

Office of Inspector General City of Jacksonville, Florida



Report of Investigation Families of Slain Children Incorporated 2024-0018

November 21, 2024

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Inspector General

Executive Summary

In February 2024, the Office of Inspector General (OIG) initiated an administrative investigation regarding alleged contract improprieties by Families of Slain Children Incorporated (FOSCI) related to City Contracts between FOSCI and Kids Hope Alliance (KHA). Specifically, City Contracts No. 70692-23 related to the College and Career Development Program and No. 70659-23 related to the Family Stability Program (Programs). Both City Contracts indicated FOSCI administered youth services through the Programs from August 2023 through May 2024.

According to allegations received by the OIG, FOSCI failed to comply with their City Contracts in various ways, including mismanagement of City funds, failure to pay sub-contractors and report fiscal accountability, and operating without a solicitation permit. Based on the investigation, these allegations were either unfounded, outside of the OIG's jurisdiction, or handled by the appropriate agency.

During the investigation, the OIG received additional information indicating FOSCI employees working under the Programs completed the Department of Children and Families (DCF) Level 2 Background Screenings¹ (Background Screenings) as per the City Contracts, but their Background Screening results indicated they were deemed Not Eligible for DCF Child Care. As a result, they should have been disqualified from employment for childcare as per DCF Child Care Licensing Program, Desk Reference Guide CFOP 170-20, dated July 2020 (DCF CFOP).

It was discovered two FOSCI employees under the College and Career Development Program were deemed Not Eligible, and one FOSCI employee was deemed N/A for DCF Child Care. From February 2024 through April 2024, two FOSCI employees were paid KHA funds totaling \$19,611 without being deemed Eligible for DCF Child Care.

It was also discovered three FOSCI employees under the Family Stability Program were deemed Not Eligible for DCF Child Care. From February 2024 through May 2024, three FOSCI employees were paid KHA funds totaling \$25,866.92 without being deemed Eligible for DCF Child Care.

Background

FOSCI is a non-profit organization located at 2122 North Myrtle Avenue, Jacksonville, FL 32209 founded in 2006. FOSCI supports family members (homicide survivors) of all ages with psychological, emotional, social, educational, and economic interventions following a homicide. FOSCI's services focus on helping individuals achieve "peace of mind" to aid the healing and recovery process after the loss of their loved ones.

¹ Background Screening components includes a criminal records check (both national and statewide), a sex offender registry search, and child abuse and neglect registry check, an employment history check, and the Child Care Attestation of Good Moral Character.

In August 2023, KHA awarded two reimbursable City Contracts to FOSCI totaling \$250,000: the College and Career Development Program for \$125,000 and the Family Stability Program for \$125,000. Both City Contracts were in effect from August 1, 2023, through May 31, 2024. In June 2024, KHA renewed the City Contracts until May 31, 2025. The OIG conducted an administrative review of the City Contracts for the Programs and all available documents to ensure contract compliance from August 1, 2023, through May 31, 2024.

Allegations

FOSCI employees were hired for positions under the Programs before their Background Screening results returned. FOSCI employees' Background Screening results indicated they were deemed Not Eligible or N/A for DCF Child Care, which disqualified them from employment. FOSCI employees maintained their employment and were paid KHA funds after their Background Screening results deemed them Not Eligible or N/A for DCF Child Care.

Governing Directives

City Contract Records Related to the Programs

City Contract No. 70692-23, dated August 1, 2023, between KHA and FOSCI related to the College and Career Development Program indicated FOSCI administered youth services to children ages 13 through 16 years old from August 1, 2023, through May 31, 2024. The proposed number of youths served was 18. This Program operates from Monday through Friday, after school from 2:30 pm through 6:00 pm, and during the summer from 9:00 am through 2:00 pm. This Contract could be renewed for up to three (3) additional one (1) year periods by KHA upon satisfactory performance by FOSCI.

City Contract No. 70659-23, dated August 1, 2023, between KHA and FOSCI related to the Family Stability Program indicated FOSCI administered adult and youth services from August 1, 2023, through May 31, 2024. The proposed number of families (adults and youth) served was 60. This Contract could be renewed for up to three (3) additional one (1) year periods by KHA upon satisfactory performance by FOSCI.

The Programs' Deliverables for staff qualifications stated Background Screening Forms, specifically the Child Care Attestation of Good Moral Character (Attestation of Good Moral Character), and Background Screening, were required yearly and upon hiring new staff at the start of the Programs and as needed.

DCF Records Related to the Programs

The OIG reviewed the DCF CFOP, dated July 2020, which contained the following information related to Background Screenings highlighted below:

Chapter 6: Background Screening

All employees in positions designated by law as positions of trust or responsibility are required to undergo a security background investigation as a condition of employment and continued employment.¹³² Positions that meet the definition of "child care personnel" are designated by the child care statutes as positions of trust or responsibility and are subject to Level 2 background screening under Chapter 435, Florida Statutes.

It is the responsibility of the Department to ensure that "child care personnel" in any child care setting are of good moral character as determined by background screening. Strict compliance with the requirements and processes included in this chapter is crucial to the safety of the children in care. When in doubt, if an unusual circumstance arises, or if you have a "bad feeling" about a provider, seek the guidance of your supervisor, Regional Safety Program Manager and/or Regional Legal Counsel to ensure that the licensing office has not only met its regulatory responsibilities, but has also exercised the full extent of its legal authority to ensure the safety of children in care.

*****Important Information*****

- Individuals *subject* to Level 2 screening must be cleared *prior* to licensure, registration, employment, volunteering or fulfilling any other role in a child care program.
- Individuals who have already completed live scan fingerprints can be hired for a position that requires Level 2 background screening for purposes of training and orientation while awaiting the fingerprint results as long as they have no direct contact with children while the screening process is being completed.¹³³
- Upon receiving written notification from the department's background screening unit, individuals can be hired for a 45-day period while awaiting out of state records that are being requested and awaiting clearance. During those 45 days the individual must be under the direct supervision of a screened and trained staff member when in contact with children.¹³⁴
- The employer/owner/operator must **initiate all screenings** through the Care Provider Background Screening Clearinghouse prior to fingerprinting.¹³⁵
- The employer/owner/operator must add child care personnel to their Employee/Contractor Roster in the Clearinghouse when the individual has received a

¹³² Section 435.04(1), F.S.

¹³³ Section 435.06(2)(d), F.S.

¹³⁴ Section 5.1, J Facility Handbook, and Section 4.1, J FDCH/FLCCH Handbook


¹³⁵ Section 435.12(2)(a)5.c., F.S.

child care eligible result and has been hired at the facility changes in status must be reported within 10 business days.¹³⁶

- The DCF background screening unit is responsible for reviewing all federal and state records and making a determination as to the individual's eligibility for employment based on their criminal history.
- Rescreenings are conducted every 5 years and require re-submission via the clearinghouse for retained fingerprints.
- An **Attestation of Good Moral Character** must be completed upon initial licensure, registration or employment as well as at time of change in employment or a break in service in excess of 90 days.
- Arrests for offenses listed on the Attestation of Good Moral Character will require child care personnel to be removed from employment until final disposition.

Persons Subject to Screening

In general, any person who meets the definition of "child care personnel" established in statute is subject to Level 2 screening. Some individuals, however, are subject to additional screening or are exempt from certain components of screening, depending on their role in the child care setting and the level of oversight that they receive.



Recommended practice...

Obtain background screening documents early in the licensing process and make sure the appropriate individuals receive screening in order for the results to be received prior to licensing.

Licensed Child Care Facility

- Owner**
 - The owner of a licensed child care facility is subject to all components of screening¹³⁷ and must be cleared through Level 2 background screening prior to licensure whether they actually work in the facility or not (unless the owner is a corporation).
 - If the owner is a corporation and the corporate officers have an active role in the facility, they are subject to all components of screening and must be cleared through Level 2 background screening prior to licensure.¹³⁸
 - If the corporate member does not have contact with the children, does not go onsite at the program during operating hours, and whose role does not involve the day-to-day operation of the child care program, they are considered a non-active corporate member. In lieu of completing background screening for non-active members, providers will be responsible for submitting the following documentation:
 - A copy of the corporation's/LLC's organizational chart.*
 - A notarized affidavit from each non-active corporate/LLC member stating that their role in the corporation/LLC does not involve the day-to-day operation of the child care program, the individual does not have contact with children in care, and that they do not have any reason to be in contact or be present at the program. The affidavit does not require renewal and must be maintained in the licensing file.*

¹³⁶ Section 435.12(2)(a)5.b., F.S.

¹³⁷ Sections 402.302(3) and (15) and 402.305(2)(a), F.S.

¹³⁸ Sections 402.302(3) and (15), 402.305(2)(a), 402.3055(1), and 39.201(6), F.S.

After School Programs Exempt from Licensure

While "After School Programs" meeting the criteria in 65C-22.008(2)(c), F.A.C., are exempt from licensure, personnel in the programs must meet the same background screening requirements as child care personnel in licensed facilities.¹⁵³

Religious Exempt Programs

While exempt from licensure, all personnel in religious exempt child care programs must meet the Level 2 background screening requirements as outlined in s.435.04, F.S.¹⁵⁴

Summer Day Camps and 24-Hour Camps

- These programs are not considered child care for purposes of licensure; however, although these programs are not regulated by the Department, screening for these individuals is processed by the background screening unit.
- Directors, employees and volunteers who work in summer day camps and summer 24-hour camps must be cleared through Level 2 background screening prior to working in the program.¹⁵⁵

Nonpublic Schools

Although non-public school programs for children who are at least 3 years of age but under 5 years of age may be exempt from licensure and not regulated by the Department, child care personnel in these programs are subject to full Level 2 screening and must be cleared through screening prior to providing childcare services. Personnel in the programs must meet the same background screening requirements as child care personnel in licensed facilities.

Persons Not Subject to Screening

The following persons are specifically exempt from background screening:¹⁵⁶


- Persons who work in a child care facility after hours when children are not present.
- Parents of children in a child care facility.
- Public or nonpublic school personnel who are providing care during regular school hours or after hours for activities related to a school's program for kindergarten through grade 12. This does not include K-12 teachers that also work as childcare personnel.
- Volunteers who assist for less than 10 hours per month, provided that they are under direct and constant supervision by persons who are screened and trained.
- Students who observe and participate in a child care facility as a part of their required coursework, provided that the observation and participation are on an intermittent basis and the students are under direct and constant supervision of persons who are screened and trained.
- A driver, if he or she is under the direct and constant supervision of screened and trained child care personnel. This is a driver who is not an employee of the child care facility. The driver could be a transportation company employee, a city bus driver, or a volunteer on a field trip.

¹⁵³ 65C-22.008(3), F.A.C.

¹⁵⁴ Section 402.316(1), F.S.

¹⁵⁵ Section 409.175(2)(b) and (k) F.S.

¹⁵⁶ Section 402.302(3), F.S.



- To open an applicant's profile page, click on the SSN hyperlink in the second column
- When the user clicks on an SSN in the search results table, the system directs to the associated person profile

Eligibility	Determination	Date
DCF General	Eligible	03/31/2017
DCF Child Care	Eligible	03/31/2017
DCF Substance Abuse - Adult Only	Eligible	03/31/2017
DCF Summer Camps	Agency Review Required	
DCF Mental Health	Agency Review Required	
APD General	Agency Review Required	
APD Developmental Disability Centers	Agency Review Required	
APD CDC	Agency Review Required	

Person ID	003114474	DOB	12/24/1972	Address	123 STREET
First Name	GEORGE	SSN	888-88-0100		CITY, FL 33333
Last Name	CLOONEY100	Phone			
Retained Prints	03/16/2020				
Expiration Date					
Clearinghouse Screening Available?	Yes				

To identify the person's current eligibility, review the 'eligibility table' at the top of the Applicant Profile Page.

Eligibility Determination Types

Eligible – Person is eligible for employment associated with this eligibility type.

Not Eligible – Person is disqualified for employment associated with this eligibility type.

Screening in Process – the background screening unit is currently processing a screening for this person. Screenings can be in process for several reasons:

- The Background Screening Unit has not yet processed the screening.
- A letter was sent to the applicant requesting more information on their criminal history. Note: Confidentiality prevents discussing an applicant's criminal history with a provider.
- The employee/applicant resided outside the State of Florida within the previous 5 years.

Agency Review Required – The applicant was previously screened by another agency, DCF Providers may request a free DCF screening by requesting an agency review.

A New Screening is Required – the applicant requires a new screening.

Disqualification

- If the background screening unit determines that an individual is disqualified for employment/licensure/registration based on screening results, the screening unit will notify the licensing unit and the provider through a "Not Eligible" status in the Clearinghouse. The applicant will be notified by writing. If applicable, the notice to the applicant will include information regarding the exemption process pursuant to s. 435.07, F.S.
- The employer must either terminate the employment of any of its personnel found to be in noncompliance with the minimum standards for good moral character or place the employee in a position for which background screening is not required, until the employee is granted an exemption from disqualification.¹⁷⁷
- Any person who is required to undergo employment screening and who refuses to cooperate in such screening or refuses to submit the information necessary to complete the screening, including fingerprints when required, is automatically disqualified for employment in such position. If already employed, that person must be dismissed.¹⁷⁸
- If an owner or operator is determined to have been arrested for and awaiting disposition of, or committed a disqualifying offense, the licensing unit must deny or revoke the provider's license or registration¹⁷⁹ and inform the owner/operator of their right to an appeal under Chapter 120, F.S.¹⁸⁰
- If an adult household member in a family day care home (licensed or registered) or large home were found to have been arrested for and awaiting disposition of, or committed a disqualifying offense, the application for a license or registration would be denied. If a family day care home operator alleges that the disqualified household member has moved out of the home and he or she wishes to reapply, care should be taken to obtain verification regarding the current residence of the disqualified person. If the person is a juvenile and under the control of the Department of Juvenile Justice (DJJ), contact the DJJ counselor.
- If an adult household member in a family day care home (licensed or registered) or large home were found to have been arrested for and awaiting disposition of, or committed a disqualifying offense, the licensing unit must revoke the provider's license or registration and inform the owner/operator of their right to an appeal under Chapter 120, F.S. If a family day care home operator alleges that the disqualified household member has moved out of the home, care should be taken to obtain verification regarding the current residence of the disqualified person.

Important Information!

In a child care facility, the only position for which background screening is not required is cleaning/maintenance after the facility is closed. In a family day care home, there is no position considered to "not have contact with children."

Exemption from Disqualification

It is the responsibility of the affected employee or provider to either contest his or her disqualification or to request exemption from disqualification. The basis for *contesting* the disqualification is proof of mistaken identity (see s.435.07, F.S.). When applicants are notified of disqualification, they are also

¹⁷⁷ Section 435.06(2), F.S.

¹⁷⁸ Section 435.06(3), F.S.

¹⁷⁹ Section 402.308(3)(d), F.S.

¹⁸⁰ Section 402.310, F.S.

notified of their right to appeal through the exemption process and provided with a "Request for Exemption" form if they are eligible for exemption.

The background screening unit is responsible for coordinating exemption review activities. The applicant has 30 days after notification of disqualification to request an exemption and the background screening unit will schedule a review within 30 days of receiving all the necessary documentation from the applicant. The applicant and the employer will be notified in writing of the final decision within 30 days of the review. This decision may be appealed under Chapter 120, F.S.

If the applicant is granted an exemption, he or she may be returned to the position for which screening was required. If the owner or director of a licensed child care facility or the operator or any adult subject to screening in a family day care home (licensed, registered, or large) has been granted an exemption, the licensing unit must maintain a copy of the notification in the provider's file. If the individual is not granted an exemption or is notified that he or she does not meet the criteria for an exemption, the original disqualification stands.

Issuing a License

A license may not be issued or renewed if the owner, director, employees, volunteers, or substitutes have failed the screening required by ss. 402.305(2) and 402.3055, F.S.¹⁸¹ (See "Important Information" Text Box Below)

- If the owner of a facility does not receive clearance on any component of background screening, the license must either be denied or revoked unless the owner is granted an exemption (see the previous section entitled "Exemption from Disqualification" for exemption procedures).
- Refusal on the part of the owner, director, or operator to dismiss any child care personnel who have been found to be in noncompliance with the background screening requirements will result in automatic denial or revocation of the license or registration in addition to any other remedies pursued by the Department or local licensing agency (see Chapter 12: Enforcement for additional information).
- A family day care home or large family child care home may not be registered or licensed until proof of background clearances on the operator and all household members have been received and verified in the Clearinghouse for eligibility.
- If the operator of the home, employee, substitute, or any adult household member does not receive clearance on any component of background screening, the license or registration must be denied, unless the individual is granted an exemption.

¹⁸¹ Section 402.308(3)(d), F.S.

The OIG reviewed the Clearinghouse Results Website Explanation of Results, which further defined Eligibility Determinations for Background Screenings highlighted below:

Eligibility Determinations

- **Awaiting Privacy Policy** – The applicant has retained prints and a photograph but is missing the privacy policy. To view the results employers must obtain a signed privacy policy from the applicant and select "Confirm Privacy Policy".
- **Agency Review Required** – The applicant has a screening in the Clearinghouse submitted by another specified agency. An Agency Review is required to obtain an eligibility determination.
- **Screening in Process** – A screening has been received and is awaiting final determination.
- **Resubmission Required – 90 Day Lapse in Employment** – The applicant has a screening in the Clearinghouse and has experienced a 90 day lapse in employment. A resubmission must be requested to obtain an eligibility determination. New fingerprints are NOT required.
- **Eligible** – Individuals are considered eligible for employment in positions required to undergo screening.
- **Not Eligible** – Individuals are considered disqualified for employment and may not work in any position within a health care or service provider that is required to undergo background screening.
- **A New Screening is Required** – A previous screening has now expired and a new screening is required.

KHA Records Related to the Programs

In June 2024, the OIG requested records from KHA related to FOSCI and the Programs. Regarding Background Screening Requirements and Guidelines, KHA responded, “(1) *Background screenings should be completed before a staff member is hired, (2) If a staff member is ineligible through the Level 2 background screening, they are not allowed to work with the students, and (3) Several emails were sent out to the providers reminding them of the requirement.*” KHA also provided the Programs’ Request for Proposals, which stated the following information related to Background Screenings highlighted below:

Background Screening. Contact Florida Department of Children and Families (DCF) for information regarding Background Screening at 1-888-352-2849, www.dcfbackgroundscreening.com. Contractor must screen all staff working with children in the program in compliance with Level 2 background screening and fingerprinting requirements in accordance with Sections 943.0542, 984.02, Chapter 435, 402, 39.001, and 1012.465 Florida Statutes, as applicable. The Contractor must maintain staff personnel files which reflect that a screening result was received and reviewed to determine employment eligibility prior to employment. Contractors operating within Dual County Public Schools (DCPS) sites must re-screen each employee, volunteer and/or subcontractor as DCPS vendors every five years (as required by DCPS), provided there is no more than a 90-day lapse in service. An annual screening and resubmission are required for the Department of Children Families for those that are also required to be licensed by DCF.

College and Career Development Program

DCF Records²

The OIG reviewed DCF records related to FOSCI and the College and Career Development Program. Based on the OIG’s records review, the OIG determined the following:

A DCF Children Licensure Questionnaire dated August 11, 2023, indicated FOSCI administered the College and Career Development Program through a City grant for children ages 13 through 16 years old. The Program’s hours of operation were after school during the school year, Monday through Friday, from 2:30 pm through 6:00 pm.³

A DCF Memorandum addressed to FOSCI dated September 28, 2023, contained the following information related to Background Screenings highlighted below:

² Some DCF records below have been redacted and modified by the OIG for confidentiality.

³ The information provided in this questionnaire is reviewed by DCF and the Office of Child Care Regulation to make determinations.

Your afterschool and summer camp program is **not required to be licensed** at this time. However, all personnel as defined in s. 402.302 Florida Statutes (F.S.) are required to meet background screening requirements through the Department pursuant to ss. 402.305 and 402.3055.

65C-22.008(4) School-age exempt providers shall submit prior to operating and upon request of the Department, an Attestation of Compliance with background screening requirements, and providers must attest that the program continues to operate in the manner as presented to the Department for the exemption determination. Prior to any changes in operation, the program shall submit a written notification to the Department outlining the proposed changes for a redetermination. Failure by a program to comply with such reporting, providing required verifications, and screening requirements shall result in the loss of the program's exemption from licensure.

The DCF Employee Roster for FOSCI listed various individuals, including the following individual of concern:

Employee Roster Export to Excel							
Person ID	Person Name	SSN	Position	Last Screening Date	Provisional Hire Date	Hire Date	End Date
[REDACTED]	[REDACTED]	[REDACTED]	Director	01/11/2024		09/18/2023	01/31/2024
[REDACTED]	[REDACTED]	[REDACTED]	Director	09/14/2023		09/18/2023	01/31/2024
[REDACTED]	[REDACTED]	[REDACTED]	Other	08/07/2020		02/01/2024	
[REDACTED]	[REDACTED]	[REDACTED]	Employee or Staff Person	03/09/2024		02/01/2024	
[REDACTED]	[REDACTED]	[REDACTED]	Other	03/28/2024		02/01/2024	
[REDACTED]	Subject 1	[REDACTED]	Other	06/23/2021		03/01/2024	
[REDACTED]	[REDACTED]	[REDACTED]	Other	05/09/2024		04/15/2024	

DCF Background Screening records indicated Subject 1 was deemed N/A for DCF Child Care:

Subject 1			
Eligibility	Determination	Date	
DCF General	Eligible	05/20/2022	
DCF Child Care	N/A		
DCF Substance Abuse	Eligible	05/20/2022	
DCF Summer Camps	Agency Review Required		
DCF Mental Health	Eligible	02/08/2024	
APD General	Agency Review Required		
APD Developmental Disability Centers	Agency Review Required		
APD CDC	Agency Review Required		

Person ID	[REDACTED]	DOB	[REDACTED]	Address	[REDACTED]
First Name	[REDACTED]	SSN	[REDACTED]		
Last Name	[REDACTED]	Phone	[REDACTED]		

KHA and FOSCI Records

The OIG collectively reviewed KHA and FOSCI records related to FOSCI and the College and Career Development Program. Based on the OIG's records review, the OIG determined the following:

The Employee Roster for FOSCI listed various individuals, including the following individuals of concern:⁴

Person Name	Position	Start Date	End Date	KHA/FOSCI Comment
Subject 1	Volunteer Instructor	April 1, 2024	Present as of May 2024	
Subject 2	Director of Operations and Training	February 1, 2024	March 13, 2024	No Youth Involvement and Removed with Final KHA Ruling
Subject 3	Program Compliance and Administration	February 1, 2024	Present as of May 2024	No Youth Involvement

The Attestation of Good Moral Character records indicated the individuals above attested the following information related to their criminal records:

Person Name	Item	Status	Eligibility Determination Date
Subject 1	DCF Child Care	N/A	April 2, 2024 (*Eligibility Status Date)
Subject 2	DCF General	Not Eligible	March 7, 2024
	DCF Child Care		
	DCF Substance Abuse		
Subject 3	DCF General	Not Eligible	March 8, 2024
	DCF Child Care		
	DCF Substance Abuse		

Background Screening records for the individuals listed above indicated the following information related to their eligibility:

Person Name	Attestation	Submission Date
Subject 1	Their record does not contain any applicable disqualifying acts or offenses	April 1, 2024
Subject 2	Their record does not contain any applicable disqualifying acts or offenses	January 17, 2024
Subject 3	Their record contains one or more of the applicable disqualifying acts or offenses	January 17, 2024

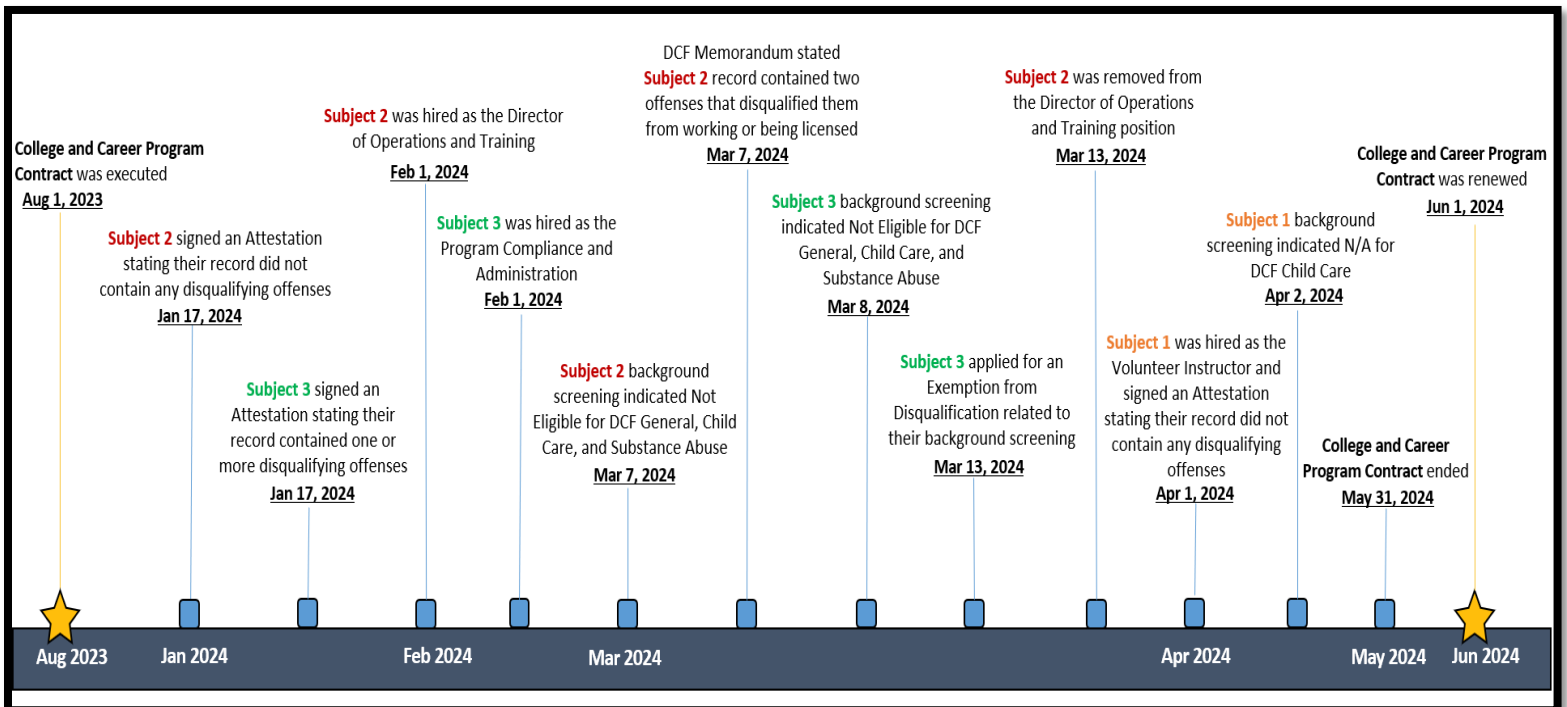
⁴ The positions, start, and end dates shown are approximate based on the OIG's records review.

Reimbursement records indicated the following individuals were paid KHA funds through the College and Career Development Program:

Payee	Check Date	Check Amount
Subject 2	February 9, 2024	\$1,087.00
	February 23, 2024	\$1,087.00
	March 8, 2024	\$1,087.00
	Total	\$3,261.00
Subject 3	February 9, 2024	\$2,725.00
	February 23, 2024	\$2,725.00
	March 8, 2024	\$2,725.00
	March 22, 2024	\$2,725.00
	April 12, 2024	\$2,725.00
	April 26, 2024	\$2,725.00
Total	\$16,350.00	
Grand Total		\$19,611.00

OIG Timeline of Events

Based on the OIG’s records review, the OIG created the timeline below to illustrate the relevant events that occurred:⁵



⁵ KHA employees sent numerous emails to FOSCI employees attempting to resolve Background Screening matters during the timeframe listed.

Family Stability Program

KHA and FOSCI Records

The OIG collectively reviewed KHA and FOSCI records related to FOSCI and the Family Stability Program. Based on the OIG's records review, the OIG determined the following:

The Employee Roster for FOSCI listed various individuals, including the following individuals of concern:⁶

Person Name	Position	Start Date	End Date	KHA/FOSCI Comment
Subject 2	Program Manager	February 1, 2024	Present as of May 2024	
Subject 3	Director of Operations and Training	February 1, 2024	Present as of May 2024	
Subject 4	Victims Assistance Advocate	August 1, 2023	Present as of May 2024	No Youth Involvement

The Attestation of Good Moral Character records indicated the individuals above attested the following information related to their criminal records:

Person Name	Attestation	Submission Date
Subject 2	Their record does not contain any applicable disqualifying acts or offenses.	January 17, 2024
Subject 3	Their record contains one or more of the applicable disqualifying acts or offenses	January 17, 2024
Subject 4	Their record does not contain any applicable disqualifying acts or offenses.	February 1, 2024

Background Screening records for the individuals listed above indicated the following information related to their eligibility:

Person Name	Item	Status	Eligibility Determination Date
Subject 2	DCF General	Not Eligible	March 7, 2024
	DCF Child Care		
	DCF Substance Abuse		
Subject 3	DCF General	Not Eligible	March 8, 2024
	DCF Child Care		
	DCF Substance Abuse		
Subject 4	DCF General	Not Eligible	March 19, 2024
	DCF Child Care		
	DCF Substance Abuse		

⁶ The positions, start, and end dates shown are approximate based on the OIG's records review.

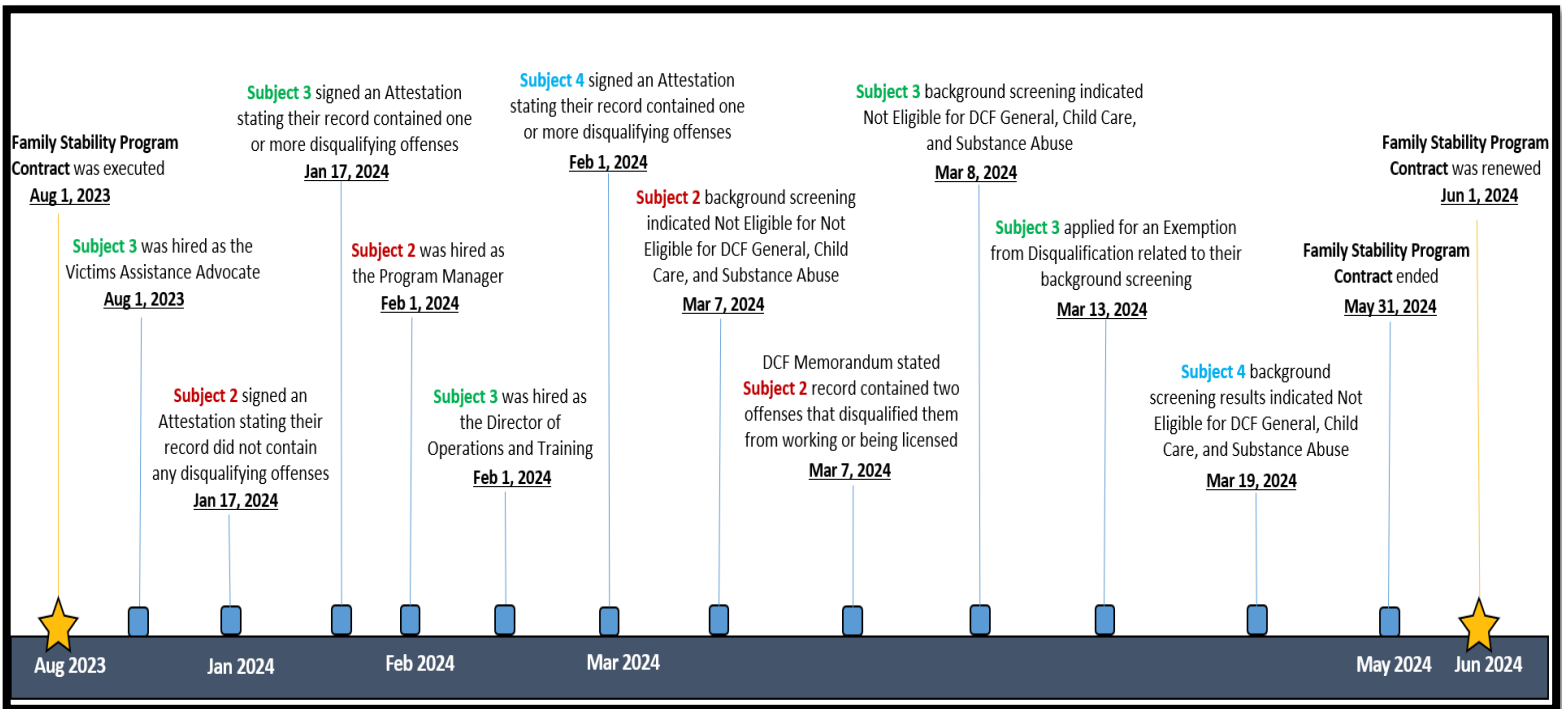
Reimbursement records indicated the following individuals were paid KHA funds through the Family Stability Program:

Payee	Check Date	Check Amount
Subject 2	February 9, 2024	\$2,225.00
	February 23, 2024	\$2,225.00
	March 8, 2024	\$2,225.00
	March 22, 2024	\$2,225.00
	April 12, 2024	\$2,225.00
	April 26, 2024	\$2,225.00
	Total	\$13,350.00
Subject 3	February 9, 2024	\$1,087.50
	February 23, 2024	\$1,087.50
	March 8, 2024	\$1,087.50
	March 22, 2024	\$1,087.50
	April 12, 2024	\$1,087.50
	April 26, 2024	\$1,087.50
	Total	\$6,525.00
Subject 4	February 9, 2024	\$748.99
	February 23, 2024	\$748.99
	March 8, 2024	\$748.99
	March 22, 2024	\$748.99
	April 12, 2024	\$748.99
	April 26, 2024	\$748.99
	May 10, 2024	\$748.99
	May 24, 2024	\$748.99
	Total	\$5,991.92
Grand Total		\$25,866.92

OIG Timeline of Events

Based on the OIG's records review, the OIG created the timeline below to illustrate the relevant events that occurred:⁷

⁷ KHA employees sent numerous emails to FOSCI employees attempting to resolve Background Screening matters during the timeframe listed.



KHA Records

The OIG reviewed KHA Advance Payment records related to FOSCI and the Programs. Based on the OIG’s records review, the OIG determined FOSCI requested and was provided two separate advance payments totaling \$50,000 for the Programs: \$25,000 for the College and Career Program, and \$25,000 for the Family Stability Program. The justification for the advance payments for both Programs was identical, stating, *“Salaries, Computers, Office Furniture, Participant Education Materials, Participant Food, Advertising, Software & Office Expenses.”*

The OIG also reviewed KHA Site Visit records related to FOSCI and the Programs that indicated from August 2023 through May 2024, KHA employees conducted two site visits on February 29, 2024, and April 18, 2024. The corresponding Site Visit Reports reflected the following relevant information:

KHA Site Visit Report dated February 29, 2024

This Site Visit Report was related to the College and Career Program and indicated Iscah Holland, Quality Manager for KHA, met with Subject 3. Holland reported 15 students were observed and stated, *“Program space is quite small for the amount of the youth present. Youth were actively engaged and participating in the discussion topic, which was follow-up interview questions.”* Holland also reported he had no concerns.

KHA Site Visit Report dated April 18, 2024

This Site Visit Report was related to the College and Career Program and indicated Chardae Chaney, Assistant Director of Contract Management for KHA, met with Subject 3 and was informed the College and Career Program was canceled due to other FOSCI employees being unable to attend.

OIG Records

The OIG conducted two site visits at FOSCI on March 28, 2024, and April 16, 2024, and obtained the following information below:

OIG Site Visit dated March 28, 2024

This site visit was conducted by the OIG and DCF. Subjects 3 and 4 were present during the site visit, but no children were present. DCF informed Subject 3 that Subjects 2 and 3 could not be on the premises during the Programs' operational hours without an Eligible Background Screening. Subject 3 stated they had not worked with children for the last two weeks and they hoped everything would be cleared by the end of Spring Break. Based on the information gathered, DCF concluded FOSCI would not be cited for standard #4-18 Supervision Unscreened Individuals with Children and standard #45-3 Background Screening Documents Disqualified; therefore, no action was taken (See Attachment 1).⁸

OIG Site Visit dated April 16, 2024

This site visit was conducted by the OIG. Subjects 3 and 4 were present during the site visit, but no children were present.

Findings**College and Career Program**

Under the College and Career Program, FOSCI provided youth services to children ages 13 through 16 years old from August 1, 2023, through May 31, 2024. FOSCI submitted a DCF Children Licensure Questionnaire dated August 11, 2023, indicating FOSCI administered the College and Career Development Program through a City grant for children ages 13 through 16 years old. DCF Employee Roster records did not indicate Subjects 2 and 3 were current or former FOSCI employees under the College and Career Development Program.

Subject 1 falsified their Attestation of Good Moral Character dated April 1, 2024, by submitting their record did not contain any applicable disqualifying acts or offenses. Subject 1 was hired as a Volunteer Instructor on April 1, 2024, before their Background Screening results returned on

⁸ Attachment 1 has been redacted and modified by the OIG for confidentiality.

April 2, 2024, indicating they were deemed N/A for DCF Child Care. No records indicated Subject 1 had applied for an Exemption from Disqualification related to their Background Screening. As of the end of the City Contract in May 2024, Subject 1 maintained their FOSCI employment without DCF granting an exemption to make them eligible to be considered for employment in a caretaker position working with children. Ultimately, Subject 1 was not paid for the Volunteer Instructor position.

Subject 2 falsified their Attestation of Good Moral Character dated January 17, 2024, by submitting their record did not contain any applicable disqualifying acts or offenses. Subject 2 was hired as the Director of Operations and Training on February 1, 2024, before their Background Screening results returned on March 7, 2024, indicating they were deemed Not Eligible for DCF General, Child Care, and Substance Abuse. Subject 2 applied for an Exemption from Disqualification related to their Background Screening, but they were removed from the Director of Operations and Training position based on a KHA ruling on March 13, 2024. Ultimately, Subject 2 was paid **\$3,261** from February 2024 through March 2024.

Subject 3 was hired for the Program Compliance and Administration position on February 1, 2024, before their Background Screening results returned on March 8, 2024, indicating they were deemed Not Eligible for DCF General, Child Care, and Substance Abuse. Subject 3 applied for an Exemption from Disqualification related to their Background Screening on March 13, 2024. As of the end of the City Contract in May 2024, Subject 3 maintained their FOSCI employment without DCF granting an exemption to make them eligible to be considered for employment in a caretaker position working with children. Ultimately, Subject 3 was paid **\$16,350** from February 2024 through April 2024.

Family Stability Program

Under the Family Stability Program, FOSCI provided adult and youth services from August 1, 2023, through May 31, 2024. FOSCI did not submit a DCF Children Licensure Questionnaire to make DCF aware of FOSCI administering the Family Stability Program through a City grant for children. As a result, there was no DCF Employee Roster indicating the current and former FOSCI employees under the Family Stability Program.

Subject 2 falsified their Attestation of Good Moral Character dated January 17, 2024, by submitting their record did not contain any applicable disqualifying acts or offenses. Subject 2 was hired as the Program Manager on February 1, 2024, before their Background Screening results returned on March 7, 2024, indicating they were deemed Not Eligible for DCF General, Child Care, and Substance Abuse. As of the end of the City Contract in May 2024, Subject 2 applied for an Exemption from Disqualification related to their Background Screening, but they maintained their FOSCI employment without DCF granting an exemption to make them eligible to be considered for employment in a caretaker position working with children or vulnerable adults. Ultimately, Subject 2 was paid **\$13,350.00** from February 2024 through April 2024.

Subject 3 was hired as the Director of Operations and Training on February 1, 2024, before their Background Screening results returned on March 8, 2024, indicating they were deemed Not Eligible for DCF General, Child Care, and Substance Abuse. Subject 3 applied for an Exemption from Disqualification related to their background screening on March 13, 2024. As of the end of the City Contract in May 2024, Subject 3 maintained their FOSCI employment without DCF granting their exemption to make them eligible to be considered for employment in a caretaker position working with children or vulnerable adults. Ultimately, Subject 3 was paid **\$6,525.00** from February 2024 through April 2024.

Subject 4 falsified their Attestation of Good Moral Character dated February 1, 2024, by submitting their record did not contain any applicable disqualifying acts or offenses. Subject 4 was hired as the Victims Assistance Advocate on August 1, 2024, before their Background Screening results returned on March 19, 2024, indicating they were deemed Not Eligible for DCF General, Child Care, and Substance Abuse. As of the end of the City Contract in May 2024, Subject 4 maintained their FOSCI employment without DCF granting their exemption to make them eligible to be considered for employment in a caretaker position working with children or vulnerable adults. Ultimately, Subject 4 was paid **\$5,991.92** from February 2024 through May 2024.

Both Programs

In conclusion, KHA and FOSCI advised Subjects 2, 3, and 4 were not directly involved with youth under the Programs. However, FOSCI provides youth services under both Programs. As a result, DCF advised individuals without Eligible Background Screenings, including Subjects 2 and 3, could not be on the premises during the Programs' operational hours. Additionally, the DCF CFOP stated, *"The employer must either terminate the employment of any of its personnel found to be in noncompliance with the minimum standards for good moral character or place the employee in a position for which background screening is not required, until the employee is granted an exemption from disqualification."*

Recommended Corrective Actions

Ensure providers have their prospective employees' Background Screenings completed, returned, and reviewed before considering them for employment.

Ensure employees deemed Not Eligible are either terminated from their employment or the employee is in a position for which background screening is not required until the employee is granted an exemption from disqualification.

Ensure providers submit the DCF Children Licensure Questionnaire to make DCF aware of programs that provide youth services.

Require KHA Contract Managers to attest all City Contract requirements have been complied with and deliverables have been fulfilled.

Management's Response

The OIG provided Saralynn Grass, Chief Executive Officer for KHA, an opportunity to submit a written response to the findings in this investigative report within ten (10) business days. Grass submitted a response to the report within the requested timeframe (See Attachment 2).⁹

Inspector General Standards

This report/review has been conducted in accordance with the ASSOCIATION OF INSPECTORS GENERAL Principles and Quality Standards for Investigations.

“Enhancing Public Trust in Government Through Independent and Responsible Oversight”

⁹ Attachment 2 has been redacted and modified by the OIG for confidentiality.



Child Care Facility Information

Name: Families of Slain Children of Jacksonville Florida, Inc.

ID Number: E04DU0350

Address: 2212 N Myrtle Ave Jacksonville FL 32209

Phone Number: (904) 345-9523 Owner/Director/Staff Responsible: [REDACTED]

Inspection Information

Type: Complaint Date: 03/28/2024 Arrival/Departure Time: 4:25 PM to 6:10 PM

Staff Present: 1 Children Present: 0 Onsite Visit: Yes

INSPECTION CHECKLIST

GENERAL REQUIREMENTS

01. Certificate Displayed/Advertising 65C-22.009, F.A.C.	Not Monitored
02. Minimum Age Requirements CCF Handbook, Section 2.2	Not Monitored
03. Ratio Sufficient CCF Handbook, Section 2.3	Not Monitored
04. Supervision CCF Handbook, Section 2.4	Compliance
05. Transportation CCF Handbook, Section 2.5	Not Monitored
06. Driver's License, Physician Certification & First Aid/CPR Training CCF Handbook, Section 2.5 and CCF Handbook, Section 7.4	Not Monitored
07. Vehicle Insurance and Inspection CCF Handbook, Section 2.5.4	Not Monitored
08. Seat Belts/Child Restraints CCF Handbook, Section 2.5.4 and CCF Handbook, Section 2.5.5	Not Monitored
09. Planned Activities CCF Handbook, Section 2.6	Not Monitored
10. Field Trip Permission CCF Handbook, Section 2.7	Not Monitored
11. Child Discipline CCF Handbook, Section 2.8	Not Monitored

PHYSICAL ENVIRONMENT

12. Facility Environment CCF Handbook, Section 3.1	Not Monitored
13. Toxic Substances, Hazardous Materials and Weapons CCF Handbook, Section 3.2	Not Monitored
14. Lighting, Temperature, and Ventilation CCF Handbook, Section 3.3	Not Monitored
15. Program Capacity CCF Handbook, Section 3.4	Not Monitored
16. Indoor Floor Space CCF Handbook, Section 3.4	Not Monitored
17. Outdoor Play Area/Fencing CCF Handbook, Section 3.5	Not Monitored
18. Bedding and Linens CCF Handbook, Section 3.6	Not Monitored



Name: Families of Slain Children of Jacksonville Florida, Inc. **License #:** E04DU0350

Address: 2212 N Myrtle Ave Jacksonville FL 32209

Type: Complaint **Date:** 03/28/2024

19. Nap/Sleep Space Requirements CCF Handbook, Section 3.6.2	Not Monitored
20. Crib Requirements CCF Handbook, Section 3.6	Not Monitored
21. Restrooms and Bath Facilities CCF Handbook, Section 3.7	Not Monitored
22. Operable Phone CCF Handbook, Section 3.8.1	Not Monitored
23. Fire Drills & Emergency Preparedness CCF Handbook, Section 3.8	Not Monitored

FOOD AND NUTRITION

24. Food Preparation Area CCF Handbook, Section 3.9	Not Monitored
25. Meals and Snacks CCF Handbook, Section 3.9	Not Monitored
26. Meal and Snack Menus CCF Handbook, Section 3.9.3 & Section 7	Not Monitored
27. Catered Food and Food Provided by Outside Sources CCF Handbook, Section 7 & Section 3.9.3	Not Monitored
28. Bottles, Breastmilk, Formula and Infant Food CCF Handbook, Section 3.9	Not Monitored
29. Health and Sanitation CCF Handbook, Section 3.6, 3.9, and 3.10	Not Monitored
30. Diapering CCF Handbook, Section 3.10	Not Monitored
31. Indoor Equipment CCF Handbook, Section 3.11	Not Monitored
32. Outdoor Equipment CCF Handbook, Section 3.12	Not Monitored

TRAINING

33. Training Requirements CCF Handbook, Section 4	Not Monitored
34. Credentialed Staff CCF Handbook, Section 4.6 & 4.7	Not Monitored

HEALTH REQUIREMENTS

35. Communicable Disease Control CCF Handbook, Section 6.1	Not Monitored
36. CPR Requirements CCF Handbook, Section 4.2.4	Not Monitored
37. First Aid Requirements CCF Handbook, Section 4.2.4 and 6.2	Not Monitored
38. Emergency Telephone Numbers CCF Handbook, Section 6.3	Not Monitored
39. Accident/ Incident Notification and Documentation CCF Handbook, Section 6.3 & 6.4	Not Monitored



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Type: Complaint **Date:** 03/28/2024

40. Medication CCF Handbook, Section 6.5 **Not Monitored**

RECORD KEEPING

41. Immunization Records CCF Handbook, Section 7.1 **Not Monitored**

42. Student Health and Records CCF Handbook, Section 7.2 **Not Monitored**

43. Enrollment Information CCF Handbook, Section 7.3 & s. 402.3054(2), F.S. **Not Monitored**

44. Personnel Records CCF Handbook, Section 7.4 **Not Monitored**

45. Background Screening Documents CCF Handbook, Section 7.4.1 **Compliance**

46. Daily Attendance CCF Handbook, Section 7.5 **Not Monitored**

ENFORCEMENT

47. Access/Child Safety CCF Handbook, Section 8 **Not Monitored**

Owner/Director/Staff Responsible Comments

.



Name: Families of Slain Children of Jacksonville Florida, Inc. **License #:** E04DU0350

Address: 2212 N Myrtle Ave Jacksonville FL 32209

Type: Complaint **Date:** 03/28/2024

SUPPLEMENTAL INSPECTION SHEET

Comments:

Program Consultant S3 = Subject 3

Staff Member S2 = Subject 2

COJ Agent DM [REDACTED]

Kids Hope Alliance Contract Manager DD = Dameka Davis

New Hire AM [REDACTED]

New Hire KM [REDACTED]



Name: Families of Slain Children of Jacksonville Florida, Inc. **License #:** E04DU0350

Address: 2212 N Myrtle Ave Jacksonville FL 32209

Type: Complaint **Date:** 03/28/2024

COMPLAINT FORM

Complaint:

Complaint was reported on 3/27/24, Agent DM with the City of Jacksonville reported that the employee at the exempt program have not been screened or do not have a clearance. Employee S2 is a felon but reported to be at the program.

Summary:

A field visit was made to the exempt child care facility by the licensure counselor on 3/28/24. Counselor completed a walk-through of the facility and observed no children in attendance. Employee S2 was not on the premises at the time of inspection.

S3 was interviewed on 3/28/24, S3 stated, S3 is a consultant for the programs. There are two programs that are provided at the facility: Family Stability (for adults only) and College and Career (for 13 to 16 year olds). S3 stated the adult program is on Wednesday evening and no children are present. The children come and go throughout the afternoon from 2:30pm 6:00pm Monday through Friday. S3 stated the children are not dropped off or picked up by a parent or guardian. The program is designed so that the children in the area have a safe place to go and they are provided meals and snacks. S3 stated the previous Director of the program and their staff resigned 1/31/24 and S3 took over the program as the Program Consultant. S3 stated that the Contract Manager, DD of the Kids Hope Alliance instructed S3 to continue operating the program while they wait for the Background Screenings to be processed for S3 and S2. S3 stated that once the screening results came back Not Eligible, they closed the program. S3 stated that both S3 and S2 filed for an exemption with Background Screening and are waiting for the results. S3 stated they have not worked with the kids for the last two weeks and that S3 hoped that everything would be cleared by the time Spring Break was over. S3 stated that once the children return that S3 has hired two new staff members, AM and KM. They both have Eligible Background Screenings.

Agent DM of the City of Jacksonville provided counselor documents regarding the Service Contract for Services For Children, Youth, And Their Families. This Services Contract is made and entered into as of the 1st day of August 2023, by and between Kids Hope Alliance, a public body acting on behalf of the City of Jacksonville, a consolidated subdivision and municipal corporation, existing under the laws of the State of Florida, and Families of Slain Children of Jacksonville, FL INC., a Florida not-for-profit corporation, with its principal offices located at 2212 N. Myrtle Avenue, Jacksonville, Florida 32209. (The contract is for one year, ending May 31, 2024)

Counselor observed two young men, perhaps teenagers standing in front of the facility. However, they never went inside and walked away from the facility by the time the counselor walked up. At the time of inspection, no children were in care. S2 was not on the premises and S3 stated S3 was the programs Program Consultant, and S3 does not work with the children. Counselor gave S3 technical assistance regarding S3, or S2 cannot be on the premises during the programs operational hours without and Eligible Background Screening.

Based on the review of the Child Care Licensure Questionnaire submitted by Families of Slain Children of Jacksonville Florida, Inc., it was determined on September 28, 2023, that the program meets the criteria for exemption from licensure. The document states, Your afterschool and summer camp program is not required to be licensed at this time. However, all personnel as defined in s. 402.302 Florida Statutes (F.S.) are required to meet background screening requirements through the Department pursuant ss. 402.305 and 402.3055.

Findings: Based on the information gathered, the facility will not be cited for standard #4-18 Supervision Unscreened Individual with Children and standard #45-3 Background Screening Documents Disqualified No Action Taken. The background screening requirements were in compliance in that the provider explained, they have not worked with the kids for the last two weeks and that S3 hoped that everything would be cleared by the time Spring Break is over. S2 is no longer employed with the childs program and only works for the adult program. The allegation was not valid.

The complaint investigation was closed on 5/3/24.

Received by: [Redacted]
Date: 03/28/2024

Inspected by: [Redacted]
Date: 03/28/2024

Ensure providers have their prospective employees' Background Screenings completed, returned and reviewed before considering them for employment.

KHA's procedures require providers to perform background screenings on all employees before allowing them to work with youth. Similar to City of Jacksonville, providers offer employment to potential employees with a condition of employment that they pass a background check. At the beginning of the contract year, KHA requires providers to sign an attestation that all employees have passed the background check. Without this documentation, initial payment to the provider is withheld. Since employee turnover occurs throughout the year, providers are to update the attestation as new employees join the organization. For providers that have a DCF license, DCF conducts an onsite inspection every six months, which includes a review of the provider's background checks to ensure that all employees are compliant. We work with DCF and they notify us of any violations. KHA will implement a similar process for those providers that are not licensed by DCF. As a part of our new Quality Improvement System, staff will review the background checks for each employee during a site visit. If any issues are discovered, a corrective action plan will be developed for the provider and the employee in question will not be allowed to be on the premises with children until resolved.

Ensure employees deemed Not Eligible are either terminated from their employment or the employee in a position for which background screening is not required until the employee is granted an exemption from disqualification.

KHA's current procedure requires providers to have an approved background screening for every employee that works with youth. No one should be employed and working with youth or allowed on the premise when youth are present if they do not have an approved background check. This is currently said in our procedures.

Ensure providers submit the DCF Children Licensure Questionnaire to make DCF aware of programs that provide youth services.

Per DCF, they do not have any authority in Middle and High School programs so programs that only serve this age group have not been asked to submit the questionnaire. However, after discussion with DCF, we are implementing a new procedure to require all providers submit a DCF Children Licensure Questionnaire no matter the age of the participants in their program.

Require KHA Contract Managers to attest all City Contract requirements have been complied with and deliverables have been fulfilled.

Contract managers attest to all contract requirements. As a part of the review process for reimbursements, the contract manager is required to check a box in the system KHA uses for tracking reimbursements to inform the KHA finance associate that all deliverables have been met and the reimbursement is ready to be processed.