

STATE OF COLORADO



Colorado Department of Human Services

people who help people

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John W. Hickenlooper
Governor

Reggie Bicha
Executive Director

August 6, 2012

Dianne E. Ray, CPA
State Auditor
Colorado Office of the State Auditor
200 East 14th Avenue, 2nd Floor
Denver, CO 80203

Dear Ms. Ray:

In response to your request dated July 10, 2012, we have prepared a status report regarding the implementation of audit recommendations contained in the November 2011 *Division of Youth Corrections Performance Audit*. The enclosed status report provides a brief explanation of the actions taken by the Colorado Department of Human Services to implement each recommendation.

If you have questions related to the status report, please contact John Gomez at (303) 866-7341 or by email at john.gomez@state.co.us. A representative from the Department will attend the hearing to present the enclosed status report.

Sincerely,

A handwritten signature in black ink that reads 'Reggie Bicha'.

Reggie Bicha
Executive Director

Enclosure

cc: Nikki Hatch, Deputy Executive Director of Operations
Julie Krow, Director, Office of Children, Youth & Families
Jay Morein, Director, Office of Performance & Strategic Outcomes
John Gomez, Director, Division of Youth Corrections
Charissa Hammer, Director, Audit Division

AUDIT RECOMMENDATION STATUS REPORT

AUDIT NAME: Division of Youth Corrections Safety Audit

AUDIT NUMBER: 2136

DEPARTMENT/AGENCY/ENTITY: Division of Youth Corrections

DATE: November 2011

SUMMARY INFORMATION

Please complete the table below with summary information for all audit recommendations. For multi-part recommendations, list each part of the recommendation SEPARATELY. (For example, if Recommendation 1 has three parts, list each part separately in the table.)

Recommendation Number	Agency's Response (agree, partially agree, disagree)	Original Implementation Date (as listed in the audit report)	Current Implementation Status (Implemented, Implemented and Ongoing, Partially Implemented, Not Implemented, or No Longer Applicable) <i>Please refer to the attached sheet for definitions of each implementation status option.</i>	Revised Implementation Date (Complete only if agency is revising the original implementation date.)
1	Agree	a. February 2012 b. June 2012	a. Implemented b. Implemented	
2	Agree	a. July 2013 b. July 2012 c. July 2012 d. July 2013	a. Partially Implemented b. Implemented and Ongoing c. Implemented d. Partially Implemented	
3	Agree	July 2012	Implemented	
4	Agree	a. February 2012 b. June 2012	a. Implemented b. Implemented	
5	Agree	a. July 2012 b. February 2012 c. Implemented d. December 2012	a. Implemented b. Implemented c. Implemented d. Partially Implemented	

DETAIL OF IMPLEMENTATION STATUS

Recommendation Number: 1

Agency Addressed: Division of Youth Corrections

Recommendation Text in Audit Report: The Division of Youth Corrections should ensure room assignments are appropriate by improving the implementation of the vulnerability assessment instrument. Specifically, the Division should:

- a. Revise Division policies related to the vulnerability assessment to clarify how facilities are expected to respond to the questions and to guide facility staff on interpreting results, including identifying acceptable criteria for overrides.
- b. Provide additional and on-going training to staff members on the purpose of vulnerability assessments and how to administer the tool and interpret the results.

Agency's Response (i.e., Agree, Partially Agree, or Disagree): Agree

Agency's Written Response in Audit Report:

a. Implementation Date: February 2012.

1. The Division of Youth Corrections will revise Policy 9.19-Sexual Contact Prevention Policy and Policy 16.1 – Admission, Reception and Orientation Policy to reflect procedural expectations for administering the vulnerability assessment instrument. Division Policy 9.19 – Sexual Contact Prevention includes the vulnerability assessment instrument as an attachment.
2. The Division will include specific instructions on how to interpret the results of the vulnerability assessment and will also develop criteria for overriding, when necessary, the results of the instrument.
3. All newly hired direct care staff receive training on the vulnerability assessment instrument in the Division's pre-service training academy.

Agency's Current Comments on Implementation Status of Recommendation: Implemented

1. Policy 9.19 has been revised to include a requirement that all facilities will utilize the Sexually Aggressive Behavior/Vulnerability to Victimization (SAB/VV) Interpretation Guide when administering the instrument.
2. The Division of Youth Corrections has created the Sexually Aggressive Behavior/Vulnerability to Victimization (SAB/VV) Interpretation Guide to provide clarity, instruction and guidance to staff on how to interpret the results of the instrument. The SAB/VV Interpretation Guide includes specific criteria for overriding the instrument
3. Training has been developed and implemented for current staff and has been added to the DYC Pre-Service Academy for new hires.

Recommendation Number: 1

Agency Addressed: Division of Youth Corrections

Recommendation Text in Audit Report: The Division of Youth Corrections should ensure room assignments are appropriate by improving the implementation of the vulnerability assessment instrument. Specifically, the Division should:

- a. Revise Division policies related to the vulnerability assessment to clarify how facilities are expected to respond to the questions and to guide facility staff on interpreting results, including identifying acceptable criteria for overrides.
- b. Provide additional and on-going training to staff members on the purpose of vulnerability assessments and how to administer the tool and interpret the results.

Agency's Response (i.e., Agree, Partially Agree, or Disagree): Agree

Agency's Written Response in Audit Report:

b. Implementation Date June 2012.

1. The Division's Office of Staff Development will review and strengthen the initial pre-service vulnerability assessment training and will also update the Division's Prison Rape Elimination Act (PREA) training curriculum, which will be provided annually to staff in facilities to include further training on administering, interpreting, and designating room assignments through use of the vulnerability assessment. As the Division continues to make improvements to, and provide additional training on, the vulnerability assessment process, the Division will continue to use the vulnerability assessment instrument, which mandates that a youth not be assigned a roommate if a youth scores high for either risk of victimization or risk for sexually aggressive behavior.

Agency's Current Comments on Implementation Status of Recommendation: Implemented

1. Yearly training for current staff and pre-service training for new hires has been updated and improved in the areas of administering, interpreting and designating room assignments.

Recommendation Number: 2

Agency Addressed: Division of Youth Corrections

Recommendation Text in Audit Report:

The Division of Youth Corrections (the Division) should ensure that behavior management programs used by all state- and contractor-operated facilities follow proven models. Specifically, the Division should:

- a. Develop and maintain an inventory of evidence-based practices in behavior management programs used at facilities.
- b. Identify proven models to make available to facilities to use.
- c. Ensure facilities properly implement proven models by instituting quality assurance reviews of behavior management programs as a part of the annual monitoring process.
- d. Develop key performance indicators for behavior management programs and require facilities to report on these measures at least annually. The Division should use these performance indicators to determine whether behavior management programs are effective and identify areas for improvements at facilities

Agency's Response (i.e., Agree, Partially Agree, or Disagree): Agree

Agency's Written Response in Audit Report:

Agree. The Division agrees that it is beneficial to identify proven models of behavior management and to inventory current practices within facilities. The Division also agrees that an ongoing assessment is necessary to ensure fidelity to the models in use by facilities. The Division currently utilizes an Evidence-Based Practice Inventory to evaluate state and contractor-operated program adherence to evidence-based practices.

a. Implementation date: July 2013.

1. The Division will compile and maintain an inventory of evidence based practices in behavior management in use in facilities through the administration of the Division's internally developed Evidence-Based Practice Inventory instrument. The Evidence-Based Practice Inventory is a comprehensive program assessment that covers all aspects of programming, including behavior management. Currently, the Division has inventoried approximately 40 percent of all state- and contractor-operated programs using the Evidenced Based Practice Inventory. Through its work with an outside consultant, the Division will continue to train internal staff to ensure that the Division can complete the remaining inventories and have the internal capacity to continue this process in the future.

Agency's Current Comments on Implementation Status of Recommendation: Partially Implemented

This action plan is due July 2013. The Division has made progress on developing internal expertise to administer the inventory instrument, and continues to work on completion of program assessments.

Recommendation Number: 2

Agency Addressed: Division of Youth Corrections

Recommendation Text in Audit Report:

The Division of Youth Corrections (the Division) should ensure that behavior management programs used by all state- and contractor-operated facilities follow proven models. Specifically, the Division should:

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- b. Identify proven models to make available to facilities to use.
- c. Ensure facilities properly implement proven models by instituting quality assurance reviews of behavior management programs as a part of the annual monitoring process.
- d. Develop key performance indicators for behavior management programs and require facilities to report on these measures at least annually. The Division should use these performance indicators to determine whether behavior management programs are effective and identify areas for improvements at facilities

Agency's Response (i.e., Agree, Partially Agree, or Disagree): Agree

Agency's Written Response in Audit Report:

b. Implementation date: July 2012.

1. The Division agrees to identify evidence-based practices and evidence based models related to behavior management programs and provide this information to both state- and contractor-operated programs. The Division will use a variety of venues to keep providers informed of emerging best practices, including the Division's Provider Council and quarterly provider meetings, as well as posting information on the Division's website. As stated in the Division's response to part c below, the Division will also continue to gather information about facility practices and provide technical assistance to both state- and contractor-operated programs.

Agency's Current Comments on Implementation Status of Recommendation: Implemented and Ongoing

The Division has researched evidence-based practice behavior management programs. Through literature review, the Division has found that:

- Regarding the efficacy of specific behavior management (milieu management) models little has been proven to be effective using scientific, randomized studies. Most strategies applied nationally are experimental or based upon observations.
- The limited body of literature is focused upon educational, school based approaches that have been transferred to the juvenile justice system and facility management.

- There are approaches, however, that are proven not to work and may even demonstrate negative outcomes. Thirty years of research seems to show that Positive Peer Culture not only may not work but also may impede safe and productive behavior management.
- Although not an evidence-based program per se, the International Association for Correctional and Forensic Psychology has created standards that describe current best practice.
- Trauma Informed Care research and practice, a current initiative in the Division and the larger Department, will bring about very positive changes in how NYC facilities manage behavior and the overall milieu.

There are common elements among promoted approaches:

- Asset or strengths based approaches,
- Well trained staff that are familiar with the theoretical and applied aspects of a given model,
- Written curriculum that provides structure to the approach,
- Cognitive-behavioral (thinking error) approaches are characteristic of good programs, and
- Behavioral management programs should be individualized and based on client needs and issues.

From the literature review, the Division's knowledge of best practice, and the Division's ongoing assessment of State-operated facilities, the Division will:

1. Continue to assess both State-operated and private, contract programs for adherence to evidence-based principles on an ongoing basis.
2. Cease using any behavior management program that has been shown to lead to negative outcomes, as identified through the Division's research.
3. Continue to evaluate programs to determine whether or not facility practices align with the standards of the International Association for Correctional and Forensic Psychologists and adjust programming as necessary.

Through program assessment, Multi-Disciplinary Team Decision Making meetings and the application of standards, the Division will continue to work to ensure programming is individualized to the cognitive abilities of youth and is strengths based.

Recommendation Number: 2

Agency Addressed: Division of Youth Corrections

Recommendation Text in Audit Report:

The Division of Youth Corrections (the Division) should ensure that behavior management programs used by all state- and contractor-operated facilities follow proven models. Specifically, the Division should:

- a. Develop and maintain an inventory of evidence-based practices in behavior management programs used at facilities.
- b. Identify proven models to make available to facilities to use.
- c. Ensure facilities properly implement proven models by instituting quality assurance reviews of behavior management programs as a part of the annual monitoring process.
- d. Develop key performance indicators for behavior management programs and require facilities to report on these measures at least annually. The Division should use these performance indicators to determine whether behavior management programs are effective and identify areas for improvements at facilities

Agency's Response (i.e., Agree, Partially Agree, or Disagree): Agree

Agency's Written Response in Audit Report:

c. Implementation date: July 2012.

1. The Division will continue to utilize the Evidence-Based Practice Inventory instrument and/or program assessments to analyze practices at state- and contractor-operated facilities.
2. The Division will identify specific elements of the Evidence-Based Practice Inventory instrument that can be aggregated and compared across programs, and will include these elements in its program monitoring process to ensure that programs are implementing these practices appropriately.

Agency's Current Comments on Implementation Status of Recommendation: Implemented

1. The Division has added a section to the Evidence-Based Practice Inventory specific to behavior management programming in facilities.
2. The Division will be using the instrument to continue assessing programs with the added element described above. The "Milieu Based Programs" section of the instrument will allow the Division to record and compare programs.

Recommendation Number: 2

Agency Addressed: Division of Youth Corrections

Recommendation Text in Audit Report:

The Division of Youth Corrections (the Division) should ensure that behavior management programs used by all state- and contractor-operated facilities follow proven models. Specifically, the Division should:

- a. Develop and maintain an inventory of evidence-based practices in behavior management programs used at facilities.
- b. Identify proven models to make available to facilities to use.
- c. Ensure facilities properly implement proven models by instituting quality assurance reviews of behavior management programs as a part of the annual monitoring process.
- d. Develop key performance indicators for behavior management programs and require facilities to report on these measures at least annually. The Division should use these performance indicators to determine whether behavior management programs are effective and identify areas for improvements at facilities

Agency's Response (i.e., Agree, Partially Agree, or Disagree): Agree

Agency's Written Response in Audit Report:

d. Implementation date: July 2013.

1. The Division agrees to utilize the Evidence-Based Practice Inventory to develop and track performance indicators for state-operated and contract facilities. Information will be gathered through the use of the Evidence-Based Practice Inventory, program assessments, and monitoring visits. The Division will implement collection and tracking of these indicators once the most effective elements of the instrument have been identified and field tested through the monitoring process.

Agency's Current Comments on Implementation Status of Recommendation: Partially Implemented

This action item is not due until July 2013. The Division has made progress toward design of several key performance indicators, and will be implementing a process that will allow for tracking these indicators.

Recommendation Number: 3

Agency Addressed: Division of Youth Corrections

Recommendation Text in Audit Report:

The Division of Youth Corrections (the Division) should ensure that both state and contractor-operated facilities are affording youth due process protections prior to initiating disciplinary sanctions or suspending normal programming by increasing the scope and depth of quality assurance and monitoring reviews of facilities' adherence to due process controls for major rule violations and special management programs. Additionally, the Division should take immediate action to stop the facility discussed above from using the staff control special management program, and take personnel action, as appropriate, to hold staff responsible for implementing staff control programs.

Agency's Response (i.e., Agree, Partially Agree, or Disagree): Agree

Agency's Written Response in Audit Report:

Implementation date: July 2012.

1. In order to ensure due process protections, the Division's state-operated facilities will develop standardized key performance indicators, reported on a monthly basis, outlining facilities' compliance with due process protections for youth.
2. The Division will work with the Governor's Office of Information Technology to complete a Trails revision to ensure full documentation of due process procedures.
3. Additionally, the Division's Quality Assurance Unit will incorporate a review of key performance indicators and documentation in its regular monitoring processes to ensure that both state- and contractor-operated facilities are in compliance with all relevant due process requirements.
4. Upon receiving information from the audit staff, the Division immediately discontinued use of the one specific staff control program cited in the report, and through its monitoring process, the Division will ensure that this approach is not used by any facility in the future. At this particular facility cited in the audit report, the Division will use the performance management process to ensure appropriate use of behavior management programming, and will continue enhanced monitoring of this facility as long as needed.
5. Additionally, the Division will develop implementing procedures within state-operated facilities for the use of modified programming as a milieu management tool, and will ensure that these procedures meet all federal, state, and local laws in addition to complying with Department of Human Services and Division policy. Implementing procedures for modified programming will be reviewed and approved by the Division's Directors of Facility Operations, and the Division will ensure compliance through its monitoring process.

Agency's Current Comments on Implementation Status of Recommendation: Implemented

1. The Division has developed standardized key performance indicators that address the issue of youth due process rights in State-operated facilities. Each month, each State-operated facility reports on these indicators in addition to the information previously collected. This data is then aggregated into a monthly report for the Division of Youth Corrections' Leadership Team review.
2. The Division worked with the Governor's Office of Information Technology to make changes to the TRAILS system to ensure proper documentation of due process protections. The incident report and the Disciplinary Hearing report have been revised.
3. The FY 2012-13 Division of Youth Corrections' Audit Standards include a review of due process protections, which will be incorporated into the Division's auditing process.
4. The staff control process highlighted by the audit report was stopped immediately upon receiving information from the audit team. Since the audit, the Division has completed a comprehensive program assessment of the facility and a DYC facility audit has been conducted. In addition, the South Central Director of Facility Operations has increased the amount of time spent at the facility. Since the audit findings were released, the Division has appointed a new Director and Assistant Director of the facility.
5. The Division created policy to provide specific guidance around the use of modified programming. These guidelines provide a structure for the use and oversight of modified programming. Implementing procedures are currently being reviewed by the Directors of Facility Operations for final approval and implementation.

Recommendation Number: 4

Agency Addressed: Division of Youth Corrections

Recommendation Text in Audit Report:

The Division of Youth Corrections (the Division) should improve its handling of sexual contact incidents. Specifically, the Division should improve its tracking and reporting of sexual contact incidents by:

- a. Ensuring that facilities document incidents involving sexual misconduct in Trails in a way that allows the incident to be identified as sexual misconduct and included in the required Prison Rape Elimination Act (PREA) of 2003 reports. Additionally, training staff to ensure they use the “other” category for critical incidents and major rule violations appropriately and complete notification and follow-up fields for all incidents related to sexual contact.
- b. Requiring facilities to report all sexual misconduct incidents to the Facility Director, including consensual incidents, to ensure that the Facility Director can investigate the consensual incidents; take action to report the incidents to county departments of social services and/or law enforcement if, in fact, the incidents are found to be nonconsensual; and provide treatment for youth when needed.

Agency’s Response (i.e., Agree, Partially Agree, or Disagree): Agree

Agency’s Written Response in Audit Report:

a. Implementation date: February 2012.

1. The Division will work with the Governor’s Office of Information Technology to modify the pick list options for sexual incidents in the Trails database in order to significantly reduce the need to select the “other” category, and will improve tracking and reporting of sexual misconduct incidents for PREA purposes.
2. The Division will also provide training to staff on the new pick list options and appropriate use of the “other” category.
3. In addition, the Division will revise Division Policy 9.19 – Sexual Contact Prevention to include a specific location in Trails to document notification to the Facility Director, or his or her designee, regarding all sexual incidents as well as the location of all documentation in Trails regarding all follow-up information related to the incident.

Agency’s Current Comments on Implementation Status of Recommendation: Implemented

1. Pick list options for sexual incident documentation in TRAILS have been modified and implemented. This will reduce the use of the “other” category. Pick list options that have caused confusion have been deleted and new options that are more descriptive of actual incidents have been added.
2. Training has been provided for Facility Directors on DYC Policy 9.19. An element of that training is the use of the “other” category and the requisite Director approval.

3. Revision to Policy 19.1 has been made that includes the proper notification to facility directors for all acts of sexual misconduct. In addition, policy has also been updated to include specific requirements for facility directors to document follow up information and where it is to be documented.

Recommendation Number: 4

Agency Addressed: Division of Youth Corrections

Recommendation Text in Audit Report:

The Division of Youth Corrections (the Division) should improve its handling of sexual contact incidents. Specifically, the Division should improve its tracking and reporting of sexual contact incidents by:

- a. Ensuring that facilities document incidents involving sexual misconduct in Trails in a way that allows the incident to be identified as sexual misconduct and included in the required Prison Rape Elimination Act (PREA) of 2003 reports. Additionally, training staff to ensure they use the “other” category for critical incidents and major rule violations appropriately and complete notification and follow-up fields for all incidents related to sexual contact.
- b. Requiring facilities to report all sexual misconduct incidents to the Facility Director, including consensual incidents, to ensure that the Facility Director can investigate the consensual incidents; take action to report the incidents to county departments of social services and/or law enforcement if, in fact, the incidents are found to be nonconsensual; and provide treatment for youth when needed.

Agency’s Response (i.e., Agree, Partially Agree, or Disagree): Agree

Agency’s Written Response in Audit Report:

b. Implementation date: June 2012.

1. Modification of Division Policy 9.19 – Sexual Contact Prevention will include clarifying requirements to ensure that staff are reporting all sexual incidents to the Facility Director, or his or her designee.
2. Pursuant to Section 19-3-304, C.R.S., Division Policy 9.17 – Reporting Alleged Child Abuse, and Division Policy 9.19 – Sexual Contact Prevention, Division staff are mandatory reporters in any case of suspected abuse. Thus, the Division currently follows this mandate and will continue to follow this mandate to report alleged sexual incidents to county departments of social/human services and/or law enforcement. The Division will also continue to provide safety planning and treatment services for youth when needed.

Agency’s Current Comments on Implementation Status of Recommendation: Implemented

1. Modifications to DYC Policy 9.19 have been completed to ensure that DYC staff are clearly identified as mandatory reporters and to include required responses to allegations of sexual misconduct.
2. Policy also includes required steps to ensure victim safety that include safety plans, separation of the alleged aggressor and victim, and personnel actions.

Recommendation Number: 5

Agency Addressed: Division of Youth Corrections

Recommendation Text in Audit Report:

The Division of Youth Corrections (the Division) should develop a clear, consistent method to collect and analyze data on the safety, security, and service needs of all detained and committed youth. Specifically, the Division should:

- a. Work with contractor-operated facilities to develop standardized survey questions for the youth survey on sexual contact so that those facilities' survey data can be comparable to data related to youth served in state operated facilities.
- b. Revise Division policy to require a standardized youth survey of youth service needs at state-operated and contractor-operated facilities. In addition, the Division should ensure that those surveys include a question or series of questions about youth safety and security.
- c. Ensure that the youth survey on sexual contact is administered confidentially at state-operated facilities, in accordance with the Division's policy.
- d. Compile survey data for both the survey on youth service needs and survey on sexual contact and provide the data to the Division leadership team to use to identify trends and safety risks to be addressed at facilities

Agency's Response (i.e., Agree, Partially Agree, or Disagree): Agree

Agency's Written Response in Audit Report:

a. Implementation date: July 2012.

The Division will require all contractor-operated facilities to use the same sexual contact survey currently in use at all state-operated facilities. This survey is consistent with the survey developed by the U.S. Department of Justice, Bureau of Justice Statistics and is aligned with the Prison Rape Elimination Act (PREA) of 2003. Survey report criteria and collection time frames will be consistent with state operated facilities to ensure data analysis is comparable.

Agency's Current Comments on Implementation Status of Recommendation: Implemented

Policy 9.19 has been revised to require the same Sexual Contact Prevention survey be used by all facilities. The survey is aligned with U.S. Department of Justice, Bureau of Justice Services and the Prison Rape Elimination Act. Time frames have been clarified and are consistent.

Recommendation Number: 5

Agency Addressed: Division of Youth Corrections

Recommendation Text in Audit Report:

The Division of Youth Corrections (the Division) should develop a clear, consistent method to collect and analyze data on the safety, security, and service needs of all detained and committed youth. Specifically, the Division should:

- a. Work with contractor-operated facilities to develop standardized survey questions for the youth survey on sexual contact so that those facilities' survey data can be comparable to data related to youth served in state operated facilities.
- b. Revise Division policy to require a standardized youth survey of youth service needs at state-operated and contractor-operated facilities. In addition, the Division should ensure that those surveys include a question or series of questions about youth safety and security.
- c. Ensure that the youth survey on sexual contact is administered confidentially at state-operated facilities, in accordance with the Division's policy.
- d. Compile survey data for both the survey on youth service needs and survey on sexual contact and provide the data to the Division leadership team to use to identify trends and safety risks to be addressed at facilities

Agency's Response (i.e., Agree, Partially Agree, or Disagree): Agree

Agency's Written Response in Audit Report:

b. Implementation date: February 2012.

1. The Division will revise its general youth survey currently in use at all state-operated facilities to include a standardized section on service needs.
2. The Division will also revise Division Policy 17.1 – Scope of Programs and Services for Detention Facilities and Division Policy 17.7 – Scope of Programs and Services for Institutional Facilities, requiring all state- and contractor-operated facilities to use the revised youth survey and to conduct youth surveys at least once per year.
3. The survey will continue to ask at least one specific question about youth safety.

Agency's Current Comments on Implementation Status of Recommendation: Implemented

1. The general youth survey has been revised to include a section on service needs.
2. Policies 17.1 and 17.7 have been combined into one policy – 17.1. Revisions include a requirement for all facilities to use the same survey.
3. Revisions have been made to the “Youth Survey” to include a specific question regarding youth safety.

Recommendation Number: 5

Agency Addressed: Division of Youth Corrections

Recommendation Text in Audit Report:

The Division of Youth Corrections (the Division) should develop a clear, consistent method to collect and analyze data on the safety, security, and service needs of all detained and committed youth. Specifically, the Division should:

- a. Work with contractor-operated facilities to develop standardized survey questions for the youth survey on sexual contact so that those facilities' survey data can be comparable to data related to youth served in state operated facilities.
- b. Revise Division policy to require a standardized youth survey of youth service needs at state-operated and contractor-operated facilities. In addition, the Division should ensure that those surveys include a question or series of questions about youth safety and security.
- c. Ensure that the youth survey on sexual contact is administered confidentially at state-operated facilities, in accordance with the Division's policy.
- d. Compile survey data for both the survey on youth service needs and survey on sexual contact and provide the data to the Division leadership team to use to identify trends and safety risks to be addressed at facilities

Agency's Response (i.e., Agree, Partially Agree, or Disagree): Agree

Agency's Written Response in Audit Report:

c. Implementation date: Implemented.

Approximately 18 months ago, the Division implemented a revised procedure to ensure that all state-operated facilities administer sexual contact surveys through a confidential process. Consistent statewide protocols for collection methods are imposed on facilities to ensure the respondents' anonymity.

Agency's Current Comments on Implementation Status of Recommendation: Implemented

DYC Policy 9.19 was revised to ensure that youth are afforded an opportunity to complete the PREA survey in a confidential manner. Also, the survey includes statements to the juvenile that the process is confidential. Instructions to staff administering the survey reinforce the confidential nature of the process.

Recommendation Number: 5

Agency Addressed: Division of Youth Corrections

Recommendation Text in Audit Report:

The Division of Youth Corrections (the Division) should develop a clear, consistent method to collect and analyze data on the safety, security, and service needs of all detained and committed youth. Specifically, the Division should:

- a. Work with contractor-operated facilities to develop standardized survey questions for the youth survey on sexual contact so that those facilities' survey data can be comparable to data related to youth served in state operated facilities.
- b. Revise Division policy to require a standardized youth survey of youth service needs at state-operated and contractor-operated facilities. In addition, the Division should ensure that those surveys include a question or series of questions about youth safety and security.
- c. Ensure that the youth survey on sexual contact is administered confidentially at state-operated facilities, in accordance with the Division's policy.
- d. Compile survey data for both the survey on youth service needs and survey on sexual contact and provide the data to the Division leadership team to use to identify trends and safety risks to be addressed at facilities

Agency's Response (i.e., Agree, Partially Agree, or Disagree): Agree

Agency's Written Response in Audit Report:

d. Implementation date: December 2012.

The Division will review and compile data for both the youth survey and the sexual contact survey to identify trends and safety risks to be addressed at facilities. The Division will collect these data from both state- and contractor-operated facilities on a quarterly or biannual basis (depending upon the survey and the population being surveyed), and the Division's Leadership Team will review the data at a minimum of once annually.

Agency's Current Comments on Implementation Status of Recommendation: Partially Implemented

This action is not due until December 2012; however the Division has revised DYC Policies 9.19 and 17.1 to ensure surveys are conducted either quarterly or bi-annually. Survey results will be compiled and reviewed by the Division's Leadership Team.