



DYRS Can Strengthen the Management of DC YouthLink, Community-Based Residential Facilities, and Performance Reporting

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Why ODCA Did This Audit

The Department of Youth Rehabilitation Services (DYRS) was selected for an audit of its fiscal year (FY) 2014 operations based on a risk assessment performed by the Office of the District of Columbia Auditor (ODCA).

What ODCA Recommends

This report makes 10 recommendations designed to strengthen administration of the DC YouthLink program and the District's Community Based Residential Facilities (CBRF). DYRS should:

- Corroborate expense reimbursement submissions;
- Document the process by which it reviews and approves expenses;
- Restrict access to its case management system;
- Revise its Human Care Agreement to reflect essential requirements;
- Design, document and implement procedures for site visits of CBRFs;
- Retain source data for performance metrics;
- Ensure that public safety metrics are defined in a consistent manner;
- Check for compliance with Human Care Agreements;
- Provide historical data for trend analysis of public safety metrics; and
- Analyze its cost structure to increase the efficiency and effectiveness of DC YouthLink.

What ODCA Found

The Department of Youth Rehabilitation Services (DYRS) provides services to court-involved youth which are designed to assist them in becoming more productive citizens. DYRS seeks to maintain public safety while providing these services in the least-restrictive environment possible.

We found that DYRS' expense reimbursement submissions were accurate and generally well supported though the reimbursement process could be improved. We also found that DYRS can strengthen the manner in which its DC YouthLink program is administered by examining the cost structure it employs, and may be able to allocate a higher proportion of funds to service delivery rather than overhead. There are also opportunities for DYRS to improve its oversight of the District's Community Based Residential Facilities (CBRF) by revising its Human Care Agreements. ODCA also issued recommendations designed to strengthen the public's confidence in DYRS by ensuring that performance metrics on public safety and other priorities are consistently defined, properly supported and published in a timely manner.

Finally, ODCA advised DYRS to examine the manner in which it protects its case management system and design procedures to restrict access to these systems. These processes, or internal control activities, should restrict authorized users to only those functions that they require for their assigned responsibilities.

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Background

The Department of Youth Rehabilitation Services (DYRS) maintains custody of District youth charged with a delinquent act. These youth are placed in the custody of DYRS under the following set of circumstances:

- While awaiting adjudication, where they are detained by DYRS; and
- Once they have been adjudicated by a DC Family Court judge and committed to DYRS.

While in the custody of DYRS, the agency provides a comprehensive set of services to these youth, both in its secure facilities and in placements within the community. The process begins as soon as the youth has been placed in the custody of DYRS. A DYRS case manager and social worker invite the youth's family, teachers and some specialized service providers to a meeting with the youth. At this meeting, the group will develop and implement an Individualized Success Plan based on the youth's strengths, risks and needs.

Secured Facilities

Among those youth who have been charged with a delinquent act and are awaiting the disposition of their court hearings, some are housed at the Youth Services Center (YSC). The YSC is an 88-bed secure residential facility in northeast D.C. that provides these youth with 24-hour supervision, custody and care.

Once a youth's case has been adjudicated, they may be placed in another secured facility, New Beginnings Youth Development Center. This facility is a 60-bed secure residential treatment facility in Laurel, MD, which was designed to address the District's most serious and chronic youth offenders. In addition to providing long term supervision, the facility focuses on successfully rehabilitating and reintegrating court-involved youth back into their community.

The District also uses other types of secured facilities to rehabilitate its court-involved youth, including residential treatment facilities focused on substance abuse, as well as the psychiatric needs of each youth. The District's secured facilities provide a wide array of services. Specifically, these youth have the opportunity to obtain the following services:

- Onsite medical and dental care;

- Trauma based behavioral health care;
- Individual and group counseling;
- Substance abuse counseling;
- Vocational and workforce training;
- Structured recreational activities; and
- Educational Services.

Community-Based Placement

As an alternative to the District’s secured facilities, a District youth may be placed in a Community Based Residential Facility (CBRF). Depending on the circumstances of each specific youth’s case, it may be more appropriate to place them in one of these facilities. It is also a requirement of District law to place youth in the least restrictive setting possible.¹ DYRS contracts with various service providers to house youth in the structured, homelike residential setting envisioned by this legal mandate. These single-sex facilities are staffed 24 hours per day and usually house 6-10 youth.

In addition to those services provided within the CBRF, these youth are provided with specialized services as part of the DC YouthLink program, a package of services established in 2009 by DYRS and the DC Children’s Youth Investment Trust Corporation (Trust). Specifically, DYRS contracted with the Trust to administer the program, including management of any grants disbursed for the program, oversight of administrative and fiscal functions, monthly reports, monitoring of contractors and the disbursement of payments to vendors.

The program was designed to assist in preparing court-involved youth for a successful reintegration to their community, with services offered at the youth’s residence, in a community center, school, or other facility located within their community. The program, although managed by DYRS and the Trust, employs the services of three Lead Agencies and at least a dozen independent service providers to meet each youth’s needs. Similar to the list of services provided at the District’s secured facilities, DC YouthLink offers the following set of services:

- **Family Counseling and Support** –Counselors visit the child’s home and discuss any necessary preparations for the re-entry of the child into his/her home and community.
- **Tutoring** – Assistance obtaining a GED or improving math or reading skills.
- **Mentoring** – Adults spend structured, one-on-one time with youth to promote healthy lifestyle choices and achievement of employment or education related goals

¹ See D.C. Code § 16-2301.02(9).

District law requires DYRS to place youth in the least restrictive most homelike environment possible.

- **Recreation** – Structured physical activities.
- **Substance Abuse Counseling and Support** – Individual and group counseling to aid in recovery.
- **Vocational/Subsidized Work Experience** – Training designed to obtain an industry-recognized credential or opportunities to participate in an everyday work environment while earning a wage.

Objectives, Scope and Methodology

Objectives

The Department of Youth Rehabilitation Services (DYRS) was selected for an audit of its fiscal year (FY) 2014 operations based on a risk assessment performed by the Office of the District of Columbia Auditor (ODCA). The scope of our risk assessment included the entire District government and accounted for the size of each agency's budget. We evaluated agency divisions for the risk of fraud, waste, abuse, inefficiency or non-compliance with District law. We also evaluated dangers or threats to human health and safety as well as other risks associated with the administration of public funds. We initiated this audit of DYRS because the agency received one of the highest overall risk scores.

This audit focused on Community Based Residential Facilities (CBRF) as they are managed by external organizations that DYRS contracts with and the DC YouthLink program, as it involves a large number of entities including the DC Children and Youth Investment Trust Corporation (Trust), three non-profits that serve as "Lead Agencies," and multiple service providers.

The objectives of this audit were to:

1. Determine if DYRS had effective internal controls in place to monitor Lead Agencies, service providers and CBRFs;
2. Assess whether DYRS accurately collected and reported data on its public safety measures of performance; and
3. Examine the percentage of funds that DYRS spent on direct services for court involved youth as opposed to overhead/administrative costs.

Scope

The audit period covered FY 2014, or October 1, 2013 - September 30, 2014.

Methodology

ODCA employed a wide range of procedures to test the effectiveness of internal controls at DYRS. For example, the audit team examined the processes used to review and approve expense reimbursement submissions for the DC YouthLink program. This included a review of

documentation in support of expenses, i.e. receipts and invoices, as well as evidence of program participation on the part of court-involved youth.

As part of our review of the agency's internal controls, we included site visits to several of the District's CBRFs. ODCA selected a sample of CBRFs and examined their compliance with the contractual requirements included in their agreements with DYRS. At each site, this included a review of individual case files and reports that each facility was required to produce and retain.

We also noted a substantial amount of interest in the ability of DYRS to maintain public safety while it works to rehabilitate the District's court involved youth. As a result, we examined the agency's ability to assess and report on the performance metrics it has established for monitoring public safety. Procedures were designed to evaluate the accuracy and reliability of several metrics.

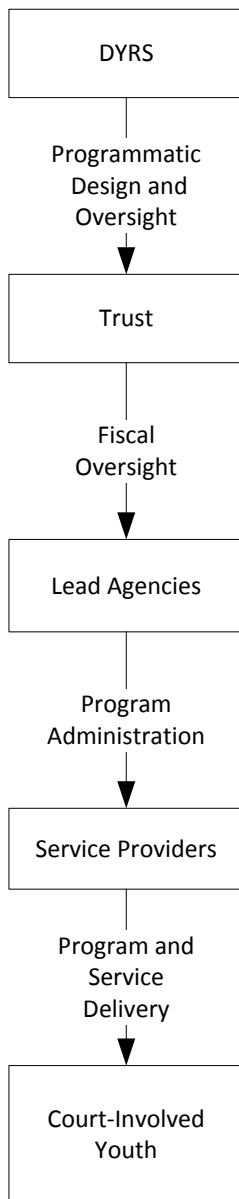
Finally, we designed some procedures for assessing the efficiency of DYRS programs and services. A common method for evaluating the efficiency of a service based organization is to assess how much of its resources are spent directly on its core programs and services, as opposed to its administrative costs. ODCA examined the DC YouthLink program from this perspective in order to gauge how efficiently it was being managed.

Where ODCA tested internal controls, we first started with a walkthrough of each control for a single transaction. Then we selected a sample of transactions for review, testing to see if the agency's internal controls were operating as they were designed and implemented.

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

Audit Results

Figure 1



Although we found The Department of Youth and Rehabilitation Services (DYRS) and the DC Children’s Youth Investment Trust Corporation (Trust) are monitoring the DC YouthLink program, there are distinct opportunities to improve the program’s administration. We have provided recommendations that will strengthen stakeholder confidence in the program and help prevent fraud, waste and/or abuse of the program’s funds.

We have also provided recommendations designed to improve the District’s management of facilities that house court-involved youth and improve DYRS’ ability to consistently define, support and report on measures of public safety associated with agency programs.

Expense reimbursement submissions were accurate and generally well supported but the Trust’s review process can be improved.

The DC YouthLink program includes multiple layers of administration. Although DYRS is ultimately responsible for the design of the program and its administration, a number of other organizations are involved in the day-to-day delivery of the program’s services.

The Trust reviews and approves expense reimbursement submissions from the program’s Lead Agencies. Lead Agencies manage the DC YouthLink Initiative on behalf of DYRS and the Trust and oversee the network of locally-based service providers. They coordinate services for DYRS youth among the program’s various service providers and are also tasked with monitoring the service providers as they deliver those services. These services encompass a wide array of specialized support, including mentoring, tutoring, family support, and developmental activities focused on the youth’s physical health, appreciation for the arts and mental health (See Figure 1).

Each Lead Agency is required to enter into sub-contracts or establish purchase orders or Memoranda of Understanding with the service providers that they will manage in the DC YouthLink program. Once the relationship has been established, Lead Agencies must provide technical assistance to each Service Provider to ensure that they understand and comply with the DC YouthLink program’s standard operating procedures manual.

Specifically, each Lead Agency is required to submit expense reports to DYRS (via the Trust), which include source documentation in support of any funds that were spent. This includes invoices, cancelled checks, payroll registers, and signed timesheets for both the Lead Agency and the service providers they manage.

In FY 2014, DYRS worked with the following three Lead Agencies to manage its DC YouthLink Initiative:

- Progressive Life Center (PLC);
- The National Center for Children and Families (NCCF); and
- East of the River Clergy Police Community Partnership (ERCPCP).

These three Lead Agencies first compiled the expense reimbursement submissions of the various service providers that they managed, verified that the expenses were supported and then submitted a monthly request for reimbursement to the Trust.

Out of the 36 monthly expense reports collectively submitted by these three Lead Agencies in FY 2014, ODCA selected a sample of 5 monthly expense reimbursement submissions for review.

Each of the three Lead Agencies documented their expense reimbursement submissions using a standard Microsoft Excel form. Expenses were categorized as follows:

Personnel - Salaries for employees of the Lead Agency that directly worked on the DC YouthLink program, including payroll taxes and fringe benefits.

Direct - Lead Agency expenses directly attributable to the program, including supplies, staff training and transportation costs.

Service Coalition - Service provider expenses which were aggregated by service line (i.e. workforce development, tutoring, and substance abuse treatment). These payments can be broken down further into the constituent parts of the performance based payment plan used by the DC YouthLink program, which includes:

Outcomes - Payments made to service providers for the achievement of a positive developmental outcome for the youth to whom they provide services. These payments range anywhere between \$100 and \$1,000, depending on the accomplishment, which include clean drug screens and obtaining a GED or a new job. For complete list of Outcome payment amounts, see Appendix I.

Attendance - Payments made to service providers for each youth that attends the service providers' specialized support services.

The hourly rate for each service, between \$32 and \$55, is determined by the type of service that is provided. For example, engaging youth in the visual or performing arts yields \$32 per hour, while substance abuse prevention is reimbursed at a rate of \$55 per hour (For complete list of Hourly Rates, see Appendix I).

Outreach - Once a Lead Agency refers one of its committed youth to a service provider, they are strongly encouraged to quickly initiate a face-to-face meeting with the youth. Service providers receive \$100 per youth if they can demonstrate that they made an effort to contact the youth, via phone, text or a visit to their home.

Documentation in support of expenses was thorough.

ODCA found that the documentation supporting each monthly expense reimbursement was thorough. Support included vendor invoices, payroll records supplied by third party payroll processors such as ADP, test results for those youth attempting to earn their GED, and certificates for industry recognized credentials that the youth earned. However, there were a few payments for which ODCA was not able to obtain support, as follows:

- \$500 which was disbursed for a youth outcome where an industry recognized credential had been earned;
- \$1,000 for assisting a youth in obtaining a GED;
- \$1,200 for an improvement in grades or standardized test scores;
- \$100 for a Service Provider's effort to reach out and engage with a committed youth;
- \$1,050 for services intended to assist youth in obtaining a job; and
- \$1,500 for community service programs in which the youth participated.

Despite the existence of these unsupported amounts, which collectively amount to \$5,350, and given the detailed nature of the support that was provided to ODCA, the audit team's assessment of the expense reimbursement process is that it is accurate and reliable. The \$5,350 in expenses which ODCA deemed unsupported, represented less than 1 percent of the total amount ODCA reviewed which amounted to \$852,621.

Generally, the documentation supporting each monthly expense reimbursement submission was robust, which instills confidence in the program's management and provides stakeholders with accurate information that they can evaluate.

Although the Trust was able to guide the audit team through its expense reimbursement and approval process, it did not always have documented procedures and controls in place that were specific to this process. For example, ODCA could not determine the nature of the supervisory review performed by the Trust once the program officer had completed her review and approved a particular reimbursement to a Lead Agency. It was

not clear if the supervisor performed a spot check, or if the supervisor only reviewed expenses that exceeded a certain amount. None of the documentation that ODCA reviewed indicated that the supervisor had completed a review, or what the results of that review were (e.g. a signature of approval or follow up questions for the program officer).

Furthermore, the audit team noted that all of the documentation used to support each Lead Agency's expense reimbursement request came directly from the Lead Agency itself. The Trust should seek to corroborate at least some of these expenses with independent third parties.

The Trust can reduce the risk that it will reimburse fraudulent expenditures by corroborating documentation that Lead Agencies submit in support of their requests for reimbursement. By corroborating supporting documentation with an independent third party, the Trust can reduce the risk that a Lead Agency would submit a fraudulent expense and be reimbursed. For example, if the Lead Agency purchases an item using a credit card, they can submit the receipt for the item and then the Trust can corroborate that expenditure by obtaining the credit card statement directly from the card issuer.

Recommendations:

1. To the extent possible, DYRS should direct the DC Children's Youth Investment Trust Corporation (Trust) to obtain corroborating documentation from an independent third party before it reimburses Lead Agency expenses. This can be accomplished in a number of ways, including:
 - Requiring each Lead Agency to pay all expenses out of one bank account. If the Trust can obtain the bank statement directly from the bank and then compare it to the receipts that it receives from the Lead Agency, it can be confident that they are in fact legitimate expenses.
 - Requiring each Lead Agency to pay all expenses using a credit card with the Trust obtaining the credit card statement directly from the financial institution that issued the card.
 - Obtaining support for Outcome Payments from external sources. For example, having test scores for GED exams sent directly to the Trust.
2. DYRS should require the Trust to document its expense review and approval process and ensure that it retains this organizational knowledge for future use.

DYRS did not appropriately restrict access to its FAMCare case management system.

ODCA's review of DYRS' DC YouthLink and CBRF program, which seek to provide community-based services and placements for court-involved youth, included a review of the program's electronic case management system, or FAMCare. DYRS recently installed the FAMCare electronic case management system, which it uses to monitor the District's court-involved youth.

FAMCare tracks youth enrollment and engagement in community-based services and placements at a granular level, including detailed and frequent notations made in each youth's electronic case file. These case notes include information on the activities that the youth engage in, as well as the outcomes of those activities (e.g. did the youth obtain their GED or pass their drug screen for 90 days).

Fraudulent payments to DC YouthLink service providers or to CBRFs could begin with a FAMCare enrollment.

The process by which youth obtain community-based services and placements begins when DYRS refers the youth to a service provider. Once the service provider accepts the referral, a record is created in FAMCare which is tied to the beginning or authorization date for services that the youth will receive.

In certain cases, ODCA was instructed to obtain support directly out of this system to verify the accuracy of expense reimbursement submissions or invoices that DYRS paid. For example, where ODCA sought to verify that a youth successfully achieved an outcome (i.e. obtained a GED) the audit team searched through the record of services recorded in each youth's FAMCare record. These records included documentation which was scanned into FAMCare and supported the youth's successful achievement of an outcome. Without this documentation, ODCA would not have been able to verify that the youth achieved the outcome, triggering a payment out of the DC YouthLink program.

ODCA also used FAMCare to verify that youth were in fact placed at a CBRF during the period in which the CBRF billed DYRS for housing and supervising the youth. Each CBRF invoice includes the name and period of enrollment for each youth placed in its facility. Without verifying youth enrollment at the facility in FAMCare, ODCA would not have been able to verify the accuracy of the invoices that each facility submitted to DYRS for payment.

ODCA reviewed how DYRS manages employee access to FAMCare. ODCA noted that the employees with the ability to create enrollment records within the system also had the ability to commit fraud with respect to outcomes or CBRF placements. In the case of these two types of disbursements, the potential for a fraudulent disbursement from DYRS would begin with an enrollment record in FAMCare. From there an employee (or another individual colluding with the employee) could scan in

fraudulent documentation in support of a fictional outcome, or enroll a nonexistent youth in a CBRF for subsequent billing. There may be other internal controls operating at DYRS which have the potential to prevent this type of fraud from occurring, but the system remains a key control point for at least some DYRS disbursements.

ODCA obtained a listing of DYRS employees that have been given the ability to create enrollment records in FAMCare. The list included 345 individuals. Per discussion with the IT department at DYRS, when the FAMCare case management system went live, DYRS case managers and department heads simply provided the IT department with the list of individuals that they wanted to have the ability to create enrollment records. As of the time that this audit occurred, DYRS had not yet designed written policies or procedures for limiting or restricting access to FAMCare based on the assigned responsibilities of its users, nor had it developed processes for promptly updating or terminating access rights when employees change job functions or leave DYRS.

According to Internal Control Standards issued by the US Government Accountability Office (GAO), management should design processes that restrict access to IT systems. These processes, or internal control activities, should restrict authorized users to the functions within these IT systems that they require for their "**assigned responsibilities**," and should be designed such that incompatible duties are segregated.

The lack of policies and procedures designed to appropriately restrict access to FAMCare could lead to fraudulent disbursements. For the two types of disbursements identified above (outcome and CBRF Invoice), documentation found in FAMCare was critical to the audit team's ability to verify that DYRS disbursements were accurate.

Recommendation:

3. DYRS should design policies and procedures to restrict access to FAMCare. These policies and procedures need to be created, implemented and periodically updated to ensure that DYRS only disburses funds for valid and approved services and placements. They should limit or restrict access to FAMCare based on the assigned responsibilities of each user, and ensure that this access is promptly updated or terminated when employees change job functions or leave DYRS.

DYRS CBRFs failed to produce and/or retain documentation required by their Human Care Agreements.

Youth that have been committed to the custody of DYRS must be placed in the "least restrictive setting" possible.² In some cases, DYRS will contract with Community-Based Residential Facilities (CBRFs) to house these committed youth. These CBRFs are staffed 24-hours per day and typically house 6-10 youth in a single-sex setting. Although youth reside at the facility, they continue to attend school and receive family visits. CBRFs provide supervision for the youth, arrange for counseling services as necessary and work to engage the youth in recreational activities and programs designed to promote positive development.

DYRS contracts with CBRFs using a type of contract referred to as a Human Care Agreement. Each of the CBRFs must provide DYRS with monthly reports as part of the deliverable schedule included in the agreement. Furthermore, the Human Care Agreement requires each CBRF to retain these monthly reports for a period of five years.

In order to verify that each CBRF complied with the requirements of their Human Care Agreement, ODCA selected two of these reports for review, the **Monthly Program Report** and the **Youth Monthly Progress Reports**. These are two distinct reports specifically referenced in each Human Care Agreement.

The Monthly Program Report provides a summary level snapshot of the facility's operations, including the number of discharges, re-arrests and newly admitted youth. The Youth Monthly Progress Report provides detailed information from the specific case files maintained for each youth, including the daily notations that are made for each youth, a record of any curfew violations or unusual incidents. The specific data elements required for each report are included in Appendix II.

Monthly Program Report

ODCA selected a sample of four CBRFs, and visited each of them to verify that the Monthly Program Report was both produced and retained by each respective CBRF during FY 2014. Of the four group homes, ODCA found the following:

- Two CBRFs could not produce any Monthly Program Reports.
- One of the CBRFs produced Monthly Program Reports for the entire fiscal year, but they were missing section "j."³

² See D.C. Code § 16-2301.02(9).

³ j - Client surveys on the effectiveness of the program (client includes youth, and if applicable, natural family members and extended family members).

- One of the CBRFs produced only one of the Monthly Program Reports out of the five months it was open in FY 2014. Additionally, each report was missing sections "i"⁴ and "j."

Youth Monthly Progress Reports

Additionally, for each of the four CBRFs that ODCA visited, the audit team examined each CBRF's compliance with the requirement for Youth Monthly Progress Reports. For each of these CBRFs, there were no Youth Monthly Progress Reports available. However, ODCA decided to review the individual cases files at each facility to see if it would be possible to obtain the required data elements of the report from the individual case files stored at each facility. ODCA selected the case files of five youth residing in each CBRF during FY 2014 for further review, noting the following:

CBRF #1: The case files contained all of the required elements for the Youth Monthly Progress Report.

CBRF #2:

- 3 of the 5 youth case files were missing:
 - b) Case Record Checklist
- 1 of the 5 youth case files was missing:
 - f) Individual Service Plan and Updates
- 4 of the 5 youth case files were missing:
 - g) Result of Strength and Needs Assessment
- All 5 of the youth case files were missing:
 - h) Weekly Progress Summaries
 - m) Goal Attainment Sheets
- 2 of the 5 youth case files were missing:
 - n) Family Responses

CBRF #3:

- 1 of the 5 youth case files were missing:
 - h) Weekly Progress Summaries
 - i) Closing and Discharge Summaries
 - j) Medical/ Dental Info/ Parent Consent for Medical/Health Care

⁴ i - Previous month's schedule of program activities including group sessions, facility events, and the activities including date(s) and time(s).

CBRF #4:

- 2 of the 5 youth case files were missing:
 - f) Individual Service Plan and Updates
 - g) Result of Strength and Needs Assessment
 - i) Closing and Discharge Summaries
 - m) Goal Attainment Sheets
- All 5 of the youth case files were missing:
 - h) Weekly Progress Summaries
 - n) Family Responses
- 4 of the 5 youth case files were missing:
 - j) Medical/ Dental Info/ Parent Consent for Medical/Health Care
 - o) 2) Notation of every Contact
- 3 of the 5 youth case files were missing:
 - o) 4) Logs of Curfew and School Attendance

Each CBRF was noncompliant with at least portions of their Human Care Agreement.

Each of the four CBRFs had at least some form of noncompliance with the agreement's requirements to produce a Monthly Program Report and Youth Monthly Progress Reports. ODCA spoke with representatives of each CBRF to determine why they did not comply with the agreement, noting the following:

- Two of the CBRFs stated that the information required by both reports was in fact available in other documents/files;
- Two of the CBRFs stated that DYRS did not require the organization to submit either of the reports;
- One CBRF stated that they were unable to retrieve some of the documentation because they were unable to locate the archived files of a staff member that had left the organization; and
- One CBRF expressed frustration with the turnover and organizational change ongoing at DYRS, as it often meant the CBRF received inconsistent instructions and requirements from DYRS.

Additionally, it does not appear as though there were any consequences for each CBRF's lack of compliance with the Human Care Agreement. The District has tasked DYRS with the supervision, custody and care of young people charged with a delinquent act in the District. In order to achieve its mission, DYRS must monitor the CBRFs it uses to house these youth and ensure that they are receiving a comprehensive, competent and efficient set of services.

The reporting requirements included in each CBRF's Human Care Agreement, specifically the requirement for each to produce and submit a Monthly Program Report and Youth Monthly Progress Report, would help DYRS achieve this goal. However, each of the CBRFs that ODCA visited was non-compliant with at least portions of the reporting requirements included in their Human Care Agreement.

Where the reporting requirements were not successful in allowing DYRS to monitor the youth in its CBRF facilities, ODCA searched for other DYRS procedures that would compensate for the missing elements of the two reports it reviewed. DYRS noted that it performed a number of site visits at its CBRF facilities in FY 2014. The log that DYRS provided included the name of facility that DYRS visited, the name of the DYRS individual that conducted the site visit and the date that it occurred. However, there was no documentation available to describe what procedures were performed, the evidence that was obtained or the outcome of the visit. As a result, it was not possible for ODCA to verify exactly what DYRS did when it visited each facility, any corrective action that was required of the facility or even a summary describing the status or state of the facility's operation.

If DYRS wants to ensure that its committed youth receive proper care while they are housed in the District's CBRFs, it must monitor these facilities. Furthermore, DYRS must retain a detailed, comprehensive set of documentation to properly demonstrate that this monitoring occurs on a regular basis, and that it is effective in keeping DYRS informed of the status of its committed youth.

Recommendations:

4. DYRS should review its Human Care Agreement and, if necessary, revise it to reflect only those requirements deemed essential. Furthermore, DYRS should establish procedures to review, verify and analyze data collected from CBRFs.
5. If DYRS intends to continue using site visits to evaluate its CBRFs, it must design, document and implement a set of procedures to guide DYRS employees as they perform their work. These procedures should ensure that DYRS collects and retains documentation resulting from the site visit.

DYRS did not consistently define, support and report on measures of Public Safety in a timely manner.

Over the past few years, some District residents have expressed concern associated with crimes committed by DC youth placed in the custody of DYRS. The public must have confidence in the District government's ability to adjudicate and successfully discharge youth that are placed in its custody, so ODCA decided to include a review of some of the metrics DYRS uses to evaluate the public safety outputs and outcomes of its program.

ODCA reviewed the following items:⁵

- Processes employed by DYRS for reporting abscondences to the District government.
- The number of abscondences recorded at each CBRF during Q1 and Q2 of FY 2014. This measure was reported in the Draft FY 2014 Facilities Status Report produced for internal use at DYRS (*Draft* version reviewed because report was never finalized).
- The number of youth demonstrating “pro-social behavior and interactions” as documented in each youth’s case file. This measure was also reported in the Draft FY 2014 Facilities Status Report that ODCA reviewed.
- Public safety indicators as reported online on DYRS’ website under the “Public Safety Indicators” heading.

ODCA's intent was to select performance metrics and review the process by which DYRS defines their performance metrics, supports them with accurate data and reports them to the public.

Review of Abscondence Reporting

An abscondence, as defined by DYRS, occurs when a youth is absent from an approved placement for any reason, including escape, truancy or curfew violation. DYRS has a process by which CBRFs are required to report abscondences which is clearly described within the Human Care Agreement that each CBRF signs. Once a CBRF determines that a youth has absconded from an approved placement, they are required to notify the following organizations within one hour:

- The Metropolitan Police Department (MPD);
- The District of Columbia Superior Court Juvenile Neglect Branch;
- The Office of the Attorney General;

⁵ ODCA did not select public safety measures from the DYRS Performance Plan for FY 2014 as the metrics included in that document focus on secured facilities, and not the CBRFs that are the focus of this audit.

- The Office of Unified Communications (OUC); and
- DYRS.

ODCA began its review of this process by first obtaining a list of abscondences as recorded by DYRS in its electronic case management system, FAMCare.

For 3 of the 25 abscondences that ODCA sampled, DYRS could not demonstrate that OUC was informed as required.

The audit team obtained a listing of all abscondences reported to OUC in FY 2014. ODCA then selected 25 youth at random from the listing of abscondences recorded in the DYRS case management system, FAMCare, and searched for each occurrence in the listing provided by OUC. ODCA noted that 3 of the 25 abscondences found in FAMCare could not be found in the listing provided by OUC. DYRS was not able to explain why these three abscondences did not appear on OUC’s listing.

Abscondences as Reported in Draft FY 2014 Facilities Status Report

In addition to the check that ODCA performed over the reporting process for abscondences, our audit team also reviewed the abscondence statistics included in the Draft FY 2014 Facilities Status Report. Within this report ODCA examined the number of abscondences as reported by the CBRFs that house DYRS youth.

The report listed the number of abscondences by CBRF for the first (Q1) and second quarters (Q2) of FY 2014. Again, although this was a draft report produced for internal use only, ODCA reviewed this metric so that it could provide DYRS with a list of suggestions for improvement, as necessary.

ODCA calculated the number of abscondences for a sample of CBRFs in Q1 and CBRFs in Q2, using the listing of abscondences extracted from FAMCare. The count for each facility was compared to the count included in the report. ODCA’s calculation differed from the report in 6 of 12 cases in Q1 and in 9 of 12 cases for Q2 (See Figure 2 below).

Figure 2

ODCA’s Recalculation of Abscondences

Provider	Q1 ODCA	Q1 Rpt	Difference	Q2 ODCA	Q2 Rpt	Difference
1	3	3	0	0	1	1
2	3	3	0	2	1	(1)
3	4	4	0	3	5	2
4	4	4	0	4	5	1
5	6	8	2	1	2	1
6	2	2	0	0	0	0
7	1	0	(1)	0	0	0
8	1	2	1	3	4	1
9	3	4	1	0	0	0
10	6	6	0	3	5	2

Provider	Q1 ODCA	Q1 Rpt	Difference	Q2 ODCA	Q2 Rpt	Difference
11	1	2	1	2	3	1
12	1	2	1	3	2	(1)

ODCA could not reconcile abscondences as reported in DYRS' case management system with the values included in its internal reports.

According to DYRS, these discrepancies arose because the dataset we used for our calculation differed from the dataset that DYRS used to produce the original report. As the performance measure required source data in order to be calculated, ODCA used the abscondence data DYRS provided out of FAMCare for this calculation. The source data that was originally used to create the DYRS report was no longer available for review by the time ODCA performed this audit. As a result, ODCA was not able to verify the explanation provided by DYRS for the differences noted in Figure 2 above.

Pro-Social Behavior as Reported in Draft FY 2014 Facilities Status Report

ODCA selected an additional performance metric from the report for further review. The audit team's objective was to verify the accuracy of this performance measure for Q1 and Q2. The measure selected was summarized as follows:

75% of youth with increased pro-social behavior and interactions as evidenced by results on progress documented into their case files.

A youth engaging in "Pro-social" behavior was defined as follows:

ODCA was not able to verify the "Pro-Social" behavior metric included in DYRS' internal reports

- Enrolled in a CBRF for a minimum of 15 days;
- Participated in an approved activity for at least one hour, twice per week; and
- The activity was related to the arts, mentoring, recreation, counseling or crisis intervention.

However, ODCA was not able to independently verify and recalculate this measure because DYRS was not able to provide the data used to calculate the performance measure. It is possible that DYRS may have been able to reconstitute the data necessary for this metric from the actual case files of the youth placed in its custody. However, the length of time and level of effort necessary to perform such a task was not within the scope of this audit.

Public Safety Indicators as Reported on DYRS website

ODCA noted that the DYRS website included performance metrics under the "Public Safety Indicators" header of its home page. Specifically, the website identified performance metrics for the reconviction and re-arrest of youth placed in the custody of DYRS.

Public Safety Indicators were updated only through 2012 on DYRS website.

However, DYRS only reported these measures for the years 2004-2012. It is important for DYRS to report its public safety indicators on a historical basis for comparison with current data, but this data should be updated through the current period within a reasonable amount of time. ODCA did not test any of the Public Safety Indicators included on the DYRS website, as they were not reported for FY 2014, which is the year under review for this audit.

The GAO's Standards for Internal Control in the Federal Government (Green Book) include standards and objectives for effective systems of internal control. Documentation should clearly establish the who, what, when, where, and why of key processes. Documentation should allow for the entity to retain the organizational knowledge associated with these processes and effectively communicate with external parties, such as auditors. Additionally, the Green Book notes that transactions or events should be recorded in a timely manner so that they are relevant and of value to decision makers.

DC Municipal Regulations (DCMR) also identifies the following record retention objectives and requirements for District agencies:

- Agency heads shall establish controls over the creation of records to ensure that adequate and proper records are made and preserved in the District government.⁶
- The record of every transaction of public business by any District official or employee shall be complete to the extent required by the following:

To make possible proper oversight by the Council of the District of Columbia...⁷

DYRS failed to retain the information necessary for a thorough review of its performance metrics. In some cases, performance metrics appear to have not been defined in a consistent manner, which is necessary for comparison purposes over time. In other cases, data that was necessary for a proper evaluation of DYRS performance metrics was not available for review. As noted previously, ODCA also examined DYRS' process for responding to abscondences as outlined in each CBRFs Human Care Agreement, and found that for 3 of the 25 abscondences that ODCA reviewed, DYRS could not demonstrate that reporting procedures for abscondences were followed. This is concerning because it confirms that there are gaps in the process DYRS employs to respond to abscondences. Finally, some of the performance measures that DYRS tracked were not updated in a timely manner, in fact rendering them obsolete for evaluation purposes.

⁶ D.C. Mun. Regs. tit 1 § 1502.1.

⁷ D.C. Mun. Regs. tit 1 1502.3(b).

ODCA identified numerous areas for improvement as it reviewed some of the public safety performance measures that DYRS tracks. Without these improvements, ODCA and other interested stakeholders will not be able to use these metrics for an evaluation of DYRS. Furthermore, the public will not be able to verify the accuracy and validity of these metrics when the source data and specific processes used to calculate them are not available.

Recommendations:

6. DYRS can improve its ability to track and report on its public safety performance metrics by ensuring that results can be recalculated by an objective third party. This means that the source data used to make the calculation must be retained, and that DYRS should document the specific steps necessary to calculate the metric.
7. DYRS should consistently define its public safety metrics so that the definition of each metric is consistent, no matter where it is reported (e.g. the DYRS website, internal or external reports).
8. DYRS should require its CBRFs to comply with the policies and procedures included in their Human Care Agreements and include consequences for noncompliance in the Agreements.
9. DYRS public safety measures should include historical data that allow for an analysis of trends in the measure over time and DYRS should provide timely updates to each measure.

The DC YouthLink program may be able to reduce its administrative costs and overhead.

The funds that an organization uses to achieve its mission can be divided between those funds that are spent directly on the organization's programs and services, and those funds that are spent on the organization's administrative costs and overhead.

To assess the efficiency with which the DYRS-funded entities spent taxpayer funds, ODCA gathered data from the Trust, each of the Lead Agencies and several of the service providers that administered the DC YouthLink program in FY 2014.

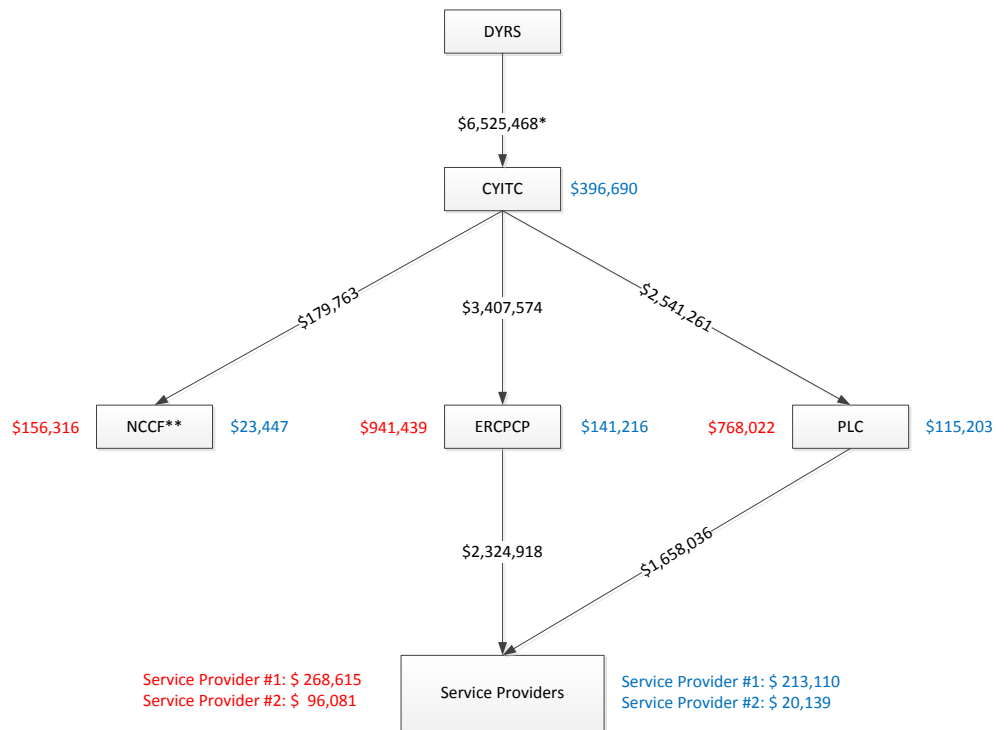
As there were a number of service providers that participated in the program in FY 2014, ODCA only selected a sample of these organizations for review. Out of this group, only two service providers responded to ODCA's inquiries, so service provider costs were estimated for the group as a whole, using averages derived from these two organizations (See Figure 3 below for specific values).

Disbursements have been included in black.

Administrative and overhead costs are in blue. These are costs which cannot be directly attributed to the programs and services offered under the DC YouthLink program.

Direct costs are included in red. They include costs for payroll, supplies, occupancy, and equipment used to deliver programs and services for the District's court-involved youth.

Figure 3



* \$8.2 million was the full amount of disbursement, of which \$1.2 million was held in reserve and \$500K was distributed to outside contractors. Both amounts were excluded from this analysis.

** NCCF participated in the program for 3 months only during FY 2014, but did not disburse funds in that time frame.

Once this data was compiled, ODCA compared it to other charitable organizations with missions similar in scope to the DC YouthLink program.

Specifically, ODCA used the compiled research and statistics of Charity Navigator, an organization devoted to the evaluation of charitable organizations based in the US. With assessments of over 8,000 charitable organizations and detailed, industry specific data available for review, ODCA selected a sample of organizations for comparison with the DC YouthLink program. ODCA selected 10 organizations at random from the Charity Navigator's "Youth, Development and Crisis Services" header, which most closely matched the mission of the DC YouthLink program. An

ODCA estimated that 29 percent of the program's total expenses were spent on administrative and overhead costs.

analysis of these 10 organizations showed that an average of 79 percent of the organization's total expenses were spent directly on the programs and services that it delivers, leaving approximately 21 percent for administrative costs and overhead.

The DC YouthLink program, however, does not appear to have been as efficient in working towards its objectives. ODCA estimated that approximately 71 percent of the program's total expenses were spent directly on the programs and services that it delivers, while 29 percent of the programs expenses were for administrative costs and overhead.

While it would appear that the DC YouthLink program should reduce its administrative costs, there are a number of factors that require additional consideration before reaching that conclusion.

- ODCA based its analysis of the program's service providers on only two service organizations. It is possible that the two respondents were not representative of the group as a whole.
- There are four levels of administration used to manage this program, including DYRS, the Trust, three Lead Agencies and numerous service providers, without an obvious rationale. Although it may be necessary for the achievement of the program's goals, the large number of entities involved in the program's administration appears to be increasing costs.
- It is possible that some of the costs assigned to the DC YouthLink program may actually be costs which should be allocated among many different programs, as opposed to the DC YouthLink program. For example, if a service provider buys IT equipment for its network, how is the cost for that equipment allocated amongst the various programs that the service provider administers? ODCA did not note any procedures in place that would help make this determination. Similarly, some of the human capital costs assigned to the program may be for staff who are administering multiple programs outside of the DC YouthLink program.
- ODCA compared the DC YouthLink program with 10 organizations that were classified as "Youth, Development and Crisis" service providers by Charity Navigator. Although this category appeared to closely resemble the service offerings of the DC YouthLink program, there may be other entities that more closely resemble the program for comparison purposes.

Recommendation:

10. DYRS should design procedures to facilitate an analysis of its cost structure for the DC YouthLink program and perform this type of analysis on an ongoing basis to ensure that the DC YouthLink

program delivers services in the most efficient and effective manner possible. Specifically, DYRS should:

- Require all service providers to periodically provide their financial statements and any other data necessary for this type of analysis.
- Perform an analysis of the program's design to determine if it should continue to be structured in its current form. DYRS should either justify the multiple layers of administration that the program employs or change the structure of the program.
- Design and implement policies and procedures to determine if all costs allocated to the program are in fact costs associated with the program.
- Search for organizations, either public or private, with objectives similar to the DC YouthLink program and perform periodic comparisons of direct and indirect costs.

Audit Results Summary

Our audit identified the following recommendations for DYRS:

Finding	Recommendation
<p>Expense reimbursement submissions were accurate and generally well supported but the Trust’s review process can be improved.</p>	<ol style="list-style-type: none"> 1. To the extent possible, DYRS should direct the DC Children's Youth Investment Trust Corporation (Trust) to obtain corroborating documentation from an independent third party before it reimburses Lead Agency expenses. This can be accomplished in a number of ways, including: <ul style="list-style-type: none"> • Requiring each Lead Agency to pay all expenses out of one bank account. If the Trust can obtain the bank statement directly from the bank and then compare it to the receipts that it receives from the Lead Agency, it can be confident that they are in fact legitimate expenses. • Requiring each Lead Agency to pay all expenses using a credit card with the Trust obtaining the credit card statement directly from the financial institution that issued the card. • Obtaining support for Outcome Payments from external sources. For example, having test scores for GED exams sent directly to the Trust. 2. DYRS should require the Trust to document its expense review and approval process and ensure that it retains this organizational knowledge for future use.

<p>DYRS did not appropriately restrict access to its FAMCare case management system.</p>	<ol style="list-style-type: none"> 3. DYRS should design policies and procedures to restrict access to FAMCare. These policies and procedures need to be created, implemented and periodically updated to ensure that DYRS only disburses funds for valid and approved services and placements. They should limit or restrict access to FAMCare based on the assigned responsibilities of each user, and ensure that this access is promptly updated or terminated when employees change job functions or leave DYRS.
<p>DYRS CBRFs failed to produce and/or retain documentation required by their Human Care Agreements.</p>	<ol style="list-style-type: none"> 4. DYRS should review its Human Care Agreement and, if necessary, revise it to reflect only those requirements deemed essential. Furthermore, DYRS should establish procedures to review verify and analyze data collected from CBRFs. 5. If DYRS intends to continue using site visits to evaluate its CBRFs, it must design, document and implement a set of procedures to guide DYRS employees as they perform their work. These procedures should ensure that DYRS collects and retains documentation resulting from the site visit.
<p>DYRS did not consistently define, support and report on measures of Public Safety in a timely manner.</p>	<ol style="list-style-type: none"> 6. DYRS can improve its ability to track and report on its public safety performance metrics by ensuring that results can be recalculated by an objective third party. This means that the source data used to make the calculation must be retained, and that DYRS should document the specific steps necessary to calculate the metric. 7. DYRS should consistently define its public safety metrics so that the definition of each metric is consistent, no matter where it is reported (e.g. the DYRS website, internal or external reports). 8. DYRS should require its CBRFs to comply with the policies and procedures included in their Human Care Agreements and include

	<p>consequences for noncompliance in the Agreements.</p> <p>9. DYRS public safety measures should include historical data that allow for an analysis of trends in the measure over time and DYRS should provide timely updates to each measure.</p>
<p>The DC YouthLink program may be able to reduce its administrative costs and overhead.</p>	<p>10. DYRS should design procedures to facilitate an analysis of its cost structure for the DC YouthLink program and perform this type of analysis on an ongoing basis to ensure that the DC YouthLink program delivers services in the most efficient and effective manner possible. Specifically, DYRS should:</p> <ul style="list-style-type: none"> • Require all service providers to periodically provide their financial statements and any other data necessary for this type of analysis. • Perform an analysis of the program's design to determine if it should continue to be structured in its current form. DYRS should either justify the multiple layers of administration that the program employs or change the structure of the program. • Design and implement policies and procedures to determine if all costs allocated to the program are in fact costs associated with the program. • Search for organizations, either public or private, with objectives similar to the DC YouthLink program and perform periodic comparisons of direct and indirect costs.

Conclusion

The Department of Youth Rehabilitation Services (DYRS) provides a critical set of services to the District's court-involved youth, including tutoring, substance abuse counseling, vocational assistance and health care services. DYRS must administer these programs efficiently and effectively so that they can assist as many court-involved youth as possible, while ensuring that the District's resources are not wasted.

We have made recommendations to help DYRS provide services in a more efficient and effective manner. For example, we questioned some of the structural choices made by the program's administrators. Our review of the DC YouthLink program identified a number of administrative layers which DYRS should justify or remove.

Some of our other recommendations will reduce wasteful activities we noted within DYRS programs, such as our recommendation to revise the Human Care Agreements that it uses. We noted that these agreements included reporting requirements and procedures which appeared unnecessary.

Accurately reporting and publishing information on DYRS program objectives and results is a difficult task. We have made suggestions designed to improve communications between the agency and its various stakeholders, including the public at large. Stakeholders should feel comfortable that they are being provided accurate data on key metrics of performance, including public safety.

Finally, we noted some opportunities for DYRS to strengthen its operations and prevent fraud and abuse. For example, by corroborating expense reimbursement submissions with independent third parties, DYRS can ensure that it only disburses funds for actual program expenses. We also made recommendations to strengthen access controls to DYRS' case management system, FAMCare. Access to the system should be determined based on the assigned responsibilities of each user, and DYRS should ensure that this access is promptly updated or terminated when employees change job functions or leave DYRS. This recommendation would also help DYRS prevent unauthorized access to the sensitive information contained in these systems, which include sensitive data elements gathered for each youth, like their address and social security number.

Agency Comments

On February 12, 2016, we sent a draft copy of this report to the Director of the Department of Youth Rehabilitation Services (DYRS) for review and written comment. DYRS provided its written comments on March 11, 2016, which are included, in their entirety, with this report.



**Response to the
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draft report titled
“DYRS Can Strengthen Administration of its DC YouthLink and
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Recommendation #1:

“To the extent possible, DYRS should direct the DC Children’s Youth Investment Trust Corporation (Trust) to obtain corroborating documentation from an independent third party before it reimburses Lead Agency expenses. This can be accomplished in a number of ways, including:

- Requiring each Lead Agency to pay all expenses out of one bank account. If the Trust can obtain the bank statement directly from the bank and then compare it to the receipts that it receives from the Lead Agency, it can be confident that they are in fact legitimate expenses.
- Requiring each Lead Agency to pay all expenses using a credit card with the Trust obtaining the credit card statement directly from the financial institution that issued the card.
- Obtaining support for Outcome Payments from external sources. For example, having test scores for GED exams sent directly to the Trust.”

Response:

DYRS agrees that controls should be put into place to help reduce the risk of reimbursing fraudulent expenses. In FY17, DYRS will be providing direct oversight of the DC YouthLink Initiative, thereby removing the DC Trust from the process, and will put checks into place that will call for independent corroboration of Lead Agency expenses, including requiring any Lead Agency to pay all expenses from a single bank account and requiring any Lead Agency to submit the bank statement from that account so that DYRS may ensure that all claimed reimbursable expenses can be reconciled when compared against the bank statement. For the remainder of FY16, DYRS shared this recommendation with the DC Trust and they are implementing these recommendations.

Recommendation #2:

“DYRS should require the Trust to document its expense review and approval process and ensure that it retains this organizational knowledge for future use.”

Response:

DYRS agrees that it is important to document the expense review and approval process. As stated in our response to recommendation #1, in FY17, DYRS will be directly overseeing the DC YouthLink Initiative and will have clearly outlined expense review and approval processes. Specifically, DYRS will explicitly outline the expense review and approval processes in the Initiative Standard Operating Procedures (“SOPs”). The SOPs will include a requirement that each Lead Agency submits a monthly summary of expenditures. Upon receipt of the summary document, DYRS’s internal reviewer will reconcile all expenses line by line matching all supporting documents to the listed expenditure before authorizing reimbursement of any expenses. This review process will be documented and stored in DYRS’s system of



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record. For FY16, DYRS shared this recommendation with the DC Trust and will request more information about how the Trust performs expense review and approval.

Recommendation #3:

“DYRS should design policies and procedures to restrict access to FAMCare. These policies and procedures need to be created, implemented and periodically updated to ensure that DYRS only disburses funds for valid and approved services and placements. They should limit or restrict access to FAMCare based on the assigned responsibilities of each user, and ensure that this access is promptly updated or terminated when employees change job functions or leave DYRS.”

Response:

DYRS began restricting the access to FAMCare based on a user’s assigned responsibilities in early 2014. The agency believes a misunderstanding occurred during the audit due the level of access provided to ODCA, which is total access only reserved for senior level managers. In 2014, the FAMCare system instituted a number of different levels of access called “Roles.” Employees are assigned the appropriate “role” level that corresponds to the level of access required to accomplish their respective jobs.

The DYRS Office of Human Resources (HR) notifies Information Technology (IT) whenever an individual’s responsibilities change to ensure that a staff member is (re)assigned an appropriate role (e.g. detailed, reassignment, etc.). If a staff member leaves, IT is immediately notified so that the employee’s access to FAMCare is terminated.

Additionally, on at least a quarterly basis, IT provides a list of all active FAMCare accounts to Human Resources to validate each employee’s employment status. Changes are made as directed by HR.

Recommendation #4:

“DYRS should review its Human Care Agreement, and, if necessary, revise it to reflect only those requirements deemed essential. Furthermore, DYRS should establish procedures to review, verify, and analyze data collected from CBRFs.”

Response:

DYRS agrees with this recommendation and in FY15, began implementation of a new Human Care Agreement. DYRS revised and updated the requirements and performance metrics detailed in the HCA for all Community Based Residential Facilities (CBRFs). More specifically, the agency outlined performance metrics and evaluation requirements to reflect DYRS’s efforts in enhancing oversight and accountability. DYRS instituted the same revision process in early 2016 for Family Reunification Homes.

During FY15, DYRS implemented an objective and outcome-based evaluation guide for assessing the performance of CBRFs. These evaluations, designed to improve CBRF performance, ultimately enhance DYRS’s oversight, increase vendor accountability, and more accurately measure program performance.



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The evaluation guide required DYRS to develop and implement new monitoring and evaluation tools, the most critical of which is the Performance Measurement Tool, a quantitative rating tool completed by Contract Administrators on a quarterly basis that reviews the performance of each CBRF vendor on safety, well-being, stability and licensing and governance. This tool is used to identify areas that need improvement and should trigger creation of a Performance Improvement Plan (PIP) where appropriate. The results of each site visit and data collection recorded are compiled to create a quarterly ratings report that is distributed to agency and District leadership.

As part of its commitment to enhancing oversight, the agency restructured its Performance Monitoring Division and equipped it with staff that could effectively employ the new evaluation practices. The division evaluated internal data collection documents and went through a rigorous revision process resulting in a series of new tools and reports demonstrating and recording the department’s monitoring and evaluation efforts, as well as the performance of the CBRF vendors. Over the course of FY15 and throughout the beginning of FY16, the Performance Monitoring Division developed the new evaluation tools.

Recommendation #5:

“If DYRS intends to continue using site visits to evaluate its CBRFs, it must design, document and implement a set of procedures to guide DYRS employees as they perform their work. These procedures should ensure that DYRS collects and retains documentation resulting from the site visit.”

Response:

As outlined in the response to recommendation #4, in early FY16, the Performance Monitoring Division revised and implemented new standard operating procedures (SOPs) that govern staff and specify the protocols for performance monitoring of CBRFs. Staff also received training and additional supports in order to operationalize the new performance evaluation system.

The Performance Monitoring Division also included requirements for data collection and retention in the updated SOPs. The procedures reflect new requirements of all department staff for training on appropriate use, filing systems, document uploading and saving, document editing, and other procedures relevant to the Risk Management Unit Division (RMUD) data base. The RMUD database is the where all documents, Excel files, and contract and performance monitoring information is stored and maintained. The updated SOPs also detail how and when all new evaluation tools must be completed and uploaded into RMUD data base.

Moreover, the program manager for the Performance Monitoring Division provides quality assurance and supervision for staff to ensure that the new policies and procedures are adhered to. Weekly staff team meetings and monthly individual work reviews are completed to ensure protocols are followed. In addition, staff is required to submit weekly reports detailing site visits and any major issues related to each DYRS facility. Additionally, monthly spreadsheets that outline the result of each site visit and the details around all performance improvement or plans of correction issued to CBRFs are submitted to the program manager. These reports trigger review of RMUD documents and staff performance where



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appropriate, and prompt enhanced supervision of CBRFs when compliance issues are identified. Finally, the program manager conducts bi-monthly audits of performance-based data in RMUD to ensure the accuracy and integrity of all performance-based records and conformity to the new departmental protocols.

Recommendation #6:

“DYRS can improve its ability to track and report on its public safety performance metrics by ensuring that results can be recalculated by an objective third party. This means that the source data used to make the calculation must be retained, and that DYRS should document the specific steps necessary to calculate the metric.”

Response:

The DYRS Office of Research and Evaluation (ORE) maintains arrest and conviction data from as far back as 2011. In early 2015, ORE developed a manual for collecting, maintaining, and calculating public safety outcomes. Provided a third party understands the nuances of charge and conviction data and the court process, a third party should be able to recalculate public safety data.

Recommendation #7:

“DYRS should consistently define its public safety metrics so that the definition of each metric is consistent, no matter where it is reported (e.g. the DYRS website, internal or external reports).”

Response:

DYRS defines public safety metrics on its website and in its publications. DYRS follows DC statute in defining offense types and, depending on the analysis, generally uses an approach that divides the number of youth rearrested by the number of committed youth. The agency also follows the Department of Justice Office of Juvenile Justice and Delinquency Prevention’s methodology for calculating recidivism.

Step-by-step descriptions of methodology are outside the scope of the website; however, DYRS does provide summaries of methodology on its website. Examples include:

- **Re-Arrest Rates of DYRS Youth as a Portion of Citywide Arrests of Individuals Age 20 and Younger:** Re-arrests of youth committed to DYRS as a percentage of citywide arrests of individuals age 20 and younger. This table indicates both percent of all arrests and percent of individuals arrested each calendar year.
- **Reconviction Rates by Initial Placement Type:** The re-conviction rates within one year of community-placement for youth committed to DYRS, by fiscal year of commitment to the agency and initial placement type.

Recommendation #8:



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“DYRS should require its CBRFs to comply with the policies and procedures included in their Human Care Agreements and include consequences for noncompliance in the Agreements.”

Response:

In FY15, DYRS adopted a new Human Care Agreement (HCA) with new performance monitoring ratings. All vendors are required to follow unusual incident reporting procedures. If a vendor does not comply with the requirements in the HCA, DYRS issues a Performance Improvement Plan (PIP) and is in communication with the vendor until the vendor’s performance improves.

With regard to the findings related to abscondences, ODCA should be aware that not all abscondences rise to the level of reporting to the Office of Uniform Communications (OUC) or a custody order. DYRS regularly records short-term or quickly resolved abscondences in its data management system. For example, a young person may miss an appointment with DYRS or with another service provider and may be reported to DYRS as having absconded and entered as such in FAMCare. However, the youth reports to the CBRF on time and the incident is never reported to OUC.

Recommendation #9:

“DYRS public safety measures should include historical data that allow for an analysis of trends in the measure over time and DYRS should provide timely updates to each measure.”

Response:

DYRS updated public safety data the week of February 1, 2016. Re-arrest data on the website now includes data up to calendar year 2015. Recidivism calculations require a full year to pass after a youth is placed in the community. For that reason, recidivism cannot be reported up to the current fiscal or calendar year. The method for calculating recidivism is drawn from the Department of Justice Office of Juvenile Justice and Delinquency Prevention and is considered to be a standard method for calculating recidivism in many states.

DYRS provides more historical public safety data than other jurisdictions. The agency plans to continue to update public safety outcomes on the website on a regular basis.

Recommendation #10:

“DYRS should design procedures to facilitate an analysis of its cost structure for the DC YouthLink program and perform this type of analysis on an ongoing basis to ensure that the DC YouthLink program delivers services in the most efficient and effective manner possible. Specifically, DYRS should:

- Require all service providers to periodically provide their financial statements and any other data necessary for this type of analysis.
- Perform an analysis of the program's design to determine if it should continue to be structured in its current form. DYRS should either justify the multiple layers of administration that the program employs or change the structure of the program.



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- Design and implement policies and procedures to determine if all costs allocated to the program are in fact costs associated with the program.
- Search for organizations, either public or private, with objectives similar to the DC YouthLink program and perform periodic comparisons of direct and indirect costs. “

Response:

DYRS agrees that the DC YouthLink model needs to reduce its administrative costs and to that end has already conducted the recommended analysis. As a result of that review, as stated previously, in FY17 DYRS intends to lower administrative costs by no longer utilizing the services of the DC Trust and by directly overseeing the DC YouthLink initiative. Further, DYRS has directed its partners in the DC YouthLink Initiative to reduce administrative costs in FY16 to ensure more funds go directly towards the provision of services to DYRS youth. DYRS was able to ensure this occurred by closely evaluating FY16 Lead Agency budgets and explicitly denying approval of a number of indirect costs, including those listed for expenses like insurance, IT, training, travel, and those staff deemed non-essential to the functioning of the initiative.

Auditor's Response to Agency Comments

The Office of the District of Columbia Auditor (ODCA) appreciates the written response from the Department of Youth Rehabilitation Services (DYRS). We note the positive tone of the Agency's letter and their agreement with the majority of the recommendations included in our report. In fact, it appears as though DYRS has already started making changes to its operations based on our recommendations. With regard to the findings and recommendations where DYRS has rebutted our conclusion, we stand by our findings and conclusions as outlined in the report.

Appendix I

Outcomes

Category	Amount per Youth
Other Significant Outcomes/Accomplishments	\$100-\$500
Enrollment in Non-DC YouthLink Service (e.g. Medicaid, private)	\$150
Arts Performance or Presentation	\$250
Learning/Doing or Attaching/Belonging Gains	\$250
No New Arrests or Convictions (Reviewed every 3 months)	\$250
Certified Curriculum Completed (e.g., Parenting/SA)	\$300
Industry Recognized Credential (less than 8 hours)	\$375
Clean Drug Screens for 90 Days	\$400
Educational Gain (Improvement in grades or standardized test score)	\$400
GED Section Passed	\$400
Grade 09 Completed	\$400
Grade 10 Completed	\$400
Grade 11 Completed	\$400
Grade 12 Completed	\$400
Employment (0-45 days)	\$400
25 Hours of Community Service Completed	\$500
College or Post-Secondary Enrollment (i.e., attend at least 30 days)	\$500
Industry Recognized Credential (greater than 8 hours)	\$500
Military Enrollment	\$500
Employment Retained (46-90 days)	\$750
GED Attained	\$1,000
High School Graduation	\$1,000
Employment Retained (91+ days)	\$1,000

Attendance

Category	Hourly Rate
Evidence-Based Mentoring	\$30
Visual and/or Performing Arts	\$32
Health, Fitness, Sports and Recreation	\$32
Civic Engagement/Community Service	\$32
ABE/ASE/Pre GED/GED	\$35
Tutoring	\$35
Workforce Development: Job Readiness, Placement, Retention	\$35
Teen Parenting Education	\$35
Vocational Training Leading to a Credential	\$40
Substance Abuse Prevention, Education and Counseling	\$55
Family Support/Wrap Around	\$55

Appendix II

Monthly Program Report

- (a) The number and types of youth placed in the program;
- (b) The number of youth successfully discharged and/or reunited with their families;
- (c) The number of youth unsuccessfully discharged;
- (d) The rate of youth re-arrests;
- (e) The number of failures to appear at court;
- (f) The number of technical violations of community release plan;
- (g) Number of staff in-service training conducted during previous month;
- (h) Information that demonstrates the Provider(s)' efforts to identify and use individuals and agencies with expertise operating within the community to provide staff in-service as part of the Provider(s)' training curriculum (Note this requirement was excluded from ODCA's review as it was too subjective to verify);
- (i) Previous month's schedule of program activities including group sessions, facility events, and the activities including date(s) and time(s); and
- (j) Client surveys on the effectiveness of the program (client includes youth, and if applicable, natural family members and extended family members).

Youth Monthly Progress Reports

- (a) Client referral sheet;
- (b) Case record checklist;
- (c) Court orders;
- (d) Intake summary face/sheet;
- (e) Date of initial request for service;
- (f) Individual service plan and updates;
- (g) Result of strength and needs assessment;
- (h) Weekly progress summaries;
- (i) Closing and discharge summaries;
- (j) Medical/Dental Info/ Parent Consent for Medical/Health Care;
- (k) Daily progress notes;
- (l) Unusual incident reports;

(m) Goal attainment sheets;

(n) Family responses;

(o) On-Going reports detailing:

1) Specific interventions used and outcomes (Note this requirement was excluded from ODCA's review as it was too subjective to verify);

2) Notation of every contact;

3) Placement status determination;

4) Logs of curfew and school attendance;

5) Monitoring;

6) Pertinent material deemed necessary or important (Note this requirement was excluded from ODCA's review as it was too subjective to verify);

7) Mental health services (Note this requirement was excluded from ODCA's review as it was too subjective to verify); and

8) Educational support services.