



OFFICE OF THE INSPECTOR GENERAL
MONTGOMERY COUNTY MARYLAND

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INSPECTOR GENERAL

The Tree House Child Advocacy Center
Follow-Up Review
OIG Publication #26-16

April 10, 2026

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EXECUTIVE SUMMARY

In 2020, the Office of the Inspector General conducted two separate investigations involving allegations of wrongdoing and non-compliance with contract requirements at The Tree House Child Advocacy Center of Montgomery County (Tree House). We initiated a follow-up review in October 2025 to determine if the previously identified issues had been resolved and if the Department of Health and Human Services (DHHS) has ensured that Tree House is compliant with the requirements outlined in their contract with the County. We found that both Tree House and the County have made improvements and addressed some of the deficiencies we identified in 2020, but problems remain. Specifically, we found that insufficient oversight by DHHS has allowed Tree House to permit new employees to begin work before their background investigation and/or Child Protective Services checks have been completed.

OBJECTIVES

Through this review, we sought to determine whether DHHS has clearly defined its oversight responsibilities and assigned appropriate roles for County personnel working at Tree House. We also evaluated DHHS's oversight regarding the handling of PII and other sensitive information by Tree House staff. Lastly, we assessed DHHS's efforts to ensure Tree House is in compliance with DHHS policy and contract terms pertaining to background investigations and CPS clearance checks for applicable personnel.

SCOPE AND STANDARDS

This review was conducted from October 2025 to January 2026, in accordance with the Association of Inspectors General Principles and Standards for Offices of Inspector General: Quality Standards for Inspections, Evaluations, and Reviews (July 2024).

RESULTS

DHHS does not have adequate controls to ensure that Tree House consistently complies with requirements related to background investigations and Child Protective Services checks.

RECOMMENDATIONS

We recommend that DHHS:

- 1) Ensure Tree House implements a formal process that verifies the completion of a background investigation and CPS check prior to an individual's start date.
- 2) Require Tree House to implement a formal process that includes automated alerts to track the status of background investigation due dates.
- 3) Ensure Tree House implements formal policies and procedures for making suitability determinations of applicants with a criminal history or CPS finding.
- 4) Implement formal policies and procedures to ensure that DHHS contract monitors routinely verify full compliance with all contract terms.

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BACKGROUND

The Tree House Child Advocacy Center of Montgomery County, Maryland (Tree House) is a non-profit entity that contracts with the County as a specialized service provider “dedicated to mitigating trauma and facilitating recovery for child and adolescent victims of sexual abuse, physical abuse, and neglect.” The organization employs a multidisciplinary model that integrates County and private resources to deliver coordinated interventions in the best interest of victims. In fiscal year (FY) 2026, Tree House received \$1,044,755 in County contract funding.

Tree House is overseen by an Executive Director and has a staff of 33 comprised of full- and part-time employees, contractors, externs and volunteers. A County Department of Health and Human Services (DHHS) registered nurse is also assigned to Tree House. DHHS has no day-to-day operational or clinical oversight beyond ensuring compliance with contractual provisions.

In September and November 2020, the OIG conducted two separate investigations involving Tree House operations. The first investigation identified improper exposure of sensitive and personally identifiable information (PII) on a County SharePoint site accessible to County employees. The second investigation revealed deficiencies regarding Tree House’s compliance with contractual and regulatory requirements, to include:

- Failure to adhere to contractual obligations relating to Maryland Child Protective Services (CPS) clearance procedures during FY 2018 and FY 2019.
- Absence of a mandated tracking mechanism for employee background investigations, including lack of alerts for reinvestigation deadlines.
- A conflict of interest arising from the Tree House director’s dual role as a DHHS employee with operational authority over the program.

We conducted this review to determine if the findings from our previous two investigations have been rectified and if appropriate internal controls exist to prevent similar issues from occurring in the future.

Objective, Scope, and Methodology

Through this review, we sought to determine whether DHHS has clearly defined its oversight responsibilities and assigned appropriate roles for County personnel working at Tree House. We also evaluated DHHS’s oversight regarding the handling of PII and other sensitive information by Tree House staff. Lastly, we assessed DHHS’s efforts to ensure Tree House is in compliance with DHHS policy and contract terms pertaining to background investigations and CPS clearance checks for applicable personnel.

We reviewed pertinent policies, procedures, and contractual obligations, interviewed DHHS and Tree House staff, and analyzed relevant documentation related to the processing and adjudication of background investigations and CPS checks.

This review was conducted from October 2025 to January 2026, in accordance with the Association of Inspectors General Principles and Standards for Offices of Inspector General, Quality Standards for Inspections, Evaluations, and Reviews (July 2024).

FINDINGS AND RECOMMENDATIONS

DHHS and Tree House have made improvements to address some of the concerns identified in our previous investigations. For example, Tree House no longer uses the County's network or servers to store information. Instead, forensic interviews conducted by Tree House staff are now recorded using software that securely stores the information, and a Healthcare Insurance Portability and Accountability Act (HIPAA) certified platform is used when they need to share information with others. Additionally, therapy notes and case data are maintained in a secure electronic system rather than on shared drives or removable media as before, further reducing risks and strengthening confidentiality of client data.

Additionally, the County has taken steps to more clearly define its role in working with Tree House and has assigned distinct responsibilities to County staff working at Tree House. DHHS staff no longer serve in a management role and the supervisory responsibilities pertaining to the sole County employee assigned to Tree House are performed by a DHHS manager. These changes provide a clearer delineation of authority and reduce the risk of the potential conflicts of interest we identified in 2020.

Despite these improvements, we determined that shortcomings still exist in the background investigation and CPS check processes, resulting in non-compliance with DHHS requirements and contractual obligations. Tree House's contract with the County requires that all personnel working with vulnerable populations complete a background investigation and CPS check prior to beginning work. DHHS further requires that background investigations be renewed every five years¹ and that Tree House maintain policies and procedures to "guide their hiring practices as related to each applicant and workforce member with a documented criminal history, especially if the history reflects prior convictions of a felony."

Finding 1: DHHS does not have adequate controls to ensure that Tree House consistently complies with requirements related to background investigations and CPS checks.

DHHS Policy – Background Investigations for Contract Vendor Workforce Members

- 1) Each applicant for a position providing services under a DHHS contract involving vulnerable populations must have a criminal background investigation completed prior to beginning work.
- 2) Background investigations must be conducted every five years for contract workforce members, unless there is a break in employment greater than 120 days, in which case a new background investigation must be completed.

¹ Although not required, Tree House also conducts new CPS checks every five years.

- 3) Vendors must maintain internal policies and procedures that guide hiring practices for applicants and workforce members with documented criminal history, particularly when the history includes prior felony convictions².

Tree House uses a spreadsheet to manually track the due dates for background investigations and has no automated alerts or reminders to notify staff of upcoming due dates. Our review identified one current Tree House staff member who began work prior to the completion of their background investigation. During our review, there were only four staff members who had been working at Tree House for more than five years, thus requiring an updated background investigation. For two of these individuals, we determined that their background investigation update was not completed within the required timeframe. Poor record keeping and a lack of documentation prevented us from determining if the updated background investigations were completed timely for the other two staff members.

To ensure Tree House meets its contractual obligations to the County, a DHHS employee monitors their performance. The contract monitor told us that they conduct annual site visits at Tree House during which they review files to ensure that all current staff have completed a background investigation. However, the contract monitor admitted that they do not review the date an investigation was completed, thus they do not verify if a background investigation was completed prior to a person beginning work. Similarly, the contract monitor may not be aware of staff that are beyond the five-year requirement to have their background investigation updated if they do not review completion dates.

During our review, we learned that two staff members had a criminal record. The criminal histories for both of these individuals were identified during their initial background investigation. According to the Tree House director, both instances were verbally discussed with Child Welfare Services and Tree House's human resources staff, and the decision to hire was based on the specific facts of each case. There were no records documenting this discussion or detailing what, if any, due diligence was exercised to verify the facts surrounding each offense and/or the factors considered when deciding to proceed with an employment offer. The DHHS contract monitor had no knowledge of these incidents, and while not a requirement, their insight may have proven beneficial when deciding if Tree House should proceed with an employment offer.

We also found that Tree House does not have written suitability criteria, disqualification standards, documentation requirements, or procedures for handling adverse findings identified as a result of a background investigation. In addition to being in violation of DHHS policy, the absence of written guidance increases the risk of inconsistent or inequitable hiring decisions and potential reputational harm to Tree House and the County.

² This requirement is also stipulated in the contract with Tree House.

DHHS Tree House Contract

The contract stipulates that a CPS check must be completed on all new Tree House staff, including subcontractors, interns, and volunteers providing services under the contract. It further requires that these checks must be completed prior to an individual's employment .

Despite this contract requirement, we identified 17 instances in which Tree House staff began providing services before receiving the results of their CPS check. In 13 of these cases, CPS results were received within approximately one month of the staff member beginning work. One staff member had been working at Tree House for more than two months before their CPS check was completed. As of December 2025, there were three staff members currently working with the results of their CPS check pending.

Allowing staff to begin working prior to receiving the results of their background investigation and CPS check may expose this already vulnerable population to individuals that should not have unsupervised access to children. Even if no wrongdoing has occurred, this is a critical liability that may erode the trust of stakeholders and the very clients that Tree House is dedicated to protecting.

DHHS's insufficient monitoring of compliance with policy and contract requirements has resulted in some Tree House staff being allowed to work with children without the proper screening. Many of the children that come to Tree House have experienced a traumatic event at the hands of an adult. Ensuring that Tree House consistently maintains a safe and supportive environment is of the utmost importance. Additionally, the lack of formal suitability criteria in hiring creates subjectivity and introduces the potential for inconsistent and inequitable decision making.

Recommendations

We recommend DHHS:

- 1) Ensure that Tree House implements a formal pre-employment screening process that verifies the completion of a background investigation and CPS check prior to an individual's start date.
- 2) Require Tree House to implement a formal process that includes automated alerts to track the status of initial and updated background investigation due dates.
- 3) Ensure that Tree House implements formal policies and procedures for making suitability determinations of applicants with a criminal history or CPS finding.
- 4) Implement formal policies and procedures to ensure that DHHS contract monitors routinely verify full compliance with all contract terms and conditions.

OIG COMMENTS TO CHIEF ADMINISTRATIVE OFFICER'S RESPONSE

The County Chief Administrative Officer's response to our report is included in its entirety in Appendix A. The response indicates concurrence with the OIG's recommendations. Appendix B summarizes the CAO's response to our recommendations and the OIG's assessment of the County's progress towards fully implementing the stated actions.

APPENDIX A: CHIEF ADMINISTRATIVE OFFICER'S (CAO) RESPONSE

The Chief Administrative Officer provided the following response to our report:



OFFICE OF THE COUNTY EXECUTIVE

Marc Elrich
County Executive

Richard S. Madaleno
Chief Administrative Officer

MEMORANDUM

April 9, 2026

TO: Megan Davey Limarzi, Inspector General

FROM: Fariba Kassiri, Deputy Chief Administrative Officer *FK*

SUBJECT: Inspector General Confidential Draft Report: The Tree House Child Advocacy Center Follow-up (OIG Publication #OIG-26-16)

Thank you for the opportunity to respond to the issues identified in the report. The Department of Health and Human Services (DHHS) is proud of the services provided to our community, especially the contracted work done by Tree House Advocacy Center of Montgomery County (Tree House). Tree House is a strong partner working closely with Child Welfare Services to reduce trauma and promote healing for child and adolescent victims of sexual abuse, physical abuse, and neglect. Since the initiation of this follow-up review of Tree House, DHHS has worked with Tree House leadership to ensure all policies continue to be updated and that processes used are efficient and allow for improved, timely communication.

DHHS acknowledges that there are opportunities to improve procedures and controls within the DHHS pertaining to the oversight of Tree House. Your follow-up report's findings and recommendations will be useful as we continue to improve processes in the future. We are committed to taking appropriate steps to address the follow-up report's findings and recommendations, as noted below.

Recommendation 1: We recommend DHHS ensure that Tree House implements a formal pre-employment screening process that verifies the completion of a background investigation and CPS check prior to an individual start date.

Response. We concur with this recommendation. Tree House will be required to adhere to a new business process for the pre-employment screening of new employees, consultants, volunteers, and interns/externs that will occur prior to the individual's start date. The DHHS Contract Monitor will create a spreadsheet wherein the following will be documented: a copy of the individual's offer letter, detailing the role for which they are being hired, the job title, and the projected start date; validation of the completed criminal background clearance and its results; and the notarized CPS Clearance Form for completion by the CWS Clearance Unit. The DHHS Contract Monitor will be the primary contact for the three (3) documents listed. The CPS Clearance Form will no longer be

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sent directly to the CWS Clearance Unit by Tree House for processing. The signed/dated CPS Clearance Form will be delivered to the DHHS Contract Monitor, with results. The DHHS Contract Monitor then will notify Tree House, in writing, that evidence of completed clearances has been presented, thus allowing an individual to begin employment, externship, etc. Tree House will be required to implement this new business process no later than April 15, 2026.

Recommendation 2: We recommend DHHS require Tree House to implement a formal process that includes automated alerts to track the status of initial and updated background investigation due dates.

Response. We concur with this recommendation. Tree House will be required to implement a formal process that includes automated alerts to track the status of initial and updated background investigation due dates no later than July 1, 2026. In the interim, a manual alert or tickler system to track the status of initial and updated background investigation due dates will be implemented no later than April 15, 2026.

Recommendation 3: We recommend DHHS ensure that Tree House implements formal policies and procedures for making suitability determinations of applicants with a criminal history or CPS finding.

Response. We concur with this recommendation. Tree House will be required to implement formal policies and procedures for making suitability determinations of applicants with a criminal history or CPS finding, as well as making suitability determinations of continued employment or contractual agreement should new allegations arise. Implementation must include written provisions and criteria, in the organization's human resource and/or personnel manual(s) no later than July 1, 2026.

Recommendation 4: We recommend DHHS implement formal policies and procedures to ensure that DHHS contract monitors routinely verify full compliance with all contract terms and conditions.

Response. We concur with this recommendation. DHHS will formalize the procedures they use to monitor Tree House's compliance as stipulated in Recommendations 1 – 3. In addition, the Contract Monitor will institute quarterly meetings with the Tree House Executive Director, beginning FY2027, to assess and/or reinforce adherence to contract terms and compliance. Lastly, the Contract Monitor will continue to perform annual contract site visits wherein personnel records and contract terms will be reviewed, measured, and documented.

Tree House contract #1182629 will be amended to include any updated terms deemed necessary to reinforce Tree House's compliance with the recommendations to be implemented.
Thank you for bringing these matters to our attention.

cc: Dr. James Bridgers, Director, Department of Health and Human Services
Mark Hodge, Chief Operating Officer, Department of Health and Human Services
Michele El-Gamil, Internal Audit Manager, Office of the County Executive

APPENDIX B: RECOMMENDATION STATUS AND FOLLOW UP

This Appendix provides a summary of the findings and recommendations presented in this report along with the OIG’s assessment of the county’s progress towards addressing the recommendations. The OIG categorizes progress towards implementation into the following 4 status groups:

- Open Unresolved: No management response, inadequate response, or no agreement on corrective action plan.
- Open In Progress: Agreed on planned action, auditee is in the process of implementing stated actions, but no evidence of implementation has yet been provided to the OIG.
- Open Resolved: Auditee provided support to OIG indicating implementation was complete, OIG testing to ensure implementation.
- Closed: Recommendation has been implemented.

Finding #	Finding	Recommendation	CAO Response	Status
1	DHHS does not have adequate controls to ensure that Tree House consistently complies with requirements related to background investigations and CPS checks.	1a: Ensure that Tree House implements a formal pre-employment screening process that verifies the completion of a background investigation and CPS check prior to an individual’s start date.	<p>Concur</p> <p>Tree House will be required to adhere to a new business process for the pre-employment screening of new employees, consultants, volunteers, and interns/externs that will occur prior to the individual’s start date. The DHHS Contract Monitor will create a spreadsheet wherein the following will be</p>	Open – In Progress

Finding #	Finding	Recommendation	CAO Response	Status
			<p>documented: a copy of the individual’s offer letter, detailing the role for which they are being hired, the job title, and the projected start date; validation of the completed criminal background clearance and its results; and the notarized CPS Clearance Form for completion by the CWS Clearance Unit. The DHHS Contract Monitor will be the primary contact for the three (3) documents listed. The CPS Clearance Form will no longer be sent directly to the CWS Clearance Unit by Tree House for processing. The signed/dated CPS Clearance Form will be</p>	

Finding #	Finding	Recommendation	CAO Response	Status
			<p>delivered to the DHHS Contract Monitor, with results. The DHHS Contract Monitor then will notify Tree House, in writing, that evidence of completed clearances has been presented, thus allowing an individual to begin employment, externship, etc. Tree House will be required to implement this new business process no later than April 15, 2026.</p>	
		<p>1b: Require Tree House to implement a formal process that includes automated alerts to track the status of initial and updated background investigation due dates.</p>	<p>Concur Tree House will be required to implement a formal process that includes automated alerts to track the status of initial and updated background</p>	<p>Open – In Progress</p>

Finding #	Finding	Recommendation	CAO Response	Status
			<p>investigation due dates no later than July 1, 2026. In the interim, a manual alert or tickler system to track the status of initial and updated background investigation due dates will be implemented no later than April 15, 2026.</p>	
		<p>1c: Ensure that Tree House implements formal policies and procedures for making suitability determinations of applicants with a criminal history or CPS finding.</p>	<p>Concur</p> <p>Tree House will be required to implement formal policies and procedures for making suitability determinations of applicants with a criminal history or CPS finding, as well as making suitability determinations of continued employment or contractual</p>	<p>Open – In Progress</p>

Finding #	Finding	Recommendation	CAO Response	Status
			<p>agreement should new allegations arise. Implementation must include written provisions and criteria, in the organization’s human resources and/or personnel manual(s) no later than July 1, 2026.</p>	
		<p>1d: Implement formal policies and procedures to ensure that DHHS contract monitors routinely verify full compliance with all contract terms and conditions.</p>	<p>Concur DHHS will formalize the procedures they use to monitor Tree House’s compliance as stipulated in Recommendations 1 – 3. In addition, the Contract Monitor will institute quarterly meetings with the Tree House Executive Director, beginning FY2027, to assess and/or reinforce</p>	<p>Open – In Progress</p>

Finding #	Finding	Recommendation	CAO Response	Status
			adherence to contract terms and compliance. Lastly, the Contract Monitor will continue to perform annual contract site visits wherein personnel records and contract terms will be reviewed, measured, and documented.	