

Appendix 1

LIST OF FINDINGS AND RECOMMENDATIONS

Key Findings:

1. **Group and shelter homes are operating without licenses in violation of District laws.**

That the A/YSA expedites the licensing of all group and shelter homes establish a timetable for all facilities to be licensed.
2. **YSA's group and shelter homes are operating without valid contracts, written criteria for services, and receiving payment for undelivered services.**
 - a. That the A/YSA directs the Chief Procurement Officer to develop RFPs to solicit competitive bids among existing and potential vendors for group and shelter homes.
 - b. That the Office of the Inspector General's Audit Division conduct an audit of all payments for services provided by the group and shelter homes.
3. **Lack of maintenance at group and shelter homes and inadequate training of monitors pose health and safety risks to youth and employees.**
 - a. That the A/YSA request an inspection of the group and shelter homes by the District of Columbia Office of Risk Management to determine whether there are health and safety hazards present, and take the necessary steps to expedite the abatement of found deficiencies.
 - b. That the A/YSA request an inspection by the Department of Consumer and Regulatory Affairs to determine whether there are building code violations present and take the necessary steps to expedite the abatement of found deficiencies.
 - c. That the A/YSA provides training and certification to LMQA monitors to ensure the proper monitoring of group and shelter homes.
 - d. That the A/YSA requires the LMQA Unit to recommend immediate closure of group and shelter homes in the event of life threatening health and safety issues.
4. **The lack of regular and adequate fire inspections may put group and shelter home residents and employees at risk.**
 - a. That the A/YSA immediately request an inspection of all group and shelter homes by the District of Columbia FEMS, Fire Prevention Bureau in accordance with ACA recommendations.

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- b. That the A/YSA take the necessary steps to abate any fire safety deficiencies that may be cited as a result of this inspection.
 - c. That the A/YSA ensure that local fire officials conduct annual fire safety inspections of all group and shelter homes, as recommended by ACA.
 - d. That the A/YSA ensure LMQA employees conduct monthly fire safety inspections and that these inspections address the requirements set forth in the District's Fire Prevention Code.
5. **Group and shelters home contractors are not conducting adequate employee criminal background checks, and are employing persons with criminal convictions.**
- a. That the A/YSA ensure that all candidates for employment and current contract employees with regular contact with youths undergo a MPD criminal background check as required by current policy.
 - b. That the A/YSA develop an internal policy that requires annual updates of criminal background checks for contract employees.
 - c. That the Director of the Department of Human Services propose legislation to the City Council that would require complete background checks for appropriate contract employees, to include a check of the records at MPD and surrounding law enforcement jurisdictions, an NCIC check, and a review of the Central Registry of Crimes Against Children/Sex Offenders as well as a Child Protection Registry Check.
 - d. That the A/YSA ensures that all contract employee personnel records are reviewed to determine that all contract employees meet employment criteria for criminal background checks.
 - e. That the A/YSA ensure that contractors discontinue the practice of employing persons with unauthorized criminal convictions.
6. **YSA may be underutilizing a District Medicaid reimbursable, residential treatment facility that could be used to reduce the number of committed youths who are housed in costly out-of-state facilities and OHYC.**
- a. That the A/YSA designate an internal point of contact at YSA who would be responsible for maximizing the potential of this in-town, Medicaid-reimbursable, residential facility.
 - b. That the A/YSA request a review of all youths who are currently residing in out-of-state residential facilities to identify those who might be better served by this in-town, therapeutic residential facility.

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7. **Inaccurate risk assessments and subsequent assignments to non-secure community facilities and ineffective monitoring of youth increase the risk of abscondences.**
- a. That the A/YSA seek to collaborate with the Superior Court Social Services Division on a qualitative review of the intake assessment process. The objectives would be to (a) improve the decision making that leads to the assignment of youths to either secure or non-secure facilities; and (b) to lower the risk of dangerous youthful offenders absconding back into the community where they might be harmed or harm others.
 - b. That the A/YSA review security and monitoring practices in all group and shelter homes and ensure that day-to-day operations serve to minimize the risk of abscondences, while meeting the requirements to provide residential care, treatment, and services for the youths.
 - c. That the A/YSA review the feasibility of automatically placing youths who abscond from a group or shelter home into more secure facilities once they have been apprehended.
8. **Absconder Locator Component (ALC) employees do not have the procedures or training to make more than minimal efforts to locate absconders, some of whom pose a threat to the community and to themselves.**
- a. That the A/YSA take immediate steps to ensure that all youths are photographed and that photos are placed in each case file.
 - b. That the A/YSA immediately put into place interim procedures and performance standards for the ALC until a permanent document is approved. We recommend that the procedures emphasize the need for prompt notification of MPD when custody orders have been signed, the transmittal of key identifying information to MPD, including photographs; the conduct of field investigations in all cases, and diligence in efforts to locate absconders as soon as possible.
 - c. That the A/YSA seek to expedite approval among all concerned agencies of the draft MOU on abscondence policies and procedures, so that ALC and MPD roles and responsibilities regarding locating and apprehending absconders can be clarified and implemented quickly.
9. **DCCP lacks written policies and procedures for many key operations.**
- That the A/YSA expedite the process of establishing written policies and procedures for all key functions within DCCP.

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10. **DCCP did not provide requested position descriptions (PDs) and performance standards for all employees.**

That the A/YSA establish written position descriptions and performance standards for all DCCP employees.

Licensing, Monitoring and Quality Assurance Unit:

11. **Not all group and shelter home employees are undergoing pre-employment tests for illegal drug use and alcohol abuse.**

- a. That A/YSA ensure that pre-employment tests for drugs and alcohol are conducted on contractor employees prior to hiring.
- b. That A/YSA ensure that test results are maintained in each contract employee's personnel records.

12. **Not all group and shelter home employees are undergoing pre-employment and follow-up physical examinations as required by District regulations.**

- a. That the A/YSA ensures that all prospective contract employees undergo a pre-employment examination.
- b. That the A/YSA ensures that all contract employees undergo follow-up examinations every 24 months.

13. **Available services for home-based counseling, mentoring, and after-school enrichment programs often go unused.**

That the A/YSA take appropriate action to ensure that DCCP case managers and their supervisors do a better job of providing home-based counseling, mentoring, and after-school enrichment programs to YSA youths.

Pre-Trial and Community-Based Services:

14. **YSA's electronic monitoring unit is not effectively monitoring youths in the evenings and on weekends.**

That the A/YSA secure personnel necessary to respond promptly to all after-hours and weekend violation alerts.

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15. **Current tours-of-duty for case managers in the Alternative Detention Division (ADD) do not adequately cover evenings and weekends when youths are at higher risk of delinquency.**

That the Chief of the ADD meet with YSA's human resources specialist and the ADD case managers to discuss the feasibility of revising tours-of-duty of current case managers to include some evening and weekend hours or hiring employees specifically to work evenings and weekends.

16. **ADD case managers are often impeded by delayed court orders and by a lack of vital case information.**

a. That the Chief of the ADD and the supervisor of the Court Liaison Unit meet with representatives from the DC Superior Court Social Services Division to (1) identify why ADD case managers do not receive all of the court orders and information they require to begin working with a youth, and (2) devise improvements in the flow of information between the Court and YSA.

b. That the supervisor of DCCP's Court Liaison unit take action to ensure that Court Liaison representatives obtain the requisite signatures on all information release forms and youth participation agreements.

17. **ADD case managers feel that current fieldwork practices are unsafe.**

a. That the A/YSA convene a meeting with all personnel who do field work to discuss ways in which the Division can improve safety and effectiveness while working with families in their homes and neighborhoods.

b. That the A/YSA work with the Washington, DC-based National Association of Social Workers to (a) develop policies and procedures that address case managers' safety; (b) identify applicable training opportunities that focus on areas such as non-violent self defense and de-escalation techniques.

c. That the A/YSA assess the feasibility of implementing a "partner system" in order to reduce the number of instances when case managers must visit client homes alone.

18. **The Central Processing Unit does not have a TB infection control program for employees.**

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- a. That the A/YSA organize an information session(s) during which all CPU employees, as well as any other front-line corrections employees at YSA who wish to participate, receive a fundamental understanding of tuberculosis transmission, the frequency with which TB appears in juvenile facilities, and the risks, if any, posed by exposure.
- b. That the A/YSA implement a baseline skin-testing program for all front-line YSA corrections employees.

19. ADD lacks a youth vocation, employment and training coordinator.

That the A/YSA approve the hiring of a vocation and employment coordinator who would (1) focus exclusively on identifying opportunities and maintaining relationships with public and private sector training programs and employers, and (2) assist ADD case managers with matching youths to employment and training opportunities.