was not fully aware of some of this variability, yet Department staff said access is granted based on the request of the agency.

Some foster care workers and agency managers noted efficiencies could be gained if information about cases managed by other agencies was more accessible. They viewed this information as necessary when seeking possible placements for children in their care or licensing and approving foster homes or places of safety. Agencies had the ability to protect case records in CFSIS as 'confidential' at their discretion. Only users approved by the agency to have "confidential access" could view these cases. Staff felt that because of these limitations they were unable to access information necessary to do their job. For example, this made it more difficult and time consuming to verify that a place of safety is in fact a safe place for a child. This is because in doing the required prior contact check, a worker might be able to see that the caregiver was the subject of a protection case, but would have to send a letter to the other agency to get any details. WCFS management viewed this lack of access to other agencies' cases as a significant barrier and stated they would like to see an opening up of CFSIS information to a greater degree.



Recommendation 41

We recommend that the Department, together with the CFS Authorities, develop protocols for system-wide access to information to promote efficiencies in assessing caregivers and ensure access is limited to a need-to-know basis.

10 Steps taken to address foster home supply issues, but risks remain

When agencies remove children from their home and take them into care, it is imperative that they be placed in a loving, nurturing, and safe environment. Therefore it is critical that there be an adequate supply of suitable foster homes. Suitability relates to the location of the home (for example, ideally in the child's original community), whether the home is culturally appropriate, and whether the foster parents are willing, able and supported to care for a particular child, since each have unique needs.

The majority of management and staff interviewed said there is a chronic shortage of suitable foster homes. Some said this was resulting in agencies making some placement decisions out of desperation rather than best fit.

An inadequate supply of suitable foster homes has substantial negative impacts on the children in care. Siblings may be separated, or a child may be placed in a group home or in a foster home not best suited to meet their needs. These less-than-ideal placements can lead to placement breakdowns, and ultimately more trauma for the child. From a financial perspective, it could also have a negative impact for the Province due to forced reliance on more expensive placement resources.

The types of shortages that agencies and Authorities described were for homes willing and able to care for large sibling groups (to prevent siblings from being separated from each other), children with complex needs, and young children (as often there was no daycare plan in place). Some officials also raised concerns that agencies with foster home vacancies were not always willing to take children under the responsibility of other agencies.

Some CFS Authorities and agencies said the shortage of foster homes was due to a lack of staff resources at the agency level to recruit, license, and support foster parents (see **SECTION 1** for a discussion on provincial funding for foster home case management). **SECTION 4.3** explains the initial licensing process, which involves a significant amount of documentation and staff time. Both the CFS Authorities and the Department need to monitor the supply of foster homes and take action when it is found the supply is not meeting the needs of children in care. We found the following related to the impact of the shortage of suitable foster homes and the work being done to ensure an adequate supply of suitable foster homes:

- Shortages of suitable foster homes are leading to reliance on more expensive placements (**SECTION 10.1**).
- There is minimal monitoring and reporting of foster home supply challenges (**SECTION 10.2**).
- The Department provides some support to address foster homes shortages but more needs to be done (**SECTION 10.3**).

This is discussed in greater detail below.

10.1 Shortages of suitable foster homes leading to reliance on more expensive placements

Although there may be foster home beds open, there are children in (less desirable) emergency placement resources (EPR) that are not being moved into those foster home beds, indicating a mismatch between the demand and the types of homes available. Emergency placement resources are designed for short-term use until the child returns home or an appropriate longer-term placement can be arranged. These emergency placements are either homes (used most) or shelters (with paid staff) and are costly. The average daily rate for an emergency foster home bed was \$175. Some children remained in EPR far beyond the intended 30-day maximum. A Department report on these placements showed that 181 of 377 (48%) children in EPR beds had been there for 90+ days as of May 31, 2018. In reviewing one Authority's EPR report, we noted 11 of the 87 children on the report had been in emergency placements for a year or more.

Emergency placement resources (EPR) are designed for short-term use until the child returns home or an appropriate longer-term placement can be arranged. These resources are either homes (used most) or shelters.

Regular foster homes are less costly than EPR and external agency foster homes. But a lack of foster homes leads to reliance on, and misuse of, these more expensive resources.

10.2 Minimal monitoring and reporting of supply challenges

CFS Authorities and the Department were aware of placement challenges but monitoring of the supply of foster homes was minimal. Two of the CFS Authorities periodically ran CFSIS reports that listed foster homes in their agencies along with the number of beds, vacant and occupied, in each home. The reliability of this information may be in question given our findings in **SECTION 9.1**.

Department management stressed that agencies along with foster parents make decisions around when placements occur, and noted that some beds are kept vacant for a long time for various reasons. These reasons included foster parents being unable or unwilling to fill all of their beds. As a result, reliable information was not available on true vacancies within the system.

Implementation of **RECOMMENDATIONS 34** and **38** would help ensure the information in CFSIS related to foster homes, including filled and vacant beds, is accurate and complete. Complete and accurate

information would be helpful for finding placements for children, reducing the number of children in EPR, and implementing a long-term strategy to support a sufficient supply of suitable foster homes.

Some CFS Authorities also reported the need for more culturally appropriate homes—in particular homes with Indigenous caregivers—given that the vast majority of children in care are Indigenous. It was an important objective of many agencies and Authorities (and their stakeholders) to place Indigenous children with Indigenous caregivers. One Authority and one agency tracked information related to this objective.

- SFNNC monitored the self-reported cultural origin of foster parents using CFSIS. A report as of October 31, 2017 showed 52% of foster parents had self-reported as Indigenous, with most identifying as having treaty status (16% had origin as not-determined). SFNNC management told us they give each of their agencies information on caregivers who have self-identified as treaty or non-status and how many bed spaces these homes have in hopes that agencies will maximize the use of these culturally appropriate homes.
- Awasis tracked the number of children placed with an Indigenous family using its own case management system. As of March 31, 2018, the agency reported that 73% of children in care were placed with an Indigenous family and 41% were placed with a relative (in a place of safety or foster home).



Recommendation 42

We recommend that the Department and CFS Authorities track and monitor the number of licensed foster homes (by type) in each agency, including filled and available vacant beds, to analyze annual trends in the supply of foster homes regionally and provincially, and that the Department work with the CFS Authorities and their agencies to use available bed space information to minimize the extent of EPR use.

10.3 Department provides some support to address foster home shortages, but more needed

Department officials were aware of challenges in finding suitable foster homes. Officials told us that they felt societal changes played a role in the shortage of suitable foster homes. The Department did not believe the system would be able to recruit to fill certain gaps. For example, not many parents are willing (or able) to stay home to foster. The basic rate paid to foster parents was meant to cover the costs of caring for the child only, and not intended as a salary. There were also challenges with access to daycare in the province, so without a daycare plan for a child, the home may not be willing to take the child.

The Department became aware of foster home supply challenges through their monitoring of EPR reports that showed children remained in these placements longer than desired indicating a lack of suitable foster homes available. Officials were also made aware of challenges through ongoing discussions with the CFS Authorities and through their Provincial Placement Desk that assists agencies with placements. The Department had provided some support to address foster home shortages, discussed further below.

At the time of our audit, the Department was focused on reducing the use of EPR, but Department officials said more needs to be done to reduce usage as children continue to remain in these resources longer than intended. The Collaborative Authority Resource Team (CART), funded by the Department, worked with agencies to move children out of EPR into long-term placements. The team consisted of representatives from each of the 4 Authorities. CART members monitored children in emergency placements to develop an understanding of placement resource needs. CART also periodically reported to the CFS Standing Committee, which consists of Department and CFS Authority representatives.

In addition to supporting CART, the Department had taken other steps to assist agencies with placement challenges.

The Department introduced an infant fee of \$10 per day in November 2016. This fee was introduced in response to feedback that there was difficulty placing infants, leading to over-use of EPR. This fee may be added to the basic maintenance rate paid to foster parents to avoid EPR use. Despite this new fee, infant placements continued to be a challenge. A Department report on EPR use as of May 31, 2018 showed that 33% of children in these beds were infants (age 2 and under). Another EPR report from one CFS Authority showed that infants under its responsibility remained in these placements on average, longer than older children.

Specialized treatment foster home programs had also been developed to assist with placements. As **SECTION 3** discusses, these resources were expensive and there were concerns that they were not always being used appropriately. Department and agency staff acknowledged that lower needs children were being placed in these homes designed (and paid) for higher-needs children. This misuse highlights a supply challenge related to regular foster homes.

To support the foster home supply generally, agencies are funded annually for foster care recruitment positions. Agencies solely funded by the Province are funded between 1 and 2 FTEs (depending on the size of the agency). Agencies that receive federal funding receive the same funding from the federal government. In 2014/15 the Department led a public advertising campaign aimed in part at recruiting Indigenous caregivers. Department officials said they gained some Indigenous foster families but not to the degree expected (or needed).

As part of our foster parent survey, we asked foster parents whether they had suggestions for recruiting foster parents. Foster parents suggested creating more awareness about fostering, improving the experience for current foster parents, and making changes to improve the system. Foster parents thought more public information with positive messages and real-life stories could combat stigma and negative stories. They spoke of how ensuring positive experiences and proper support for current foster parents goes hand-in-hand with promoting fostering through word-of-mouth. Some foster parents also explained that more financial support would allow foster parents to stay home to take in more children, or care for younger children. Foster parents had many suggestions for how systems and processes could be improved to better support foster parents and children care. Some of these suggestions are reflected in this report and the recommendations made.

Department officials told us a key focus of the current government was to reduce demand for foster homes by providing better support to extended family members of children in care to be their caregivers thus resulting in less children in care and with shorter stays in care. Despite several initiatives aimed at achieving these goals, as noted earlier, a shortage of suitable foster homes remains an ongoing challenge.



Recommendation 43

We recommend that the Department, in collaboration with CFS Authorities, develop and implement of a long-term strategy to achieve a sufficient supply of suitable foster homes to meet the needs of children in care across the province.

Additional information about the audit

This independent assurance report was prepared by the Office of the Auditor General of Manitoba on the Management of Foster Homes. Our responsibility was to provide objective information, advice and assurance to assist the Legislature in its scrutiny of the government's management of resources and programs, and to conclude on our objectives and criteria.

All work in this audit was performed to a reasonable level of assurance in accordance with the Canadian Standard for Assurance Engagements (CSAE) 3001—Direct Engagements set out by the Chartered Professional Accountants of Canada (CPA Canada) in the CPA Canada Handbook —Assurance.

The Office applies Canadian Standard on Quality Control 1 and, accordingly, maintains a comprehensive system of quality control, including documented policies and procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements.

In conducting the audit work, we have complied with the independence and other ethical requirements of the Roles of Professional Conduct of Chartered Professional Accountants of Manitoba and the Code of Values, Ethics and Professional Conduct of the Office of the Auditor General of Manitoba. Both the Rules of Professional Conduct and the Code are founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality, and professional behavior.

In accordance with our regular audit process, we obtained the following from management:

1. Confirmation of management's responsibility for the subject under audit.
2. Acknowledgment of the suitability of the criteria used in the audit.
3. Confirmation that all known information that has been requested, or that could affect the findings or audit conclusion, has been provided.

Period covered by the audit

The audit covered the period between July 2016 and December 2017. This is the period to which the audit conclusion applies.

Date of the audit report

We obtained sufficient and appropriate audit evidence on which to base our conclusion on July 11, 2019, in Winnipeg, Manitoba.

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Summary of recommendations

In this section we provide the responses of CFS Authorities and agencies who chose to provide responses for individual recommendations. The Department has chosen not to provide responses for each recommendation. Their overall response can be found in the Responses from Officials section.

Section 1: Funding foster home case management

1. We recommend that the Department, in determining funding allocations for CFS Authorities, explicitly include costed resources for foster home case management.

Response of officials:

While this recommendation is directed to the Department, the following CFS Authorities and agencies chose to comment on this recommendation:

General Authority: The Authority and agency (WCFS) support the recommendation for the department to amend the design of the funding model to explicitly include resources for foster home case management. However, the General Authority is concerned that with the move to single envelope funding and resource allocations already being set for the next three years there will not be sufficient funding/resources for foster care case management. Finding support for this important role will still have to come from within the envelope that did not allow for this function.

Northern Authority: The NA agrees and supports this recommendation made. The NA supports funding discussions for Resource positions as part of the Single Envelope Funding. There were previous discussions advising there are requirements under the Standards Manual, however, funding for these positions are not covered in Core funding.

SFNNC: The SFNNC strongly agrees with this recommendation and is willing to assist in these changes. There has been work expected throughout the system involving foster care for many years that has never been compensated and changing this will strengthen the foster care system as a whole.

Awasis: Awasis Agency agrees in part with this recommendation, but also recommends the Department provide funding for foster care resourcing similar to what external agencies receive that includes funding for development and training of specialized placements, and caseloads for foster care management comparable to external agencies or at a ratio no higher than 20:1. To date Awasis has had numerous meetings with Provincial Department Heads as well as the Minister's office and has provided numerous written submissions to both provincial and federal funders providing documented shortfalls in the

funding model. Awasis has utilized federal funding and provincial funding designated for other areas in order to provide foster care staffing for provincial responsibility services. Awasis will continue to advocate for appropriate funding.

SECFS: Strongly Agree - SECFS spends over 1.3 million in the case management of foster homes on salary and travel alone. 65% of the children in care are a provincial responsibility. The province does not include any foster home case management in the design of the current funding model. This means the Agency must utilize \$800,000 for staff salaries that could be spent working with children and families to prevent family breakdown and reunifying children to their families.

2. We recommend that the Department, in collaboration with the CFS Authorities, promptly and every 3 to 5 years thereafter, review the CFS funding assumptions, base amounts and calculations, and make the necessary changes to ensure a fair and equitable funding approach for agencies.

Response of officials:

General Authority: The General Authority would like to make note that while Winnipeg CFS is initially funded at an allotment for higher pay scales, its additional treasury board reduction must be accounted for.

Northern Authority: The NA agrees and supports this recommendation made. The NA is in current funding discussions with the Department and other Authorities.

SFNNC: The SFNNC agrees with this recommendation and will work with the Department to make this happen.

While this recommendation is directed to the Department and CFS Authorities, the following agencies chose to comment on this recommendation:

Awasis: Awasis Agency agrees with this recommendation. Awasis believes this recommendation could be strengthened to ensure agencies are funded based on current case count levels rather than historical numbers. The Agency has consistently advocated since 2009 for core funding based on the set criteria, as well as adequate funding for areas that are grossly underfunded given the size, geographical and remoteness of the agency, as well as for the Designated Intake services provided on behalf of the four Authorities which is not recognized or funded. Awasis is equivalent to two large agencies, but funded as a large agency. Awasis has had to utilize federal funding in order to operate. Awasis will continue to advocate for appropriate core funding as well as for areas that are not or are grossly underfunded.

SECFS: Strongly Agree - Worker caseloads are higher than assumptions due to trending crises i.e. Crystal Meth epidemic, or the lack of schooling for teens to continue schooling after grade 9 in communities. Other children come to the city due to lack of specialized placement options or resources in their community. This results in ever increasing caseloads for workers. The Agency strongly agrees with the auditors that wage levels need to be fairly dispersed through the system to stop the inequality and inequity that has gone on for years in First Nation child welfare agencies.

Section 2: Funding caregivers

3. We recommend that the Department promptly, and regularly thereafter, review the basic maintenance rates to ensure the rates cover the costs incurred by foster parents and place-of-safety caregivers.

Response of officials:

While this recommendation is directed to the Department, the following CFS Authorities and agencies chose to comment on this recommendation:

General Authority: The General Authority supports a review of basic maintenance. Additionally, a formal review of basic maintenance rates must examine the role of additional special rates in overall payments to foster families. As we have moved to single envelop funding consistency between Authorities related to basic maintenance is important. Input/collaboration with Authorities and agencies in this process is critical.

Northern Authority: The NA agrees and supports this recommendation made. There were previous discussions and research completed to ensure the basic maintenance rates are appropriate for foster parents' location of service. Current rates do not cover the costs due to the current cost of living.

SFNNC: The SFNNC agrees that the Department promptly and regularly review the basic maintenance rates to ensure that costs incurred by foster parents and place of safety caregivers are covered.

Awasis: Awasis Agency agrees with this recommendation. It should be noted that a commitment was made by the Province to increase the Basic Maintenance rates in 2013 which did not occur. What is consistently not considered is the higher cost of living in Northern remote communities; not just a higher cost for food, but all areas. Awasis Agency will continue to advocate for appropriate basic maintenance rates that are reflective of the cost of living.

SECFS: Strongly Agree – The small increment that northern foster parents receive in basic maintenance rates does not begin to address the actual costs of meeting the need for children in the north. There has been no assessment of the true costs for food, diapers, and formula costs for children in care up north.

4. We recommend that the CFS Authorities and the Department, in collaboration with the agencies, periodically review and update as necessary the Department's needs assessment scoring tool (the CAF) and special rate setting process, to ensure a robust culturally appropriate province-wide process. We further recommend that the Department provide related training and support. A robust needs assessment scoring tool and special rate setting process would:
- Link the score resulting from the assessment tool directly to a service fee.
 - Consider the skills, abilities, and needs of foster parents to meet the child's assessed needs (including assessing the need for respite and support).
 - Capture all of the child's relevant needs.
 - Require documentation and justification of any respite and support hours approved.

Response of officials:

General Authority: The General Authority would like to suggest that the Department research, develop and implement a new or revised tool that is both modernized and robust (similar to the process of the Supports Intensity Scale for CLDS). Certification, training, and support for the new or revised tool is also necessary.

Northern Authority: The NA agrees and supports this recommendation. Ensuring that the needs of children is directly linked to the needs assessment tool will ensure that the child's needs are the first and foremost concern when setting service fees. The department providing training and support is a key piece in ensuring the tool is being utilized in a consistent manner.

SFNNC: The SFNNC agrees that the Department and CFS Authorities, in collaboration with agencies, review and update the Department's needs assessment scoring tool and special rate setting process. This is something that the SFNNC has worked on in previous years (2013, 2016) with our agencies, authority partners and the Department.

Awasis: Awasis Agency agrees with this recommendation. In addition, Awasis recommends utilizing the tools created by the Standardized Rates Implementation Committee which began in 2012 and included participants from the Authorities, Agencies, and province. The Committee created assessment tools

and tutorials for workers and amended the provincial CAF format. These were presented to Standing Committee and the Province in 2013. Awasis adopted the assessment tools created by the committee that highlight the importance of culturally appropriate placements in their assessments for special rate funding. The Agency is complying with the Department's recent Directive to use the outdated provincial forms (CAF) for special rate applications, but is disappointed in their simply issuing a Directive to use outdated systems when significant funding was spent province-wide to improve on the system six (6) years ago.

SECFS: Agree - SECFS would agree as long as cultural competence relevant to the child's community and language are included in the skills, abilities and needs of foster parents. These traits cannot be purchased or developed with foster parents who are external or not connected to a child's community.

5. We recommend that the CFS Authorities and the Department enforce and monitor the use of a province-wide standardized needs assessment tool.

Response of officials:

General Authority: The General Authority supports the use of a province-wide standardized assessment tool provided it has been researched and developed by the Department as both appropriate and robust.

Northern Authority: The NA agrees with this recommendation.

SFNNC: The SFNNC agrees that the Department enforce and monitor the use of a province-wide standardized needs assessment tool.

While this recommendation is directed to the Department and CFS Authorities, the following agencies chose to comment on this recommendation:

Awasis: Awasis Agency agrees with this recommendation. In addition, we would advocate for the use of the tools created jointly by the Implementation Committee.

SECFS: Agree - SECFS agrees as long as there is sufficient training and support for staff. We require an assessment tool that incorporates criteria beyond mainstream medical and developmental questions. Research supports the connection with culture is a significant contributor to overall child well-being and a reduction in suicidal ideation.

6. We recommend that the Department set parameters around the maximum number of respite and support hours per child, based on level of need.

Response of officials:

While this recommendation is directed to the Department, the following CFS Authorities and agencies chose to comment on this recommendation:

General Authority: The General Authority recommends that the use of a standardized tool is required, and we believe that a need exists for training and support regarding the calculation of foster care rates (including respite and support). Additionally, we suggest that the context of the overall needs of the home in totality are accounted for along with the specific needs of children placed in the home.

Northern Authority: The NA maintains the position that each child is unique and setting maximum hours for children in care may result in the inability to meet the needs to the child in special circumstances.

SFNNC: The SFNNC agrees that the Department set parameters around the maximum number of respite and support hours per child, based on level of need. Similar work has already occurred for level V children and in relation to this, the SFNNC has developed draft guidelines for use of respite and support for children in care.

SECFS: Agree - SECFS agrees with this recommendation providing there are provisions for emergency or exceptional circumstances.

7. We recommend that the Department monitor and enforce compliance with its policy for the annual review and approval of special rates by agencies and CFS Authorities.

Response of officials:

While this recommendation is directed to the Department, the following CFS Authorities and agencies chose to comment on this recommendation:

General Authority: The General Authority is in support of the annual review of rates, however, we suggest that work needs to be completed for a quality assurance framework (i.e. what is entailed in the annual review?; Is the process effective?). We also recommend that quality assurance review of “agency special rate committees” occur.

Northern Authority: The NA acknowledges this recommendation. It is important that special rates are

reviewed annually and revised where necessary. The NA does not support expiry dates on special rates.

SFNNC: The SFNNC agrees that the Department monitor and enforce compliance with its policy for the annual review and approval of special rates by agencies and CFS Authorities. Changes in this area have already occurred as part of the Rate Hold Policy that was implemented by the Department in December 2018. Agencies and Authorities have been informed to put expiry dates (maximum one year) on special rates for children in care.

Awasis: Awasis Agency does not agree with this recommendation. The Agency does agree with internal agency reviews of rates that could be monitored by the Authority and Department through CFSIS. The costs and human resources to Agencies, Authorities, and Division to complete the entire special rate approval process annually is exorbitant and the limited funding could and should be used for social work, not processing paperwork.

SECFS: Agree – Providing the government adequately funds the Agency for foster care staff, we could meet this requirement. Without adequate funding of foster home case management, it will be a struggle to comply with this recommendation.

Section 3: Use of external agency foster home programs

8. We recommend that the Department, in consultation with the CFS Authorities, enter into service purchase agreements with all provincially funded external agencies providing foster home services and that these agreements clearly define:
- Service and program result expectations.
 - Reporting requirements for services provided and the results achieved.

Response of officials:

General Authority: Clarification needs to occur between the role of the Department and Authorities regarding foster homes that are part of the larger externally managed group care resources. Does responsibility – (SPA) for these foster homes rest with the mandating Authorities and licensing Agencies or the Province? This should be a collaborative process with the province and Authorities.

Northern Authority: The NA agrees and supports this recommendation. The use of SPA would ensure all parties involved are aware of requirements and expectations.

SFNNC: The SFNNC agrees that all provincially funded external resources that provide foster care service should have service purchase agreements and we are willing to participate in the development of each SPA for all externals (Community Care Providers).

While this recommendation is directed to the Department and CFS Authorities, the following agency chose to comment on this recommendation:

SECFS: Agree - Program requirements and results need to be equally shared with agencies when our children are in their facilities. Rates of homes need to be justified.

9. We recommend that the Department, or as applicable given single-envelop funding, the CFS Authorities, require all placements in externally managed foster home programs go through the Provincial Placement Desk (or an equivalent, at the CFS Authority level). We further recommend that the Department, in collaboration with the CFS Authorities, strengthen processes for referring and placing children in care in externally managed homes by ensuring that:
- Placements are justified and made in a consistent manner.
 - Only children assessed as having needs consistent with the program's mandate are placed in the program (with potential exceptions for sibling groups, with sibling rates set based on their required level of care).
 - Expectations regarding the referral and approval processes are clearly outlined and communicated to all CFS agencies.

Response of officials:

General Authority: The General Authority does not agree that all placements to externally managed homes go through the provincial placement desk. Not all of these homes are level 4 /5 (some are level 3). An Authority and agency level quality assurance framework must be developed to monitor the use of these homes and the rates paid – value for money and service outcomes. Given single envelop funding and that Authorities being accountable for its agencies child maintenance expenditures, this only makes sense.

Northern Authority: The NA does not agree with this recommendation made. There are concerns with the length of the process of referrals to the Provincial Placement Desk (PPD). Further, there are concerns with the identified placements for children not always suitable.

SFNNC: The SFNNC agrees that all placements within an externally managed resource should go through a screening process to gain a placement. This would eliminate all direct referrals to CommunityCare Providers. We currently have a process in place that looks at all referrals to the Provincial Placement Desk however, this process could be strengthened to ensure equality for all referrals.

While this recommendation is directed to the Department and CFS Authorities, the following agency chose to comment on this recommendation:

SECFS: Agree - A broader development of sibling group placements would be a benefit to SECFS. Many of our families have large numbers of children and this would prevent them from being separated. A fair and percentage based distribution of placement beds should be developed for each Agency. This will allow service providers and agency staff to become more familiar with each other's treatment options and expectations.

10. We recommend that the Department, or as applicable given single-envelop funding, the CFS Authorities, ensure the use of external agency foster homes be properly justified based on the high needs of the child(ren) being placed in these homes and the special services provided in these homes.

Response of officials:

General Authority: See the response to recommendation #9.

Northern Authority: The NA agrees with this recommendation made. There are concerns with children placed in homes that are not appropriate for their needs, placements not agreed upon by the child's agency.

SFNNC: The SFNNC agrees that all children going into an external resource should be matched appropriately with a rate that is suitable to the child's needs. We currently strive for this to occur in our work today with both our Service Support and Alternative Care teams working together to ensure appropriateness whenever possible.

While this recommendation is directed to the Department and CFS Authorities, the following agency chose to comment on this recommendation:

SECFS: Disagree - SECFS has specialty placements created under Shawenim Abinoojii. At times the needs may not match the rate of the child/ren; however, there are no other alternatives available in our remote communities. Children would all have to be relocated to Winnipeg if the Shawenim homes were not available.

11. We recommend that the Department ensure adequate documentation of the rationale for any differences between foster care worker caseload ratios used in funding external agencies as compared to internal agencies.

Response of officials:

While this recommendation is directed to the Department, the following CFS Authorities and agencies chose to comment on this recommendation:

General Authority: The General Authority supports this recommendation. We recommend the Department examine mandating external agencies to license their homes or transfer funding resources to allow for this role in internal agencies.

Northern Authority: The NA agrees with this recommendation made. It has been identified that there is a discrepancy between funding of these positions. It is hoped that with current funding discussions under Single Envelope funding that Resource be a part of those discussions for equality.

SFNNC: The SFNNC agrees that there should be equality in the ratio between foster care workers who either work at an external resource or at an agency when licensing for level 3-5 children in care. This rational of external agencies being funding 1:15 has left a two tiered system which leaves our children in agency resources at a disadvantage.

SECFS: Agree – This ensures more fairness and equality across the system for all internal and external agency agencies along with foster home case management workers.

Section 4: Processes for approving new foster homes

12. We recommend that the Department, in collaboration with the CFS Authorities, periodically review and revise the Foster Homes Licensing Regulation and CFS Standards Manual to ensure standards are up-to-date, relevant, and culturally appropriate.

Response of officials:

General Authority: The General Authority agrees with this recommendation as with the advent of single envelope funding many policies need to be re-examined. A variety of working groups have already commenced under partnership with the Province and Authorities and their agencies.

Northern Authority: The NA agrees with this recommendation made. The NA will continue to sit on the Inter-Agency Standards Working Group (IASWG) to be the voice for the northern agencies.

SFNNC: The SFNNC agrees that regular reviews of the Foster Home Regulations and Standards along with the Foster Parent Appeal Regulations should be completed and revised when appropriate.

While this recommendation is directed to the Department and CFS Authorities, the following agencies chose to comment on this recommendation:

Awasis: Awasis Agency agrees with this recommendation. In addition, it recommends the Foster Home Licensing Regulation be amended to revert the length of time a License is in effect to the former two (2) years from the current one (1) year.

SECFS: Agree – This is already in progress and occurs as necessary.

13. We recommend that the Department issue one electronic document, containing the full CFS Standards Manual for CFS Authorities and agencies to use, ensuring links in the document are functioning.

Response of officials:

While this recommendation is directed to the Department, the following CFS Authorities and agencies chose to comment on this recommendation:

Northern Authority: The NA agrees with this recommendation made. The IASWG currently is working on altering the Standard Manual template and updating the individual standards of the changes within the system.

SFNNC: The SFNNC agrees an electronic copy of the CFS Standards Manual would be helpful to our staff and agencies.

SECFS: Agree – This is already in place but is not fully completed in all categories.

14. We recommend that the Department, in collaboration with the CFS Authorities, amend the Foster Homes Licensing Regulation to define kinship foster homes and related requirements. We also recommend that the Department in conjunction with the CFS Authorities provide comprehensive direction for approving, monitoring, and supporting these homes.

Response of officials:

General Authority: The General Authority is awaiting further direction and information regarding kinship homes as work from a cross-Authority and province team has been submitted in past. The work completed by the team included information regarding the difference in home standards related to those well known to the child versus a home not known to the child and also to address issues/concerns related to community standards.

Northern Authority: The NA does not agree with this recommendation. Each CFS Authority and agency has the “in house” expertise to develop (in collaboration with cultural and linguistic needs of all children in care) a culturally comprehensive assessment that is specific to the communities it serves.

SFNNC: The SFNNC agrees that kinship homes need to be recognized as a legitimate resource for children to be placed with. It is also important to know that these homes need to be supported in a unique manner and requires our agency foster care workers to have more time to support and monitor these types of homes.

While this recommendation is directed to the Department and CFS Authorities, the following agency chose to comment on this recommendation:

SECFS: Agree – Kinship foster homes should not be as stringently regulated as stranger based foster homes.

15. We recommend that the Department, in collaboration with the CFS Authorities, develop comprehensive guidance for:
- Assessing the suitability of foster home applicants, using all key pieces of licence application information required in the Regulation.
 - Documenting this assessment.

Response of officials:

General Authority: The General Authority respectfully disagrees with this recommendation. The GA Foster Home framework provides detailed information and practice notes on how to manage key areas. The use of the foster home framework has demonstrated previous success, with other Authorities, the Department, and external agencies utilizing it. Additionally, the General Authority is in the process of further implementing the SAFE home study tool to assess for risk, mitigation and the suitability of the foster home applicants. The SAFE tool is an evidenced-based tool widely used across Canada and the USA.

Northern Authority: The NA does not agree with this recommendation. Each CFS Authority has the “in house” expertise to develop (in collaboration with agencies) a culturally comprehensive assessment that is specific to the communities it serves.

SFNNC: The SFNNC agrees that a comprehensive assessment tool would be a benefit to our agencies when completing home studies and annual reviews with foster parents. This tool would need to have some cultural appropriateness to it and take into consideration the foster care workers professional assessment.

While this recommendation is directed to the Department and CFS Authorities, the following agency chose to comment on this recommendation:

SECFS: Agree - Foster home studies should be more than a collection of data about a particular home. The home studies should be concluded with a workers assessment as to the applicant’s suitability for fostering agency specific children.

16. We recommend that the Department, in collaboration with the CFS Authorities, develop a checklist for supervisors to use when reviewing licence packages (new and renewal) that ensures the thoroughness of the packages and consideration of all regulatory and policy requirements.

Response of officials:

General Authority: The General Authority has a checklist that could be further utilized across authorities. WCFS and EPR have already utilized the checklist.

Northern Authority: The NA does not agree with this recommendation made. This should not be a Department task but rather a task assigned to the Authority to work with their agencies in setting up checks and balances for appropriate supervision.

SFNNC: The SFNNC agrees that a check list attached to all home study and annual review packages should be developed to assist supervisors in final decision making regarding licensing. Some of our agencies currently have such a tool and this could be reviewed and expanded on.

While this recommendation is directed to the Department and CFS Authorities, the following agency chose to comment on this recommendation:

SECFS: Agree – SECFS agrees this would be a useful tool.

17. We recommend that CFS Authorities require their agencies to regularly report on all exceptions from requirements in the Regulation and policies made by agencies when issuing licences.

Response of officials:

General Authority: The General Authority requires further clarity as it is not possible for Authorities to approve exceptions from standards.

Northern Authority: The NA agrees and supports this recommendation made. The next step is to set up a tracking system within NA. This will need to be coordinated with the seven northern agencies through existing inter-agency and NA committees. From this the information can be analyzed for trends, themes and advocacy activities.

SFNNC: The SFNNC agrees that all variations to foster home licenses should be approved by the authorities and statistics kept on each type of variance.

While this recommendation is directed to the CFS Authorities, the following agency chose to comment on this recommendation:

SECFS: Agree (Conditionally) – We agree on the condition we are adequately funded to complete this task.

18. We recommend that CFS Authorities track and monitor all exceptions being made by their agencies from requirements in the Regulation and policies, and determine if any actions are warranted to achieve better overall compliance.

Response of officials:

General Authority: Authorities cannot issue exceptions. This recommendation could be made possible through changes to Regulation and policies.

Northern Authority: The NA agrees and supports this recommendation made. Continue to work with agencies on exceptions made and planning actions toward compliance. From this, the information can be analyzed for trends, themes and advocacy activities with external collaterals.

SFNNC: The SFNNC agrees that all variance requests should be tracked and monitored. This is currently being done at this office and we will continue to report on the type and number of variances the authority approves yearly.

While this recommendation is directed to the CFS Authorities, the following agency chose to comment on this recommendation:

SECFS: Agree.

Section 5: Ongoing management of foster homes

19. We recommend that the Department, in consultation with the CFS Authorities and their agencies, establish and communicate guidance on:

- The expected frequency of completing required security checks on foster parents and other adults living in the home.
- The follow-up actions that should be taken when foster parents do not comply with safety standards.
- The escalating actions that should be taken when there is repeat non-compliance by foster parents.

Response of officials:

General Authority: The General Authority supports a uniformed and consistent approach to these areas and recommend that a standardized timeline across Authorities should be developed for security checks.

The General Authority respectfully suggests that perhaps not all standards are reflective of community and cultural norms. It is also suggested that the standards specific to kinship and non-familial homes be different.

Northern Authority: The NA does not agree with this recommendation made. There are changes

happening within the Resources of CFS allowing agencies to do their own Resource Development. The NA believes that with the implementation of Bill C92, this should become a task of the Authority to work with their agencies in establishing appropriate guidelines.

SFNNC: The SFNNC agrees with this recommendation and will work with our agencies to begin looking at what is reasonable for frequency of all checks including guidelines around what is acceptable and how to manage results. Following up on all safety standards that may be outstanding in foster homes and how these things should be dealt with when non-compliance exists should be developed.

While this recommendation is directed to the Department and CFS Authorities, the following agency chose to comment on this recommendation:

SECFS: Agree – Parameters or criteria need to be established collectively between the Authority and Agencies.

20. We recommend that the Department, in consultation with the CFS Authorities, develop a risk-based licence renewal process for foster homes, taking into account the foster home type and history of compliance.

Response of officials:

General Authority: The General Authority respectfully disagrees with this recommendation. Given that we are accountable for children in care, we find that an annual licence is required on all foster homes.

Northern Authority: The NA does not agree with this recommendation. This should be an Authority task to work with their agencies in developing internal policies and processes.

SFNNC: The SFNNC agrees that an annual review risk tool could be useful in helping foster care workers in better assessing homes on a yearly basis.

While this recommendation is directed to the Department and CFS Authorities, the following agency chose to comment on this recommendation:

SECFS: Agree (Conditionally) - The Department should purchase the Foster Home Risk Assessment Tool for all agencies to use. Currently, the southern and northern agencies do not have access to the foster home risk assessment tool developed by the Structured Decision Making group. Our agencies only have use of the Parent/Guardian Risk Assessment Tool.

21. We recommend that agencies implement a process that identifies licences that are near expiration and schedule needed reviews prior to the licence expiry date.

Response of officials:

Awasis: Awasis Agency agrees with this recommendation, however, further recommends the Province complete revisions to CFSIS reports that have been recommended by all Authorities to include a specific section for Licensing and Expiry dates. This recommendation could be met once Recommendation #40 has been completed. This information is entered into CFSIS and therefore should be accessible. Currently, the Agency must rely on their own database to track expiry dates.

Metis: Metis Child, Family and Community Services agrees with this recommendation. Over the past 2 years, the Alternative Care supervisor has improved the internal tracking systems. The Agency is currently working to implement a new electronic case management system that works alongside CFS IS. As part of that, warning reminders of expiry dates will be automatic and providing adequate time for the completion of licensing renewal activities. Factors outside of direct agency control such as variance sign off, delayed criminal record checks and occasionally medical references must be taken into account.

SECFS: Agree – A bring forward system should be developed and incorporated within CFSIS.

While this recommendation is directed to agencies, the following CFS Authorities chose to comment on this recommendation:

General Authority: The General Authority will continue to provide a quality assurance on the status of licences. Agencies are also required to conduct a quality assurance on this.

Northern Authority: The NA agrees with this recommendation made. The agencies should establish a tracking system to ensure licensing requirements are being met.

SFNNC: The SFNNC agrees that a process should be in place for all agencies to organize foster home license renewals in a timely manner. A number of our agencies currently use a foster home list with renewal dates in order to complete annual reviews in a timely manner.

22. We recommend that foster care workers and the child's worker collaboratively ensure an appropriate number of home visits occur during the year, while ensuring some of the coordinated home visits are done by the foster care worker to support the foster parents, and that the visits done by each are separately documented.

Response of officials:

Metis: Metis Child, Family and Community Services agrees with this recommendation. Foster care workers and the child's worker do coordinated/integrated visits on all files. There is more contact on higher risk placements or higher risk children. Documentation is held primarily on separate files - i.e. a case note made by a foster care worker about the care provider may not be shared with the child's worker if it is not directly relevant to the care of the child. As well, the Agency could have foster care workers coded as auxiliary to the child's file to allow them to use the face to face screen in CFS IS, but this would also change how we currently track the child's workers face to face contact.

SECFS: Agree (Conditionally) – The Agency needs to be adequately funded for foster home case management.

While this recommendation is directed to agencies, the following CFS Authorities chose to comment on this recommendation:

General Authority: The General Authority has developed a communication policy with respect to collaboration and communication between the foster care worker, the child in care worker and the external agency worker. We support the development of standards with respect to face to face contact with these entities, however, this is tied to the availability of funding and staffing of foster care case management resources.

Northern Authority: The NA does not agree with this recommendation made. Presently, Foster Care Workers are not included as part of the Core Funding formula. This recommendation can potentially force agencies to reallocate funding for these positions. There should be appropriate number of home visits, however, the agency should be able to identify staffing of how that is completed.

SFNNC: The SFNNC agrees communication between the foster parents, the child's worker and the foster care worker are important to maintain and should be documented. The four authorities are currently working together to write a Foster Home Communication Protocol that addresses some of this recommendation. It would also be important to have a set number of home visits for foster care workers based on the risk level in a foster home.

23. We recommend that agencies establish, communicate, and monitor compliance with written policies on foster care worker contact with foster homes. Policies should require:

- A minimum number of annual visits to foster homes based on assessed risks (and for homes where higher-risk factors are present, include unannounced visits).
- Documenting contact between foster care workers and foster homes using a prescribed form.

Response of officials:

Awasis: Awasis Agency agrees with this recommendation in principal, with the understanding that the 'prescribed' form is understood to be an agency prescribed form, not a provincial prescribed form embedded in Regulations that cannot be amended to meet agencies' needs.

Metis: Metis Child, Family and Community Services agrees with this recommendation.

SECFS: Agree – All information between direct service workers and foster care management workers should be documented in CFSIS.

While this recommendation is directed to agencies, the following CFS Authorities chose to comment on this recommendation:

General Authority: Contact with foster families should be with respect to enhanced skill development of the foster parent and variable needs of the child. The General Authority is in support of a prescribed form once research around its content has been conducted.

Northern Authority: (This reads to be the same recommendation as #22)

The NA does not agree with this recommendation made. Presently, Foster Care Workers are not included as part of the Core Funding formula. This recommendation can potentially force agencies to reallocate funding for these positions. There should be appropriate number of home visits, however, the agency should be able to identify staffing of how that is completed.

SFNNC: The SFNNC agrees that a more formal system should be in place for the work completed by foster care staff and should be consistent across all authorities.

24. We recommend that the Department, in consultation with CFS Authorities, establish the minimum supports to be made available to all foster parents. Such supports should include:

- Standardized initial and ongoing training and information on the common needs of children in care and the related agency expectations and supports.
- Initial and ongoing communication about the specific needs of a child placed in their home, including behaviour, medical, educational and cultural needs.
- Initial contact with foster parents within a week of a child's placement to assess how the new placement is going.

Response of officials:

General Authority: Work is underway across Authorities and the Department to examine foster care training and communication. The training provided to foster parents is dependent on resources and funding to foster care case management. It is important to note the unrelated expenses that are incurred to support foster parent training (e.g. the cost of alternate care that must be provided while the foster parent attend training or is absent from work).

Initial contact within a week may need to occur via electronic or telephonic means due to geography but should occur as soon as possible.

Northern Authority: The NA agrees with this recommendation made. The Department's role is to support this work of agencies to have a reliable level of funding for Foster Care. This will assist agencies ensure child and family safety needs are meeting minimal foundational standards integrating community expectations of agencies.

SFNNC: The SFNNC agrees that foster parents along with kinship placements need much more training and support than they currently are provided with. The four authorities have been tasked with working to develop an SPA for the Kinship and Foster Family Network of Manitoba. Perhaps some of the functions of this organization need to be reviewed and possibly allocated to agencies. Agencies need and want the responsibility to train their foster parents the way they see would best suit their children in care.

While this recommendation is directed to the Department and CFS Authorities, the following agency chose to comment on this recommendation:

SECFS: Agree - With new cases, workers are not always aware of the specific needs of children entering care. The foster parent living with the child will initially be better informed about the child's needs and issues. This task should be a collaborative approach between the worker and foster parent until enough time has been established to have a better understanding of the child.

25. We recommend that the CFS Authorities review the supports available to foster parents in each of their agencies, identify gaps and inconsistencies, and implement plans where needed for improving support for foster parents.

Response of officials:

General Authority: Authorities review with agencies their Strategic Service Plan annually, which outlines support and deliverables for foster care. Plans are always in the context of available funding and other resources.

Northern Authority: The NA does not agree that this recommendation made. There is accountability measures beginning with the Foster Care Worker through to the Executive Director at the agency level. The involvement of NA begins when the complainant at the agency level exhausts issue management avenues.

SFNNC: The SFNNC agrees that agencies should have the resources to support their foster parents the best way possible.

While this recommendation is directed to the CFS Authorities, the following agency chose to comment on this recommendation:

SECFS: Agree.

Section 6: Assessing and monitoring places of safety

26. We recommend that the Department, in consultation with CFS Authorities, develop written standards and guidance on conducting assessments of places of safety. The standards should include:

- The follow-up and documentation of security check results and related risk-ratings.
- The follow-up and related documentation of items of non-compliance.
- The documentation of whether a placement is done on an emergency basis or not.
- Greater clarity on how to conclude on the suitability of a place of safety, including how to identify and assess factors that indicate a place of safety is unsuitable.

Response of officials:

General Authority: The General Authority has developed, utilized and trained its agencies with a place of safety framework which addresses all of these issues.

Northern Authority: The NA does not agree with this recommendation: CFS Authorities have the mandate and expertise to develop Culturally Specific Standards conducive to the people they serve. The Northern

Authority can develop, educate, monitor and guide agencies on conducting Place of Safety Assessments. Consulting with the Department is not required as the Northern Authority is the expert on First Nations people as we have lived experience.

Additional financial resources for each agency to further hire and develop their foster care departments and supports to children and foster parents alike would be beneficial.

SFNNC: The SFNNC agrees that a place of safety assessment would be a positive move forward and will provide guidance to our agencies when completing these types of placements. The SFNNC does have one agency that has developed an assessment for completing POS placements which could be a good starting point for future work in this area.

While this recommendation is directed to the Department and CFS Authorities, the following agency chose to comment on this recommendation:

SECFS: Agree – Better training on how to assess a foster home would be an asset. Province wide training on 'Safe Home Studies' would also be beneficial for all foster home case managers. Many provinces in Canada use this framework. Again, the SDM tools utilizing the Foster Parent Safety Assessment would also be an asset for every agency.

27. We recommend that agencies monitor whether workers are complying with the Department's policy of conducting initial home visits shortly after placing a child, and that these visits are documented.

Response of officials:

Metis: Metis Child, Family and Community Services agrees with this recommendation.

SECFS: Agree – This would be a Direct Service Worker responsibility and not foster care.

While this recommendation is directed to agencies, the following CFS Authorities chose to comment on this recommendation:

General Authority: The General Authority is in support of this recommendation in light of recommendation #24.

Northern Authority: The NA agrees with this recommendation. Home visits need to be conducted according to the assessment (low, medium, high risk) and Standards. NA will continue to monitor and ensure agency compliance.

SFNNC: The SFNNC agrees that shortly after placements into place of safety homes visits are necessary and should be documented.

28. We recommend that the Department, in collaboration with the CFS Authorities, review and if needed, revise place of safety time limits.

Response of officials:

General Authority: The General Authority suggests that the current timeline could be acceptable once kinship standards are developed and are extended to all place of safety homes.

Northern Authority: The NA does not agree with this recommendation. The Authorities are mandated to review and revise Place of Safety and to determine the Cultural Appropriateness of the existing standards and barriers.

SFNNC: The SFNNC agrees the place of safety process needs to be reviewed and analyzed to ensure agencies are working to meet the best interests of children being placed in these homes.

While this recommendation is directed to the Department and CFS Authorities, the following agency chose to comment on this recommendation:

SECFS: Agree – It takes time to gather all the information from references and medical personnel.

29. We recommend that for places of safety that become longer-term placements, agencies appropriately monitor the placement and provide the same support offered to foster parents.

Response of officials:

Metis: Metis Child, Family and Community Services agrees with this recommendation. The Agency puts a high value on Kinship placements. Kinship has the greatest number of dedicated full time staff. Five Alternative Care Workers provides supports equal to or greater than our general foster homes. The only difference being that licensed these homes after the 6 month period is difficult due to limited resources.

SECFS: Agree – This should be occurring now as the standards are not any different.

While this recommendation is directed to agencies, the following CFS Authorities chose to comment on this recommendation:

General Authority: The General Authority concurs with this recommendation. We believe that our agencies provide the same level of service to places of safety as foster homes and strive to provide the same level of service and support to all caregivers.

Northern Authority: The NA does not agree with this recommendation. Caregivers and the children under their responsibility need to be afforded (whether it is a long term or short term placement) the same monitoring, financial, emotional support.

SFNNC: The SFNNC agrees that place of safety resources need to be supported and monitored in the same manner as licensed foster parents when the placement becomes long term. Currently the system allows place of safety homes to appeal removals of children if they have been in this status for more than 6mths, giving them the same rights as a licensed foster parent.

Section 7: Complaints follow-up and appeals process

30. We recommend that the Department and CFS Authorities monitor the timelines for the conduct of appeals, identify reasons for delays, and amend processes as needed to facilitate the timely completion of appeals.

Response of officials:

Northern Authority: The NA does not agree with this recommendation. Monitoring the timelines for foster parent appeals is the responsibility of the Authorities and needs to remain. Current processes are in place to facilitate timely completion of appeals.

SFNNC: The SFNNC agrees that foster home appeals needs to be monitored from start to finish. Currently we have a process that will track appeals from the point it reaches this office. The SFNNC will work towards developing a tracking system from the beginning of the alternative dispute resolutions process. This will help to identify any reasons for possible delays.

While this recommendation is directed to the Department and CFS Authorities, the following agency chose to comment on this recommendation:

SECFS: Agree – The timelines are already in place for foster home appeals. Any delays may be due to

geographical proximity or scheduling issues due to worker, supervisor, or foster parent availability, and timelines need to reflect unique and unavoidable circumstances.

31. We recommend that in cases where CFS Authorities are involved in the decision to remove a child from a foster home, that the appeals be heard by the Department (rather than the CFS Authority).

Response of officials:

General Authority: The General Authority disagrees that appeals should be heard by the Department. Authorities need to ensure segregation of duties for foster home appeals versus ongoing case management work.

Northern Authority: The NA does not agree with this recommendation. The decision to remove children are best considered by the agencies who work with the children. The Department has an adjudicator who will hear Appeals on the Removal of foster children if the Agency and the Authority are in agreement with the removal. The foster parent can Appeal to an Adjudicator at the Child and Family Division. This step was to be a “short-term” solution that came when the Proclamation of the Authorities Act was established in 2004. This protected and ensured foster parents, that agencies would not remove children from non-First Nations Homes once they had the power to do so and or without just cause.

SFNNC: The SFNNC agrees that if an authority is involved in the decision making to remove a child from a foster home and this decision is appealed, the authority should step back and the Division should continue with the appeal.

While this recommendation is directed to the Department and CFS Authorities, the following agency chose to comment on this recommendation:

SECFS: Agree – The Authority should not be involved in the process where they were part of the decision to remove the child. In cases where they were not part of the decision making process then the Authority should be involved. Foster parent availability, and timelines need to reflect unique and unavoidable circumstances.

32. We recommend that CFS Authorities ensure agencies develop appropriate Alternative Dispute Resolution (ADR) processes and that agencies comply with these processes.

Response of officials:

General Authority: The General Authority concurs with this recommendation. Agencies can manage ADR processes but as previously stated, segregation of duties is critical.

Northern Authority: The NA agrees and supports this recommendation made. The NA will work in coordination with the seven northern agencies toward developing a practical Alternative Dispute Resolution (ADR) process to accommodate the various geographical locations of service delivery offices.

SFNNC: The SFNNC agrees that agencies should have an appropriate alternative dispute resolution process in place including reporting on that process. The SFNNC has recently developed a best practice document given to all of our agencies that outlines what an ADR is intended for and what to take into consideration when completing this process.

While this recommendation is directed to the CFS Authorities, the following agency chose to comment on this recommendation:

SECFS: Agree - SECFS agrees that ADRs should be developed to ensure neutrality and mediation as a function of the process. ADRs are time consuming and Agencies should be funded to bring in outside mediators. Currently, Agency staff facilitates the ADR as there are no funds to hire independent facilitators or mediators.

33. We recommend that the Department, in consultation with the CFS Authorities, review and assess concerns raised by agencies and the Child Welfare Legislative Review Committee and strengthen the Foster Parent Appeals Regulation as appropriate.

Response of officials:

General Authority: The General Authority concurs and believes that it is in the child's best interest to be with their family of origin and culture of origin.

Northern Authority: NA agrees with the recommendation made. However, the focal point must be strengthening the ability of parents, grandparents and community caregivers in addressing removal and reunification needs of all children in care.

SFNNC: The SFNNC agrees the Foster Parent Appeals Regulation needs to be thoroughly reviewed and revised to ensure the appeal process is completed in a timely manner and without unnecessary steps.

While this recommendation is directed to the Department and CFS Authorities, the following agency chose to comment on this recommendation:

SECFS: Disagree - The Agency does not want to see the foster parents gain stronger rights than they already do, and should provide more rights and flexibility to the Agency for the foster parent appeal process.

Section 8: Quality assurance processes

34. To provide agency management with proper assurance that foster homes and places of safety are appropriately approved, we recommend that agencies implement a risk-based quality assurance review process over all key processes including:

- Issuing new foster home licences (as discussed in **SECTIONS 4.3** and **4.4**).
- Renewing foster home licences (as discussed in **SECTION 5.1**).
- Assessing and approving places of safety (as discussed in **SECTION 6.1** and **6.2**).
- Managing complaints (as discussed in **SECTION 7.1**).
- Maintaining foster home records in the CFSIS database (as discussed in **SECTION 9.1**).

Response of officials:

Metis: Metis Child, Family and Community Services agrees with this recommendation. In February 2019, the Metis Child and Family Services Authority (MCFSA) undertook an audit of all Alternative Care files. As part of the audit, workers were required to ensure a number of documents were uploaded to CFSIS. Documents included the home study which includes the physical requirements checks, medical clearance and 4 references. It was also required to upload copies of the original license or the original POS package for kinship homes and all annual license reviews. Further documents required included criminal record checks, child abuse registry and prior contact checks for all adults in the home and respite providers. The Agency continues to stress the importance cultural competence and will continue to work closely with our foster and kinship homes to share the importance of knowing the Metis culture and history. Any risk based quality assurance process adopted must account for the effects of colonization. This has been a significant barrier in the acceptance of standardized risk assessment tools for Indigenous agencies.

SECFS: Agree (Conditionally) - The Agency supports this recommendation if funds were made available for additional QA staff. Each SFNNC agency is funded for one QA employee despite the size of the Agency.

The Agency's QA staff person focuses primarily on direct services cases and ensuring the data base numbers are correct. The Agency has 3 data bases in use and these data bases need to be merged and corrected every month. QA management is led by the SFNNC and we focus on the subject matter as per their direction.

While this recommendation is directed to agencies, the following CFS Authorities chose to comment on this recommendation:

General Authority: The General Authority will support continued implementation and review of the standardized SAFE assessment tool for issuing and renewing licences, and a quality assurance review of SAFE assessment outcomes. Further implementation and review of SAFE, SAFE renewal and quality assurance will allow for a better understanding of how to support our agencies. As of October 2019, the General Authority will be providing refresher training of SAFE and training for new users and supervisors. The General Authority would like to recommend that SAFE be utilized for places of safety as other provinces have fully implemented SAFE. SAFE requires supervisors to be trained in it and ensures that its standards have addressed quality assurance checklists prior to licensing approval.

Northern Authority: The NA agrees and supports this recommendation made. It is an approach within Quality Assurance at NA to work with agencies in quality assurance reviews. This includes agency staff as part of the review process where mutually agreed. As one example, in the family assessment review, agency based supervisors and quality assurance coordinators participated as reviewers. NA Quality Assurance provided assistance and guidance throughout the process.

SFNNC: The SFNNC agrees a more robust quality assurance process needs to be put in place involving foster care. It has been limited up to this point due to the lack of funding for foster care positions at an agency level. With the assumption recommendation #1 comes into effect, agencies will have the staff to maintain and manage work required to be completed in the foster care area. The SFNNC will work with our agencies to develop a quality assurance review process.

35. To ensure that the agencies under their responsibility are following established foster home standards and practices, we recommend that CFS Authorities:

- Monitor agencies' quality assurance review results related to foster home management and provide feedback, as deemed necessary.
- Develop and implement a risk-based quality assurance review plan that includes a review of each agency's foster home management practices on a regular cycle.
- Report quality assurance review activities and key results to the Department.

Response of officials:

General Authority: The General Authority concurs with this recommendation. As of early 2019, the General Authority through the SAFE Consortium had completed a quality assurance audit of our SAFE home studies and we are in support of our own staff become proficient in conducting their own SAFE audits. Authorities are responsible of quality assurance, the General Authority has a schedule of program areas to review (DIA, Children In Care, etcetera) but due to capacity we can't complete them all at the same time.

Northern Authority: The NA agrees and supports this recommendation made. The NA-QA worked together with the seven agencies to establish the Working Group to continue to develop the quality assurance program in designing and implementing the scope of a quality assurance reviews (e.g. Family Assessment Review and Case Planning).

SFNNC: The SFNNC agrees the authorities should have a system in place to monitor agency foster care quality assurance processes. The SFNNC currently has a working group of quality assurance and alternative care people from each agency who come together on a regular base that can look at beginning some of this work.

While this recommendation is directed to CFS Authorities, the following agency chose to comment on this recommendation:

SECFS: Agree – The Agency agrees provided that we receive appropriate funding for staff to undertake such tasks given the extra-large size of SECFS.

36. We recommend that the Department review and monitor CFS Authority reporting of quality assurance review activities and key results.

Response of officials:

While this recommendation is directed to the Department, the following CFS Authorities and agencies chose to comment on this recommendation:

Northern Authority: The NA does not agree with this recommendation made. The Department already participates at the Collaborative Working Group table with NA toward working together to addressing mutual child and family services matters. Further to this, the Department takes a lead in work at Working Groups where NA participates thereby influencing the course of work of NA and agency departments.

SFNNC: The SFNNC agrees the Division will monitor authority quality assurance reporting and key results.

SECFS: Agree – Reports can be sent in to the SFNNC.

37. We recommend that the CFS Authorities, with agencies hiring field staff 1, ensure that their agencies develop a formal development program for "field staff 1's".

Response of officials:

General Authority: The General Authority adheres to a Hiring Criteria Policy. The policy ensures that when educational/staffing qualifications are not held, approval from the CEO of the General Authority is provided before hiring can proceed that must include a training plan. Currently all front line staff meet this criteria.

Northern Authority: The NA agrees and supports this recommendation. A program should be develop to ensure field staff obtain the required/recommended training, experience and skills to perform their roles.

SFNNC: The SFNNC agrees the work force qualification process for field staff 1 need to be strengthened and a development program should be in place for each field staff 1 employee.

While this recommendation is directed to the CFS Authorities, the following agencies chose to comment on this recommendation:

Awasis: Awasis Agency agrees with this recommendation, however, only if there is adequate funding provided to cover the costs of training that may be associated with the development program. Currently, the agency receives funding for training of core positions only, and that funding is minimal.

SECFS: Agree – The Agency requires the support of the SFNNC to complete this task given we receive no funds for trainers at the Agency level.

Section 9: Child and Family Services database

38. We recommend that the CFS Authorities periodically verify that key information in CFSIS agrees to agency records.

Response of officials:

General Authority: The General Authority monitors this and requires agencies to also periodically verify that key information in CFSIS corresponds with their records. The General Authority will follow-up with agencies to ensure their compliance. Additionally, the General Authority will work with agencies to ensure that administrative processes for data entry is accurate, current and inputted on a timely basis.

Northern Authority: The NA agrees and supports this recommendation made. Further, the NA formed a CFSIS Compliance Working Group with representatives from each of the seven agencies. The NA also created and updated a CFS IS manual and had a CFSIS support staff member that provided training in agency offices.

SFNNC: The SFNNC agrees a quality assurance process should be developed in order to verify key information on CFSIS for the foster care management system. The quality assurance and the alternative care table at the SFNNC can work together to develop this work.

While this recommendation is directed to the CFS Authorities, the following agency chose to comment on this recommendation:

SECFS: Agree.

39. We recommend that agencies with community offices that have unreliable internet access establish a process to periodically send key information for these offices to agency offices with reliable internet, for inputting in CFSIS.

Response of officials:

SECFS: Agree - The Agency's QA conducts a review of the demographic data, legal, funding source, worker and supervisor information from the community and city case lists, in addition to the CFSIS and the financial data base at every month end. QA lacks the time and manpower to review contact notes, etc.

While this recommendation is directed to agencies, the following CFS Authorities chose to comment on this recommendation:

Northern Authority: Some agencies refuse to send case files outside of the office providing services to children and families. Sending information outside of the office:

- Increases the likelihood that persons can gain access to information that should be limited to those persons who "need to know";
- Requires additional staff to cull through the paper file to extract key information that would have to be sent to create a case file or person record in CFSIS; and
- Requires additional financial resources to ship confidential documents via courier or by plane for those communities that are winter road access only – 12 of 27 communities are winter road access only.

SFNNC: The SFNNC agrees a process needs to be put in place to allow agencies with community office where there is unreliable internet service to input information on CFSIS regularly.

40. We recommend that the Department prioritize system enhancements identified by CFS Authorities and agencies, and act on the most pressing requests.

Response of officials:

While this recommendation is directed to the Department, the following CFS Authorities and agencies chose to comment on this recommendation:

General Authority: The General Authority is a part of the CFSA user group, however we believe that funding is not currently sufficient to make improvements or enhancements to CFSIS.

Northern Authority: There has been an enhancement freeze that has been in place since the fall of 2017.

On October 23, 2018, the members of the CFSA working group prioritized the list of CFSA enhancements identified by the members. As of this writing, none of the identified enhancements have been completed.

BTT has a new process by that all government departments are required to follow in making IT requests (net new or enhancement). This new process has been designed to provide requesting party an estimated cost and duration to complete any IT request made.

We have submitted enhancement requests regarding Customary Care, Guardianship Support and Embedding Safety Assessment. BTT has provided cost and duration estimates for these requests however, the estimates are pending approvals to proceed.

Without the financial commitment of the government to complete enhancements only work that involves minimal or no costs will be completed.

SFNNC: The SFNNC agrees that CFSIS system enhancements need to be updated as quickly as possible in order to have access to the best information possible on the system.

SECFS: Agree – There are numerous issues that need system enhancement on CFSIS; however, we were told updating the system is limited to one issue a year.

41. We recommend that the Department, together with the CFS Authorities, develop protocols for system-wide access to information to promote efficiencies in assessing caregivers and ensure access is limited to a need-to-know basis.

Response of officials:

General Authority: The General Authority supports this recommendation.

Northern Authority: The NA does not agree with this recommendation made. There is accountability and communication measures beginning with front line staff through to the Executive Director at the agency level. The involvement of NA begins when issue management avenues are exhausted at the agency level.

SFNNC: The SFNNC agrees a system wide process needs to be developed in order for information pertaining to caregivers is available when agencies are attempting to assess a potential placement for a child.

While this recommendation is directed to the Department and CFS Authorities, the following agencies chose to comment on this recommendation:

Awasis: Awasis Agency does not agree with this recommendation. There is a need for province-wide protocols for consistent, appropriate information to be provided in a timely manner to agencies requesting the information in order to assess caregivers, however, those agencies should not be required to utilize their resources and staff time to review other agencies' cases on CFSIS in order to assess caregivers. This responsibility should remain with the agency that has the records. Based on how CFSIS is set up, there is no specific section that information required could be reviewed other than the 'Recordings' section, but vital information may be missed depending on the description given to the 'Recording'. At this time, when Awasis staff receive the minimal information as described in the report, they attempt to contact the Supervisor from the other agency in order to obtain information in order to assess caregivers.

SECFS: Agree – All departments need system-wide access of information to promote efficiencies for intake, direct services, and foster care.

Section 10: Foster home supply

42. We recommend that the Department and CFS Authorities track and monitor the number of licensed foster homes (by type) in each agency, including filled and available vacant beds, to analyze annual trends in the supply of foster homes regionally and provincially, and that the Department work with the CFS Authorities and their agencies to use available bed space information to minimize the extent of EPR use.

Response of officials:

General Authority: On a daily basis, the General Authority monitors the use of EPR and follows the established EPR collective owner process for related approvals at 30-60-90 days. Complex case reviews are facilitated by agencies in order to ensure that the best interests of the child are prioritized in regards to where they are placed. EPR is always a last resort. The General Authority believes that the needs of the child are critical to where they are placed. Critical matching between the needs of the child with the skills of the foster parents is necessary. Additionally, a child's culture and geography must also be accounted for, and family connections need to be maintained.

Northern Authority: The Authorities have access to the Foster Care Management (FCM) Statistical Detail report that includes placements by type and category; it also includes information about the most recent licensing status, number of beds the home is licensed for, number of vacant, occupied, unavailable and reserved beds. The primary focus had been on entering CIC and Family file cases into CFSIS and agencies have been advised over the last four years that that they need to create foster care management cases in CFSIS. We, the Northern Authority, are monitoring FCM cases being created in CFSIS and have seen a significant increase in the number of FCM cases being created in CFSIS. In 2015, there were 978 open FCM cases, in 2019, there are 1795 open FCM cases, this is an increase of 84%.

From an Authority perspective we do not require the Department to track or monitor FCM cases, this is already being done by the Authority. What would be beneficial is one report that includes demographic and cultural information about the children and the care provider in one report. This would enable Authorities (and agencies) to report on where the children are being placed (on reserve/off reserve) and whether the children are residing with care providers who are from the same first nation community.

We, the members of the CFSA working group have provided feedback about the content of the report to the Department, as of this writing have not been provided with an update of the status of this request.

SFNNC: The SFNNC agrees that tracking and monitoring licensed foster home and the vacant bed spaces in these homes will provide some information on trends in this area. The SFNNC is currently working with our agencies in filling and reducing empty bed spaces in agency foster homes. This continues to help agencies in reducing the number of children they could have in Emergency Placement Resources.

This process also ensures the information on empty bed spaces on CFSIS is not over inflated and is as accurate as possible.

While this recommendation is directed to the Department and CFS Authorities, the following agency chose to comment on this recommendation:

SECFS: Agree (Conditionally) - We encourage the tracking of filled and available vacant beds. We recognize that many of the unfilled beds may be placements that do not take a certain age group of child or sub-par placements. Good foster homes are always fully utilized and we do not want to be forced to take a placement just because it has an open bed.

43. We recommend that the Department, in collaboration with CFS Authorities, develop and implement of a long-term strategy to achieve a sufficient supply of suitable foster homes to meet the needs of children in care across the province.

Response of officials:

General Authority: The primary goal of the General Authority and agencies is to utilize preventative measures to reduce the number of children coming into care. The General Authority would like to see family finding supported and implemented across authorities.

Northern Authority: The NA agrees with this recommendation made. The scope of involvement through the Department must provide NA with stable financial supports toward identifying opportunities for resource capacity building in the North (e.g. increasing the availability of stable placement resources).

SFNNC: The SFNNC agrees a strategy needs to be developed to recruit and maintain an adequate number of foster parents in order for the system to be less reliant on the EPR and group care systems. It will be important to promote kinship care and to train workers on different way to engage family members to planning for their children.

While this recommendation is directed to the Department and CFS Authorities, the following agency chose to comment on this recommendation:

SECFS: Agree – SECFS agrees a long term strategy is needed to support our Agency in the development and sustainability of Indigenous foster homes.

Appendix A: Foster parent survey methodology and data tables

METHODOLOGY

Part of our examination of the Management of Foster Homes in Manitoba included a confidential survey of foster parents. The purpose of the survey was to get foster parents' views on the support they receive from their foster care worker and licensing agency. The survey was sent to all foster parents licensed by the following Child and Family Services agencies:

- Awasis Agency of Northern Manitoba (Awasis)
- Metis Child and Family Services Agency (Metis)
- Southeast Child and Family Services Agency (SECFS)
- Winnipeg Child and Family Services Agency (WCFS)

Foster parents who were currently licensed, and had a child within their care within the past year, were eligible to participate. We asked that only one foster parent from each foster home/household, provide a response.

Foster parents' contact information was obtained from the licensing agencies. For those foster parents with an email address on file, an electronic survey was emailed to them. For those with no email address, a paper survey was mailed to them. Foster parents managed by external agencies (licensed by WCFS) were excluded from the survey.

We hired a professional Manitoba research firm, Probe Research Inc., to assist us with conducting the survey. We are pleased that 38% of foster parents that received the survey provided a response. The response rate by agency is provided below. This also reveals the representation of responses across the four agencies.

Distribution of survey respondents by agency

Agency	Number in sample	Number of respondents	% of sample	% of all responses	Overall response rate
Awasis	134	46	12%	11%	34%
Metis	222	114	21%	28%	51%
Southeast	474	132	44%	32%	28%
Winnipeg	247	121	23%	29%	49%
Total	1077	413	100%	100%	38%

DATA TABLES

The following data tables list all the statements and questions asked on the questionnaire.

Percentages may not add up to 100 due to rounding.

1. Foster care worker support

Survey Question	Response	Total	WCFS	SECFS	Metis	Awasis
My foster care worker is available to help me manage the needs of the child(ren) placed in my care.	Strongly agree	45%	58%	42%	46%	24%
	Moderately agree	27%	20%	26%	27%	43%
	Neutral	11%	8%	15%	8%	11%
	Moderately disagree	9%	5%	12%	10%	11%
	Strongly disagree	8%	8%	5%	8%	11%
	Unsure	0%	0%	0%	2%	0%
I can contact my foster care worker or their back-up when needed.	Strongly agree	51%	67%	48%	43%	33%
	Moderately agree	24%	18%	22%	30%	30%
	Neutral	10%	5%	15%	8%	15%
	Moderately disagree	7%	2%	10%	9%	11%
	Strongly disagree	7%	8%	5%	9%	11%
	Unsure	0%	0%	0%	1%	0%

Survey Question	Response	Total	WCFS	SECFS	Metis	Awasis
My foster care worker returns phone calls and emails in a timely manner.	Strongly agree	49%	65%	44%	43%	37%
	Moderately agree	22%	14%	24%	26%	30%
	Neutral	12%	7%	17%	8%	17%
	Moderately disagree	9%	7%	9%	12%	7%
	Strongly disagree	8%	8%	7%	11%	9%
	Unsure	0%	0%	0%	1%	0%
My foster care worker does everything they can to help resolve my concerns.	Strongly agree	46%	57%	41%	49%	28%
	Moderately agree	23%	19%	23%	23%	30%
	Neutral	12%	9%	15%	10%	13%
	Moderately disagree	10%	6%	13%	7%	20%
	Strongly disagree	9%	8%	8%	10%	9%
	Unsure	0%	0%	0%	1%	0%
I receive enough support from my foster care worker.	Strongly agree	46%	63%	36%	48%	24%
	Moderately agree	19%	14%	25%	20%	17%
	Neutral	12%	8%	13%	10%	22%
	Moderately disagree	11%	7%	10%	12%	24%
	Strongly disagree	12%	8%	16%	9%	13%
	Unsure	0%	0%	0%	2%	0%
I am satisfied with the amount of contact, including home visits, I receive from my foster care worker.	Strongly agree	50%	64%	42%	54%	26%
	Moderately agree	18%	14%	21%	18%	20%
	Neutral	12%	8%	16%	8%	20%
	Moderately disagree	8%	5%	8%	6%	17%
	Strongly disagree	12%	8%	13%	13%	17%
	Unsure	0%	0%	0%	2%	0%
I receive at least 1 unannounced/unscheduled home visit by my foster care worker each year.	Strongly agree	27%	23%	34%	26%	20%
	Moderately agree	14%	11%	9%	18%	25%
	Neutral	12%	12%	13%	10%	11%
	Moderately disagree	8%	11%	10%	4%	7%
	Strongly disagree	38%	44%	34%	39%	36%
	Unsure	1%	0%	1%	3%	0%

Survey Question	Response	Total	WCFS	SECFS	Metis	Awasis
About how often, if at all, does your foster care worker visit your home on average?	Once per year	21%	11%	33%	12%	37%
	2-3 times per year	20%	19%	16%	25%	21%
	4 times per year	12%	21%	6%	12%	7%
	More than 4 times per year	45%	47%	42%	48%	35%
	Not at all	2%	2%	2%	3%	0%

2. New placements

Survey Question	Response	Total	WCFS	SECFS	Metis	Awasis
Have you had a child newly placed in your home in the last 3 years?	Yes	52%	58%	58%	39%	54%
	No	48%	42%	42%	61%	46%

Survey Question	Response	Total	WCFS	SECFS	Metis	Awasis
My foster care worker makes sure I receive the information I need about the...						
Medical need(s) of the child(ren) placed in my care.	Strongly agree	41%	55%	31%	38%	42%
	Moderately agree	16%	16%	18%	17%	8%
	Neutral	15%	12%	13%	24%	13%
	Moderately disagree	10%	3%	17%	7%	8%
	Strongly disagree	18%	13%	19%	14%	29%
	Unsure	0%	0%	1%	0%	0%
Behavioural need(s) of the child(ren) placed in my care.	Strongly agree	31%	42%	24%	30%	26%
	Moderately agree	19%	27%	15%	19%	13%
	Neutral	17%	11%	16%	26%	17%
	Moderately disagree	13%	9%	16%	9%	17%
	Strongly disagree	19%	9%	26%	16%	26%
	Unsure	1%	2%	3%	0%	0%

Survey Question	Response	Total	WCFS	SECFS	Metis	Awasis
Educational need(s) of the child(ren) placed in my care.	Strongly agree	31%	43%	26%	29%	25%
	Moderately agree	20%	23%	13%	29%	21%
	Neutral	17%	14%	20%	17%	17%
	Moderately disagree	9%	4%	14%	12%	4%
	Strongly disagree	20%	14%	24%	14%	33%
	Unsure	2%	2%	3%	0%	0%
History of the child(ren) placed in my care.	Strongly agree	29%	43%	20%	23%	24%
	Moderately agree	23%	22%	16%	34%	24%
	Neutral	16%	17%	15%	16%	16%
	Moderately disagree	11%	6%	18%	9%	12%
	Strongly disagree	20%	12%	28%	18%	24%
	Unsure	1%	0%	3%	0%	0%

Survey Question	Response	Total	WCFS	SECFS	Metis	Awasis
Have you had a child placed in your home that came from a different cultural or ethnic background than your own?	Yes	65%	71%	58%	61%	76%
	No	33%	27%	39%	39%	20%
	Unsure	2%	1%	3%	0%	4%

Survey Question	Response	Total	WCFS	SECFS	Metis	Awasis
My foster care worker...						
Makes sure I receive the information I need about the cultural needs of the child(ren) placed in my care.	Strongly agree	30%	32%	29%	41%	16%
	Moderately agree	25%	36%	18%	15%	26%
	Neutral	17%	18%	18%	15%	16%
	Moderately disagree	8%	2%	18%	0%	11%
	Strongly disagree	19%	10%	18%	30%	32%
	Unsure	1%	2%	0%	0%	0%

Survey Question	Response	Total	WCFS	SECFS	Metis	Awasis
Discusses my readiness and commitment to the cultural needs of the child(ren) placed in my care.	Strongly agree	33%	42%	29%	33%	16%
	Moderately agree	24%	30%	24%	15%	21%
	Neutral	16%	14%	11%	19%	32%
	Moderately disagree	9%	2%	16%	11%	11%
	Strongly disagree	17%	10%	20%	22%	21%
	Unsure	1%	2%	0%	0%	0%
Provides me with support to meet the cultural needs of the child(ren) placed in my care.	Strongly agree	30%	36%	29%	33%	16%
	Moderately agree	22%	30%	13%	22%	21%
	Neutral	17%	20%	16%	11%	21%
	Moderately disagree	8%	2%	13%	4%	16%
	Strongly disagree	22%	10%	29%	30%	26%
	Unsure	1%	2%	0%	0%	0%
Now thinking about your most recent child placement in the last three years, when, if at all, did the foster care worker first contact you to check on how things were going?	Within one week	51%	67%	32%	61%	44%
	Within 2 weeks	13%	13%	18%	5%	16%
	Within 1 month	15%	13%	14%	20%	12%
	Later than 1 month following placement	9%	4%	13%	9%	12%
	Not at all	10%	3%	17%	5%	16%
	Unsure	2%	0%	5%	0%	0%

3. Financial support

Survey Question	Response	Total	WCFS	SECFS	Metis	Awasis
Overall, I receive enough financial support to meet the needs of the child(ren) placed in my care.	Strongly agree	19%	25%	18%	17%	17%
	Moderately agree	29%	26%	31%	27%	41%
	Neutral	12%	12%	13%	12%	13%
	Moderately disagree	18%	17%	13%	24%	17%
	Strongly disagree	21%	20%	26%	21%	11%
	Unsure	0%	1%	0%	0%	0%

Survey Question	Response	Total	WCFS	SECFS	Metis	Awasis
The Basic Maintenance Rate I receive is enough to meet the needs of the child(ren) in my care.	Strongly agree	17%	26%	18%	9%	13%
	Moderately agree	19%	16%	21%	19%	24%
	Neutral	12%	12%	11%	12%	15%
	Moderately disagree	19%	16%	15%	29%	20%
	Strongly disagree	31%	30%	34%	31%	28%
	Unsure	0%	1%	0%	1%	0%
The Service Fee amount I receive is enough to meet the needs of the child(ren) in my care.	Strongly agree	15%	22%	14%	10%	11%
	Moderately agree	21%	16%	20%	22%	32%
	Neutral	17%	19%	18%	15%	18%
	Moderately disagree	18%	12%	17%	24%	23%
	Strongly disagree	28%	30%	31%	28%	14%
	Unsure	1%	2%	0%	1%	2%
I receive enough respite hours to meet my needs.	Strongly agree	28%	33%	22%	32%	20%
	Moderately agree	20%	20%	26%	14%	20%
	Neutral	18%	15%	16%	16%	34%
	Moderately disagree	17%	16%	20%	16%	11%
	Strongly disagree	18%	15%	17%	23%	14%
	Unsure	0%	1%	0%	0%	0%
I am able to find appropriate respite caregivers for the child(ren) placed in my care.	Strongly agree	40%	42%	45%	39%	27%
	Moderately agree	23%	24%	26%	19%	23%
	Neutral	12%	8%	9%	16%	18%
	Moderately disagree	13%	17%	9%	10%	23%
	Strongly disagree	12%	8%	13%	15%	9%
	Unsure	1%	1%	0%	1%	0%
I receive my basic maintenance payments on time.	Always	73%	81%	66%	73%	72%
	Often	20%	11%	28%	17%	26%
	Sometimes	5%	5%	3%	7%	2%
	Rarely	1%	1%	1%	2%	0%
	Never	1%	2%	2%	1%	0%
	Unsure	0%	1%	0%	0%	0%

Survey Question	Response	Total	WCFS	SECFS	Metis	Awasis
I receive my service fee payments on time.	Always	62%	74%	54%	58%	64%
	Often	20%	14%	24%	21%	19%
	Sometimes	10%	7%	10%	11%	12%
	Rarely	3%	2%	4%	5%	0%
	Never	5%	3%	8%	3%	5%
	Unsure	1%	1%	0%	1%	0%
I receive my respite payments on time.	Always	50%	53%	54%	51%	27%
	Often	28%	29%	34%	25%	16%
	Sometimes	12%	10%	7%	15%	30%
	Rarely	6%	3%	4%	6%	22%
	Never	3%	5%	1%	3%	5%
	Unsure	1%	1%	1%	0%	0%
The Basic Maintenance payments I receive are for the correct amount.	Always	70%	85%	62%	69%	59%
	Often	19%	9%	21%	22%	33%
	Sometimes	8%	4%	15%	6%	7%
	Rarely	0%	0%	1%	0%	0%
	Never	1%	0%	0%	2%	0%
	Unsure	1%	2%	1%	1%	2%
The Service Fee payments I receive are for the correct amount.	Always	61%	80%	50%	55%	59%
	Often	20%	9%	27%	21%	24%
	Sometimes	11%	4%	15%	12%	12%
	Rarely	4%	2%	5%	6%	0%
	Never	3%	2%	4%	3%	5%
	Unsure	2%	3%	0%	2%	0%
The Respite payments I receive are for the correct amount.	Always	55%	68%	56%	46%	38%
	Often	26%	21%	24%	32%	30%
	Sometimes	13%	6%	14%	16%	22%
	Rarely	3%	0%	3%	3%	11%
	Never	2%	3%	2%	2%	0%
	Unsure	1%	2%	0%	1%	0%

4. Training

Survey Question	Response	Total	WCFS	SECFS	Metis	Awasis
Overall, I receive the training I need to meet the needs of the child(ren) placed in my care.	Strongly agree	43%	50%	36%	48%	33%
	Moderately agree	28%	29%	28%	26%	27%
	Neutral	15%	14%	20%	10%	16%
	Moderately disagree	6%	4%	5%	7%	9%
	Strongly disagree	8%	1%	12%	8%	16%
	Unsure	0%	1%	0%	0%	0%
My foster care worker lets me know about useful resources and training opportunities.	Strongly agree	47%	65%	31%	56%	24%
	Moderately agree	23%	19%	31%	20%	22%
	Neutral	10%	8%	11%	9%	18%
	Moderately disagree	8%	3%	11%	7%	16%
	Strongly disagree	10%	3%	16%	8%	20%
	Unsure	1%	3%	0%	0%	0%
The training sessions available to me are relevant to the needs of the child(ren) placed in my care.	Strongly agree	37%	47%	26%	44%	27%
	Moderately agree	28%	31%	32%	20%	30%
	Neutral	19%	14%	22%	22%	18%
	Moderately disagree	7%	6%	9%	6%	9%
	Strongly disagree	8%	2%	11%	8%	16%
	Unsure	0%	1%	0%	0%	0%
Training sessions are available at times that work for my schedule.	Strongly agree	21%	24%	13%	27%	19%
	Moderately agree	24%	30%	29%	18%	12%
	Neutral	22%	18%	25%	21%	26%
	Moderately disagree	13%	19%	11%	9%	16%
	Strongly disagree	18%	8%	19%	23%	26%
	Unsure	2%	1%	2%	2%	2%
Training sessions are held in locations that are easy for me to travel to.	Strongly agree	26%	35%	18%	26%	27%
	Moderately agree	24%	27%	24%	25%	16%
	Neutral	22%	21%	22%	22%	27%
	Moderately disagree	12%	10%	13%	11%	14%
	Strongly disagree	14%	6%	21%	14%	14%
	Unsure	2%	1%	2%	2%	2%

FOSTER PARENT PROFILE & DEMOGRAPHICS

Tenure as a foster parent		
Number of years	Number	Per cent
Under 1 year	14	3%
1-5 years	118	29%
6-10 years	121	29%
Over 10 years	160	39%

Type of foster home	Number	Percent
General	217	53%
Specialized/Treatment	94	23%
Kinship	84	20%
Other	16	4%
Unsure	29	7%

Prevalence of children placed in care by an agency other than by licensing agency		
No	324	78%
Yes	77	19%
Not Applicable/Unsure	12	3%

	Total	WCFS	SECFS	Metis	Awasis
Age of foster parent					
18-34 years	6%	7%	4%	7%	9%
35-54 years	45%	41%	46%	46%	50%
55+years	41%	48%	40%	40%	30%
Prefer not to answer	7%	4%	11%	6%	11%
Ages of children in care in the home					
Birth to 2 years	18%	23%	21%	8%	20%
3-5 years	19%	16%	19%	17%	35%
6-11 years	46%	31%	51%	59%	39%
12-17 years	45%	43%	44%	45%	50%
18-21 years	12%	14%	11%	10%	17%
Number of children in care					
None	8%	12%	8%	5%	2%
One	34%	35%	31%	35%	37%
Two	26%	31%	24%	27%	17%
Three	17%	12%	17%	18%	24%
Four	13%	10%	17%	8%	17%
More than Four	2%	0%	2%	5%	2%
Additional children in the home					
None	55%	61%	55%	54%	43%
One	19%	17%	16%	23%	28%
Two	12%	10%	13%	13%	15%
Three	5%	7%	4%	6%	4%
Four	1%	2%	2%	0%	2%
Five or more	1%	2%	0%	0%	2%
Prefer not to answer	5%	2%	11%	4%	4%
Gender					
Men	10%	15%	8%	7%	11%
Women	85%	81%	86%	88%	89%
Prefer not to answer	5%	4%	6%	5%	0%

	Total	WCFS	SECFS	Metis	Awasis
Indigenous person					
Status	10%	3%	15%	5%	26%
Non-Status	2%	2%	3%	3%	0%
First Nations	3%	0%	8%	1%	2%
Métis	18%	7%	11%	35%	26%
No	57%	80%	52%	42%	43%
Prefer not to answer	10%	8%	11%	14%	2%
Ancestry of non-Indigenous respondents					
1st Generation Canadian	20%	25%	29%	4%	5%
2nd Generation Canadian	12%	10%	14%	15%	10%
Longer than that	59%	51%	49%	77%	85%
Prefer not to answer	12%	15%	9%	10%	10%
First language(s)					
English	87%	85%	85%	93%	79%
Tagalog/Filipino	6%	7%	11%	0%	4%
French	5%	7%	3%	6%	0%
German	2%	5%	1%	1%	2%
Saulteaux	2%	0%	5%	0%	2%
Cree	1%	0%	0%	0%	9%
Other	4%	2%	6%	3%	2%
Prefer not to answer	4%	2%	7%	2%	4%

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Valued for positively influencing public sector performance through impactful audit work and reports.

» **Our Mission**

To focus our attention on areas of strategic importance to the Legislative Assembly, and to provide Members of the Legislative Assembly with reliable and efficient audits.

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