

**Findings and
Recommendations:
ADMINISTRATION**

41. OHYC is not an accredited youth detention facility.

The ACA recommends that youth detention facilities be inspected and accredited by an external entity. The goal is to improve a facility's operations through objective evaluation and constructive criticism. According to ACA, accreditation provides the following benefits:

- improved staff training and development;
- assessment of program strengths and weaknesses;
- defense against lawsuits;
- establishment of measurable criteria for upgrading operations;
- improved staff morale and professionalism;
- safer environment for staff and offenders;
- reduced liability insurance costs; and
- performance-based benefits.⁴⁵

Accreditation also provides reasonable assurances that a youth detention or correctional facility meets established standards and procedures and is capable of providing the required services. The accreditation should be conducted by the youth detention or correctional facility's peers, and provide a realistic assessment of the quality of the facility and recommendations for improvement.

The team found that OHYC is not an accredited youth detention facility, and there are no District regulations requiring inspection, accreditation, or independent evaluation of the facility.

OHYC operates without an external, objective peer review of its operations. Consequently, District stakeholders cannot be assured that it meets established national standards and provides recognized levels of quality service to District citizens and the youths entrusted to YSA's care.

Recommendations:

- a. That the A/YSA take the necessary steps to have OHYC inspected and evaluated by the ACA.

Agree _____ **X** _____ Disagree _____

DHS's Response to IG's Recommendation, as Received:

By agreeing with this recommendation, DHS does not necessarily agree with OIG's factual findings. The MOU between DHS and DOC requires that DOC facilitate contact on YSA's behalf with ACA. While the Interim A/YSA understands and agrees with the need "to have OHYC inspected and evaluated by the ACA," taking steps to have the facility accredited does not

⁴⁵ See www.aca.org.

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make sense where the Blue Ribbon Commission has recommended construction of a new facility and demolition of the old facility.

- b. That the A/YSA work with the City Council and the Mayor in proposing legislation requiring OHYC to become an accredited facility.

Agree _____ Disagree _____ **X** _____

DHS's Response to IG's Recommendation, as Received:

The MOU between DHS and DOC requires that DOC facilitate contact on YSA's behalf with ACA. While the Interim A/YSA understands and agrees with the need "to have OHYC inspected and evaluated by the ACA," proposing legislation to require accreditation of the facility does not make sense where the Blue Ribbon Commission has recommended construction of a new facility and demolition of the old facility. Instead, the Interim A/YSA proposes that such efforts be concentrated on the new Youth Services Center and that the experience be used to seek accreditation of a newly-constructed OHYC.

OIG Response: **OIG stands by recommendation as stated.**

42. The Institutional Review Committee, an important quality assurance mechanism within YSA, is not active.

A BCCS case manager and an OHYC treatment team leader share case management responsibilities for committed youths housed at OYHC. Such shared oversight makes disagreements over case management issues inevitable. YSA's Institutional Review Committee (IRC) was established to serve as a quality assurance mechanism with authority to make final decisions on case management disputes that arise between BCCS and OHYC case managers. The IRC also resolves disputes about treatment and placement decisions, home visits, and the appropriate level of aftercare supervision. According to the case management manual, the IRC should serve as a resource to the OHYC treatment teams by reviewing cases upon request and providing direction to the teams.

The IRC should consist of four members: the OHYC Superintendent, the OHYC Director of Mental Health Services, the Oak Hill Academy Director, and BCCS's Division of Social Services Chief. IRC decisions must be made by consensus and a record must be kept of all cases reviewed and decisions rendered. With respect to timeframes, the manual states the IRC must conduct a hearing within 5 working days of receipt of a request for IRC review. In addition to mediating professional disagreements, the IRC should also play a role in evaluating each caseworker's performance.

The team found that the IRC is not a standing, active committee, and that it has not met for a number of months. Personnel turnovers and attrition at YSA have contributed to the inactivity of the IRC. As a result, treatment disputes between case managers are not being reviewed and resolved in a timely manner. In addition, the absence of the IRC represents a gap in

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quality assurance and the ability of YSA to evaluate the work of the treatment team leaders based on the observations of multi-disciplinary group.

Recommendation:

That the A/YSA immediately reactivate the Institutional Review Committee.

Agree X Disagree _____

DHS's Response to IG's Recommendation, as Received:

By agreeing with this recommendation, DHS does not necessarily agree with OIG's factual findings. The OHYC Assistant Superintendent for Treatment previously reactivated the Institutional Review Committee.

43. YCOs are not signing in and out on the Daily Sign-In/Out Sheet as required.

The YSA Human Resources Manager requires that Time and Attendance (T&A) Clerks verify an employee's presence or absence from work either by verification of the Daily Sign-In/Out Sheets, Shift Operations Reports⁴⁶, or a D.C. Standard Form 71 (Application for Leave).

A YSA internal policy memorandum dated November 27, 2000, to OHYC security personnel, states that "[e]ffective 27 November 2000, you will sign in when reporting for duty and sign-out at the completion of your tour of duty."

Each day the Administrative Assistant to the Deputy Administrator for Program Operations collects and forwards all T&A support documentation⁴⁷ to the Human Resources Manager for processing. Prior to the approval and authorization of payment, the T&A Clerk must verify the authenticity of the documents and ensure that documents submitted are accurate, i.e., if an employee is listed on the Shift Operations Report, that employee should have signed the Daily Sign-In/Out Sheet.

Daily Sign-In/Out Sheets are forwarded to the T&A Clerk for inclusion in payroll processing. The team noted that YCOs are not signing the Daily Sign-In/Out Sheets upon arrival to work and upon completion of their tour of duty. YCOs failure to sign the Daily Sign-In/Out Sheets makes it difficult for the Time and Attendance Clerk to verify their presence at work on specific dates and to verify the number of hours worked. Delays in processing occur because the T&A Clerk must seek other means to verify YCOs presence at work and the number of hours worked on specific dates. Failure to adhere to this policy creates a potential for T&A fraud.

Recommendations:

⁴⁶ Shift Roster that indicates each employee's name and the posts employees worked that day.

⁴⁷ Support documentation includes Shift Operations Reports from each shift, Requests for Authorization of Overtime Work, YCOs' Requests for Overtime/Compensatory Time Sign-In/Out Sheet, and Applications for Leave.

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- a. That the Officers-of-the-Day ensure that all YCOs sign the Daily Sign-In/Out Sheets upon their arrival and departure from work.

Agree _____ **X** _____ Disagree _____

DHS's Response to IG's Recommendation, as Received:

By agreeing with this recommendation, DHS does not necessarily agree with OIG's factual findings.

- b. That the Officers-of-the-Day review the Daily Sign-In/Out Sheets for signatures and obtain any missing signatures prior to forwarding the sheets to the T&A Clerk.

Agree _____ **X** _____ Disagree _____

DHS's Response to IG's Recommendation, as Received:

By agreeing with this recommendation, DHS does not necessarily agree with OIG's factual findings.

44. YCOs are exceeding the 24-hours-per-pay-period limit on working overtime.

YSA has an internal policy that limits the amount of overtime YCOs can work per pay period to 24 hours. YCOs who have met this limit should normally not be permitted to work additional hours.

An OHYC internal policy memorandum, dated August 21, 2001, states that "All security personnel that have met the 24-hour limit for overtime will not be able to work additional overtime unless it have [sic] been approved by Superintendent or his designee." In addition, the policy requires YCOs to request approval from the Officer-of-the-Day or the Shift Supervisor before exceeding the 24-hour overtime limit.

The YSA Human Resources Manager tracks the total number of overtime hours worked by each YCO who is close to meeting or who has exceeded the 24-hour limit and provides a daily Overtime Tracking Report to the Deputy Administrator for Program Operations.

The team reviewed the Overtime Tracking Reports and the Overtime Comparison Chart, and determined that YCOs are consistently exceeding the 24-hour limit by averaging 30-60 overtime hours per pay period.

The lack of policy enforcement by the Deputy Administrator and Officers-of-the-Day has allowed YCOs to consistently exceed the limit.

Recommendation:

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That the A/YSA enforce compliance with the 24-hours-per-pay-period limit on overtime worked by YCOs.

Agree X Disagree _____

DHS's Response to IG's Recommendation, as Received:

By agreeing with this recommendation, DHS does not necessarily agree with OIG's factual findings. The Acting OHYC Superintendent, Officers-of-the-Day, and the Human Resources Manager already are enforcing compliance with 24-hours-per-pay-period limit on overtime.

45. YSA is not complying with training and staff development programs at OHYC as required by the Decree.

YSA is required under the Decree to comply with the standards of the ACA pertaining to training and staff development. These standards require that employees with regular or daily contact with juveniles receive an additional 40 hours of training each year of employment subsequent to the year they were hired. This training allows employees to sharpen skills and keep abreast of changes in operational procedures.

ACA states that the following job descriptions of general job categories should be used in determining minimum training requirements:

| Category | Typical Position Titles | Training Hours First Year on the Job | Training Hours Each Year Thereafter |
|--|---|--------------------------------------|-------------------------------------|
| Clerical/Support (Minimum Contact with youth) | Secretaries, Clerks, Typists, Computer/Warehouse Personnel, Accountants, Personnel Staff | 16 | 16 |
| All Child Care/Supervision Staff | All staff assigned to full-time child care and/or supervision duties, security officers | 120 | 40 |
| Administrative/Management Personnel | Superintendents, Deputy or Assistant Superintendents, Business Managers, Personnel Directors, Child Care Supervisors, Shift Supervisors | 80 | 40 |

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Additionally, contract or part-time employees should receive training similar to full-time employees in their particular category and pertinent to their role in working with juveniles.

The team found that although YSA is complying with ACA training standards for employees during their first year on the job, employees are failing to meet the training requirements during subsequent years. The team reviewed training records and found that employees with regular contact with the youths, such as YCOs and professional and support staff take only 12 hours of training each subsequent year, rather than the required 40 hours.

The Training Coordinator stated that he provides YSA supervisors with a list of training classes each month and a list of employees who are due or overdue for training. He stated that it is the responsibility of supervisors and employees to contact the training center to sign up for required classes, but they are not doing so. He also stated that the YSA Training Center has no enforcement mechanism or quality assurance program to ensure that employees take the required classes.

YSA's failure to comply with the ACA training standards does not ensure that OHYC employees are familiar with updated or new operational procedures.

Recommendation:

That the A/YSA take the necessary steps, to include appropriate administrative action, to ensure that all affected employees meet the training requirements as set forth in the Decree.

Agree X Disagree _____

DHS's Response to IG's Recommendation, as Received:

By agreeing with this recommendation, DHS does not necessarily agree with OIG's factual findings. The Interim A/YSA took action in December 2003 to ensure "that all affected employees meet the training requirements as set forth in the Decree" by the end of January 2004. Because of snow days, that deadline was extended by one week. As of March 2004, all employees in a duty status were current on mandatory Jerry M. Consent Decree training requirements.