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JAN 31 2002

A-01-01-02505

Mr. Dennis Langley, Executive Director
Urban League of Rhode Island, Inc.
246 Prairie Ave.
Providence, RI 02905

Dear Mr. Langley:

Enclosed are two copies of the final report of the results of our Review of the Adoption Opportunities Grants Administered by the Urban League of Rhode Island, Inc. covering the period September 30, 1997 through September 29, 2000.

Final determination as to actions taken on all matters reported will be made by the HHS action official named below. We request that you respond to the HHS action official within 30 days from the date of this letter. Your response should present any comments or additional information that you believe may have a bearing on the final determination.

In accordance with the principles of the Freedom of Information Act, 5 U.S.C. 552, as amended by Public Law 104-231, Office of Inspector General, Office of Audit Services reports are made available to members of the press and general public to the extent information contained therein is not subject to exemptions in the Act which the Department chooses to exercise. (See 45 CFR Part 5.) To facilitate identification, please refer to Common Identification Number A-01-01-02505 in all correspondence relating to this report.

Sincerely yours,

A handwritten signature in black ink that reads "Michael J. Armstrong".

Michael J. Armstrong
Regional Inspector General
For Audit Services

Enclosure – as stated

Direct Reply to HHS Action Official:

Audit Liaison Officer
Administration for Children and Families
U. S. Department of Health and Human Services
Division of Financial Integrity
Room 703 Aerospace Building
370 L'Enfant Promenade, S. W.
Washington, D.C. 20447

Department of Health and Human Services

**OFFICE OF
INSPECTOR GENERAL**

**REVIEW OF ADOPTION
OPPORTUNITIES GRANTS
ADMINISTERED BY THE URBAN
LEAGUE OF RHODE ISLAND, INC.
SEPTEMBER 30, 1997 THROUGH
SEPTEMBER 29, 2000**



JANET REHNQUIST
Inspector General

JANUARY 2002
A-01-01-02505

Office of Inspector General

<http://oig.hhs.gov>

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EXECUTIVE SUMMARY

BACKGROUND

The purpose of the Adoption Opportunities Program is to eliminate barriers to adoption and help to find permanent families for children who would benefit by adoption, particularly children with special needs. The program has seven major program areas, including the placement of minority children who are in foster care and the recruitment of minority families looking to adopt. Grants are awarded to organizations that submit proposals with promise of meeting specific objectives focusing on innovation and advancement, reasonableness of cost, and qualification of staff in the field of adoptions.

OBJECTIVES

The objectives of our audit were to assess the grantee's (1) performance in achieving project objectives and complying with the terms and conditions of the grant award; and (2) accountability for Federal funds.

SUMMARY OF FINDINGS

We determined that the Urban League properly accounted for Federal funds. However, we also found that the Urban League should strive to improve its processes for setting, documenting, and achieving adoption opportunity program goals. The Urban League did not:

- . document the achievement of its goal to reach 1,200 people interested in adopting;
- . achieve its goal to recruit 40 Black, Hispanic, and other ethnic and racially mixed families and individuals to become adoptive parents for minority children; and
- . achieve its goal to place 40 minority children (ages birth to 16 years, with emphasis on children over 10 years old and sibling group) in these homes for each project year.

Our review of program operations determined that the Urban League did not maintain an accurate record keeping system for recruiting and tracking minority families interested in adopting minority children. Without proper documentation, there is no assurance that the goals of the program are being met. Further, the adoption placement targets in the Urban League's grant proposal may have been overly optimistic, especially when the surrounding community may not have had the number of families

necessary to place a large number of children with similar ethnic backgrounds.

RECOMMENDATION AND AUDITEE COMMENTS

The Urban League could improve its performance management on current and future projects by:

- . assuring that all policies and procedures are put in writing;
- . making more and better use of computers to monitor and to document program activities, such as goal-setting, recruiting interested families, screening applications, evaluating residences, training families, and tracking the status of potential adoption placements; and
- . standardizing processes and forms to provide better flow and tracking of cases from initial contact through completion.

The Urban League's response to the draft report, dated January 24, 2002, is attached to this report. (See APPENDIX) The response basically concurs with the information in the report and provides additional details about their accomplishments and plans for improvements.

TABLE OF CONTENTS

	Page
INTRODUCTION	1 1
Background	
Objectives, Scope And Methodology	2
FINDINGS AND RECOMMENDATIONS	2
Outreach and Recruitment Activities Training	3
Recruited Families	3
Placing Minority Families	3
Conclusion	4
Recommendations	4
Auditee Comments	5
APPENDIX - Auditee Comments Dated January 24, 2002	

INTRODUCTION

Background

The purpose of the Adoption Opportunities Program, Catalog of Federal Domestic Assistance Number 93.652, is to eliminate barriers to adoption and help to find permanent families for children who would benefit by adoption, particularly children with special needs. The program has seven major program areas, including the placement of minority children who are in foster care and the recruitment of minority families looking to adopt. Grants are awarded to organizations that submit proposals with promise of meeting specific objectives focusing on innovation and advancement, reasonableness of cost, and qualification of staff in the field of adoptions.

The Administration for Children and Families (ACF) administers the Adoption Opportunities Program and awarded \$27.4 million for 106 grants in the Fiscal Year ended September 30, 2000. ACF requires grantees to submit annual and semiannual financial status reports, biannual progress reports, and annual independent public accountants audit reports.

By grant period, the Federal share of the Adoption **Opportunity grants** to the Urban League were as follows

September 30, 1997 to September 29, 1998 -	\$167,522
September 30, 1998 to September 29, 1999 -	\$190,317
September 30, 1999 to September 29, 2000 -	<u>\$199,999</u>
Three-year Total	<u>\$557,838</u>

The Urban League's grant proposal listed the following goals for each of three years:

- . To conduct recruitment activities sufficient to reach and introduce adoption opportunities to a minimum of 1,200 targeted (Black, Hispanic, and other ethnic and racially mixed) persons;
- . To train and conduct home studies on 40 recruited families and individuals to become adoptive parents for minority children, and
- . To place 40 minority children (with emphasis on children over 10 years old and sibling groups) in these homes.

The mission of the Urban League of Rhode Island, Inc. is to (1) eliminate racial discrimination and segregation in the state, (2) achieve parity for Blacks, other minorities and the poor in every phase of American life, and (3) achieve social justice and economic, educational and political equality for all. The Urban League's Minority Recruitment & Child Placement Program combines many initiatives aimed at providing homes to children who are in need of loving homes. The program recruits, provides information, advocacy, referrals and support to families in adoption, foster care and host homes. Post-placement services include reports, counseling and support groups. In addition, the Program provides services to runaway and abandoned teens through the Transitional Living Program and Host Home Programs. Adoption and foster care services are provided through a variety of recruitment strategies.

Objectives, Scope and Methodology

Objectives

The objectives of our audit were to assess the grantee's (1) performance in achieving project objectives and complying with the terms and conditions of the grant award; and (2) accountability for Federal funds.

Scope and Methodology

Our review was made in accordance with generally accepted government auditing standards. We limited our review to the performance and fiscal management controls employed by the Urban League to administer the Adoption Assistance grants for the period September 30, 1997 through September 29,2000. We obtained, observed, and selectively reviewed activity logs, intake logs, case records, minutes of staff meetings, internal reports, performance reports, fiscal reports, independent auditor reports, minutes of Board of Director Meetings, fiscal and cash withdrawal policies and procedures, and Annual Reports.

Our review of fiscal activities consisted of obtaining and reviewing OMB Circular A-133 reports and audit reports issued by independent public accountants, reviewing written policies and procedures, reviewing the reconciliation of semiannual Financial Status Reports to financial records and reviewing policies and procedures used to make cash withdrawals for the Adoption Opportunity grants. Because three years of independent public accountant audit reports showed no issues related to Federal grants, we did not test any transactions.

We conducted our on site review at the offices of the Urban League of Rhode Island, 246 Prairie Avenue, Providence, Rhode Island from May 22 through May 25,2001. We held a closing conference with Urban League officials on May 25, 2001.

The Urban League's response to the draft report is included as the APPENDIX of this report.

FINDINGS AND RECOMMENDATIONS

We determined that the Urban League properly accounted for Federal funds. However, we also found that the Urban League should strive to improve its processes for setting, documenting, and achieving adoption .opportunity program goals.

Our review of program operations detennined that the Urban League did not maintain an accurate record keeping system for recruiting and tracking minority families interested in adopting minority children. Without proper documentation, there is no assurance that the goals of the program are being met. Further, the adoption placement targets in the Urban League's grant proposal may have been overly optimistic, especially when the surrounding community may not have had the number of families necessary to place a large number of children with similar ethnic backgrounds. The Urban League's response to the draft report, dated January 24,2002, is attached as the APPENDIX to this report. The response basically concurs with the infonnation in the report and provides additional details about their accomplishments and plans for improvements.

Outreach and Recruitment Activities

The Urban League conducted about 100 recruitment activities for each of the three years to reach and introduce adoption opportunities to large numbers of target families. At each event, they gave presentations and provided pamphlets, refrigerator magnets, bookmarks, calendars, and other items to make people aware of adoption opportunities. However, the Urban League did not document its activities to show the number of people who attended or the number who showed interest in becoming adoptive parents. Without such documentation, there is no way to determine whether the Urban League met its goal to conduct recruitment activities sufficient to reach and introduce adoption opportunities to a minimum of 1,200 persons from the targeted cities and towns for each of the three years of the grant.

Training Recruited Families

Of the 281 names entered in the Urban League's manual intake logbooks used to record inquiries about adoption, the records of the Urban League indicated they gave out only 54 applications for adoption training; of these, about 25, including about 10 families outside of the targeted population, completed the training and registered for adoptions with the State. Even so, the results were far less than the program goal to recruit 120 (40 each year for three years) Black, Hispanic, and other ethnic and racially mixed families and individuals to become adoptive parents for minority children.

The records do not indicate whether the other 227 families who inquired about adopting a minority child were ever contacted or why and when they were screened out without being sent applications. According to the Urban League's management, families are screened out when there is:

- o A conflict with law enforcement (criminal record);
- o Not enough income;
- o A failed State inspection of the home (i.e. not enough living space for family);
- o A conflict with families schedule to attend training program by Urban League; or
- o A military family that wants to adopt. (The State requires adopted children to remain in the state for six months after the adoption is completed.)

According to management, the type of file folder lets them know whether the family has successfully completed all requirements and has been referred to the State adoption agency. We reviewed a sample of 20 of the 54 case files for those families who were sent applications. We noted that they did not indicate why the families were or were not forwarded to the State adoption agency.

Placing Minority Families

Over the three-year grant period, the Urban League reported a total of 13 adoption placements were completed. The results were far less than the program goal to place 120 (40 each year for three years) minority children with families recruited and trained by the Urban League. Records also showed 23 people were awaiting adoptions. We found that 12 of the 23 names awaiting adoptions were never recorded in the intake logs. The Urban League could not explain why 12 of those awaiting adoptions were not recorded in the intake logs. However, we observed that two of the three logbooks had gaps in the tracking numbers of the families interested in adopting a child.

Conclusion

Under this three-year project, the Urban League's major functions were to:

- . conduct informational presentations;
- . provide families, particularly minority families, with training to allow them to qualify as adoptive families; and
- . help families register with State adoption agencies.

We were unable to identify the number of minority placements specifically resulting from the efforts for this three-year project period. Specifically, the Urban League has been conducting adoption opportunities projects for many years prior to and following this three-year period and records, when maintained, were mostly manual. While Urban League officials can recount the individual cases they worked over the years in detail, the manual program records are not in a format that can be readily used to identify program results. We also found that the Urban League did not document all of its education and training efforts and did not standardize all forms for intake, meetings, training, and procedures. In addition, we found that the Urban League did not have a functioning Internet Web page (as a result of a vendor business failure) and did not have a Spanish Web page, even though Hispanics form a major portion of the Urban League clientele.

Recommendations

Overall, the Urban League needs to develop and place in writing policies and procedures for all processes related to adoption opportunities, establishing goals, writing applications, conducting presentations, counting attendance at recruitment meetings, encouraging sign-ups, tracking cases, screening interested families, providing applications, aiding preparation of applications, conducting training, evaluating residences, and registering trainees with the State.

Specific recommendations include:

(1) For contacts and recruiting:

- . Develop an internet web page to encourage contacts.
- . Develop a Spanish web page to serve the newly revised target population for the current grants.
 - Standardize forms for intake, meetings, and training.
- . Develop written policies and procedures for all programmatic processes in use.

(2) For recruiting families to apply for adoption training:

- . Make more and better use of computers for tracking cases from beginning to end (placement or resignation.)

- (3) For documenting placements of minority children with minority parents when preparing performance reports:
- . Tie reports to supporting documentation.
 - . Compare achievements with goals and explain differences.
 - . Assure that target populations are served first and document that any services provided to those outside the target populations have no negative impact on the target populations.
 - . Establish and implement an accurate record keeping system for all programmatic processes in use.
- (4) In applying for Federal grants:
- . Identify and obtain statistics needed to set goals.
 - . Set goals the Urban League can control and can monitor

Auditee Comments

The Urban League's response to the draft report, dated January 24,2002, is attached as the APPENDIX to this report. The response basically concurs with the information in the report and provides additional details about their accomplishments and plans for improvements. The Urban League indicated that they plan to continually improve the delivery of services and the maintaining of appropriate record keeping. Specifically, they have purchased equipment to computerize data to a centralized database program, assisting them in tracking demographic information and developing a protocol manual.

APPENDIX

URBAN LEAGUE—RHODE ISLAND

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January 24, 2002

Mr. Michael J. Armstrong
Regional Inspector General
Office of Audit Services
Region I
John K. Kennedy Federal Building
Boston, MA 02203

Dear Mr. Armstrong:

Please accept my response to your review of the Adoption Opportunities Grants Administered by the Urban League referred to as: Common Identification Number A-01-01-02506. We understand this is a draft and we are pleased to present our comments to your observations and recommendations.

In your findings, you stated that the program did not achieve its goal of reaching 1,200 people interested in adoption. The dissemination of activities were included in the quarterly and yearly reports. We indicated:

- 5,175 persons were reached in 69 church presentations (a conservative estimate of 75 persons in attendance)
- Flyer distributions reached over 6,000 persons
- We participated in 95 special events with a range of 100-10,000 persons in attendance and 71 informational booths were conducted with information on adoption and the program.

Media advertisement included:

- Eight (8) newspaper ads
- Three outdoor billboard campaigns
- Nine radio advertisement campaigns
- Two television advertisement campaigns
- Two newspaper advertisement campaigns
- Two television interviews
- Numerous public service announcements in newspapers, radio, and TV.

Mr. Michael Armstrong
January 24, 2002
Page 2

It is important to note that we clearly exceeded the expectations in the recruitment of 1,200 persons per year. Over the course of 3 years, 322 persons responded through the above recruitment activities. Unfortunately, only 66 applications were returned. Thirteen (13) families were disqualified from the process. Barriers preventing more foster and adopting families such as Alien Status, Health, and Housing were in outlined quarterly BCI and CANTS Reports. Additionally, 17 families dropped out of the 10-week training process. Although we were not able to meet our contractual goals, it is important to note the considerable effort exercised and significant barriers we encountered.

As a result of recruitment strategies, 17 families were recruited for the Foster Care Program.

During the grant period we were contracted to place 40 children per program year. Thirteen (13) children were placed with families we recruited. Again, it is significant to note that based on state regulations, we are not in control of the placement process. We opted to work diligently with state and local adoption agencies to facilitate placement for our families by participating in adoption parties in Rhode Island and Massachusetts and monthly collaborative meetings with placement agencies. The first year was devoted to start-up activities. Placement would occur only after families were recruited, trained, and approved.

In regard to your recommendation to improve our performance on current and future projects, it is the objective of the Urban League to continually improve the delivery of services and the maintaining of appropriate record keeping. The period of time covered in this review was 1997 through 2000. Many changes have occurred, during the tenure of Charlene Zienowicz as the Director of Minority Recruitment & Child Placement Program, that address your concerns and recommendations.

In reaching our program goals, staffing was cited as a concern regularly on reports. The MSW and recruiter positions were challenging to fill and difficult to retain. At staff exit interviews, low salaries were indicated as a significant factor. As a result, productivity at satellite offices was compromised.

We would like to assure you that we have developed new measures to ensure greater accuracy in reporting. Lack of equipment hindered our ability to completely computerize data. In an effort to improve overall efficiency, computer equipment has been purchased or upgraded to support on-line networking in order to transfer all paper records to a centralized database program. We are using ACCESS to document all phases of activity and client records. Activity tracking currently being done using Excel worksheets. These worksheets will be transferred to ACCESS as part the improvements to documentation. It is believed that this database will address the need for improved documentation from intake to placement for each client, and, provide needed information to evaluate achievements of goals more effectively. It will also enhance tracking of demographic information (including race & ethnicity), and ensure accuracy and greater detail in program reports.

Mr. Michael Armstrong
January 24, 2002
Page 3

A protocol manual has been developed and is currently in production. It will describe in detail all policies and procedures within the department. This manual will include flow charts for every process, a complete description of each step, a list of all forms, glossary of terms, and all regulations pertinent to adoption and foster care. The manual will address standardizing procedures and forms to improve tracking and documentation. Completion of this manual is scheduled for March 31, 2002.

The Adoption Pre-Service Training Program has been outlined in a PowerPoint presentation format in response to the need for greater standardization in methods and procedures. The feedback from program participants has been favorable. A Spanish version of this training presentation is in progress presently. Also, plans are underway to video-record the 10-week training classes for clients. In the event of an emergency, this new procedure will enable clients to come to the office to view any classes they have missed.

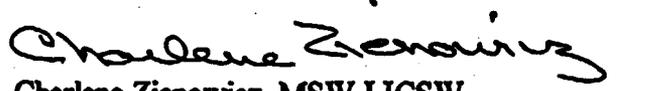
Another area of concern noted by the audit was the need for materials available on a website. There is a general agency website that describes all the programs of the Urban League of Rhode Island. We are considering developing a specific MRCPP website that would include applications, current information, schedule of trainings, important regulations, events, appeals for waiting children, and significant links.

In the area of goal setting, the Urban League has adjusted current aims to reflect a realistic prediction of attainable goals based on the demographics of our region, knowledge of our target, current staffing, past efforts and the number of children available to adopt.

In conclusion, we appreciate the candidness of your review of the Adoption Opportunities Grant. We recognize the usefulness of your assessment and we will continue to make every effort to improve our services on behalf of those whom we serve—children waiting for loving homes.

Sincerely yours,


Dennis B. Langley
Executive Director


Charlene Zienowicz, MSW-LICSW
Director
Minority Recruitment & Child Placement Program