

Oklahoma Office of Juvenile Affairs Performance Assessment

Agency Performance and Accountability Commission

December 2018

Report Prepared By

BKD

CPAs & Advisors

CONSULTANT REPORT

Agency Performance and Accountability Commission
5005 North Lincoln Boulevard
Oklahoma City, OK 73102

We are pleased to provide our report on the *Performance Assessments of the Oklahoma Office of Juvenile Affairs* performed by **BKD, LLP** (BKD). We want to thank the Office of Juvenile Affairs (OJA) management and staff members who contributed to our efforts.

We have performed the procedures enumerated in the Scope and Procedures section of the report, which were agreed to by you pursuant to our engagement agreement, dated August 17, 2018, to directly assist OJA to perform the specified consulting services. Our services were performed in conformance with International Standards for the Professional Practices of Internal Auditing established by the Institute of Internal Auditors.

This engagement was limited in scope and not designed to prevent or discover errors, misrepresentations, fraud or illegal acts. Inherent limitations in any internal control structure are that errors, fraud, illegal acts or instances of noncompliance may occur and not be detected. Controls may become inadequate because of changes in conditions or deterioration in design or operation. Two or more people may also circumvent controls or management may override the system.

We were not engaged to provide an opinion with respect to the effectiveness of your controls over financial reporting or the degree of compliance with your policies and procedures or applicable laws and/or regulations. Accordingly, we do not express such an opinion. Our procedures were performed on an interview and test basis only and cannot be relied upon to detect all errors or violations of laws, regulations or Company policy. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

BKD, LLP

BKD, LLP

December 7, 2018

EXECUTIVE SUMMARY

BACKGROUND

Created in 1995, the Oklahoma Office of Juvenile Affairs (OJA) is responsible for coordinating educational, rehabilitative and secure services for the young people currently involved or at-risk of entering the State's juvenile justice system. OJA currently provides two secure facilities and contracts with 17 detention centers, 15 group homes and a number of independently-contracted, community-based providers — all of which provide a variety of services for at-risk and detained youth. The OJA is governed by a board appointed by the Governor with consent of the Oklahoma Senate.

The OJA's primary responsibilities include:

- Enforcing the various provisions outlined in the Oklahoma Juvenile Code
- Planning of the various programs and functions utilizing study based research to guide curriculum
- Establishing and Maintaining facilities and institutions for the operation of programs for children under OJA jurisdiction

The major departments of the OJA include:

- The Division of Institutional Services who maintains the two (2) medium secure facilities.
- The Division of Community-Based Services who manages and monitors the Community-Based Service Agencies for local youth; as well as providing intake, probation and parole services and statewide placement services for youth. They also handle the programs outside of the scope of the Community Based Youth Services Agencies.

SCOPE AND PROCEDURES

BKD was engaged by the Agency Performance and Accountability Commission (APAC) to complete a performance assessment to evaluate the effectiveness and efficiency of the OJA. The assessment had four primary objectives:

Objective 1

Conduct a diagnostic analysis of services provided by the OJA to assess whether services are legally mandated, evaluate process documentation (policies, procedures, etc.), identify potential inefficiencies and process improvements, and identify opportunities for internal alignment and shared services.

Objective 2

Assess OJA's performance measurement for achieving or non-achieving against established goals and objectives.

Objective 3

Conduct an assessment of the organizational structure of the agency and identify improvements to help the OJA achieve their maximum potential.

Objective 4

Recommend opportunities regarding cost savings, revenue generation, elimination of services, private sector provider of services, identification of best practices that can be implemented, public-private-partnerships, consolidation, outsourcing and statutory and/or regulatory changes.

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

To achieve the objectives provided by the APAC, we assessed processes and procedures relating to OJA's programs and support services including; accounting and finance, capital asset management, administration and legal, human resources and information services. We obtained and assessed information and data to measure operations through qualitative and quantitative metrics relating to OJA's operations. This included, but was not limited to, capital assets, performance measures, budgeting, vendors, accounting function, employees, legislation and regulations and the Oklahoma Youth Academy. We conducted interviews with various OJA staff personnel, as well as each of the members of the OJA Board of Directors.

The recommendations contained within this report reflect our performance assessment of OJA based on the guidelines provided by the four objectives. As a result of the observations from this assessment, we recommended opportunities (internal, external and public-private partnerships) for the State and the OJA's consideration and approval. The recommendations were designed to address the goals of the effort, including putting the OJA on a more sustainable financial and operational footing going forward and drive the agency towards a more outcomes-based future. At the request of APAC, we further prioritized and selected the following 10 recommendations as potentially the most impactful opportunities.

We found the OJA leadership team to be extraordinarily responsive to our requests for information and very helpful during the engagement. Their team was energetic, transparent and thoughtful about potential opportunities to improve the organization. The support provided by the OJA team was critical to the success of our assessment.

TOP 10 RECOMMENDATIONS

As requested, we have judgmentally identified 10 of the most important recommendations for the client's consideration. A summarized version of these recommendations follows:

- 1) BKD recommends OJA consider providing an online virtual option for the Oklahoma Youth Academy Charter School (OYACS) curriculum for students after they leave OJA secure facilities. Education is a critical component of the successful outcome of a Juvenile under OJA's care. Due to factors such as gaps in attendance, multiple placements, and lack of family advocates, it is not unusual for students in custody education programs to enroll with out of-date individual education programs. Students often continue to fall further behind their peers when they move from one facility to another. Since the curriculum is already developed, OJA would need to evaluate the current service providers and select one provider that is already approved by the Oklahoma legislature to develop, operate, and service the online classroom. *BKD notes this recommendation will require legislative proposal. **Innovation Tournament Winner*** (Oklahoma Youth Academy Charter School, Recommendation 1, page 44)
- 2) BKD recommends OJA consider removing or limiting parts of the requirements for the OJA to only work with designated Community-Based Youth Services (CBYS) providers. This additional flexibility will promote more competition among these providers and allow additional service providers to more easily enter the market. This may also promote more innovative service approaches that depart from conventional models. There are currently 40 CBYS providers; therefore, OJA is paying for 40 directors, 40 facilities, etc. while not incentivizing CBYS providers to be more efficient. *BKD notes this recommendation will require legislative proposal.* (Program and Program Performance, Recommendation 9, page 26)
- 3) Due to the advancements in technological capacity, speed and mobility, there are a number of technology improvements that could be implemented to help OJA run more efficiently and save employees time. In particular, OJA should explore options to utilize audio/video technology including applications in education, rehabilitation, monitoring and coordination with other system partners (courts, district attorneys, defenders, department of human services, etc.). We recommend OJA evaluate and prioritize technology solutions and coordinate with OMES and select partners to initiate a pilot project. (Information Systems, Recommendation 7, page 61)
- 4) BKD recommends that OJA initially build seven of the nine residential cottages allowed for in the masterplan due to the declining trend in population in Oklahoma secure detention facilities. The project is expected to occur in two major construction phases and will consist of multiple sub-phases to complete the project while maintaining an operational and secure facility. Phase 1 will consist of building four residential cottages and building/renovating

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

support buildings and Phase 2 will consist of building at least three residential cottages for a total of seven cottages. Flexibility should be maintained in the project to build the additional two cottages at a later date if the additional space is required. It is further recommended that OJA consider utilizing construction audit services during the construction of the NGF (New Generation Facility) to assist in minimizing the risks associated with a construction project and to control costs. (Facilities, Recommendation 13, page 41)

- 5) BKD recommends that OJA utilize more data and predictive analytics to measure effectiveness of its programs and services. The OJA currently measures the performance of its programs and employees through three processes: agency strategic plan metrics, performance based standards and employee performance reviews. However, evidence-based and outcome-driven programming have become highly prevalent in the juvenile justice field over the last decade. Certain states have adopted legislation to measure the performance of programs and treatment for juvenile offenders and base program funding on performance measurements. Specifically, more data would be useful to measure the long-term outcomes of youth who participate in programs and services and to improve program effectiveness. Capturing more performance data and data on services being provided may have the added benefit of helping the legislature visualize the efforts, progress, and the needs of OJA. (Program and Program Performance, Recommendation 11, page 28)
- 6) BKD recommends strategically right-size the number of Regional Secure Detention Centers (RSDC). This adjustment is warranted by current data on juvenile arrests and OJA referrals. Many counties are sub-contracting out their RSDC to another entity, sometimes a Youth Service entity. This means that counties contract the entire facility (physical facility and administration) through this third-party entity. This contracting method is cumbersome and could be streamlined to promote competition and increased provider performance. The Benefits of this recommendation go beyond cost savings and right-size the use of detention beds. By strategically right-sizing the number of RSDCs throughout the State of Oklahoma, juveniles could be more accessible by counselors, community outreach programs, church programs, and other services. *BKD notes this recommendation will require legislative proposal.* (Program and Program Performance, Recommendation 4, page 22)
- 7) BKD recommends that OJA work with the State or Federal Government to determine the most cost efficient way to provide healthcare coverage for juveniles who are in transition from the detention centers back into the community. Other states such as Indiana, who enacted a law in July 2015, requires its Department of Corrections to help enroll individuals in Medicaid before releasing them from custody by helping them reactivate suspended Medicaid coverage and working with the inmates to complete new Medicaid applications 60 days before release. *BKD notes this recommendation will require legislative proposal and potential negotiations with federal partners including potential state plan amendments for Medicaid.* (Program and Program Performance, Recommendation 10, page 27)
- 8) BKD recommends that OJA consider redeployment of some of the duties of the Residential Care Specialist III (RCS III) role to allow them to assist in the recruitment, retention and succession planning for Residential Care Specialist I (RCS) positions. Currently, the recruitment and hiring of open RCS positions is handled centrally by Oklahoma's state human resources function. Due to the unique and complex role of the RCS position, it is very difficult for a third-party organization to recruit for this position. Consequently, there are long recruiting periods, high vacancy rates and steep attrition for these positions. RCS III staff have more relevant knowledge about the types of individuals and skillsets that will allow for recruitment and selection of the most effective RCS employees. Also, if the RCS III employees are more invested in the hiring process, they are likely to take more ownership over the development and retention of new staff. *Innovation Tournament Finalist* (Program and Program Performance, Recommendation 14, page 30)
- 9) BKD recommends that OJA continue to enhance its posture on its IT systems and employees with an eye towards security, privacy and available. To that end, BKD had seven recommendations to enhance user access controls and cybersecurity awareness training, completing consolidation of policies and procedures and processes with OMES, and enhancing business continuity and disaster recovery plans and backups to increase availability of systems in the event of a disruptive event, either weather or cyber related. (Information Systems, Recommendations 1-6, 9, starting page 59)
- 10) BKD recommends that OJA consider licensing the Juvenile Online Tracking System (JOLTS) to similar agencies in other states to provide a revenue stream for OJA in exchange for licensing fees. JOLTS is a database created by OJA

to assist overall administration and ongoing policy research in Oklahoma. This database links judges, district attorneys, juvenile detention centers, youth services agencies and shelters, juvenile institutions, group homes, juvenile bureaus, social workers and the Office of Juvenile Affairs. JOLTS allows for a single juvenile file including collection of all referral, arrest, court processing, detention, and shelter activity on a juvenile in one place. *BKD notes this recommendation will require legislative proposal. Innovation Tournament Finalist* (Information Systems, Recommendation 8, page 61)

TABLE OF CONTENTS

CONSULTANT REPORT	1
EXECUTIVE SUMMARY	2
BACKGROUND	2
SCOPE AND PROCEDURES	2
TABLE OF CONTENTS	6
BACKGROUND	7
SCOPE AND PROCEDURES	8
OBSERVATION PRIORITIZATION	9
MANDATES	14
PROGRAMS AND PROGRAM PERFORMANCE	18
FACILITIES	32
OKLAHOMA YOUTH ACADEMY CHARTER SCHOOL	43
ACCOUNTING AND FINANCE	49
BUDGET	53
INFORMATION SYSTEMS	57
APPENDIX A: RECOMMENDATIONS LISTING	63
PROGRAM AND PROGRAM PERFORMANCE	63
FACILITIES	70
OKLAHOMA YOUTH ACADEMY CHARTER SCHOOL	78
ACCOUNTING AND FINANCE	80
BUDGET	83
INFORMATION TECHNOLOGY	85

OJA MISSION STATEMENT, VISION STATEMENT, AND VALUES

Mission Statement:

The Office of Juvenile Affairs, by protecting the public, projecting an excellent public image, providing dynamic innovative services, ensuring aggressive analysis and accountability and fostering the growth of highly motivational and satisfied employees will be recognized as a national leader in the field of juvenile justice.

Vision Statement:

The Office of Juvenile Affairs is a state agency entrusted by the people of Oklahoma to provide professional prevention, education and treatment services as well as secure facilities for juveniles in order to promote public safety and reduce juvenile delinquency.

Values and Behaviors:

OJA believes in the dignity of the individual, and is committed to impartial and professional treatment of all individuals and organizations with whom we work. OJA recognizes and accepts diversity among ourselves and others, and values the individual's right to fair and equitable treatment in an environment free of bias and prejudice. OJA aspires to maintain high moral and ethical standards and to reflect honesty, integrity, reliability, and forthrightness in all relations. OJA strives to have a balanced responsibility to provide protection to the public as well as providing accountability and prevention programs to the juveniles within our communities.

Source: FY-2020 Agency Program Information and Strategic Plan

BACKGROUND

The Oklahoma Office of Juvenile Affairs (OJA) was created in 1995 by the Juvenile Reform Act. OJA is responsible for coordinating educational, rehabilitative and secure services for the young people currently involved in, and those who are at-risk of entering, Oklahoma's juvenile justice system. OJA currently has about 625 employees and operates two medium-secure facilities and contracts with 17 detention centers, 15 group homes, and a number of independently contracted community based providers.

As indicated on OJA's website, the governing body for OJA is a seven member board (the Board) appointed by the Governor with the advice and consent of the Oklahoma Senate. The term of office for a board member is four years and appointments are limited to two terms. The current board members are:

- Tony Caldwell
- Dr. Steve Grissom
- Karen Youngblood
- Sean Burrage
- Mautra Jones
- Jason Nelson
- Hon. Janet Foss

The Board meets monthly in a manner consistent with the Oklahoma Open Meeting Act. The Board sets broad policy for OJA and is the rulemaking body. The Board is also responsible for reviewing and approving the budget; assisting the agency in planning activities related to the priorities and policies of the agency; providing a public forum for receiving comments and disseminating information to the public; establishing contracting procedures for the agency; and guidelines for rates of payment for services provided by contract.

The OJA's mandated responsibilities are authorized by the Oklahoma Juvenile Code (Title 10A, Article 2 of the Oklahoma Statutes) and the School Code (Title 70 of the Oklahoma Statutes).

The majority of OJA's mandates are provided in chapters 3, 4, 5, 7, 8, and 9 of Section 2 Juvenile Code. These chapters provide mandates for the conditions of detention centers and facilities, personnel, investigations, arrests, transportation, group homes, placement of youthful offenders, educational needs of youthful offenders, community-based programs, youth service agencies, information systems, intake, physical force and restraints, foster care for children in the custody of the OJA, the OJA charter school, prevention programs, early intervention programs and the juvenile online tracking program (JOLTS).

Title 70, Chapter 3 of the Oklahoma Statutes provides the mandates for the Oklahoma Youth Academy Charter School. Article 132 of Chapter 3 provides the limitations and requirements of starting new schools.

SCOPE AND PROCEDURES

On behalf of the Agency and Accountability Commission, BKD was engaged to complete a performance assessment to evaluate the effectiveness and efficiency of the OJA. We focused our scope on the following areas of OJA's operations:

- Programs and Program Performance
- Facilities
- The Oklahoma Youth Academy Charter School
- Accounting and Finance
- Budget
- Information Systems

To achieve the four objectives provided by APAC, we assessed processes, procedures and internal control documentation relating to OJA's programs and support services (accounting and finance, capital asset management, administration and legal, human resources and information services). We obtained and assessed information and data to measure operations through qualitative and quantitative metrics relating to OJA's operations. This included, but was not limited to, capital assets, performance measures, budgeting, vendors, accounting function, employees, legislation and regulations and the Oklahoma Youth Academy.

In addition, we conducted numerous interviews and informal discussions with staff as well as OJA's Board of Directors. Some conversations were more structured and scheduled while other conversations were more informal and were used to answer specific or clarifying questions we accumulated. We made site visits to the Tecumseh medium secure facility, the Office of Management and Enterprise Service's (Oklahoma agency that provides IT and other support to OJA) data center, and a Regional Secure Detention Center (RSDC). BKD also conducted an innovation tournament where OJA employees from various departments (education, public information, information services, administration, training, human resources, programs, legal, research and facilities) came together to brainstorm opportunities for innovation within OJA and present ideas. The innovation tournament participants were split into three teams to brainstorm ideas. Each team then selected an idea to present and answer follow-up questions about these ideas. After all of the ideas were presented, the OJA participants voted on a winning idea. The winning idea and the presented ideas from the other two teams are included within the relevant areas of the report.

Our fieldwork took place between September 10 and October 31, 2018. As a result of the assessment of the in-scope areas, BKD identified observations around current processes, as well as opportunities that the OJA could consider utilizing to either enhance existing processes and controls or assist with the implementation of new processes the OJA is either considering or in the process of implementing.

What is an innovation Tournament?

"Innovation Tournaments" is a book published in 2009 written by Christian Terwiesch and Karl T. Ulrich. Innovation tournaments are comprised of two basic activities: creating a pool of opportunities and selecting winners. An innovation opportunity is a hypothesis that value can be created. An opportunity may be a newly sensed need, a newly discovered technology, or a rough match between a need and a possible solution.

Source: "Innovation Tournaments"

How does it work?

Innovation tournaments begin with a large set of opportunities that are compared with each other. A filtering process selects a subset to move to the next stage and, from those, picks one or more winners. Tournaments are common corporate innovation processes, but they are also often included in other human endeavors including sports, entertainment, and the process of selecting elected officials in democratic societies.

Source: "Innovation Tournaments"

OBSERVATION PRIORITIZATION

We developed a process whereby the recommendations from the performance assessment are systematically prioritized - as requested in the RFP – into short-term, medium-term and long-term opportunities. This process is subjective; based on conversations with OJA board and leadership, assessment of similar recommendations in other states and the judgment of the BKD team.

The RFP defines the categories as:

- 1) Short-term – opportunities which can be implemented within the current budget cycle
- 2) Medium-term – opportunities which can be implemented within one to three years
- 3) Long-term – opportunities which may require three or more years to fully implement

Each recommendation was measured on a number of factors including:

- The positive impact the implementation of this recommendation could have on meeting the organization’s objectives
- Estimated savings creation or risk avoidance this recommendation could allow OJA to generate
- How quickly this recommendation can be implemented

Completed Short Term (Current Budget Cycle)

Recommendation Summary		
Section	Rec Number	Recommendation
Program and Program Performance	1	BKD Recommends OJA determine actual daily costs incurred by the RSDCs in providing services and analyze those costs for appropriateness in relation to the current fixed daily rates paid by OJA.
Program and Program Performance	8	BKD recommends OJA consider implementing a process for service providers to enter services into JOLTS and to be paid based on the services provided through the JOLTS system.
Program and Program Performance	15	BKD recommends OJA consider non-financially incentivizing parents to be more engaged with treatment programs which may result in less time spent being supervised by OJA.
Facilities	1	BKD recommends that the deferred maintenance issues at COJC and SWOJC be reviewed by management and reasonably addressed where possible. Priority should be given to issues of safety and security.
Facilities	2	BKD recommends that the security consultant assisting the AE1/DBE with the designing of the NGF should tour COJC and SWOJC facilities to see if there are security considerations that can be reasonably addressed in the interim to improve resident and staff safety.
Facilities	4	BKD recommends OJA work toward establishing a culture of communication between management and facility staff and among facility staff to assist in job performance at expected levels, employee morale and staff turnover.

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

Recommendation Summary		
Section	Rec Number	Recommendation
Facilities	4a	BKD recommends OJA assess the current job descriptions for secure facility staff to ensure they appropriately communicate expected activities, responsibilities and expected performance of each position.
Facilities	4c	BKD recommends OJA hold discussions/meetings with staff specifically to convey the strategic goals and objectives of OJA. The goal of the discussions/meetings should be to ensure that staff understand the importance of the strategic issues, goals and objectives of OJA and allow staff to ask questions and offer feedback for management's consideration.
Facilities	7	BKD affirms OJA's FY2020 budget request for a \$500,000 funding change for employee incentives to the direct care staff to improve the hiring pool and retention. The funding change request also includes costs associated with performance pay, virtual health visits and a 20 year retirement plan for direct care workers
Facilities	9	BKD affirms and recommends that as part of the AE1/DBE team, hire a security consultant to assist with designing the security features at the NGF
Facilities	10	BKD affirms and recommends that OJA hire a work efficiency (time and effort) consultant to study the current staff processes to take into account how those processes will need to change to be optimized in the new facility.
Facilities	11	BKD affirms and recommends that as part of the AE1/DBE team, hire a technology consultant to advise on the most appropriate hardware/software to assist in security and work efficiency efforts for the new facility
Facilities	14	BKD recommends that OJA consider utilizing construction audit services during the construction of the NGF to assist in minimizing the risks associated with a construction project and to control costs.
Charter School	5	BKD recommends that the OJA/OYACS consider reviewing and possibly enhancing existing professional development programs.
Accounting and Finance	1	BKD recommends that OJA work with the State (OMES) to determine if they could use electronic approval for all invoices to make payment of invoices more efficient.
Accounting and Finance	2	BKD recommends that OJA work with the State (OMES) to determine if they could develop an electronic expense reimbursement process.
Accounting and Finance	5	BKD recommends that OJA implement dual control over mail opening to ensure all checks are properly accounted for.
Budget	1a	Administrative Adjustment Path: BKD recommends that the OJA should work with DHS and OKHCA to review potential additional federal funding sources for OJA-type activities.
Information Technology	2	BKD recommends that OJA develops a process for periodically reviewing and approving system administrative accounts.
Information Technology	7	BKD recommends that OJA work with the State (OMES) and other system partners to identify and pilot a technology project that leverages recent technology developments.

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

Completed Medium Term (1-3 Years)

Recommendation Summary		
Section	Rec Number	Recommendation
Program and Program Performance	2	BKD recommends OJA Assess the impact of reimbursing RSDCs for contracted beds based on actual usage by juveniles to determine potential cost savings. Simultaneously, consider what programs, potentially community-based in the local counties, could be implemented or enhanced with the potential cost savings and the repurposing of unused beds.
Program and Program Performance	3	BKD recommends OJA monitor the availability of beds versus the demand for beds at the RSDCs, both from within the local counties and between counties, to determine if all RSDCs are appropriately sized and necessary given the mission of OJA, the trend in juvenile detentions, and the economics of the RSDCs.
Program and Program Performance	4	BKD recommends OJA consider strategically right-size the number of RSDCs, repurposing beds in certain areas
Program and Program Performance	5	BKD recommends OJA consider a move to a fee-for-service compensation models for the RSDCs and adjust and improve these compensation models as they are beginning to be used.
Program and Program Performance	6	BKD recommends OJA consider additional community-based alternative services for juveniles to avoid detention in general.
Program and Program Performance	7	OJA consider new legislation, or amending current legislation, to allow OJA the option to contract directly with the organization which is administering the Community Detention Centers, instead of contracting through counties.
Program and Program Performance	9	BKD recommends OJA consider removing or limiting parts of the requirements for the OJA to only work with the currently designated Community-Based Youth Services providers, which will promote more competition among these providers and allow additional service providers to easily enter the market.
Program and Program Performance	12	BKD recommends that OMES provide OJA the ability to customize the employee performance evaluation process. Currently, the employee performance evaluation process is controlled by OMES
Program and Program Performance	16	BKD recommends that OJA monitor the success of the implementation of the incentive-based payments to Community Group Homes and consider aspects that may be applied to RSDCs.
Facilities	3	BKD recommends the technology consultant assisting the AE1/DBE with the design of the NGF should review the current IT capabilities at the medium secure facilities and determine a plan to appropriately update the facilities' hardware/software/document imaging capabilities. Such a plan should translate directly to implementation of the same in the NGF.
Facilities	4b	BKD recommends OJA establish a comprehensive staff training program for the secure facilities personnel appropriate for their job responsibilities. The training programs should encompass policies, procedures, de-escalation/resident behavior management techniques, decision-making and other skills desired of and expected to be implemented by staff in their daily duties, as appropriate for their positions.

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

Recommendation Summary		
Section	Rec Number	Recommendation
Facilities	5	BKD recommends OJA Review available case studies/research regarding common contributors to high turnover in impacted secure facility positions, and what can reasonably be done to address identified issues.
Facilities	6	BKD recommends OJA conduct a salary survey for secure facility positions to determine appropriate pay scales to attract and retain qualified staff. Plans, timelines and budgets should then be established to move toward appropriate pay scales. Projected cost saving to be generated by the NGF should be considered as a potential funding source.
Charter School	1	The OJA should consider providing a virtual option for the OYACS curriculum online for students after they leave OJA secure facilities. Innovation Tournament Winner
Charter School	2	BKD recommends that OJA adopt new processes to ensure smooth and timely transition of educational records, ideally in advance of the youth's placement.
Charter School	3	BKD recommends that OJA develop tools to collect and assess student and school performance on a range of key metrics. These metrics should include such things as student academic achievement, student engagement, student behavior plan accomplishments and the number of students successfully achieving program outcomes.
Charter School	4	BKD recommends OJA/OYACS perform an assessment of their operations to evaluate their current programs, identify areas of improvement and possibly expand, enhance or create new educational programs that can strengthen the programs and curriculum available at the Charter School. Possible expansion may include community-based group homes and detention centers.
Accounting and Finance	3	BKD recommends that OJA evaluate responsibilities within grant reporting to ensure adequate staffing is available to complete grant administration requirements and obtain additional funding.
Accounting and Finance	4	BKD recommends that OJA use available technology resources (JOLTS or another tool) to streamline grant reports. This would save time for OJA staff as well as provide consistent reporting of any OJA program's funded by grants.
Accounting and Finance	6	BKD recommends that OJA, with the help of OMES, integrate the time keeping system and PeopleSoft. This will reduce the chance of human error and the amount of employee's time involved with each payroll run.
Budget	1b	Administrative Adjustment Path: BKD recommends that the OJA should work with DHS and OKHCA to review potential additional federal funding sources for OJA-type activities.
Information Technology	1	BKD affirms and recommends that the OJA complete its plans for information security awareness training for OJA employees.
Information Technology	3	BKD affirms and recommends that the OJA complete the process of moving all IT policies and procedures over to the state-level policies and procedures to be consistent with the rest of the state.
Information Technology	4	BKD affirms and recommends that OJA complete its plans for disaster recovery for all OJA assets and systems.
Information Technology	5	BKD recommends incorporating certain additional processes into the OMES Media Destruction policies.
Information Technology	8	BKD recommends that OJA consider licensing JOLTS to similar agencies in other states to provide a revenue stream for OJA in exchange for licensing fees. Innovation Tournament Finalist

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

Recommendation Summary		
Section	Rec Number	Recommendation
Information Technology	9	BKD recommends that OJA provide the district attorneys with limited access to JOLTS to be able to electronically sign documents to make the Juvenile's adjudication process through OJA system more efficient.

Completed Long Term (3+ Years)

Recommendation Summary		
Section	Rec Number	Recommendation
Facilities	8	BKD affirms and recommends that the OJA complete the plans for the construction of the NGF.
Facilities	12	BKD affirms and recommends that OJA design a formalized data analytics process to coincide with its ability to collect/store electronic data through enhanced hardware/software resources
Facilities	13	BKD affirms and recommends that OJA initially build 7 of the 9 residential cottages allowed for in the masterplan due to the declining trend in population in Oklahoma secure detention facilities and Oklahoma State Bureau of Investigation (OSBI) juvenile arrest data.
Information Technology	6	BKD recommends that OJA work with the State (OMES) to determine if supervisors can get notified when an employee works 35 hours that week so they can determine how much, if any, overtime their employees are going to be working.

MANDATES

The OJA utilizes Title 10A, Article 2 entitled the Oklahoma Juvenile Code as a guideline to establishing their policies and processes. The code was created with the purpose of “...the laws relating to juveniles alleged or adjudicated to be delinquent is to promote the public safety and reduce juvenile delinquency. This purpose should be pursued through means that are fair and just, that:

1. *Recognize the unique characteristics and needs of juveniles;*
2. *Give juveniles access to opportunities for personal and social growth;*
3. *Maintain the integrity of substantive law prohibiting certain behavior and developing individual responsibility for lawful behavior;*
4. *Provide a system relying upon individualized treatment and best practice for the rehabilitation and reintegration of juvenile delinquents into society;*
5. *Preserve and strengthen family ties whenever possible, including improvement of home environment;*
6. *Remove a juvenile from the custody of parents if the welfare and safety of the juvenile or the protection of the public would otherwise be endangered;*
7. *Secure for any juvenile removed from the custody of parents the necessary treatment, care, guidance and discipline to assist the juvenile in becoming a responsible and productive member of society; and*
8. *Provide procedures through which the provisions of the law are executed and enforced and which will assure the parties fair hearings at which their rights as citizens are recognized and protected.”*

Some significant defined responsibilities of OJA include:

- **Designing, Defining, and Targeting of Services and Programs**

Services and Programs section 2-7-310 notes “All programs and services shall be designed to ensure the accessibility of the program to the persons served. Provision for transportation, child care and similar services necessary in order to assist persons to access the services shall be made. If the service is provided in an office setting, the service shall be available during the evening, if necessary. Services may be provided in a school setting at the request of or with permission of the school.” This includes periodic review by OJA to ensure programs and services target areas within the entire state that have the greatest need of them, and those programs have been designed to meet the needs of that particular area. The OJA is given authority to sign contracts for the establishment and maintenance of these programs and services. The organization shall “adopt clear, written guidelines to ensure uniformity in the management, monitoring and enforcement of contracts for services. If in-state private providers are unable or unwilling to respond to the proposal, then out-of-state providers should be encouraged to respond.”

- **Providing delinquency prevention and diversion programs**

Set forth in section 2-7-301 of Title 10A, Article 2, the OJA “...in its role as coordinator for delinquency prevention services, shall, after full consideration of any recommendation of the Oklahoma Association of Youth Services:

1. *Establish guidelines for juvenile delinquency prevention and diversion programs for use in community-based programs, including but not limited to:*
 - a. *counseling programs,*

- b. recreational programs,*
- c. job skills workshops,*
- d. community public improvement projects,*
- e. mediation programs,*
- f. programs to improve relationships between juveniles and law enforcement personnel,*
- g. diagnostic evaluation services,*
- h. substance abuse prevention programs,*
- i. independent living skills and self-sufficiency planning programs, and*
- j. case management services; and*

2. *Provide that personnel shall be available in each county of the state to assist local communities in developing and implementing community programs to prevent delinquency and to divert juveniles who have committed delinquent acts from committing further delinquent or criminal acts. The Office of Juvenile Affairs shall provide this service in each county either directly or by contract...*

- **Providing Community based programs**

Section 2-7-303 indicates that the OJA, *“...in its role as planner and coordinator for juvenile justice and delinquency prevention services, is hereby authorized to and shall enter into contracts for the establishment and maintenance of community-based facilities, services and programs which may include, but are not limited to: Children's emergency resource center, diagnosis, crisis intervention, counseling, group work, case supervision, job placement, school-based prevention programs, alternative diversion programs for first-time offenders and for youth alleged or adjudicated to be in need of supervision, recruitment and training of volunteers, consultation, case management services, and agency coordination with emphasis on keeping youth with a high potential for delinquency out of the traditional juvenile justice process and community intervention centers. The Office of Juvenile Affairs shall enter into contracts with Youth Services Agencies for core community-based facilities, programs and services based on need as indicated in its State Plan for Youth Services Agencies.”*

- **Establishing, maintaining and continuously refining a program for delinquent children**

Delinquent Children, section 2-7-503 notes that the legislature of the state intends to provide the creation of a reasonable means and methods to prevent delinquency, care and rehabilitation of delinquent children and to the protect the public. Specifically this section intends to, *“through the Office of Juvenile Affairs, establish, maintain and continuously refine and develop a balanced and comprehensive state program for children who are potentially delinquent or are delinquent*

B. Except as provided in subsection C of this section, whenever a child who has been adjudicated by the court as a delinquent child has been committed to the Office of Juvenile Affairs, the Office shall provide for placement pursuant to any option authorized” by this mandate, including but not limited to, *“Place the child in a secure facility, including a collocated secure facility, or other institution or facility maintained, operated or contracted by the state for delinquent children if the child has” ... or “Place the child in a facility maintained, operated or contracted by the state for children, or in a foster home, group home, transitional living program or community residential center...”* or *“...Place the child in any licensed private facility deemed by the Office of Juvenile Affairs to be in the best interest of the child; or*

The placement of committed children is dictated by section 2-2-803 where it states *“The Office of Juvenile Affairs shall review and assess each child committed to the Office to determine the type of placement consistent with the treatment needs of the child in the nearest geographic proximity to the*

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

home of the child and, in the case of delinquent children, the protection of the public. Such review and assessment shall include an investigation of the personal and family history of the child, and his environment, and any physical or mental examinations considered necessary.” It notes that the Office may use any facilities, public or private, which offer the aid indicated in the assessment noted above.

The Office is also responsible for providing “for the care, education, training, treatment and rehabilitation of juveniles who are placed in the institutions and facilities. The Office shall provide for a uniform system of assessment of the reading ability of each juvenile upon initial placement in an Office-operated institution or facility.” (Section 2-7-601)

- **Section 2-7-616 establishes a charter school to be administered by the OJA.** *“...Establishing and operating a charter school, pursuant to the provisions of Section 3-130 et seq. of Title 70 of the Oklahoma Statutes, the Board of Juvenile Affairs may serve as the governing body of the charter school and may take any action necessary to serve in such capacity and in accordance with rules of the State Board of Education.”*

Charter schools are setup to

- “1. Improve student learning;*
- 2. Increase learning opportunities for students;*
- 3. Encourage the use of different and innovative teaching methods;*
- 4. Provide additional academic choices for parents and students;*
- 5. Require the measurement of student learning and create different and innovative forms of measuring student learning;*
- 6. Establish new forms of accountability for schools; and*
- 7. Create new professional opportunities for teachers and administrators including the opportunity to be responsible for the learning program at the school site.”*

Other chapters within the Article provide additional mandates for the conditions of detention centers and facilities, personnel, investigations, arrests, transportation, group homes, placement of youthful offenders, educational needs of youthful offenders, community-based programs, youth service agencies, information systems, intake, physical force and restraints, foster care for children in the custody of the OJA, the OJA charter school, prevention programs, early intervention programs and the juvenile offender tracking program (JOLTS).

On at least an annual basis, OJA is responsible for reviewing their various programs and services. Section 2-7-311 requires that the Office *“review its programs and services and submit a report to the Governor, the Speaker of the House of Representatives, the President Pro Tempore of the Senate, the Supreme Court of the State of Oklahoma, the Board of Juvenile Affairs, and the Oklahoma Commission on Children and Youth analyzing and evaluating the effectiveness of its programs and services. The report shall include, but not be limited to:*

- 1. An analysis and evaluation of programs and services continued, established and discontinued during the period covered by the report;*
- 2. A description of programs and services which should be implemented;*
- 3. Relevant information concerning the number of children comprising the population of any facility operated by the Office of Juvenile Affairs during the period covered by the report;*
- 4. An analysis and evaluation, by age, of the number of children assessed for literacy skills, the number who failed to demonstrate age-appropriate reading skills, and the number who were required to participate in a literacy skills improvement program; and*

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

5. Such other information as will enable a user of the report to ascertain the effectiveness of the programs, services and facilities.

B. The Office of Juvenile Affairs shall annually analyze and evaluate the implementation of the Youthful Offender Act, the effectiveness of the Youthful Offender Act and any problems which have occurred which have limited the effectiveness of the Youthful Offender Act. The annual analysis and evaluation shall be incorporated in the report required by subsection A of this section.”

Based on the analysis of the major responsibilities of the OJA, the procedures performed by BKD on the internal processes and programs and services offered by the OJA it appears that the department is meeting their mandated responsibilities. The content, observations and recommendations within this report are designed to give the OJA a roadmap to make improvements and enhancements to their existing processes, programs and services.

PROGRAMS AND PROGRAM PERFORMANCE

Background

Vendors are the entities that OJA pays to provide programming and administration services through residential treatment centers and the Community-Based Support Group. The OJA vendors who account for most of the OJA's payments to vendors are in three main categories, RSDCs located in counties throughout Oklahoma, Community Based Youth Services and Level E Group Homes. These categories account for 72% of the top 20 vendor expenses as of August 31, 2018, for fiscal year 2018.

The OJA's mandated responsibilities for programs are scattered throughout the Oklahoma Juvenile Code (Title 10A, Article 2 of the Oklahoma Statutes). Chapter 7 of the Juvenile Code provides many of the mandates for programs for juveniles in both residential and non-residential facilities.

Residential Treatment Centers

The Residential Treatment Support Group provides rehabilitative facilities for treatment to juveniles who have been adjudicated as Youthful Offenders or delinquents. This division has two medium secure institutions that are operated by OJA directly which include the Central Oklahoma Juvenile Center located in Tecumseh, Oklahoma and the Southwest Oklahoma Juvenile Center located in Manitou, Oklahoma.

Regional Secure Detention Centers (RSDC)

There are 17 RSDC that serve the 77 counties in the State of Oklahoma. OJA contracts with 16 of the detention centers, the exception being Creek County. RSDCs are locations intended to be a short-term stay for youth considered a danger to the community, those waiting adjudication and those youth pending placement by OJA. RSDCs in Oklahoma range from 79 beds (Oklahoma County) to six beds (Bryan, Texas, and Beckham Counties). There are approximately 300 beds currently in Oklahoma at RSDC. The OJA licenses RSDCs and determines how many beds each RSDC is licensed to have. OJA personnel referenced research during our interviews that indicates that placement in an RSDC can be detrimental to juveniles. RSDCs primary purpose is to house residents instead of providing treatment. Therefore, OJA personnel believe this type of environment can be damaging to a child's development because they often need to be cared for instead of housed as an inmate.

Level E Group Homes

Oklahoma has approximately 15 Level E Group Homes (LEGH) throughout the State with 212 beds. LEGH are contracted agencies that provide a highly structured environment where youth in OJA custody receive treatment, education, medical care, recreation, independent living and social skills. Several LEGH specialize in different areas such as substance abuse, career tech programs, sex offender treatment and those with mental health issues.¹

There are waiting lists for the LEGH program, which results in a system with very few vacancies. The longest a bed will stay empty is one to two days. A typical LEGH is 16 beds or fewer. The LEGHs are not as heavily legislated, and, therefore, OJA officials are able to use their judgement on which vendors should house certain juveniles. All LEGH accept juveniles no matter how difficult their behavior or medical situation may be. While LEGH facilities are not secured, they can have juveniles who go absent without official leave (AWOL). Overall, OJA personnel indicate that the LEGH facilities provide a safe environment and have a high rate of juveniles that complete programs successfully.

¹ https://www.ok.gov/oja/Community_Based_Support/Juvenile_Services_Unit/index.html

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

The Community-Based Support Group utilizes a network of youth service agencies designated by the Board of Juvenile Affairs and works with the Community-Based Youth Services agencies to provide prevention, diversion, and treatment programs to keep juveniles from entering or progressing further into the juvenile justice system.

Community Based Support Group

This division monitors 15 contracted group homes. These group homes provide a highly-structured environment where young people in the custody of OJA receive treatment, education and medical care, along with learning independent living and social skills. OJA works with contracted partners in these staff secure residential facilities. Crisis intervention is available 24-hours a day for juvenile offenders who have extreme anti-social and aggressive behaviors. Lastly, OJA contracts with local counties for secure detention services of which there are 17 RSDCs that provide beds after arrest, during the court process, and pending OJA placement.

Community-Based Youth Services

The Community-Based Support Group at OJA contracts with private and public organizations to provide prevention and intervention services. There are 40 CBYS agencies that service all of the Counties in Oklahoma. CBYS is primarily a community diversion/prevention program. Parents can bring youth in for mentoring, tutoring, counseling, and help building skills for job interviews and other prevention programs. Some CBYS facilities have emergency shelters. In shelters, juveniles are not detained as they are in detention centers and the environment resembles a home-like setting rather than a secure setting. The local CBYS has an office and receives referrals from OJA, local schools or other sources. Specific services provided include:

- Emergency shelter beds
- First Time Offender Program
- Community Intervention Centers
- Crisis intervention
- Individual, family, and group counseling
- Prevention and substance abuse groups
- Transitional living programs
- Teen court programs
- Tutoring, mentoring, and case management.

There are multiple steps that must take place for a CBYS provider to be licensed and designated. §10A-2-7-306 of the Oklahoma Statutes provides further instruction on the specific expenditure of appropriated funds specifically designated for youth services. In general this mandate instructs the OJA to only enter into contracts with designated Youth Service Agencies. The OJA is given appropriated funding earmarked for CBYS. The specific instructions on how (and who) the OJA is to expend this funding via contracts heavily favors current designated CBYS agencies. Should a new agency wish to compete for a contract paid by appropriations from the community services category, they could face what might be seen as numerous barriers that limit their ability to do so. As a result, it was represented to us that OJA can only authorize 40 or so CBYS agencies per year. This may cause a lack of open-market competition between CBYS providers and could lead to complacency, as providers could believe that they will receive funding from OJA regardless of whether or not they perform well.

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

<u>Program</u>	<u>Security Level</u>	<u>Major Services Provided</u>	<u>Temporary or Long-Term?</u>	<u>Current Population vs. Total Capacity</u>	<u>5-Year % Change in Population</u>
Residential Treatment Centers	Medium	Housing, education (Oklahoma Youth Academy Charter School), medical services, treatment programs, rehabilitation, therapeutic interventions (individual, group, and family), substance abuse treatment,	12 to 13 Months	120 current residents 142 total beds <i>84% capacity</i>	14.3% decrease
RSDCs	Medium	Housing, education, medical care, crisis intervention as needed, and recreation activities	Temporary	245 current residents 303 total beds <i>81% capacity</i>	2014 - 4203 2018 - 3498 16.8% decrease
Level E Group Homes	Staff Secure	Housing, education, medical care, Individualized Treatment programs, therapeutic interventions (weekly individual and group counseling, family therapy) recreation, crisis intervention as needed, independent living and social skills, substance abuse, career tech programs, sex offender treatment, and access to mental health treatment.	Temporary - up to 7 months	203 current residents 212 total beds <i>96% capacity</i>	2014 - 210 2018 - 169 19.5% decrease Note: there was an increase in individuals on the waitlist. 2014 - 23 2018 - 62
Community-Based Youth Service Agencies	Low	Treatment programs (prevention and diversion), emergency shelter beds, counseling, education, medical care, learning independent living and social skills, crisis intervention, substance abuse programs, transitional living programs, teen court programs, tutoring, mentoring, and case management.	Temporary	110 current residents 202 total beds <i>54% capacity</i>	2014 - 3,317, 2018 - 2,187 34% decrease

Observations/Opportunities

Residential Treatment Centers

Monitor Fee-for-Service Reimbursement

As of 2018, RSDCs are paid by OJA for capacity, or the number of beds they have available for a juvenile. This means each RSDC was paid a guaranteed rate per bed, whether or not the bed is occupied. Rates paid to RSDCs are established by the OJA's Rates and Standards Board. OJA developed a formula to calculate rates, and this rate is applied per bed state-wide. One formula is applied to all of the detention centers to determine their rate. The formula takes the fixed costs (mostly administrative payroll costs and other overhead costs) and divides them by the number of beds. This rate was multiplied by the number of days in the year to get the total amount paid to the RSDC.

OJA has been working toward converting all service agreements from cost reimbursement to fee-for-service. Fee for service would compensate the RSDCs only for services rendered. Fee-for-service contracts provide increased accountability because service providers are being paid for the services they provide instead of their capacity to provide services. A cost reimbursement model reimburses entities for capacity regardless of volume or outcomes.

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

The OJA is already using the fee-for-service model for RSDCs and Group Homes will begin implementing fee-for-service for Community-Based Youth Services Agencies beginning January 1, 2019.

Management indicated that the rate-setting data used as the basis for the fixed rate reimbursements was established about 10 years ago. Management has made various assumptions in salary growth to arrive at the currently theoretical daily reimbursement rates. However, due to recent state revenue failures and resulting budget cuts, OJA was forced to reduce rates paid for RSDC services for FY15 and FY16, and again in FY17. Management validated that rising costs over the last several years combined with a reduction in OJA determined rates means that the cost of providing the service often exceeds the rates set by OJA. This deficit could impact:

- the safety and security of juveniles and staff, if security measures are not up to date and/or staff is inadequately trained,
- the quality and level of services provided juveniles, thus impacting the RSDCs effectiveness, and
- the condition of the physical buildings due to potential deferred maintenance.

OJA provides reimbursement, per contracted bed per day, regardless of the vacancy rate of the contracted beds.

Recommendation #1 - Determine actual daily costs incurred by the Regional Secure Detention Centers (RSDCs) in providing services and analyze those costs for appropriateness in relation to the current fixed daily rates paid by OJA.

Tasks	Responsible Party
Compile a report showing the actual daily costs incurred by the RSDCs and compare to current fixed daily rates paid by the OJA	Deputy Director Finance & Administration (F&A)
Discuss the actual costs and current rates with the with relevant parties during the Budget Program process so that the true cost of providing these services may be taken into consideration in the appropriations process	Deputy Director F&A
Compare methods for calculation with similar States like Oklahoma and utilize feedback.	Deputy Director F&A
Determine what would be an appropriate per bed rate	Deputy Director F&A
Calculate cost for actual occupancy with the per bed rate and compare to current fixed daily rates paid by the OJA	Deputy Director F&A
Negotiate a per bed rate for actual occupancy with RSDCs in order to minimize costs for the OJA	Deputy Director F&A

Recommendation #2 - Assess the impact of reimbursing RSDCs for contracted beds based on actual usage by juveniles to determine potential cost savings. Simultaneously, consider what programs, potentially community-based in the local counties, could be implemented or enhanced with the potential cost savings and the repurposing of unused beds.

Tasks	Responsible Party
Compile a 3–5 year comparison of bed occupancy	CBS Deputy Director, assisted by CFO
Review comparison to determine if occupancy has typically been at capacity	CBS Deputy Director, assisted by CFO
Determine what would be an appropriate per bed rate	CBS Deputy Director, assisted by CFO
Calculate cost for actual occupancy with the per bed rate and compare to current fixed daily rates currently paid by the OJA	CBS Deputy Director, assisted by CFO
Negotiate a per bed rate for actual occupancy with RSDCs in order to minimize costs for the OJA	CBS Deputy Director, assisted by CFO
Conduct a research on alternative programs that other States with similar facilities have implement to repurpose unused beds	CBS Deputy Director, assisted by CFO

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

Recommendation #2 - Assess the impact of reimbursing RSDCs for contracted beds based on actual usage by juveniles to determine potential cost savings. Simultaneously, consider what programs, potentially community-based in the local counties, could be implemented or enhanced with the potential cost savings and the repurposing of unused beds.

Tasks	Responsible Party
Compile listing from research of plausible and potentially alternatives to be utilized by the OJA	CBS Deputy Director, assisted by CFO
Conduct a research on the listing of potential alternatives for success rates and outcomes	CBS Deputy Director, assisted by CFO
Create a plan and timeline for implementation of alternatives	CBS Deputy Director, assisted by CFO

Strategically Right-Size the Number of Beds

We recommend strategically right-size the number of beds in RSDC facilities. Benefits to this recommendation go beyond cost savings. Evaluating the overall amount of RSDC facilities would allow the OJA to reinvest in alternatives to detention. There are not many funded viable alternatives to RSDCs in Oklahoma so RSDCs are often relied upon to be the first place to send juvenile offenders. If RSDCs are not generally filled to capacity, then the OJA has the ability to re-license the RSDC to have fewer beds. However, this may cause the County to receive less revenue leading to fewer incentives to maintain these types of facilities.

Per OJA, in the past, agency administrators have tried to adjust the fixed rate to allow for a fixed and variable component (the variable component being based on services rendered) of the per bed rate; however, this would be detrimental to smaller counties, as low volume could not allow the smaller county RSDCs to cover their costs. Keeping smaller facilities funded under the new fee-for-service model will be a challenge.

Many counties are sub-contracting out their RSDC to another entity, sometimes a Youth Service entity. This means that counties contract the entire facility (physical facility and administration) through this third-party entity. OJA estimates that there may be up to a 20% artificial inflation of costs. Per Oklahoma statute §10A-2-3-103, the boards of county commissioners in each county shall provide for temporary detention services and facilities. County commissioners often contract RSDCs and services to third-party contractors. Due to the statute, OJA must negotiate with the county instead of negotiating directly with the contractor providing the RSDC and services.

Recommendation #3 - Monitor the availability of beds versus the demand for beds at the RSDCs, both from within the local counties and between counties, to determine if all RSDCs are appropriately sized and necessary given the mission of OJA, the trend in juvenile detentions, and the economics of the RSDCs.

Tasks	Responsible Party
Compile data on 3-5 years of bed availability and actual occupancy at each RSDC	CBS Deputy Director, assisted by IT Director
Compare bed availability and actual occupancy for each RSDC	CBS Deputy Director, assisted by IT Director
Review results to determine the trend for beds unoccupied and if any RSDC encountered an overage of demand versus available beds.	CBS Deputy Director, assisted by IT Director

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

Recommendation #4 - Strategically right-size the number of RSDCs, repurposing beds in certain areas.

Tasks	Responsible Party
Compile 3 - 5 years of data showing the bed occupancy rate for each Regional Secure Detention Center (RSDC)	CBS Deputy Director
Rank each RSDC from highest to lowest in terms of utilization, or bed occupancy rate	CBS Deputy Director
Compile data that shows success (recidivism, completion of programs, etc.) of juveniles in RSDCs versus other programs (Residential Treatment Centers, Level E Group Homes, Community-Based Youth Services)	CBS Deputy Director
Prepare a report to present to the State Government as to why the reduction of Community Detention Centers would be beneficial to juveniles in connection with the Juvenile Detention Alternative Initiative (JDAI), which is a part of the State Plan for Detention	CBS Deputy Director
Meet with State Government to present findings and results and propose legislation in order to reduce the number of Community Detention Centers	CBS Deputy Director

Recommendation #5 - Consider a move to a fee-for-service compensation models for the RSDCs and adjust and improve these compensation models as they are beginning to be used.

Tasks	Responsible Party
Compile a 3- 5 year comparison of bed occupancy by RSDC	Deputy Director F&A
Review comparison to evaluate RSDC utilization and bed occupancy rates	Deputy Director F&A
Determine and negotiate an appropriate per bed rate and improve the compensation models as these rates after they are implemented	Deputy Director F&A

Alternatives to Detention

OJA should request funding for community-based alternative services for juveniles to avoid detention in general. Alternatives to detention include electronic monitoring devices, home bound detention, and day reporting.

Recommendation #6 - Consider additional community-based alternative services for juveniles to avoid detention in general.

Tasks	Responsible Party
Conduct a research on what other states have implemented as an alternative to detention (foster care stipends, ankle bracelets, etc.)	CBS Deputy Director
Compile a listing from research of plausible and potential alternatives to be utilized by the OJA	CBS Deputy Director
Conduct a research on the listing of potential alternatives for success rates and outcomes	CBS Deputy Director
Create a plan and timeline for implementation of alternatives, using the plan in connection with the JDAI and the State Plan for Detention	CBS Deputy Director
Implement alternatives and track data (success rates, costs, etc.) associated with these alternatives	CBS Deputy Director
Compile one year of data from use of alternatives and compare to outcomes of individuals placed in detention	CBS Deputy Director

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

Recommendation #16 - Monitor the success of the implementation of the incentive-based payments to Community Group Homes and consider aspects that may be applied to RSDCs.

Tasks	Responsible Party
Collect data on results (improvement of service, youths served, completion of programs, recidivism, costs saved, etc.) of the incentive-based payments and compare to data from prior to implementation of incentive-based payments	CBS Deputy Director
Discuss if any, or all, aspects of the incentive-based payments could be applied with the RSDCs to improve things such as morale, retention, efficiency, etc.	CBS Deputy Director

These alternatives are typically cheaper than placing juveniles in RSDCs and they also provide a more suitable environment. Multiple states have successfully acted upon the effort to “Reduce, Reform, Replace, Reinvest”²:

- Reduce the pipeline into youth prisons to reduce the number of incarcerated youth.
- Reform the culture, configuration and decision-making process so that the entire system comes to focus on achieving positive outcomes for every youth instead of just housing them.
- Replace youth prisons with smaller, non-correctional programs that focus on turning lives around. These are treatment-intensive, developmentally appropriate, secure programs that emphasize stronger youth-staff relationships, nurture family engagement, and build community connections.
- Reinvest by implementing all three strategies above simultaneously. Dollars saved can be used to further expand the array of options available.

States that have successfully implemented alternatives to detention include³:

- California - Achieved an 80% decrease in youth in state facilities.
- Ohio - Reduced correctional facility admissions by 68%.
- Missouri- While cross-state recidivism comparisons are challenging, Missouri reports a recidivism rate of 31%; only 6.6% of youth return to the juvenile justice system and only 6.6% are committed to the adult prison system within three years.
- Virginia - Reduced population by about 40% in two years and decreased the length of stay by 12%.
- Texas- Youth confined to facilities decreased by 2/3, and saved the state \$150 million.

Given the success in multiple other states, Oklahoma should commit additional resources to identifying and developing alternatives to RSDCs.

Legislation to Allow OJA to Contract directly with Service-Providers of RSDCs

Propose new legislation or amend current legislation that allows OJA to contract directly with the organization that is administering the RSDC, on an as needed basis. This will potentially allow OJA to have stronger negotiating position and reduce costs by avoiding any artificial inflation of costs. In some counties, the county commissioners may not be completing much contract monitoring or actively negotiating their contracts due to all of their other duties. If OJA could negotiate directly with contractors, they could be in a better position than the county commissioners to monitor and negotiate service contracts.

² The Future of Youth Justice: A Community-Based Alternative to the Youth Prison Model; by Patrick McCarthy, Vincent Schiraldi, and Miriam Shark

³ *ibid*

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

Recommendation #7 - New legislation, or amending current legislation, to allow OJA the option to contract directly with the organization which is administering the Community Detention Centers, instead of contracting through counties.

Tasks	Responsible Party
Discuss and determine the possibility of being able to contract directly with the organization which is administering the RSDC instead of the counties. Include the possibility of OJA being able to influence the decision on which organization is the subcontractor for the county.	Chief Operating Officer
Determine if current legislation can be amended to allow for the OJA to contract with the organization which is administering the RSDC and have the option to decide who the contractor will be, or if new legislation is needed.	Chief Operating Officer
Discuss what laws will need to be amended or new legislation will be needed as well as the language of the amendments or legislation	Chief Operating Officer
Draft amended or new legislation	Chief Operating Officer
Meet with legislator's to answer any questions as they consider the passing of amended or new legislation	Chief Operating Officer
Implement amended or new legislation	Chief Operating Officer
Develop and implement new procedures for negotiating directly with the RSDC providers	Chief Operating Officer

Community-Based Support Group

Increase Utilization of the JOLTS System

Instead of contract and field monitoring to review documentation of costs under the cost-reimbursement model, all of the services provided by CBYS contractors can be entered into JOLTS and they can be paid based on the services provided. This can reduce administrative costs and free up time for the contract monitoring staff. OJA is already working towards going to rate-based contracts and hopes to convert all major contracts to rate-based by the end of the year. The data entered into JOLTS can also be used to develop visual graphics and other statistics for measuring performance by CBYS providers.

Recommendation #8 - Consider implementing a process for service providers to enter services into JOLTS and to be paid based on the services provided through the JOLTS system.

Tasks	Responsible Party
Reach out to the administrators of JOLTS and begin discussions on the possibility, costs, and functionality of allowing service providers access to enter their services into the system, and being paid through the system.	OPI Administrator, assisted by IT Director
Begin discussions with service providers to make them aware of the change and their responsibilities and the way they will be paid, which will have them inputting services provided into the JOLTS system	OPI Administrator, assisted by IT Director
Work with JOLTS administrators on how the process will look and what will need to be done on both the service provider's and OJA's end in order to implement the process successfully	OPI Administrator, assisted by IT Director
Create a plan of action regarding implementation and the timeline for the migration of the service providers to the system	OPI Administrator, assisted by IT Director
Prepare and deliver instruction materials to service providers explaining and showing how to input information about services provided into the JOLTS system and begin paying providers through the JOLTS system	OPI Administrator, assisted by IT Director

Reimbursement paid to CBYS providers has historically been under a cost-reimbursement model, but as of January 1, 2019, a fee-for-service based system will be implemented in an effort to be better stewards of Oklahoma tax dollars and to start paying service providers based on performance and rendering services instead of the costs they incur. All

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

CBYS contracts will go to rate per service. In the transition, CBYS is paying its providers an amount to “keep the lights on” along with the rate to be sure they have enough volume to be solvent.

Historically, OJA has found that the allocation of CBYS funds has appeared to be based on political considerations in the geographic areas. Some CBYS providers were very well funded while others struggled. The change that is being made will neutralize this imbalance. It is expected that CBYS providers that live up to expected performance levels will thrive, while underperformers may struggle.

Review CBYS Provider Requirements and Remove Unnecessary Barriers to Entry

BKD recommends reviewing requirements and consider removing or limiting parts of the requirements, which will promote more competition among these current and potential CBYS providers and allow additional service providers to enter the market more easily. It could also allow for more innovative service approaches that depart from conventional models. The OJA may not be able to remove all of these barriers due to statutes.

Recommendation #9 - Consider removing or limiting parts of the requirements for the OJA to only work with the currently designated Community-Based Youth Services providers, which will promote more competition among these providers and allow additional service providers to easily enter the market.

Tasks	Responsible Party
Review requirements instructing the OJA to only enter into contracts with designated CBYS providers and determine if there are any requirements which can be removed or limited	COO, assisted by OPI Administrator
Evaluate the criteria to become a designated Community Based Youth Service provider, and consider updating to reduce any perceived or actual barriers to entry	COO, assisted by OPI Administrator
Work with the State Government to remove, or determine what updates to requirements would look like	COO, assisted by OPI Administrator
Remove requirement or implement updates to requirements	COO, assisted by OPI Administrator

There are currently 40 CBYS providers; therefore, OJA has been paying for 40 directors, 40 facilities, etc. while not incentivizing CBYS providers to be more efficient or to cooperate. Contract monitoring for CBYS providers is currently manual and cumbersome. The cost-reimbursement model requires site visits, extensive documentation of costs, and manual completion of a spreadsheet of their expenses by CBYS providers. These program administration costs reduce the amount of funds that can be spent on direct services to juvenile participants.

However, changing to a fee-for-service model in 2019 should help resolve this challenge. It will lower payments to vendors that are not providing services. Also, there are monitoring costs involved with reimbursement based contracts to document costs and determine if the amount of costs being reported by the CBYS providers is accurate. This may also reduce the amount of CBYS program administrative costs because there will be less cost monitoring required.

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

General Programs and Program Performance

Juvenile Resident Healthcare

BKD recommends that OJA work with the State of Oklahoma or Federal Government to determine the most cost efficient way to provide health care coverage for juveniles who are in transition from the detention centers back into the community. Other states such as Indiana, who enacted a law in July 2015, which requires its Department of Corrections to help enroll individuals in Medicaid before releasing them from custody by helping them reactivate suspended Medicaid coverage and working with the inmates to complete new Medicaid applications 60 days before release⁴.

Recommendation #10 - Work with the State or Federal Government to determine the most cost efficient way to provide health care coverage for juveniles in OJA's custody.	
Tasks	Responsible Party
Conduct a research on what other states have implemented to provide cost efficient health care coverage for juveniles in their custody	Deputy Director F&A
Begin meetings and discussions with the State and Federal Government to discuss cost efficient ways health care coverage can be provided to juveniles in either of the OJA's support groups	Deputy Director F&A
Determine most cost efficient way to provide health care coverage for the OJA	Deputy Director F&A
Create a plan and timeline to implement health care coverage changes	Deputy Director F&A
Implement health care coverage changes for juveniles in OJA's custody	Deputy Director F&A

When OJA places a juvenile in a secure facility or a juvenile is placed in a RSDC, starting the first day of the next month, SoonerCare (Medicaid) considers the juvenile an inmate and therefore no longer eligible for SoonerCare coverage. While a large number of youth entering juvenile justice residential facilities may be eligible for SoonerCare or the Children's Health Insurance Program (CHIP), federal law prohibits most from having their services paid for by SoonerCare or CHIP, due to the "inmate exclusion."

Given their low incomes, most children moving into and out of juvenile justice facilities are likely eligible for Medicaid and CHIP. Further, nearly all crossover youth in juvenile justice residential placements are automatically eligible for Medicaid on the basis of being a foster child⁵. However, the inmate exclusion policy limits Medicaid and CHIP coverage for most services for youth detained in juvenile justice facilities. Specifically, federal Medicaid law prohibits the payment of federal Medicaid matching funds for the cost of any services provided to an "inmate of a public institution," except when the individual is a "patient in a medical institution."⁶ This policy, known as the inmate exclusion, applies to both adults in jails or prisons as well as to youth involuntarily detained in a state or local juvenile facility, although there are some distinctions in the law between Medicaid and CHIP. Youth may be enrolled in Medicaid while detained in a juvenile justice facility; however, even if they are enrolled, Medicaid will not cover the cost of their care, except for care received as an inpatient in a hospital or other medical institution. In contrast, children may not be enrolled in CHIP while involuntarily detained⁷. As such, juvenile justice-involved youth may often be uninsured upon release from a facility, making it difficult to access continuous, comprehensive care as they reenter the community. These gaps in coverage and access may have particularly important implications for juvenile justice-involved youth given their significant physical and mental health needs.

⁴ <https://www.pewtrusts.org/en/research-and-analysis/issue-briefs/2016/08/how-and-when-medicare-covers-people-under-correctional-supervision>

⁵ Redmond, Pat. Children Discharged from Foster Care: Strategies to Prevent the Loss of Health Coverage at a Critical Transition. Kaiser Family Foundation. January 2003

⁶ Subparagraph (A) in the matter after section 1905(a)(29) of the Social Security Act.

⁷ Section 2110(b)(2)(A) of the Social Security Act. "Clarification of Medicaid Coverage Policy for Inmates of a Public Institution," (December 12, 1997).

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

Agency Performance Measurement

The OJA currently measures the performance of its programs and employees through three processes:

- **Agency Strategic Plan:** Every other fiscal year as part of the budget request submitted to OMES, the OJA submits a strategic plan. The strategic plan provides information about the programs, the amount of staff dedicated to the programs, major accomplishments over the past year, program funding, and goals for the next fiscal year, and action items to achieve goals. The OJA also submits a cost performance assessment to OMES showing labor costs and the total amount of all invoices paid.
- **Performance-Based Standards:** Two times per year, the OJA measures the performance of outcomes of the residential placement support program through Performance-based Standards measurements. Performance-based standards is a data-driven improvement model grounded in research that challenges youth correction, detention, assessment and community-based facilities and agencies. Performance-based standards set national standards of excellence to guide facility operations, services and programs to best serve youths, staff and families. Performance-based Standards address facility safety, security, order, programming and fairness as well as services provided to respond to youth's needs for physical health, behavioral health, substance use, education, vocational education, reentry planning and connection to family and community. The OJA inputs data into a database and Oklahoma is measured against 43 other states that participate in this program
- **Employee Performance Reviews:** Employee reviews are completed yearly through the Human Capital Management System provided by OMES.

Utilize Data and Predictive Analytics to Evaluate Program Effectiveness

The data measured through Performance-based standards mostly involves metrics that are measured while the juveniles are housed in secure facilities. The OJA does not capture much data around how programs and services are affecting the outcomes of participants, especially in the long term.

Recommendation #11 - Consider utilizing more data and predictive analytics to measure effectiveness of its programs and services. Specifically, more data to measure the long-term outcomes of youth who participate in programs and services.

Tasks	Responsible Party
Discuss and determine specific outcomes of youth who participated in programs and services with the OJA to track that would be useful in improving the long-term outcomes of the programs and services offered	OPI Administrator, assisted by IT Director
Meet with members of legislation to determine what type of deliverable they would like to see and discuss working together in order to track these specified outcomes	OPI Administrator, assisted by IT Director
Research service providers and/or release an RFP for providers who can develop and implement that desired deliverable.	OPI Administrator, assisted by IT Director
Along with the service provider, once selected, create a plan of action for capturing data on long-term outcomes for juveniles and timeline to implement the tracking	OPI Administrator, assisted by IT Director
Compile results and determine areas of improvement for OJA programs	OPI Administrator, assisted by IT Director

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

Evidence-based and outcome-driven programming have become highly prevalent in the juvenile justice field over the last decade.⁸ Certain states have adopted legislation to measure the performance of programs and treatment for juvenile offenders and base program funding on performance measurements.^{9 10}

Los Angeles County in California is on the forefront for using data in juvenile justice. The Juvenile Justice Crime Prevention Act (JJCPA) in Los Angeles County provides funding to counties for juvenile-targeting programs that have proven effective in curbing crime among juvenile probationers and young at-risk offenders. The JJCPA requires the Board of State and Community Corrections to submit annual reports to the California state legislature measuring the success of programs. Measurements of individual programs include: (1) successful completion of probation, (2) arrests, (3) probation violations, (4) incarcerations, (5) successful completion of restitution, and (6) successful completion of community service. Los Angeles County can also request that programs measure supplemental outcomes for locally identified service needs.¹¹ Los Angeles County is also developing in-depth definitions for the data they are measuring. For example, recidivism is measured in many different ways. In some cases, it is based on whether or not a child reoffends and for others it is based on whether that child actually progresses into college or a career. Officials at the City of Compton, for example, look at the data of most interest to them, like a reduction in recidivism, and work backwards to define the data points they are measuring to become more data informed.

There are tangible ways this could be used in Oklahoma right now. For example, there is a welding certificate program that is offered to youth as part of the Welch, Oklahoma facility. It was represented to us that there is good anecdotal evidence that this program is helpful in getting released youth help with a future career. If OJA could capture and analyze more information from these juveniles about how they are progressing well after they are released, they may be able to improve the program and provide support to implement it or other similar programs elsewhere.

Data collection is applicable to LEGH's as well, especially in the area of residence-based therapy. For Medicaid to fund residence-based therapy, OJA has oversight requirements that must show that they provide therapy for each client. However, LEGH's are not collecting much additional information on how therapy is helping them progress in the long-term. More data can help OJA understand what they are getting for their money in residence-based therapy and other services.

It is possible that OJA could invest some of the money they save through rate-based contracts with CBYS providers to accomplish this. OJA should consider using data analytics consultants to come in with outside perspective to find new ways OJA can analyze and measure data.

Employee Performance Reviews

The employee performance review system is part of the Human Capital Management system provided by OMES. Through inquiry with OJA, BKD ascertained that OJA does not currently have the ability to customize the employee performance evaluation process to measure performance metrics that are specific to OJA employees. BKD recommends that OMES enable the OJA to customize their employee performance evaluations to maximize the value of performance evaluations and cater them to OJA's employee job duties and expectations.

Recommendation #12 - OMES to provide OJA the ability to customize the employee performance evaluation process. Currently, the employee performance evaluation process is controlled by OMES.

Tasks	Responsible Party
Discuss and compile a listing of requested customizations and improvements to the employee performance evaluations that make it useable for OJA	Deputy Director F&A

⁸https://cjjr.georgetown.edu/wp-content/uploads/2015/03/ImprovingEffectiveness_December2010.pdf

⁹ These states include: Florida, Pennsylvania, Washington, North Carolina, Oregon, and Tennessee

¹⁰https://cjjr.georgetown.edu/wp-content/uploads/2015/03/ImprovingEffectiveness_December2010.pdf

¹¹ https://www.rand.org/pubs/research_reports/RR2401.html

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

Recommendation #12 - OMES to provide OJA the ability to customize the employee performance evaluation process. Currently, the employee performance evaluation process is controlled by OMES.

Tasks	Responsible Party
Meet with OMES to discuss these improvements to the employee performance evaluations	Deputy Director F&A
Create a plan and timeline with OMES for the completion of the customization and the implementation with the new customized features	Deputy Director F&A
Implement the new employee performance evaluation process	Deputy Director F&A

Public-Private Partnerships

There is a Women in Recovery (WIR) program that is managed by the Oklahoma Office of Management and Enterprise Services in Tulsa that receives much of its funding through a public-private partnership with investment from the George Kaiser Family Foundation (GKFF). The Women in Recovery program has a “pay for success” funding model which was the first program with this type of contract in the country dealing with female incarceration¹². Payments to WIR are tied to outcomes of participants, such as the number of prison years avoided, program completion rate, and program recidivism rate¹³.

Recommendation #13 - Consider doing more to seek out public-private partnerships to get private investment into OJA programs.

Tasks	Responsible Party
Conduct a research to determine what public-private partnerships are available for OJA programs	Executive Director
Determine requirements for public-private partnerships available and whether the OJA programs can complete/meet these requirements	Executive Director
Apply for eligible public-private partnerships	Executive Director

Community intervention models through public-private partnerships may be a new way to help programs get funding. Increased data collection, as explained above, may provide additional support for private investors to invest in programs. If private investors can see that programs are meeting their goals and providing successful outcomes for participants, they may be more likely to invest more dollars.

Direct Care Recruitment, Retention, and Succession

INNOVATION TOURNAMENT FINALIST: OJA currently has about 150 employees that provide direct care and supervision to OJA clients. The Resident Care Specialist (RCS) is a position fulfilling this role at the OJA and the RCS III position is at the supervisor level and requires specialized training and experience. The RCS positions see high turnover due to the difficult nature of the job, lack of training, and lack of management checking in on them.

The recruitment and hiring of open RCS positions is handled centrally by Oklahoma’s state human resources function. There have been examples where job seekers find other positions by the time they are interviewed and hired at OJA. Further, there is a lack of consistent and regular training, especially at the RCS III level, which results in high vacancy rates after these positions are filled.

¹² <https://nondoc.com/2017/04/12/women-in-recovery-prison-diversion/>

¹³ <https://payforsuccess.org/project/oklahoma-women-recovery>

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

Recommendation #14 - Consider delegating certain responsibilities for recruitment, retention, and succession planning to the internal human resources function as well as the existing employees that fill these positions.

Tasks	Responsible Party
Discussion between internal HR, management and Resident Care Specialist (RCS) employees to create a listing of job responsibilities for job postings, along with characteristics and qualifications of individuals needed to fill these positions	RPS Director
Internal HR, management and RCS employees to discuss areas which could lead to potential of individuals leaving for another position	RPS Director
Create a plan of action and timeline to address weakness identified	RPS Director
Review results of internal HR recruitment and retention rate of those hired employees and compare to those of individuals hired when Oklahoma's state HR was completing this function	RPS Director

Ultimately, OJA staff have more relevant knowledge about the types of individuals and skillsets that will be effective employees at the OJA so they may be able to identify these individuals more successfully than the state's central human resources function. Also, if the OJA employees are more invested in the hiring process, they may take more ownership over the development and retention of new staff.

Technology can also be used to improve recruitment, retention, and succession. Online video meetings (for example Skype) for job interviews can allow interviews to occur sooner in the hiring process and allow OJA to interview more applicants. Computer-based training modules can provide more consistent training for OJA employees. Performance reviews (currently handled by central HR without the ability to customize) that are more catered to the needs of OJA can help OJA management track the performance of metrics that are more specific to OJA's goals.

RCS employees are not currently trained in HR responsibilities so additional training in HR processes and procedures will need to be provided. This additional training will require additional resources and overtime. The benefits from reduced turnover may outweigh the costs to implement moving these responsibilities to the OJA.

Encourage Parental Involvement

There are complex family dynamics that impact parental engagement in treatment plans for OJA youth. The lack of engagement by parents causes negative impacts to an OJA youth's progression. OJA should consider incentivizing parents to be more engaged through reduced community service hours, reduced costs/fees, and other incentives. Oklahoma statutes (Title 10A, Article 2, §2-502) allow judges to sanction parents to create a home environment that will assist juvenile justice involved youth in their success.

Recommendation #15 - Consider non-financially incentivizing parents to be more engaged with treatment programs which may result in less time spent being supervised by OJA.

Tasks	Responsible Party
Conduct a research to determine ways other similar juvenile agencies have increased parent engagement with treatment programs and what the success rate looked like (i.e. providing transportation)	CBS Deputy Director, assisted by RPS Director
Compile a list of ideas which would best fit treatment programs offered by the OJA	CBS Deputy Director, assisted by RPS Director
Create a plan of action, budget and timeline to implement activities to engage parents	CBS Deputy Director, assisted by RPS Director
Compile 6 months of data and review the success rate of implementation	CBS Deputy Director, assisted by RPS Director

Data collection, as discussed above, would be beneficial to monitor and reward parental involvement, and report back to the legislature on the impact that is being made.

FACILITIES

Background

The OJA primary facilities evaluated include the medium secure facilities.

Medium Security Facilities

The OJA operates two medium secure facilities for adjudicated delinquents and youthful offenders, the Central Oklahoma Juvenile Center (COJC), an 82-bed facility serving both males and females in Tecumseh, Oklahoma and the Southwest Oklahoma Juvenile Center (SWOJC), a 60-bed facility in Manitou, Oklahoma.¹⁴ Residents of the medium secure facilities are served through therapeutic interventions (*i.e.*, individual, group, family and substance abuse treatment) as determined through their Individual Service Plans. A charter school for residents is in place at both medium secure facilities. Both facilities are accredited by the American Correctional Association and were found to be compliant with the Prison Rape Elimination Act through an onsite audit. The facilities were assessed and are licensed by the Office of Public Integrity.

The COJC facility was originally a school for “incurable girls”. The SWOJC facility is a re-purposed high school building acquired by OJA in 1993. Many of the buildings at both facilities date back to the 1930’s and earlier. Neither location is ideal for use as a juvenile justice facility. Many buildings are outdated and not conducive to education, treatment and rehabilitation. As examples, both locations utilize open bay sleeping arrangements to some degree, which is not ideal for youth who need to be in a treatment modality. Both locations have blind-spot and line-of-sight issues, which can pose significant issues from a security and safety standpoint. Both locations have deferred maintenance issues as well. The FY20-FY25 Strategic Plan estimates the deferred maintenance backlog at approximately \$2.585 million.

Currently, OJA is in the planning and design phase for the New Generation Facility (NGF) for treating and housing the youth in their secure care. The NGF will be built at the current COJC facility location in Tecumseh, Oklahoma. The intent is that the NGF will become the only Oklahoma secure care treatment for all juveniles. Thus, the COJC facility will largely be replaced by the NGF, and juveniles from SWOJC will be transferred to the NGF upon its completion. Through the new centralized facility, it is OJA’s goal to address technology inefficiencies, improve medical and treatment services, provide equitable education for all resident youth, and save money in transportation and travel.

OJA is currently in the Request For Proposal stage for the construction of NGF. Construction is expected to commence in the spring of 2019 and be completed by the end of 2020. The key design concepts for the NGF include:

- Masterplanned Program for 144 youth
- Unit housing of no more than 16 youth each (maximum of 9 “cottages”)
- Acute housing pod to manage the reintegration of deregulated youth (crisis management unit)
- Improved daylighting
- Normative environment
- Comfortable sleeping rooms that are a place of sanctuary
- Multipurpose spaces

¹⁴ The “For Girls” (“4G”) location in Norman, Oklahoma closed in August 2018 and the female residents transferred to COJC. The former 4G building is being leased to a community group home provider.

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

- Safe, private spaces
- Year-round outdoor activity space
- Life skills training
- Staff retention

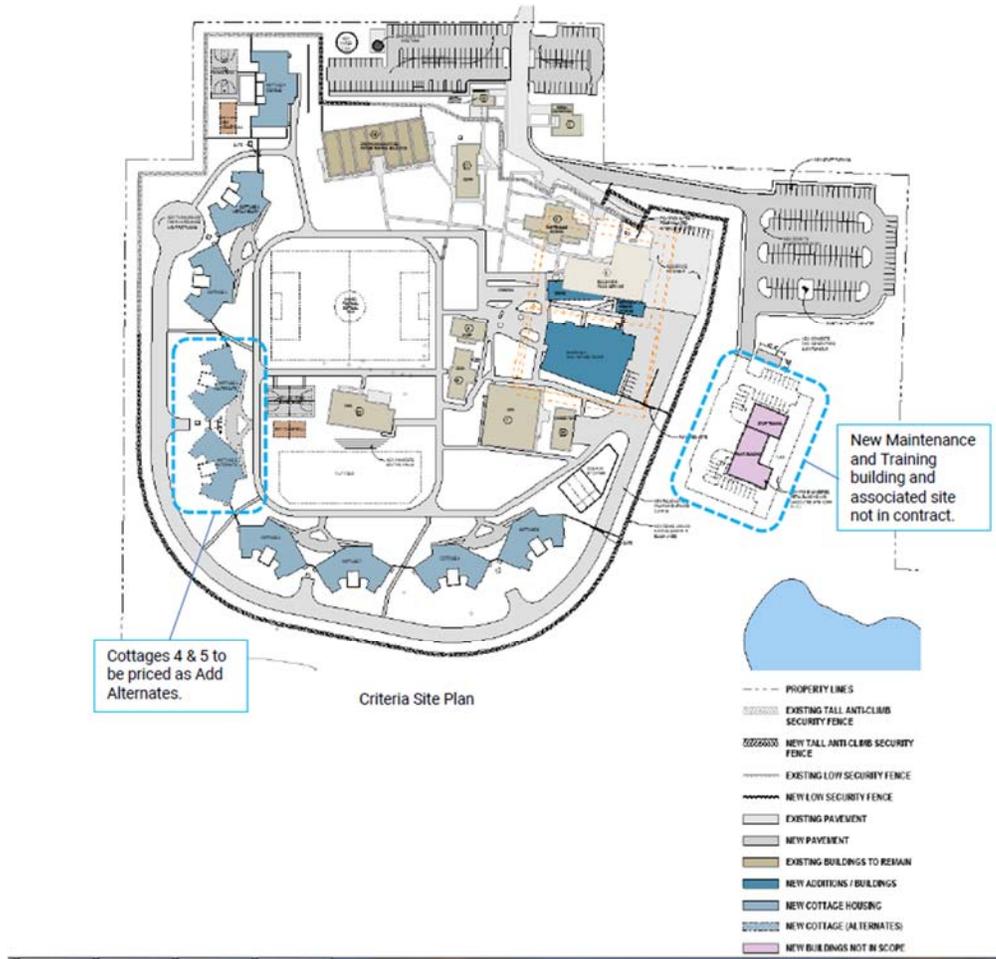
Each cottage will be hardened to allow for increased wear and tear. Needed support buildings such as Intake, Clinic, Crisis Management Unit, Dining and storage are also included in the plan. It is anticipated that some existing COJC buildings will remain for use in the NGF. Safety and security issues are a priority for the design of the NGF, including ensuring sight lines, direct and passive supervision, and suicide resistant components in all aspects of the design. The NGF will be built with the aid of the American Correctional Association Standard for Juvenile Facilities.

The project is expected to occur in two major construction phases and will consist of multiple sub phases to complete the project while maintaining an operational and secure facility. Phase 1 will consist of building four residential cottages and building/renovating support buildings. Phase 2 will consist of building at least three residential cottages (for a total of at least seven cottages). The site Masterplan is included as **Figure 1**, below.

In 2017, lawmakers approved and the governor signed legislation authorizing up to \$45 million in bonds for the construction of the NGF. The construction budget is currently \$46 million, with \$1 million being made available from OJA funds. OJA projects that it will fund the bond payments with cost savings from efficiencies afforded by consolidating all medium secure facilities to one location, and will require no increase in state appropriations to fund construction or improvements.

OJA currently employs more than 300 personnel at its medium secure facilities. Staffing includes, but is not limited to, administration, medical/mental health services, programming, direct care/security, and maintenance. The largest number of personnel at the medium secure facilities are in the area of direct care/security, currently approximating 190 personnel.

Figure 1



Observations/Opportunities

Medium Security Facilities

Physical Facilities

BKD’s assessment of the existing medium secure facilities is based on the tour of the COJC facility and discussions with Terry Smith, Deputy Director of Residential Placement Support and Kevin Clagg, Deputy Director F&A (collectively “Management”).

Per Management, no significant capital improvements or maintenance are planned for the SWOJC facility, and will only occur if necessary to preserve the integrity of the buildings or the safety of the residents and/or staff. A similar stance for capital improvements and maintenance exists for the COJC facility, unless the capital improvements or maintenance will translate to the Next Generation Facility (NGF).

Recommendation #1 - Deferred maintenance issues at COJC and SWOJC be reviewed by management and addressed where reasonably possible, with priority given to issues of safety and security.

Tasks	Responsible Party
Deputy Director of Residential Placement Support (RPS) instruct Facility Superintendents to supply a current listing of deferred maintenance at each facility	Deputy Director of Residential Placement Support (RPS)/Superintendents
Facility Superintendents work with Facility Maintenance to prepare a listing of deferred maintenance at each facility along with associated costs to repair	Superintendents/Facility Maintenance

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

Review list of deferred maintenance and prioritize based on safety and security issues	Superintendents
Review prioritized deferred maintenance list with Deputy Director RPS and determine what items can and should be addressed given available resources	Superintendents/Deputy Director RPS
Review deferred maintenance issues to be addressed with Facility Maintenance	Superintendents/Facility Maintenance
Request acquisition of necessary supplies	Facility Maintenance/Facility Admin Staff
Perform approved deferred maintenance	Facility Maintenance
Review and approve deferred maintenance repairs	Superintendents

Recommendation #2 - The security consultant assisting the AE1/DBE with the designing of the NGF should tour COJC and SWOJC facilities to see if there are security considerations that can be reasonably addressed in the interim to improve resident and staff safety.

Tasks	Responsible Party
Security consultant tours the facilities and assesses security considerations that may reasonably be addressed in the interim	Superintendents/Security Consultant
Review security consultant's listing of security concerns and prioritize	Superintendents
Review prioritized security considerations list with Deputy Director RPS and determine what items can and should be addressed given available resources	Superintendents/Deputy Director RPS
Review security considerations with appropriate facility staff	Superintendent/Facility Staff
Review and approve changes for security considerations	Superintendents
Request acquisition of necessary hardware/software, if applicable	Facility Staff
Implement approved changes	Facility Staff

Recommendation #3 - The technology consultant assisting the AE1/DBE with the design of the NGF should review the current IT capabilities at the medium secure facilities and determine a plan to appropriately update the facilities' hardware/software/document imaging capabilities. Such a plan should translate directly to implementation of the same in the NGF.

Tasks	Responsible Party
Technology consultant tours the facilities to assess current hardware/software/document imaging capabilities and determine a plan to update those capabilities for current use and future use in the NGF	Superintendents/Technology Consultant
Review technology consultant's recommendations and prioritize implementation plan	Superintendents
Review prioritized technology plan(s) with Deputy Director RPS and determine what items can and should be addressed given available resources and an appropriate timeline	Superintendents/Deputy Director RPS
Request acquisition of necessary hardware/software	Facility Staff/DBE
Implementation of technology hardware/software	Facility Staff/OMES IT/DBE

Medium Facilities Staffing

BKD noted that OJA recently combined the Juvenile Security Officer (JSO) and Youth Guidance Specialists (YGS) positions into one position, Resident Care Specialist (RCS). JSO historical responsibilities involved safety and security at the medium secure facilities, including walking patrols, rule enforcement, and providing protection for residents and staff. YGS historical responsibilities involved providing direct care and supervision to residents, including providing para-professional guidance and counseling to residents, interventions to control aggressive behaviors, and documentation of behaviors and activities. The goals in combining the two positions into the RCS position include combining the direct care, supervision and security positions to provide for enhanced performance opportunities for employees and to attain personnel cost efficiencies.

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

Over the past few years, OJA has been in the process of shifting the culture of the juvenile justice system it is responsible for overseeing from “punitive to rehabilitation”. As an example, the use of pepper spray at facilities has been eliminated and is being replaced with increased training to equip staff with the skills to de-escalate situations and improve and maintain facilities’ safety and security. However, interviews of staff representatives at COJC revealed that some facility staff, particularly those who interact with residents on a frequent basis, remain concerned that the culture change quells their or their colleagues’ ability to maintain control when disruptive behavior occurs, and may place both residents and staff at a higher risk of injury. In interviews, management indicated that they are aware of these concerns and that there is some validity to them at this time. However, as more training is provided and staff learn more effective alternative methods to dealing with disruptive behavior, the belief is that these types of concerns will subside.

Through interviews with representatives of secure facilities staff, BKD ascertained that more open and effective communication between OJA administration/facility management and the secure facility staff is desired from the perspective of the secure facility staff. Common themes brought up in interviews indicated that secure facility staff do not always feel that they are appropriately informed with regard to changes in staff position responsibilities, operating policies and procedures, and strategic initiatives that impact the secure facilities. Furthermore, some facility staff indicated that they would like the opportunity to offer input in those areas given their knowledge of the secure facilities’ daily operations.

The communication issue appears to be contributing to employee morale issues and potentially to high turnover rates in secure facility positions. Interviews with secure facility staff indicate other factors contributing to high turnover include, but are not necessarily limited to, below-market pay, shift lengths, the need for more job training, and safety concerns. High turnover rates result in increased costs for recruitment and training on an ongoing basis, and can decrease the overall effectiveness of the services and programming provided at the secure facilities.

OJA has recently increased the pay scale for the RCS positions, but OJA administration acknowledged that the pay scale for secure facility staff is on the low end of that offered by other state agencies and below market for some positions. As an example, BKD learned that facility nursing staff are paid approximately \$16 an hour which the nursing manager indicated is approximately \$5.00 per hour below the relevant market rate. Due to challenges hiring secure facility medical staff,¹⁵ at least in part due to the below market rate offered, some staffing is provided through Agency Nurses who are contracted to the facilities at an hourly rate of approximately \$32.00. From an economic standpoint, it appears to make sense to increase the offered hourly rate to assist in attracting facility staff rather than continue to hire Agency Nurses at twice the current facility staff rate. Therefore, the Nursing Manager has made a formal salary proposal and request to increase nursing staff hourly rates by \$5.00, which is currently under consideration by OJA administration/management.

Recommendation #4 - Work toward establishing a culture of communication between management and facility staff and among facility staff to assist in job performance at expected levels, employee morale and staff turnover.

Task	Responsible Party
Create and conduct a survey to determine strengths and weakness of communication between and among facility management and facility staff	Facility HR Manager
Compile results from survey and determine the significant areas of weaknesses	Facility HR Manager
Discuss survey results with Facility Superintendents	Superintendents/Facility HR Manager
Create a plan of action (and potentially policies) to address areas of weaknesses	Facility HR Manager
Review, approve and implement communication plan	Superintendents
Conduct a follow-up survey in order to determine if actions taken have addressed weaknesses	Facility HR Manager

¹⁵ The medium secure facilities have 24-hour medical clinics staffed by a rotation of Registered Nurses, Licensed Practical Nurses and psychological clinicians. Contracted physicians, dentists, psychologist and psychiatrists provide additional medical and mental health services.

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

Recommendation #4a - Assess the current job descriptions for secure facility staff to ensure they appropriately communicate expected activities, responsibilities and expected performance of each position.

Task	Responsible Party
Review and revise current job descriptions for all secure facility staff to align with current expectations with regard to activities, responsibilities and expected performance	Superintendents/Facility HR Manager
Distribute updated job descriptions to facility staff	Facility HR Manager
Conduct staff meetings to solicit feedback, concerns and potential areas of needed training	Superintendents/Facility HR Manager

Recommendation #4b - Establish a comprehensive staff training program for the secure facilities personnel appropriate for their job responsibilities. The training programs should encompass policies, procedures, de-escalation/resident behavior management techniques, decision-making and other skills desired of and expected to be implemented by staff in their daily duties, as appropriate for their positions.

Task	Responsible Party
Utilizing updated job descriptions, evaluate each facility staff for areas of needed training	Facility Staff Supervisors/Facility HR Manager
Establish facility staff training modules to address areas of need	Facility HR Manager
Conduct quarterly facility staff trainings to review overall policies and procedures. Also include situational analyses which would apply to all positions	Facility HR Manager
Conduct quarterly trainings by departments/staff positions to review policies, procedures, and desired and expected skills which are specific to different positions. Also include situational analyses which would apply to that position	Facility HR Manager/Facility Staff Supervisors
Review annual facility staff evaluations/appraisals to determine if training is on target and effective	Superintendent/Facility HR Manager

Recommendation #4c - Hold discussions/meetings with staff specifically to convey the strategic goals and objectives of OJA. The goal of the discussions/meetings should be to ensure that staff understand the importance of the strategic issues, goals and objectives of OJA and allow staff to ask questions and offer feedback for management's consideration.

Task	Responsible Party
Schedule staff meetings by department to discuss current/updated strategic goals and objectives	Superintendent
Discuss with staff the strategic goals and objectives, making sure to include what plans are in place to meet those goal and objectives	Superintendent
Create a plan of action to address feedback from staff, as appropriate	Superintendent
At next scheduled department staff meeting, discuss changes to strategic goals and objectives given staff feedback	Superintendent

Recommendation #5 - Review available case studies/research regarding common contributors to high turnover in impacted secure facility positions, and what can reasonably be done to address identified issues.

Task	Responsible Party
Review available case studies/research and contact other juvenile facilities such as those in Oregon and Kansas	Facility HR Manager
Consider results of facility staff exit reviews to determine if there are other specific issues contributing to turnover	Facility HR Manager
Review results of research and prioritize list of concerns, taking into consideration what the employees stated could be done to reduce/eliminate those reasons	Facility HR Manager

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

Create a plan of action to reduce/eliminate causes of concern which would cause potential staff turnover	Superintendent/Facility HR Manager
Monitor facility staff exit interviews to determine if implemented plan of action is have the desired impact	Superintendent/Facility HR Manager

Recommendation #6 - Conduct a salary survey for secure facility positions to determine appropriate pay scales to attract and retain qualified staff. Plans, timelines and budgets should then be established to move toward appropriate pay scales. Projected cost saving to be generated by the NGF should be considered as a potential funding source. - IN PROCESS

Task	Responsible Party
Determine if cost benefit to conducting internal salary survey of secure facility positions vs hiring third party service	Superintendent/Facility HR Manager
Compile a listing of average compensation for each position at all levels	Facility HR Manager/Consultant
Compile a listing of comparable market average compensation for each position and level	Facility HR Manager/Consultant
Compare the OJA compensation to market average compensation to determine any deficits	Facility HR Manager/Consultant
Review budget and determine plausibility of increasing compensation for positions where a deficit to the market average exists	Deputy Director of Finance & Administration (F&A)
Create a plan a timeline to move compensation levels of existing and future employees to those of the market average	Deputy Director F&A
Implement plan and timeline of moving compensation levels to those of the market average	Deputy Director F&A

Recommendation #7 - FY2020 budget request for a \$500,000 funding change for employee incentives to the direct care staff to improve the hiring pool and retention. The funding change request also includes costs associated with performance pay, virtual health visits and a 20 year retirement plan for direct care workers.- COMPLETED

Task	Responsible Party
Create a budget showing amounts to go towards employee incentives, performance pay, virtual health visits and retirement plan -COMPLETED	Deputy Director F&A
Make budget request through OJA Budget Work Program submitted to OMES - COMPLETED	Deputy Director F&A

New Generation Facility

BKD's assessment of the planned NGF is based on our reading of the Request for Proposal for the construction of the project, design drawings and discussions and interviews with Steve Buck- OJA Executive Director, Terry Smith- Deputy Director of Residential Placement Support and Kevin Clagg – Deputy Director F&A (collectively "Management").

Recommendation #8 - Complete the plans for the construction of the NGF. - IN PROCESS

Task	Responsible Party
Let Request for Proposal (RFP) 9.21.18 -COMPLETED	Deputy Director F&A/OMES
Mandatory pre-bid meeting/tour on Tecumseh campus 10.9.18 -COMPLETED	Deputy Director F&A/OMES
Owner addenda Issued 10.12.18 -COMPLETED	Deputy Director F&A/OMES
DBE questions due 10.19.18 -COMPLETED	DBEs
Responses due DBE questions 10.26.18 -COMPLETED	Deputy Director F&A/OMES
RFP response due date at 3:00pm 12.14.18	DBEs

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

Recommendation #8 - Complete the plans for the construction of the NGF. - **IN PROCESS**

Task	Responsible Party
DBE interviews 12.19.18	Deputy Director F&A/OMES/Selection Committee
Clarifications for DBE 1.4.19	Deputy Director F&A/OMES/Selection Committee
Announce DBE selection 1.11.19	Deputy Director F&A/OMES
Project contracting	Deputy Director F&A/OMES/DBE
Preliminary design phase	Deputy Director F&A/OMES/DBE
Schematic design phase	Deputy Director F&A/OMES/DBE
Design development phase	Deputy Director F&A/OMES/DBE
Construction documents phase	Deputy Director F&A/OMES/DBE
Construction phase	Deputy Director F&A/OMES/DBE
Review monthly progress reports and pay applications	Deputy Director F&A/OMES/DBE
Project close-out phases	Deputy Director F&A/OMES/DBE

Recommendation #9 - As part of the AE1/DBE team, hire a security consultant to assist with designing the security features at the NGF. - **IN PROCESS**

Task	Responsible Party
R&N System Designs is the designated electronic security consultant as part of the AE1 team for the NGF -COMPLETED	Deputy Director F&A/OMES
Successful DBE team to include a Security Systems Designer. Security design to be evaluated as part of the RFP selection process	Deputy Director F&A/OMES/Selection Committee

Recommendation #10 - Hire a work efficiency (time and effort) consultant to study the current staff processes to take into account how those processes will need to change to be optimized in the new facility.

Task	Responsible Party
Discuss vision, expectation and needs of what is to be accomplished with hiring of a work efficiency consultant	Deputy Director RPS/Facility Superintendents
Determine if competitive bid process must be utilized or if OJA can utilize the current vendor through OMES	Deputy Director RPS
Either open position up for bid or work with vendor available through OMES	Deputy Director RPS
Select work efficiency consultant that best fits the vision, expectation and needs of the OJA	Deputy Director RPS
Work efficiency consultant to perform study	Work Efficiency Consultant
Review results of work efficiency consultant and prioritize results	Deputy Director RPS/Facility Superintendents
Create a plan of action to address results of work efficiency consultant, beginning with the highest priority items	Deputy Director RPS/Facility Superintendents
Follow-up on actions taken and determine if results are positive or if more/different action needs to be taken	Deputy Director RPS/Facility Superintendents

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

Recommendation #11 - As part of the AEI/DBE team, hire a technology consultant to advise on the most appropriate hardware/software to assist in security and work efficiency efforts for the new facility.

Task	Responsible Party
Discuss vision, expectation and needs of what is to be accomplished with the hiring of a technology consultant	Deputy Directors RPS and F&A/Facility Superintendents/OMES IT
Determine if competitive bid process must be utilized	Deputy Director F&A
Either open position up for bid or research technology consultant	Deputy Director F&A/OMES
Review bids or contact multiple technology consultants and initiate discussions to determine cost and if they fit the needs of OJA	Deputy Directors RPS and F&A/Facility Superintendents/OMES IT
Select technology consultant that best fits the need of advising on hardware/software to assist in security and work efficiency efforts	Deputy Directors RPS and F&A/Facility Superintendents/OMES IT
Technology consultant to perform study	Technology Consultant
Follow-up on actions taken and determine if results are positive or if more/different action needs to be taken	Deputy Director RPS/Facility Superintendents

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

Recommendation #12 - Design a formalized data analytics process to coincide with its ability to collect/store electronic data through enhanced hardware/software resources.

Task	Responsible Party
Consider using the assistance of outside parties, such as the "Data Science for Social Good" fellowship at the University of Chicago (See note)	Executive Director/ Deputy Directors of RPS and F&A
Determine strategic questions of importance to OJA (focus on goals, objectives and pain points) that can be answered or tracked with the assistance of collected data	Executive Director/ Deputy Directors of RPS and F&A
Determine objectives or steps necessary to aid in answering strategic questions (what are you trying to accomplish and how will you know when you get there?)	Executive Director/ Deputy Directors of RPS and F&A
Determine key performance measures for each of the chosen strategic questions (what is important to track, why it is important to track and how to track it)	Executive Director/Deputy Directors of RPS and F&A
Determine where the necessary data is housed and who "owns" it (both internal and potentially external to OJA)	Deputy Directors of RPS and F&A
Determine availability of necessary software tools (e.g., Standard analysis-Excel & Access; Data analytics - ACL, IDEA, Arbutus; Data visualization-Tableau & NodeXL; Artificial intelligence)	Deputy Directors of RPS and F&A
Develop and apply data analytic procedures	Deputy Directors of RPS and F&A/IT Analyst
Analyze collected data and present results	IT Analyst
Review results of data analytics	Executive Director/ Deputy Directors of RPS and F&A
Implement plans of action and review as necessary for needed refinements and revisions	Executive Director/ Deputy Directors of RPS and F&A

Recommendation #13 - Initially build 7 of the 9 residential cottages allowed for in the masterplan due to the declining trend in population in Oklahoma secure detention facilities and Oklahoma State Bureau of Investigation (OSBI) juvenile arrest data.

Task	Responsible Party
Continue with plan to build four residential cottages in phase 1 of construction and three residential cottages in phase 2 of construction - COMPLETED	Deputy Director F&A
After phase 1 and 2 of construction, re-evaluate the population trend for juveniles in Oklahoma secure detention facilities to determine if remaining 2 cottages should be built	Executive Director/ Deputy Directors of RPS and F&A

Recommendation #14 - Consider utilizing construction audit services during the construction of the NGF to assist in minimizing the risks associated with a construction project and to control costs. - **IN PROCESS**

Task	Responsible Party
Discuss if external construction audit services would be beneficial for the NGF project - COMPLETED	Deputy Director F&A/ OMES CAP
If it is decided to utilize external construction audit services:	
Determine if competitive bid process must be utilized - COMPLETED	Deputy Director F&A
Either go through sole-source or RFP process - COMPLETED	Deputy Director F&A/OMES
Award contract - COMPLETED	Deputy Director F&A/OMES
Contracting process - COMPLETED	Deputy Director F&A/OMES
<i>Phase 1: Contract review (Ensure all essential terms & conditions are in contract to protect owner; identify any contradictory language, etc.)</i>	Construction Audit Consultant/OMES

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

Recommendation #14 - Consider utilizing construction audit services during the construction of the NGF to assist in minimizing the risks associated with a construction project and to control costs. - IN PROCESS

Task	Responsible Party
<i>Phase 2:</i> Pay application reviews (review project in close to real time; review monthly pay apps (labor, equipment, rental, overhead, etc.); review all change orders; independently track project process and budget, etc.)	Construction Audit Consultant/OMES
<i>Phase 3:</i> Closeout review (Verification for retention payouts; review project checklists; obtain all lien waivers, post-project checklist/punch list, etc.)	Construction Audit Consultant/OMES

OKLAHOMA YOUTH ACADEMY CHARTER SCHOOL

Background

The charter for Oklahoma Youth Academy Charter School (OYACS) was issued in January 2015, sponsored by the Oklahoma State Board of Education. The accreditation is for middle school and high school, however, OYACS primarily serves grades 9 through 12 for students between 14 and 19 years old. OYACS has two locations, Tecumseh and Manitou¹⁶ that have a total of 142 beds. OYACS's mission statement is:

Our mission is to provide an individualized education, which encompasses academic, social, emotional, and employment skills for highly challenged youth in a non-traditional setting. This will be accomplished by encouraging self-worth and determination in a supportive atmosphere with dedicated teachers and staff that will assist youth toward realizing their true potential.

The focus of OYACS is for the youth to earn a high school diploma, rather than a focus on the testing for the GED. OYACS noted this focus is supported to statistics that show the overall success of individuals who have a high school diploma vs. individuals who receive their GED. OYACS will enroll and pay for college classes while students are in the Facility. OYACS has an agreement with Career Tech at the SW Campus Juvenile Center, an auto-mechanics small engine shop at Manitou.

At the time of our fieldwork there were 22 certified teachers employed by OYACS along with a teacher's assistant for each classroom. OYACS indicated there historically has been a high level of turnover, which they attribute to the higher risk environment working with troubled youth. The average salary for the 132 youth guidance specialists at OJA is \$27,591 and the average experience of a staff member exiting OJA is 3.35 years.

Each youth is tested upon entering OYACS. Per faculty, the average youth entering OYACS tests at about a 5th grade level, and many have not had any schooling for several years. Youth often have difficulty returning to school because of missing school records and lengthy delays in the transfer of their school records, as well as perceived or actual confidentiality barriers to record sharing.

It is not unusual for students in custody education programs to enroll with out of-date individual education programs, this can be due to factors such as gaps in attendance, multiple placements, and lack of family advocates. In this case, educators must initiate the evaluation process, regardless of the facility type. This requirement is particularly difficult for short-term education programs, both because the student in all likelihood will be released prior to the completion of the evaluation, and because short-term education programs typically do not have enough staff or staff with the right qualifications to complete the evaluation.

As of 2016, 39 young men from both the Central Oklahoma Juvenile Center (COJC), and the Southwest Juvenile Center (SWOJC) have earned their high school diploma.

OYACS measures success in a number of different ways.

- Department of Education test scores
- Number of credits earned
- Number of high school graduations
- Improvement from a pre-test and a post test in reading and math

¹⁶ These locations will fold into one location at Tecumseh once the new secured facility is opened.

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

Observations/Opportunities

On-Line Schooling after Release

INNOVATION TOURNAMENT WINNER: Currently, students cannot continue the OYACS curriculum when they leave the secure facilities. Students often transfer from county to county after leaving the secure facilities and credits may not transfer to their new schools. This leads to negative impacts on the progression of their education. Additionally, most students start at a lower grade level than their peers, leading to potential issues upon their exit at the facility of still being grade levels behind when they transition into a new school. The superintendent presented a statistic that each time a student transfers, they lose between three and six months of their education. Growth they experienced during student’s time at OYACS can be lost when they exit the curriculum.

Recommendation #1 - Consider providing a virtual option for the OYACS curriculum online for students after they leave OJA secure facilities. Innovation Tournament Winner- IN PROCESS	
Task	Responsible Party
Draft legislative language pertaining to the virtual OYACS curriculum. IN PROCESS	Superintendent, Executive Director
Meet with legislators to present the language and gain feedback.	Chief Operating Officer
Submit legislation for approval	Chief Operating Officer
Evaluate current service providers approved by the Oklahoma legislature and determine which ones meet the needs and vision for the OYACS virtual option	Superintendent, Deputy Director F&A
Select service provider that best meets the need of the OJA and the OYACS virtual option	Superintendent, Deputy Director F&A
Work with service provider selected to develop the online OYACS classroom	Superintendent, Deputy Director F&A
Determine and create a policy for the online OYACS classroom and qualifications to attend the online classroom	Superintendent, Deputy Director F&A
Promote and launch the online OYACS classroom	Superintendent, Deputy Director F&A

With the introduction of an online OYACS curriculum, OJA should also consider expanding the curriculum to more students. The majority of public schools in Oklahoma have some type of online classroom for some of their curriculum, but these schools do not use the same online service provider. Using one service provider to deliver the OYACS curriculum to students across the state will allow OJA to track the effectiveness of OYACS education through measurements such as course completion, graduation rate, and GEDs awarded.

The curriculum for the OYACS is already developed, what is needed is the delivery method. OJA should evaluate the current service providers and select one provider that is already approved by the Oklahoma legislature to develop, operate, and service the online classroom.

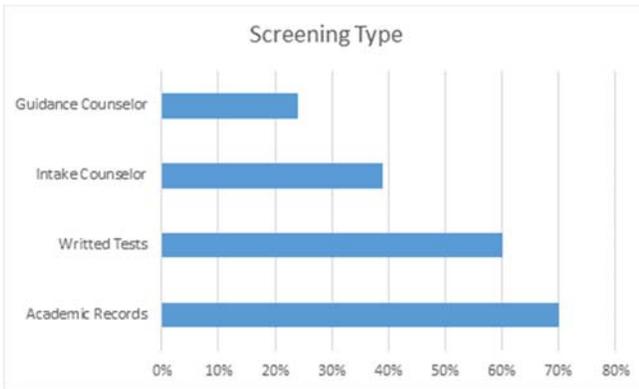
During BKD’s walkthrough of the OYACS facility we noted that each youth is tested upon entering. Per faculty, the average youth entering OYACS tests at about a 5th grade level, and many have not had any schooling for several years. BKD researched of peer facility screening practices.

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

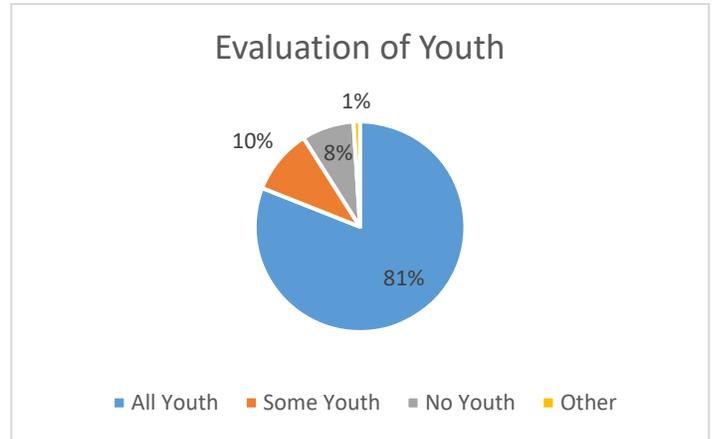
Peer facilities provide the following screening: educational screening for grade-level proficiency, placement, and educational needs. About 81 percent evaluate all youth, 8 percent evaluate some youth, and another 10 percent do not screen any youth.

Peer facilities screen the following: screen some but not all youth, the decision of who to screen is based on staff identification of the need for a screening (70 percent), non-availability of an educational record (63 percent), known educational problems for the youth (56 percent), and/or entry of the youth directly from home, rather than from another facility (12 percent).

Peer facilities screen the following: roughly 90 percent of facilities that screened some or all youth used as a means of screening previous academic records, while others administered written tests (70 percent) or conducted an education-related interview with an education specialist (60 percent), intake counselor (39 percent), or guidance counselor (24 percent).



evaluation process, regardless of the facility type. This requirement is particularly difficult for short-term education programs, both because the student in all likelihood will be released prior to the completion of the evaluation, and because short-term education programs typically do not have enough staff or staff with the right qualifications to complete the evaluation.



Peer facilities also documented that during the screening process, approximately 30 percent of youth have been previously diagnosed with a learning disability.

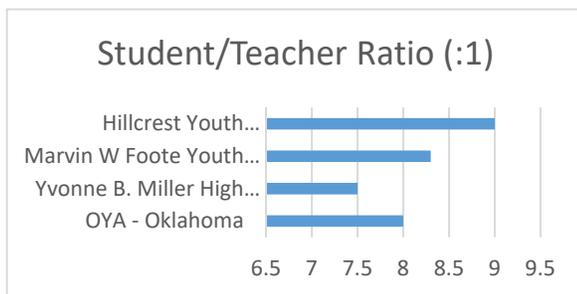
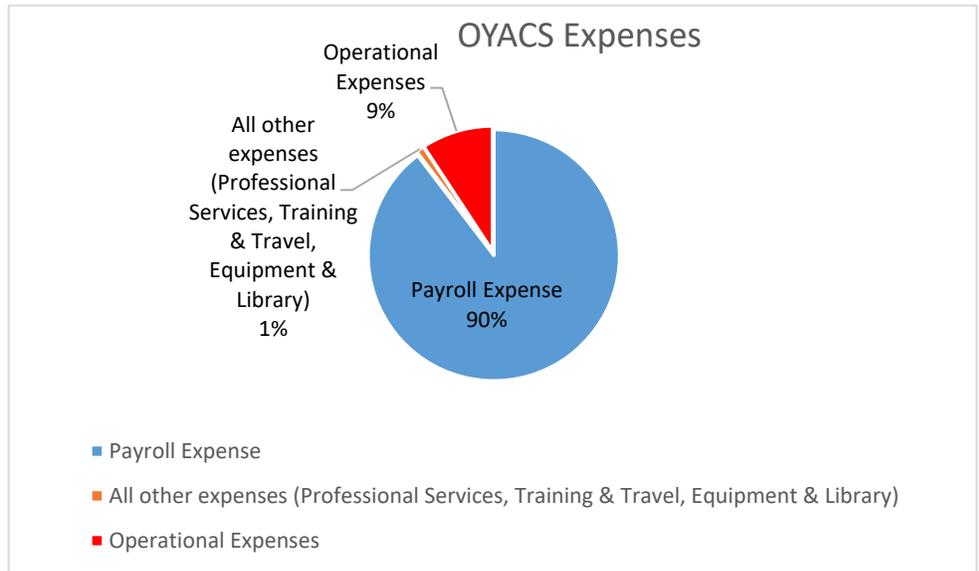
Due to factors such as gaps in attendance, multiple placements, and lack of family advocates, it is not unusual for students in custody education programs to enroll with out-of-date individual education programs. In this case, educators must initiate the

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

The largest expenses for OYACS are teachers' salaries and benefits, which represent 90% of expenses. The next largest expense is derived from maintaining their computer systems, such as Engenuity, their on-line curriculum, and their accounting system, MASS.

State Aid is received for students, but is based on a 30:1 student/teacher ratio, not the 8:1 ratio that is maintained at OYACS.

It is not unusual to have this lower student/teacher ratio in a secured facility environment. With a student/teacher ratio at 8:1, OYACS lines up with other high performing secured facilities schools in Oregon, Virginia, and Colorado.



Historically, OYACS has experienced a high level of turnover which is a result of the higher-risk environment. However, the Superintendent feels that they currently have a good core group of teachers that will be with them for a while. Per OYACS, they pay more than local schools, however, school is in session all year round, which eliminates the normal teaching 'perk' of having summers off.

Transfer of Education Files

OYACS has found that student records are hard to locate in a timely manner, as there appears to be no consistency in the way they are communicated and handled. Youth often have difficulty returning to school because of missing school records and lengthy delays in the transfer of their school records, as well as perceived or actual confidentiality barriers to record sharing. The Oklahoma State Department of Education has student records electronically for other groups of students, such as the students in foster care.

Recommendation #2 - Adopt new processes to ensure smooth and timely transition of educational records, ideally in advance of the youth's placement.

Task	Responsible Party
Inquire about the developed electronic files for educational records that many states and local education agencies have developed through the Oklahoma State Department of Education.	IT Director, Superintendent
Determine any costs associated with building a system to utilize electronic education records for adjudicated students, and time/cost associated with converting to the program	IT Director, Superintendent
Order the system to be built	IT Director, Superintendent
Migrate to electronic files system by utilizing for all new juveniles and transferring files of those juveniles previously or currently educated by the OJA	IT Director, Superintendent

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

Generally accepted minimum standards call for maintaining education files separately from the resident filing system within the facility. Many states and local education agencies have developed electronic files for educational records. Facility education programs should make every effort to gain access and to contribute to these electronic systems to facilitate a timely transfer of educational records. This proactive records exchange assists schools in placing students with appropriate services and in maintaining continuity in the student’s educational instruction. Although always considered preferable practice to do so, it does not appear to be a legal requirement to have parental or student consent to transfer school records from educational agencies and schools to the custody education program. The Family Educational Rights and Privacy Act (FERPA) has explicitly included correctional and juvenile justice facilities, longer-term alternative programs, and dropout prevention programs within the definition of “educational programs” to facilitate the exchange of educational records for students in these settings.

Create a Reliance on Data

Recommendation #3 - Develop tools to collect and assess student and school performance on a range of key metrics, blending institutional performance, psychological tests, and other metrics that would be beneficial.

Task	Responsible Party
Meet with stakeholders to discuss metrics that are currently being monitored, and how the output of those results are being accessed. Determine which key metrics will be beneficial to the stakeholders to track, such as student academic achievement, student engagement, student behavior plan, psychological testing, etc.	Superintendent
Conduct a cost/benefit analysis on implementing key metrics tracking tool	Superintendent
Select tool which best fits the needs of the OJA	Superintendent
Create a plan of action/timeline for implementing the collection, tracking, and assessing of selected key metrics	Superintendent
Review results of key metrics and identify strengths and weakness	Superintendent

Once these metrics are gathered, the administrator and staff should use the data to inform bold, meaningful changes based on the outcomes of the analysis, with the purpose of improving student outcomes. Once the initial reliance on a data-based culture is established, data collection systems can be expanded to monitor other key practices such as teacher recruitment, performance and retention.

Encourage OYACS to annually assess their capacity using a Quality Assessment Tool (QAT) and make evidence-based improvements to support youth enrolled in OJA education programs

OYACS indicated that OJA treatment plans are not always communicated to OYACS, and may not always appear school friendly. We were told that youth are frequently taken out of class for therapy and medication management, which can cut in to several hours of classroom time. In addition, a new “focus room” has been implemented and not well communicated. Youth are using it for a way to get out of school.

The QAT lists the modified principles and includes effective strategies associated with each for OYACS education program staff to assess and use. Based on these assessments OYACS staff may want to identify areas where they are particularly successful or need professional development, or other gap filling resources. When used strategically and consistently the QAT results have the power to catalyze dialogue and actions necessary to drive continuous improvements. The following are modified QAT Principles that could be utilized

- **POSITIVE CLIMATE** - A safe, healthy, and positive facility-wide climate exists. The climate prioritizes education and provides the social emotional conditions for learning.
- **COMMUNITY ENGAGEMENT** - A safe and healthy relationship with the community, ensuring the provision of education, skill building, treatment and intervention resources is in place.

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

- **HIGHLY EFFECTIVE CLASSROOM PRACTICES** - Highly effective classroom practices are a critical element of a high quality learning experience. It is essential to support the recruitment, retention and professional development of qualified education staff with skills relevant in juvenile justice settings. Teachers, administrators, and staff who can positively impact long-term student outcomes, are critical in detention center settings. A process for sharing effective practices and programs emerging from local and national youth detention center work across detention sites and with partners exists. In addition, necessary social emotional services that address individual youth needs, including those with disabilities and English language learners, are in place.
- **ACADEMIC ENGAGEMENT** - Rigorous and relevant curricula aligned with state, academic, career and technical education standards that utilize instructional methods, resources and practices that promote college and career readiness are in place.
- **COORDINATED TRANSITION SUPPORTS** - Community- and family-based strategies that prevent recidivism are part of a coordinated transition support system that leads to successful navigation across child serving systems and smooth reentry into communities.

Recommendation #4 - Perform an assessment of operations to evaluate current programs, identify areas of improvement and possible expand, enhance or create new educational programs that can strengthen the programs and curriculum available at the Charter School. Possible expansion may include community based group homes and detention centers.

Task	Responsible Party
Conduct a research on various Quality Assessment Tools (QAT) and determine which best fits the needs of OYACS	Superintendent
Complete QAT for OYACS	Superintendent
Review results of QAT and identify areas of success or in need of professional development	Superintendent
Prioritize results in need of professional development in order to take action on these results	Superintendent
Create a plan an timeline to take actions on those results that are in need of professional development, beginning with the highest priority	Superintendent
Create policies and procedures for completing the QAT in the future (at least annually) and actions taken on results	Superintendent

Promote professional development activities through enhanced vocational training

As part of the transformation efforts, sites may want to identify areas where staff need and want long-term professional development and coaching, prioritizing topics emerging from research. These include behavioral intervention, educating students with disabilities, instructional strategies, transition, literacy instruction, assessment and classroom management. OYACS may also want to establish virtual and in person learning communities as a way to promote cross learning, and to gauge how colleagues apply and assess the value of the training they receive.

Recommendation #5 - Consider reviewing and possibly enhancing existing professional development programs.

Task	Responsible Party
Create and conduct a survey to determine the success and struggles of the professional development programs	OYACS Principle
Compile results from survey and identify and prioritize the areas where staff has identified the professional development programs are struggling	OYACS Principle
Create a plan of action to enhance the areas of struggle	OYACS Principle

ACCOUNTING AND FINANCE

Background

OJA outsources many of its accounting functions to OMES. These accounting services include the following:

- **Capital Assets Management:** OMES provides asset management services through procurement, facilities, real estate, construction, fleet, risk management, property re-utilization, printing and distribution.
- **Central Accounting and Reporting:** OMES provides accounting and reporting services directed by the Office of the State Comptroller which is responsible for establishing the policies and procedures for state financial transactions and for executing those transactions in accordance with various state statutes, federal regulations, and governmental accounting and reporting systems.
- **Central Purchasing:** OMES provides procurement functions and provides oversight of OJA’s procurement activities as defined by the Oklahoma Central Purchasing Act (Title 74 of the Oklahoma Statutes §85.1, et seq.).
- **Performance and Efficiency:** OMES provides audit and internal investigations to ensure that programs and contracts are conducted in accordance with laws and are used in an ethical manner. Audit and internal investigations provides monitoring, administrative investigations, risk-based audits, compliance audits, an anonymous fraud reporting system and preventative training courses and guides. This also includes services provided through the statewide performance office who is responsible for statewide performance management which includes the performance framework for Oklahoma’s Performance Informed Budgeting Initiative, strategic implementation of the governor’s top priorities, and consultation and facilitation. Services are also provide by the strategic projects department who manages projects regarding process improvement, efficiency, and budget and operations for the division.

Observations/Opportunities

Expense Processing

When OJA receives invoices through the mail the administrative assistant who opens the mail for that office will stamp and forward to person/persons responsible for verifying goods or services have been received. Upon return to the accounts payable department the invoice is processed for payment and scanned for retention. Through inquiry, BKD ascertained that OJA has started using electronic approval of invoices for some purchases but not for all purchases that comes into OJA. Invoices are usually approved by the appointed signee but some services have multiple levels of approval that are required, in particular, invoices for Community-Based Youth Services.

Additionally, several OJA employees travel to meet with juveniles, go to the District Attorney’s office, or travel elsewhere to perform their duties. Consequently, there are several travel expense reports that have to be completed. All travel expenses are required to be supported by a travel reimbursement form (Form I9). An average of 600-700 I9s are completed a year which accounting spends 5-6 hours a week auditing and batching to OMES. This is on top of the time spent by employees to complete the I9 and OMES to review when they receive from OJA.

Recommendation #1 - Work with the State Office of Management and Enterprise Services (OMES), which provides IT support for OJA, to determine the feasibility and cost of using electronic approval for all invoices to make payment of invoices more efficient.

Task	Responsible Party
IT department to install Adobe Sign software for all OJA personnel who process invoices.	OJA IT Department
All of the impacted personnel will need to do training to learn how to effectively use the Adobe Connect software.	All Impacted Personnel

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

Recommendation #1 - Work with the State Office of Management and Enterprise Services (OMES), which provides IT support for OJA, to determine the feasibility and cost of using electronic approval for all invoices to make payment of invoices more efficient.

Task	Responsible Party
All of the impacted personnel will submit feedback and troubleshooting issues to the OJA IT department.	All Impacted Personnel
IT department to resolve any trouble shooting issues with the Adobe Connect software.	OJA IT Department
Finance policies and procedures manual to be updated to reflect electronic routing and approval of all invoices.	OJA Finance Team

Recommendation #2 - Work with the State (OMES) which provides IT support for OJA to determine if they could develop an electronic expense reimbursement process that could do the following:

- a. Enter beginning location/office and destination for online mapping site to automatically put time and mileage for the trip
- b. Enter other employees in the vehicle so their travel time will match other employees on the same trip
- c. Use a camera phone to take picture of meal and lodging receipts to save time scanning in receipts at a later point, as well as limiting the chance of receipts getting lost
- d. Connect to travel website to ensure flights are booked within the limits set by the state and save documentation of flight pricing/options at the time the flight was booked.
- e. Have error messages for when support/descriptions are missing or if an expense is not recorded correctly

Task	Responsible Party
IT department to develop internal program that loads information into the OMES expense reimbursement form.	OJA IT Department
Expense reimbursement policies and procedures manual to be updated to reflect updated expense reimbursement process.	OJA Finance Team
Create training manuals to be used as references for the updated expense reimbursement process.	OJA Finance Team
All of the impacted personnel will need to do training to learn how to effectively use the expense reimbursement system.	All Impacted Personnel
OJA to consult with other agency CFO's to determine if a universal expense reimbursement program can be developed on a multi-agency basis.	Deputy Director F&A

Grant Accounting

OJA has pass-through grants from the Department of Justice, Oklahoma Healthcare Authority, Department of Health, Department of Human Services, and the Department of Education. Funds from these grants approximated \$8.74MM, \$8.22MM, and \$9.41MM for the fiscal years ended June 30, 2018, 2017, and 2016, respectively¹⁷. These grants allow a portion of the funds to be used to administer the grants and therefore, a portion of payroll gets allocated to these grants. Through inquiry, BKD ascertained that OJA's accounting department has to track time spent on grants in a spreadsheet and then make a manual entry every payroll to allocate time to grants.

Grants require a time commitment to both apply for grants and to complete the administration portion of grants OJA is awarded. OJA staffing does not appear adequate to monitor current grants and be able to apply for additional grants. See summary of grants by federal and state below¹⁸:

¹⁷ Per information received from Kevin Clagg, Deputy Director of Finance and Administration

¹⁸ Per information received from Kevin Clagg, Deputy Director of Finance and Administration

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

	BR-2016		BR-2017		BR-2018	
	Federal	State	Federal	State	Federal	State
JAIBG/OJJDP	7,865		5,686			
Formula/OJJDP	362,784		460,972		501,948	
EOP?OJJDP					12,303	
PREA/OJJDP/DAC	8,307	7,803	5,017		10,840	42,600
Title XIX/OHCA		7,531,662		7,055,199		7,861,163
Title XIX Indirect Cost/OHCA		183,817		71,060		146,898
Capacity Building/ODMHS		19,385				
CFSD/Hotline/DOH		190,418		223,088		235,567
RSAT/DAC				1,392		8,046
Title IV-E/DHS		366,910		160,650		87,328
Title I N&D/SDE				180,335		153,773
511 Title IA /SDE		59,964		49,216		44,639
541 Title IIA /SDE				7,802		

Grants have reporting elements due back to the granting agency. OJA staff have to compile information from several offices or sub-grantees. Because the information needed to report back to the funding agency is often not in similar formats, OJA staff spend significant resources to consolidate information for reporting purposes.

Recommendation #3 - Evaluate responsibilities within grant reporting to determine how to best obtain additional funding to help their mission and to make sure adequate staffing is available to complete any grant administration requirements.

Task	Responsible Party
OJA Community Based Support team to determine if additional federal grants are available to support OJA's mission.	Community Based Support Department
OJA Community Based Support team to determine the skill level and personnel needed of additional team members if additional grants were applied for and administered by OJA.	Community Based Support Department
OJA Community Based Support team to either research or contact other states who administer similar community based support programs to determine the level of staffing used by other states to administer similar federal programs.	Community Based Support Department
OJA Finance team to perform a comprehensive cost/benefit analysis to determine the financial viability of additional personnel to apply, administer and manage grants.	OJA Finance Team
If financial viability of adding additional personnel is determined to be warranted, OJA Community Based Support team will need to develop job descriptions and qualifications to be used for seeking out additional personnel.	Community Based Support Department

Recommendation #4 - Use technology resources available, JOLTS or another tool, to streamline grant reports. This would save time for OJA staff as well as provide consistent reporting of any OJA program's funded by grants.

Task	Responsible Party
OJA IT department and OJA Community Based Support department to collaborate to determine the performance based metrics information needed to be extracted from JOLTS for federal grant reporting purposes.	Community Based Support Department/IT Department
OJA IT department to implement reporting system in JOLTS	IT Department

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

Recommendation #4 - Use technology resources available, JOLTS or another tool, to streamline grant reports. This would save time for OJA staff as well as provide consistent reporting of any OJA program's funded by grants.

Task	Responsible Party
OJA to update policies and procedures for electronic reporting in JOLTS.	
CBYS recipients to receive training on new reporting tools in JOLTS.	Community Based Support Department

Cash Receiving

When OJA receives a check through the mail the secretary who opens the mail for that office will stamp and enter the check into a log book. Checks are locked in the unit safe with copies of the checks forwarded to the accountant who will prepare a deposit. BKD ascertained that only one OJA employee is present when mail is opened.

Recommendation #5 - Implement dual control over mail opening to ensure all checks are properly accounted for.

Task	Responsible Party
Deputy Director of Finance and Administration to revise the procedures for opening the mail to ensure that two personnel are opening the mail and properly logging all checks received.	Deputy Director F&A
Update internal policies and procedures and provide relevant training to individuals assigned to open the mail and prepare the check log.	Deputy Director F&A

Time-Keeping

Payroll is run through PeopleSoft and the current time management system (TMS) is manually posted to PeopleSoft. Through inquiry, BKD ascertained that at each of OJA's seven district offices normally the administrative assistant functions as the "timekeeper". This person's role is to input into PeopleSoft information from the time keeping system. In addition to the seven administrative assistants who enter time at the district offices, there are also six employees who perform this function at the main OJA office. Between the administrative assistants at the district offices and employee at the main location, it takes approximately 44 hours bi-weekly to enter time into the time-keeping system. There is no formal reconciliation to ensure that all time is entered correctly into PeopleSoft, but the Payroll Accountant will review for any unusual items before posting the payroll entry.

Recommendation #6 - With the help of OMES, integrate the time keeping system and PeopleSoft. This will reduce the chance of human error and the amount of employee time involved with each payroll run.

Task	Responsible Party
OJA IT department to continue to monitor OMES' implementation of the cloud-based Oracle system at OMES level.	IT Department
Once cloud-based Oracle system is fully implemented at the OMES level, OJA IT department to receive technical aspects for TMS to Oracle integration from OMES IT department.	IT Department
OJA IT department to review technical aspects for TMS to Oracle integration and revise coding and TMS platform for integration.	IT Department
OJA IT department to perform integration tests in a test-run environment to ensure that all data is properly transferred from TMS into Oracle.	IT Department

BUDGET

Background

OJA’s annual budget request is intended to reflect the agency’s financial operating needs, including funds for purchasing community services to assist juveniles and to supplement existing programs, for the following fiscal year. OJA is required to submit its budget to OMES no later than October 1 of each year.

A large majority of the funding for juvenile justice in Oklahoma comes from state appropriations. State appropriations accounts for between 89 percent and 91 percent of all expenditures by the Oklahoma Office of Juvenile Affairs. Most of the remaining funds come from federal dollars, while 1 percent comes from other sources. The largest source of federal funds going to OJA comes through Targeted Case Management (TCM) and Residential Behavioral Management (RBMS). OJA also receives modest funding through the federal Office of Juvenile Justice and Delinquency Prevention (OJJDP) grant program and the Juvenile Accountability Block Grant (JABG). OJA funding has risen slightly in recent years, as appropriations for OJA are \$109.2 million in FY2018, up \$.21 million, or .2 percent, from the previous year.

Summary by Division	Annual Budget (000s)
Division 01 - Office Juvenile Justice & Delinquency Prevention	\$ 864
Division 02 - Administration	\$ 4,120
Division 03 - Residential Services	\$ 30,320
Division 04 - Non Residential Services	\$ 48,072
Division 05 - Community Based Youth Services	\$ 21,379
Division 10 - Santa Claus Commission	\$ 20
Division 88 - ISD Data Processing	\$ 2,201
Division 90 - Statewide Capital Projects	\$ 2,200
Office of Juvenile Affairs	\$ 109,176

In order to begin the annual budget development process, the OJA Finance Division delivers instructions, forms, and electronic request form files to the Executive Director/Chief of Staff and each Division Director with a stated completion date. Designated personnel within each OJA division complete the necessary forms and return them to the Finance Division after ensuring that their submission complies with OJA’s and OMES policies, procedures, and instructions. The Division Director will ensure appropriate staff participation in the budget preparation process. The OJA Finance Division reviews submissions for completeness, accuracy, and conciseness. Financial Services then establishes a deadline in order for Agency to meet OMES requirements.

The Executive Director participates in budget hearings and presents justification to support the budget request. After the budget is approved by the Oklahoma legislature, the Institutional Superintendent, District Supervisor or designee monitors fiscal activity and may submit timely budget revision requests to his or her respective division director as changes in operation or trends mandate.

The Institutional Superintendent is responsible for fiscal management and control. The Institutional Superintendent also coordinates fiscal activities with the OJA Finance Division. Procedures for the collection, safeguarding, and disbursement of monies must comply with the Oklahoma State Statutes and applicable accounting procedures. Within the institution these procedures shall be reviewed annually by the Institutional Superintendent. Any changes resulting from the annual review shall be submitted to the OJA Finance Division.

Observations/Opportunities

Approximately 11.3 percent of the OJA's \$91,531,914 revenues from FY2018 came from federal funding sources, according to the Governor's FY 2019 budget book. These sources include Title XIX (Medicaid) funding, Department of Justice grants, and Department of Education grants (for the OJA's charter school). According to OJA officials, about 30 percent of the State's cost to operate the Level E Group Homes is reimbursed from federal funds, but that federal funding has declined as a share of all OJA revenues, in recent years.

Some states indicate they are able to achieve a higher level of federal reimbursement for their OJA-type activities. For example, some states successfully claim Title IV-E reimbursement of "candidate" costs for youth who are supervised on probation. OJA officials indicate they are aware that other states are able to draw more in the way of federal reimbursement to support juvenile justice activities. However, securing additional federal funding may cause an increase in State of Oklahoma expenses due to additional resource requirements to ensure compliance around federal fund spending. OJA officials indicate that the State, in the past, had a situation in which OJA was required to pay back the substantial sum of approximately \$8 million to the federal government because of the State's inability to document that the federal funds had been used consistent with program requirements. This pay back effort placed a huge burden on an agency with a budget less than \$100 million annually. This experience, along with a federal Health and Human Services (HHS) regional office in Dallas that OJA administrators perceive as being less expansive in its interpretation as to how federal dollars can be used to support OJA-type activities, has led the State to take a restrained role when it comes to aggressively pursuing additional funding.

Despite this history, discussions with OJA executives Steve Buck and Kevin Clagg indicate that there may be opportunities to identify and pursue additional federal funding streams that would be beneficial to support OJA programs and services. For example, the U.S. Congress recently (10/2018) passed legislation that would allow for the use of Medicaid funds (for up to 30 days) to support services for those non-elderly individuals with substance use disorders who are in "institutions for mental disease" (IMDs). Additional research is needed, but this change could provide more funding for OJA to support individuals under its care.

Analyzing potential federal funding streams will require close coordination with the Oklahoma Health Care Authority (OKHCA). Any additional funding sought /received by OJA could require changes to the State's Medicaid Plan, which is within the purview of the OKHCA. Because a change to the State's Medicaid Plan requires federal approval, the process for accomplishing such a change to the State's Medicaid Plan is of indeterminate length, though could be well over a year. BKD recommends that the OJA should work with DHS (Department of Human Services) and OKHCA to review potential additional federal funding sources for OJA type activities.

Alternatively, there may be additional funding streams that OJA can access that would not require changes to the State's Medicaid Plan. In this case, while coordination with OKHCA would still be required, the time involved in securing the funding and implementing associated changes to policies and programs would likely not be so long. For this scenario in which a change to the State's Medicaid Plan would not be required, the timing from initial analysis of opportunities to implementation could be significantly shorter.

The accompanying task list breaks the process of securing federal funding into the separate steps of "Initial Analysis" and "Administrative Adjustment Path," which represents the scenario in which changes to the State's Medicaid Plan would not be required. Because of the indeterminate and potentially lengthy nature of the process associated with seeking federal funding that requires a change to the State's Medicaid Plan, no credible estimate of the tasks and timing associated with that path can be made at this time.

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

Recommendation #1a Initial Analysis: BKD recommends that the OJA should work with DHS and OKHCA to review potential additional federal funding sources for OJA-type activities.

Task	Responsible Party
Conduct informal discussions with HHS Region 6 peer agencies as to their use of federal funding sources to support juvenile justice-related activities	Deputy Director F&A
Specifically investigate the use of Title IV-E reimbursement, as used by the Texas Juvenile Justice Department (TJJD)	Deputy Director F&A
Consider the potential impact of recent changes (10/2018) to federal law that allow for the use of Medicaid funds (for up to 30 days) to support services for those non-elderly individuals with substance use disorders who are in "institutions for mental disease" (IMDs)	Deputy Director F&A
Discuss with the Oklahoma Department of Human Services (DHS) and Oklahoma Health Care Authority (OKHCA) executives and/or grant staff these and any other sources of federal funding that could be accessed to support OJA services and programs	Deputy Director F&A
With OKHCA, determine whether the potential federal funding stream(s) under review (if secured) would require changes to the State's Medicaid Plan or whether they could be implemented administratively	OKHCA/Deputy Director F&A
Based on this information, make determination whether to move forward to conduct "due diligence" on the potential use of the new federal funding stream(s)	Deputy Director F&A

Recommendation #1b Administrative Adjustment Path: BKD recommends that the OJA should work with DHS and OKHCA to review potential additional federal funding sources for OJA-type activities.

Task	Responsible Party
Conduct a site visit(s) to other states to inspect exactly how such additional federal funds are used; discuss with other state executives the pros and cons of such usage	Deputy Director F&A
Conduct a detailed assessment as to how the federal funding would be used if secured, including: required changes to the OJA program, reporting requirements, State matching fund requirements, analysis of whether it would be State- or contractor-operated program, whether there is a viable vendor base to provide the service (if contractor operated), audit requirements, and the risk of non-compliance	Deputy Director F&A
Confirm adequacy of financial tracking tools to support the requirements of any new funding, if secured	Deputy Director F&A
Develop the business case for the use of the new federal funding stream(s)	Deputy Director F&A
If necessary, brief and secure support from OK legislative representatives on the necessity of state matching funds, if the additional federal funding stream(s) are secured	Deputy Director F&A
Determine OJA's go/no go on whether to formally pursue the targeted federal funding stream(s)	Deputy Director F&A
Determine the timing around the receipt of the targeted federal funds, if received	Deputy Director F&A
If needed, coordinate with federal representatives (House and Senate) to make them aware of OJA's intent to pursue additional federal funding streams and request assistance (if needed)	Deputy Director F&A
Apply to the appropriate agency(ies) for the additional federal funds	Deputy Director F&A
Draft effective oversight/audit procedures based on the particular funds received	Deputy Director F&A

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

Recommendation #1b Administrative Adjustment Path: BKD recommends that the OJA should work with DHS and OKHCA to review potential additional federal funding sources for OJA-type activities.

Task	Responsible Party
If additional federal funds are approved, develop an implementation plan consistent with the business case developed	Deputy Director F&A
If necessary, work with OK legislative leaders to secure appropriation of any required state matching funds	Deputy Director F&A
Implement new programs/policies supported by the new federal funds	Deputy Director F&A
Bill for federal reimbursement	OKHCA

INFORMATION SYSTEMS

Background

The OJA outsources many of its information systems and cyber security functions to the Oklahoma Office of Management Enterprise Systems (OMES). OMES is a government agency which manages and supports the basic functioning of the government of Oklahoma. OJA outsources the following information systems services to OMES:

- Desktop and Laptop Services: The Microsoft operating system and Office licensing, anti-virus software, and client management including patches and upgrades.
- Application Maintenance: This covers operational costs for agency-specific applications.
- Enterprise Resource Planning and Human Capital Management software: Business process management software that allows an organization to use a system of integrated applications to manage the business and automate many back office functions related
- Network: The connection of desktops and laptop PCs to the State network, including internet access.
- Voice: Standard phone services.
- Application Development: Application developers create, test, and program application software for the computer.
- Software support: Support and maintenance for other software used by OJA.

The Juvenile Online Tracking System (JOLTS) is a database used by OJA to assist overall administration and for ongoing policy research in Oklahoma. This database links judges, district attorneys, juvenile detention centers, youth services agencies and shelters, juvenile institutions, group homes, juvenile bureaus, social workers and the Office of Juvenile Affairs. JOLTS allows for a single juvenile file including collection of all referral, arrest, court processing, detention, and shelter activity on a juvenile in one place. JOLTS was created by the Oklahoma Office of Juvenile Affairs in the 1990's.

Observations/Opportunities

Information Security Awareness Training

Information security awareness training is managed by OMES and involves online videos that cover different information security topics including social engineering, malware, phishing, passwords, mobile devices, physical security, encryption and cloud services. Each video has an exam and OMES monitors the completion of information security awareness training for OMES employees, including OMES employees who provide IT services to the OJA.

Through inquiry, BKD ascertained that OMES IT employees receive information security awareness training on a regular basis. Due to the increasing threats and risks of various cyber attacks, employees have become the weakest link and industry best practices suggest a trained and aware employee is the best first line of defense.

BKD ascertained that OJA employees do not currently receive information security awareness training. BKD ascertained that OMES has plans to provide information security awareness training to OJA staff, but this plan has not been finalized yet.

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

Recommendation #1 - Complete its plans for information security awareness training for OJA employees.	
Task	Responsible Party
Develop rotating plan for employee security information awareness training (quarterly is normal)	IT Director
Consider using OMES resources for training or a third party like security mentor (securitymentor.com) or KnowBe4 (knowbe4.com)	IT Director
Begin awareness training	IT Director

Active Directory and Other Application Administrative Accounts

Active Directory is a Windows operating system directory service that facilitates working with interconnected, complex and different network resources in a unified manner. Active Directory serves as a single data store for quick data access to all users and controls access for users based on the directory's security policy. The Active Directory has a group of administrators that have full control of the entire active directory and the other accounts. There is an Active Directory for OJA and there are other applications and systems that OJA use that have administrative accounts.

It is a general best practice in the various standard setting groups (NIST, CoBIT, ISO) that a separate management review of administrator accounts be performed periodically to approve administration accounts for the Active Directory and other systems. Generally this review is performed quarterly.

Through inquiry, BKD ascertained that there is no formal management review process for active administrator accounts.

Recommendation #2 - Develop a process for periodically reviewing and approving system administrative accounts.	
Task	Responsible Party
Develop plan for sample size and frequency (normally 25%, quarterly)	IT Director
Develop inventory of applications and network(s) subject to review	IT Director
Conduct periodic system admin reviews	IT Director

Information Systems Policies

The OJA is currently in the process of consolidating all of their information systems to OMES. As part of this consolidation, the OJA is transitioning all of their policies and procedures for information systems to the OMES policies and procedures.

Recommendation #3 - Complete the process of moving all IT policies and procedures over to the state-level policies and procedures to be consistent with the rest of the state.	
Task	Responsible Party
Complete the inventory of policies and procedures	IT Director
Determine which of final policies and procedures can be removed or superseded to OMES or other state policies and procedures	IT Director/OMES
Complete move of policies and procedures	IT Director

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

Disaster Recovery Plan

A disaster recovery plan is a documented process to recover and protect IT infrastructure in the event of a disaster. The plan specifies procedures that the organization is to follow before, during, and after a disaster. As part of OJA's consolidation of their information systems functions with OMES, the OJA is working on a disaster recovery plan that covers all OJA assets and systems.

Recommendation #4 - Complete its plans for disaster recovery for all OJA assets and systems.	
Task	Responsible Party
Complete inventory of applications and systems subject to DR plans	IT Director/OMES
Complete listing of responsible parties for DR for OJA and OMES personnel	IT Director/OMES
Develop Risks and Business Impact Analysis	IT Director/OMES
Coordinate with OMES resources between OJA and OMES	IT Director/OMES
Complete documentation for DR plan (Risk Assessment, BIA, Inventory, testing plan)	IT Director/OMES
Conduct initial test of DR plan	IT Director/OMES

Paper and Media Destruction Policy

Media destruction policies provide procedures for the proper disposal of media that holds sensitive information. Due to the very personal and confidential nature of the information relating to the youth and children supported by the mission of the OJA, we observed some gaps relating to paper and media that potentially contains this sensitive information. This media includes hard drives, USB drives, CD-ROMs, paper, and other storage media that contains the organization's data. The OJA uses the media destruction policy provided by OMES for destruction of media containing OJA data. Through review of this media destruction policy, BKD noted that the policy did not clearly address:

- Securing shred boxes
- Obtaining and maintaining certification of destruction of electronic media
- Media destruction third-party written agreements
- Media destruction third-party confidentiality

Recommendation #5 - Incorporate certain additional processes into the OMES Media Destruction policies.	
Task	Responsible Party
Evaluate information types (paper, electronic) subject to federal and state laws	IT Director/OMES
Evaluate inventory and location of data subject to federal and state laws	IT Director/OMES
Enhance media destruction polices to reflect analysis	IT Director/OMES

Time Keeping System

OJA employees enter time into a time keeping system. Several employees for OJA are hourly employees, and therefore OJA attempts to monitor the amount of overtime employees are working, especially in the institutions, so they can better manage costs. Total overtime paid to institutional employees was approximately \$1.47 million, \$1.27 million and \$1 million for the fiscal years ending June 30, 2018, 2017, and 2016, respectively.

Through inquiry, BKD ascertained supervisors and administration currently do not have the ability within the current timekeeping system to monitor weekly hours worked on a real-time basis, which limits OJA's capacity to effectively and efficiently manage overtime.

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

Recommendation #6 - Work with the State (OMES) to determine if supervisors can get notified when an employee works 35 hours that week so they can determine how much, if any, overtime their employees are going to be working.

Task	Responsible Party
Review positions subject to employee alerts	IT Director/OMES
Review changes needed to systems for forecasting and incorporating planning for overtime	IT Director/OMES
Enhance systems to provide functionality	IT Director/OMES

Ideally, this time keeping system would allow supervisor to set parameters that would send email alerts to the supervisors when an employee has reached a certain hour threshold. This would help OJA distribute work evenly and save costs of paying overtime.

Technology Utilization

Due to the advancements in technology capacity, speed and mobility, there are a number of technology improvements that could be implemented to help OJA run more efficiently and save employees time. In particular, OJA should explore options to utilize audio/video technology including applications in education, rehabilitation, monitoring and coordination with other system partners (courts, district attorneys, defenders, department of human services, etc.). We recommend OJA evaluate and prioritize technology solutions and coordinate with OMES and select partners to initiate a pilot project.

Additionally, OJA's systems consolidation with OMES is still in process and not all of these responsibilities have been shifted to OMES and therefore, the OJA IT department spends some of their time doing hardware maintenance which falls under the OMES IT agreement, instead of implementing technology changes, such as application development, to help OJA achieve its mission as efficiently as possible.

Recommendation #7 - Work with the State (OMES) and other system partners to identify and pilot a technology project that leverages recent technology developments.

Task	Responsible Party
Conduct assessment with help of OMES and system partners	IT Director/OMES
Conduct assessment with other similar states to determine other users of technology with similar missions to OJA	IT Director/OMES
Continue to attend association and other conferences to determine technologies which may be applicable	IT Director/OMES
Conduct evaluations of emerging technologies for applicability	IT Director/OMES

Licensing JOLTS to Other Agencies and Expanding Data Capture

INNOVATION TOURNAMENT FINALIST: The OJA's use of JOLTS is ahead of the curve compared to other state agencies who manually track this data which can be cumbersome, exhausting, and result in incorrect data. JOLTS provides much of the foundation that states need to administer and collect data on their juvenile affairs services.

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

Recommendation #8- Consider licensing JOLTS to similar agencies in other states to provide a revenue stream for OJA in exchange for licensing fees. Innovation Tournament Finalist	
Task	Responsible Party
Work with legal to determine requirements needed legislatively to allow concept to be launched	IT Director
Determine estimate for "productizing" JOLTS application for license	IT Director
Determine support and ongoing maintenance requirements	IT Director
Determine potential partners (I2E, for example) to provide guidance, funding, potential vendors	IT Director
Present legislation with language to launch concept	IT Director

The JOLTS system could also be improved for its use by the OJA. Specifically, the JOLTS system should be expanded to provide better measurements for the outcomes of programs that provide services to OJA clients.

JOLTS could be used to track more data on the quality of programs and to help ensure programs are aligning with their goals. For example, the JOLTS system does not currently provide metrics on whether the GED programs result in GED's earned by participants. JOLTS could track the outcomes of these programs and provide quarterly data to the OJA which can help assist the OJA in determining the effectiveness of their programs. The projected costs and revenues for licensing JOLTS to other states is unclear at this point. Since every state has different legislation for administering juvenile affairs services, licensing JOLTS will take customization to adapt it to different agencies.

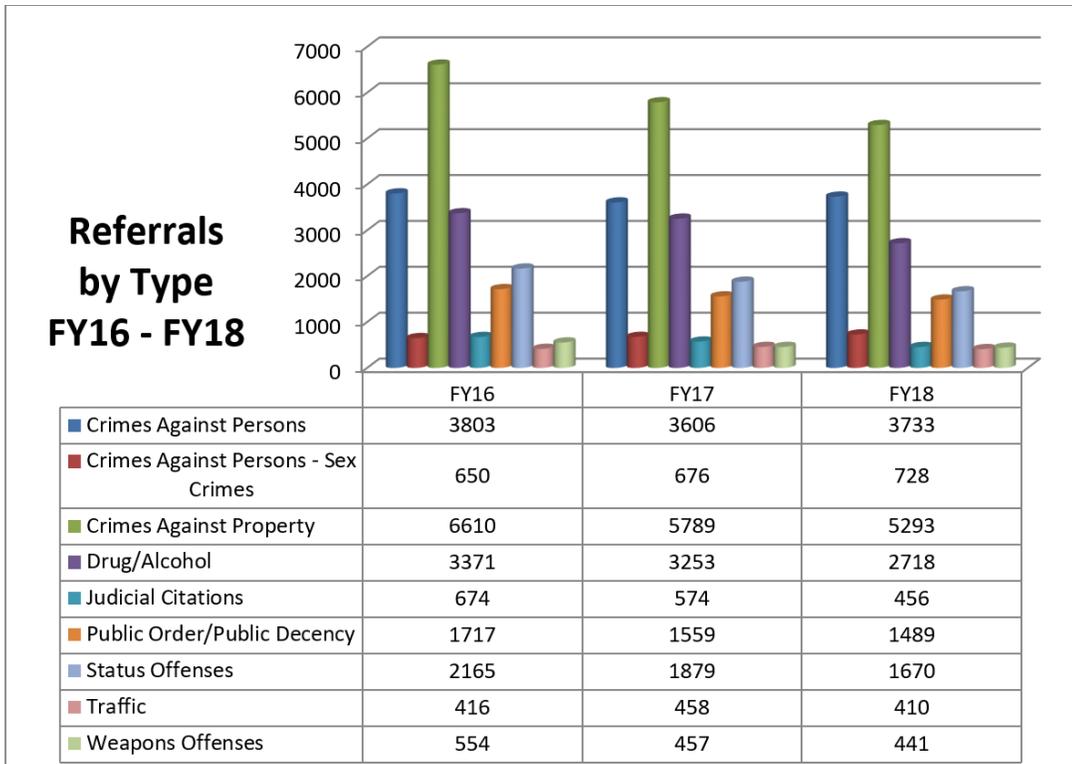
Intake Electronic Signatures

The Oklahoma Juvenile Affairs (OJA) receives juveniles through referrals from law enforcement, public agencies and self-referral at each of their district offices. Once referred to OJA, a Juvenile Justice Specialist (JSS) obtains information from the referred individual and enters it into JOLTS to make a recommendation for the juvenile to the District Attorney. Recommendations fall into the following five categories: 1) Decline to File, 2) Deferred Decision to File, 3) Diversion, 4) Informal Adjustment Agreement, 5) File a Delinquent Petition.

The following chart represents referrals by type for the fiscal years ending June 30, 2018, 2017 and 2016, respectively:¹⁹

¹⁹ Chart received from Shelly Waller, Deputy Director – Community Based Support

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS



Through inquiry, BKD ascertained that OJA employees have to hand deliver all intake face sheets, which contains recommendations to the District Attorney’s office to be signed and completed. At a later date, OJA has to return to pick up signed documents from the District Attorney’s office. Through inquiry with OJA personnel, this takes one to four hours a week at each county office (68 offices) depending on the current caseload.

Recommendation #9 - Provide the district attorneys with limited access to JOLTS to be able to electronically sign documents to make the Juvenile’s adjudication process through OJA system more efficient.	
Task	Responsible Party
Evaluate legal requirements, as applicable	IT Director
Determine access list of new users to system	IT Director
Determine changes needed, if any, to logical access rules for proper controls	IT Director
Spec changes needed, if any, to applications and determine plan for implementation and responsibility	IT Director

This would also save the time and travel costs of hand delivering paper documents to the District Attorneys.

APPENDIX A: RECOMMENDATIONS LISTING

Implementation Plans for recommendations under each area of focus were compiled. For each recommendation, BKD included the following; a list of critical steps, including statutory or regulatory changes, the responsible party for the task as well as the estimated timeline for implementation.

PROGRAM AND PROGRAM PERFORMANCE

PROGRAM AND PROGRAM PERFORMANCE									
Task	Responsible Party	Timeframe (quarters)							
		Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8
Recommendation #1 - Determine actual daily costs incurred by the Regional Secure Detention Centers (RSDCs) in providing services and analyze those costs for appropriateness in relation to the current fixed daily rates paid by OJA.									
<ul style="list-style-type: none"> • Compile a report showing the actual daily costs incurred by the RSDCs and compare to current fixed daily rates paid by the OJA • Discuss the actual costs and current rates with the with relevant parties during the Budget Program process so that the true cost of providing these services may be taken into consideration in the appropriations process • Compare methods for calculation with similar States like Oklahoma and utilize feedback. • Determine what would be an appropriate per bed rate • Calculate cost for actual occupancy with the per bed rate and compare to current fixed daily rates paid by the OJA • Negotiate a per-bed rate for actual occupancy with RSDCs in order to minimize costs for the OJA 	Deputy Director F&A								
	Deputy Director F&A								
	Deputy Director F&A								
	Deputy Director F&A								
	Deputy Director F&A								
	Deputy Director F&A								
Recommendation #2 - Assess the impact of reimbursing RSDCs for contracted beds based on actual usage by juveniles to determine potential cost savings. Simultaneously, consider what programs, potentially community-based in the local counties, could be implemented or enhanced with the potential cost savings and the repurposing of unused beds.									
<ul style="list-style-type: none"> • Compile a 3-5 year comparison of bed occupancy • Review comparison to determine if occupancy has typically been at capacity 	CBS Deputy Director, assisted by CFO								
	CBS Deputy Director, assisted by CFO								

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

PROGRAM AND PROGRAM PERFORMANCE									
Task	Responsible Party	Timeframe (quarters)							
		Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8
<ul style="list-style-type: none"> Determine what would be an appropriate per bed rate Calculate cost for actual occupancy with the per bed rate and compare to current fixed daily rates currently paid by the OJA Negotiate a per bed rate for actual occupancy with RSDCs in order to minimize costs for the OJA Conduct a research on alternative programs that other States with similar facilities have implement to repurpose unused beds Compile listing from research of plausible and potentially alternatives to be utilized by the OJA Conduct a research on the listing of potential alternatives for success rates and outcomes Create a plan and timeline for implementation of alternatives 	CBS Deputy Director, assisted by CFO								
	CBS Deputy Director, assisted by CFO								
	CBS Deputy Director, assisted by CFO								
	CBS Deputy Director, assisted by CFO								
	CBS Deputy Director, assisted by CFO								
	CBS Deputy Director, assisted by CFO								
	CBS Deputy Director, assisted by CFO								
Recommendation #3 - Monitor the availability of beds versus the demand for beds at the RSDCs, both from within the local counties and between counties, to determine if all RSDCs are appropriately sized and necessary given the mission of OJA, the trend in juvenile detentions, and the economics of the RSDCs.									
<ul style="list-style-type: none"> Compile data on 3-5 years of bed availability and actual occupancy at each RSDC Compare bed availability and actual occupancy for each RSDC Review results to determine the trend for beds unoccupied and if any RSDC encountered an overage of demand versus available beds. 	CBS Deputy Director, assisted by IT Director								
	CBS Deputy Director, assisted by IT Director								
	CBS Deputy Director, assisted by IT Director								
Recommendation #4 - Strategically right-size the number of RSDCs, repurposing beds in certain areas									
<ul style="list-style-type: none"> Compile 3 - 5 years of data showing the bed occupancy rate for each Regional Secure Detention Center (RSDC) Rank each RSDC from highest to lowest in terms of utilization, or bed occupancy rate Compile data that shows success (recidivism, completion of programs, etc.) of juveniles in RSDCs versus other programs (Residential Treatment Centers, Level E Group Homes, Community-Based Youth Services) 	CBS Deputy Director								
	CBS Deputy Director								
	CBS Deputy Director								

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

PROGRAM AND PROGRAM PERFORMANCE									
Task	Responsible Party	Timeframe (quarters)							
		Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8
<ul style="list-style-type: none"> Prepare a report to present to the State Government as to why the reduction of Community Detention Centers would be beneficial to juveniles in connection with the Juvenile Detention Alternative Initiative (JDAI), which is a part of the State Plan for Detention Meet with State Government to present findings and results and propose legislation in order to reduce the number of Community Detention Centers 	CBS Deputy Director								
	CBS Deputy Director								
Recommendation #5 - Consider a move to a fee-for-service compensation models for the RSDCs and adjust and improve these compensation models as they are beginning to be used.									
<ul style="list-style-type: none"> Compile a 3- 5 year comparison of bed occupancy by RSDC Review comparison to evaluate RSDC utilization and bed occupancy rates Determine and negotiate an appropriate per bed rate and improve the compensation models as these rates after they are implemented 	Deputy Director F&A								
	Deputy Director F&A								
	Deputy Director F&A								
Recommendation #6 - Consider additional community-based alternative services for juveniles to avoid detention in general.									
<ul style="list-style-type: none"> Conduct a research on what other states have implemented as an alternative to detention (foster care stipends, ankle bracelets, etc.) Compile a listing from research of plausible and potential alternatives to be utilized by the OJA Conduct a research on the listing of potential alternatives for success rates and outcomes Create a plan and timeline for implementation of alternatives, using the plan in connection with the JDAI and the State Plan for Detention Implement alternatives and track data (success rates, costs, etc.) associated with these alternatives Compile 1 year of data from use of alternatives and compare to outcomes of individuals placed in detention 	CBS Deputy Director								
	CBS Deputy Director								
	CBS Deputy Director								
	CBS Deputy Director								
	CBS Deputy Director								
	CBS Deputy Director								
Recommendation #7 - New legislation, or amending current legislation, to allow OJA the option to contract directly with the organization which is administering the Community Detention Centers, instead of contracting through counties.									
<ul style="list-style-type: none"> Discuss and determine the possibility of being able to contract directly with the organization which is administering the RSDC instead of the counties. Include the possibility of OJA being able to influence the decision on which organization is the subcontractor for the county. 	Chief Operating Officer								

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

PROGRAM AND PROGRAM PERFORMANCE									
Task	Responsible Party	Timeframe (quarters)							
		Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8
<ul style="list-style-type: none"> Determine if current legislation can be amended to allow for the OJA to contract with the organization which is administering the RSDC and have the option to decide who the contractor will be, or if new legislation is needed. Discuss what laws will need to be amended or new legislation will be needed as well as the language of the amendments or legislation Draft amended or new legislation Meet with legislator's to answer any questions as they consider the passing of amended or new legislation Implement amended or new legislation Develop and implement new procedures for negotiating directly with the RSDC providers 	Chief Operating Officer								
	Chief Operating Officer								
	Chief Operating Officer								
	Chief Operating Officer								
	Chief Operating Officer								
	Chief Operating Officer								
Recommendation #8 - Consider implementing a process for service providers to enter services into JOLTS and to be paid based on the services provided through the JOLTS system.									
<ul style="list-style-type: none"> Reach out to the administrators of JOLTS and begin discussions on the possibility, costs, and functionality of allowing service providers access to enter their services into the system, and being paid through the system. Begin discussions with service providers to make them aware of the change and their responsibilities and the way they will be paid, which will have them inputting services provided into the JOLTS system Work with JOLTS administrators on how the process will look and what will need to be done on both the service provider's and OJA's end in order to implement the process successfully Create a plan of action regarding implementation and the timeline for the migration of the service providers to the system Prepare and deliver instruction materials to service providers explaining and showing how to input information about services provided into the JOLTS system and begin paying providers through the JOLTS system 	OPI Administrator, assisted by IT Director								
	OPI Administrator, assisted by IT Director								
	OPI Administrator, assisted by IT Director								
	OPI Administrator, assisted by IT Director								
	OPI Administrator, assisted by IT Director								
Recommendation #9 - Consider removing or limiting parts of the requirements for the OJA to only work with the currently designated Community-Based Youth Services providers, which will promote more competition among these providers and allow additional service providers to easily enter the market.									
<ul style="list-style-type: none"> Review requirements instructing the OJA to only enter into contracts with designated CBYS providers and determine if there are any requirements which can be removed or limited 	COO, assisted by OPI Administrator								

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

PROGRAM AND PROGRAM PERFORMANCE									
Task	Responsible Party	Timeframe (quarters)							
		Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8
<ul style="list-style-type: none"> Evaluate the criteria to become a designated Community Based Youth Service provider, and consider updating to reduce any perceived or actual barriers to entry Work with the State Government to remove, or determine what updates to requirements would look like Remove requirement or implement updates to requirements 	COO, assisted by OPI Administrator								
	COO, assisted by OPI Administrator								
	COO, assisted by OPI Administrator								
Recommendation #10 - Work with the State or Federal Government to determine the most cost efficient way to provide health care coverage for juveniles in OJA's custody.									
<ul style="list-style-type: none"> Conduct a research on what other states have implemented to provide cost efficient health care coverage for juveniles in their custody Begin meetings and discussions with the State and Federal Government to discuss cost efficient ways health care coverage can be provided to juveniles in either of the OJA's support groups Determine most cost efficient way to provide health care coverage for the OJA Create a plan and timeline to implement health care coverage changes Implement health care coverage changes for juveniles in OJA's custody 	Deputy Director F&A								
	Deputy Director F&A								
	Deputy Director F&A								
	Deputy Director F&A								
	Deputy Director F&A								
Recommendation #11 - Consider utilizing more data and predictive analytics to measure effectiveness of its programs and services. Specifically, more data to measure the long-term outcomes of youth who participate in programs and services.									
<ul style="list-style-type: none"> Discuss and determine specific outcomes of youth who participated in programs and services with the OJA to track that would be useful in improving the long-term outcomes of the programs and services offered Meet with members of legislation to determine what type of deliverable they would like to see and discuss working together in order to track these specified outcomes Research service providers and/or release an RFP for providers who can develop and implement that desired deliverable. Along with the service provider, once selected, create a plan of action for capturing data on long-term outcomes for juveniles and timeline to implement the tracking Compile results and determine areas of improvement for OJA programs 	OPI Administrator, assisted by IT Director								
	OPI Administrator, assisted by IT Director								
	OPI Administrator, assisted by IT Director								
	OPI Administrator, assisted by IT Director								
	OPI Administrator, assisted by IT Director								

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

PROGRAM AND PROGRAM PERFORMANCE									
Task	Responsible Party	Timeframe (quarters)							
		Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8
Recommendation #12 - OMES to provide OJA the ability to customize the employee performance evaluation process. Currently, the employee performance evaluation process is controlled by OMES.									
<ul style="list-style-type: none"> Discuss and compile a listing of requested customizations and improvements to the employee performance evaluations that make it useable for OJA 	Deputy Director F&A								
<ul style="list-style-type: none"> Meet with OMES to discuss these improvements to the employee performance evaluations 	Deputy Director F&A								
<ul style="list-style-type: none"> Create a plan and timeline with OMES for the completion of the customization and the implementation with the new customized features 	Deputy Director F&A								
<ul style="list-style-type: none"> Implement the new employee performance evaluation process 	Deputy Director F&A								
Recommendation #13 - Consider doing more to seek out public-private partnerships to get private investment into OJA programs.									
<ul style="list-style-type: none"> Conduct a research to determine what public-private partnerships are available for OJA programs 	Executive Director								
<ul style="list-style-type: none"> Determine requirements for public-private partnerships available and whether the OJA programs can complete/meet these requirements 	Executive Director								
<ul style="list-style-type: none"> Apply for eligible public-private partnerships 	Executive Director								
Recommendation #14 - Consider delegating certain responsibilities for recruitment, retention, and succession planning to the internal human resources function as well as the existing employees that fill these positions. (Innovation Tournament Finalist)									
<ul style="list-style-type: none"> Discussion between internal HR, management and Resident Care Specialist (RCS) employees to create a listing of job responsibilities for job postings, along with characteristics and qualifications of individuals needed to fill these positions 	RPS Director								
<ul style="list-style-type: none"> Internal HR, management and RCS employees to discuss areas which could lead to potential of individuals leaving for another position 	RPS Director								
<ul style="list-style-type: none"> Create a plan of action and timeline to address weakness identified 	RPS Director								
<ul style="list-style-type: none"> Review results of internal HR recruitment and retention rate of those hired employees and compare to those of individuals hired when Oklahoma's state HR was completing this function 	RPS Director								
Recommendation #15 - Consider non-financially incentivizing parents to be more engaged with treatment programs which may result in less time spent being supervised by OJA.									

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

PROGRAM AND PROGRAM PERFORMANCE									
Task	Responsible Party	Timeframe (quarters)							
		Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8
<ul style="list-style-type: none"> Conduct a research to determine ways other similar juvenile agencies have increased parent engagement with treatment programs and what the success rate looked like (i.e. providing transportation) Compile a list of ideas which would best fit treatment programs offered by the OJA Create a plan of action, budget and timeline to implement activities to engage parents Compile 6 months of data and review the success rate of implementation 	CBS Deputy Director, assisted by RPS Director								
	CBS Deputy Director, assisted by RPS Director								
	CBS Deputy Director, assisted by RPS Director								
	CBS Deputy Director, assisted by RPS Director								
Recommendation #16 - Monitor the success of the implementation of the incentive-based payments to Community Group Homes and consider aspects that may be applied to RSDCs.									
<ul style="list-style-type: none"> Collect data on results (improvement of service, youths served, completion of programs, recidivism, costs saved, etc.) of the incentive-based payments and compare to data from prior to implementation of incentive-based payments Discuss if any, or all, aspects of the incentive-based payments could be applied with the RSDCs to improve things such as morale, retention, efficiency, etc. 	CBS Deputy Director								
	CBS Deputy Director								

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

FACILITIES

FACILITIES									
Task	Responsible Party	Timeframe (quarters)							
		Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8
Recommendation #1 - Deferred maintenance issues at COJC and SWOJC be reviewed by management and addressed where reasonably possible, with priority given to issues of safety and security.									
<ul style="list-style-type: none"> Deputy Director of Residential Placement Support (RPS) instruct Facility Superintendents to supply a current listing of deferred maintenance at each facility Facility Superintendents work with Facility Maintenance to prepare a listing of deferred maintenance at each facility along with associated costs to repair Review list of deferred maintenance and prioritize based on safety and security issues Review prioritized deferred maintenance list with Deputy Director RPS and determine what items can and should be addressed given available resources Review deferred maintenance issues to be addressed with Facility Maintenance Request acquisition of necessary supplies Perform approved deferred maintenance Review and approve deferred maintenance repairs 	Deputy Director of Residential Placement Support (RPS)/Superintendents								
	Superintendents/Facility Maintenance								
	Superintendents								
	Superintendents/Deputy Director RPS								
	Superintendents/Facility Maintenance								
	Facility Maintenance/Facility Admin Staff								
	Facility Maintenance								
	Superintendents								
Recommendation #2 - The security consultant assisting the AE1/DBE with the designing of the NGF should tour COJC and SWOJC facilities to see if there are security considerations that can be reasonably addressed in the interim to improve resident and staff safety.									
<ul style="list-style-type: none"> Security consultant tours the facilities and assesses security considerations that may reasonably be addressed in the interim Review security consultant's listing of security concerns and prioritize Review prioritized security considerations list with Deputy Director RPS and determine what items can and should be addressed given available resources Review security considerations with appropriate facility staff 	Superintendents/Security Consultant								
	Superintendents								
	Superintendents/Deputy Director RPS								
	Superintendent/Facility Staff								

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

FACILITIES									
Task	Responsible Party	Timeframe (quarters)							
		Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8
<ul style="list-style-type: none"> Review and approve changes for security considerations Request acquisition of necessary hardware/software, if applicable Implement approved changes 	Superintendents Facility Staff Facility Staff								
Recommendation #3 - The technology consultant assisting the AE1/DBE with the design of the NGF should review the current IT capabilities at the medium secure facilities and determine a plan to appropriately update the facilities' hardware/software/document imaging capabilities. Such a plan should translate directly to implementation of the same in the NGF.									
<ul style="list-style-type: none"> Technology consultant tours the facilities to assess current hardware/software/document imaging capabilities and determine a plan to update those capabilities for current use and future use in the NGF Review technology consultant's recommendations and prioritize implementation plan Review prioritized technology plan(s) with Deputy Director RPS and determine what items can and should be addressed given available resources and an appropriate timeline Request acquisition of necessary hardware/software Implementation of technology hardware/software 	Superintendents/Technology Consultant Superintendents Superintendents/Deputy Director RPS Facility Staff/DBE Facility Staff/OMES IT/DBE								
Recommendation #4 - Work toward establishing a culture of communication between management and facility staff and among facility staff to assist in job performance at expected levels, employee morale and staff turnover.									
<ul style="list-style-type: none"> Create and conduct a survey to determine strengths and weakness of communication between and among facility management and facility staff Compile results from survey and determine the significant areas of weaknesses Discuss survey results with Facility Superintendents Create a plan of action (and potentially policies) to address areas of weaknesses Review, approve and implement communication plan Conduct a follow-up survey in order to determine if actions taken have addressed weaknesses 	Facility HR Manager Facility HR Manager Superintendents/Facility HR Manager Facility HR Manager Superintendents Facility HR Manager								
Recommendation #4a - Assess the current job descriptions for secure facility staff to ensure they appropriately communicate expected activities, responsibilities and expected performance of each position.									

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

FACILITIES									
Task	Responsible Party	Timeframe (quarters)							
		Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8
<ul style="list-style-type: none"> Review and revise current job descriptions for all secure facility staff to align with current expectations with regard to activities, responsibilities and expected performance Distribute updated job descriptions to facility staff Conduct staff meetings to solicit feedback, concerns and potential areas of needed training 	Superintendents/Facility HR Manager								
	Facility HR Manager								
	Superintendents/Facility HR Manager								
Recommendation #4b - Establish a comprehensive staff training program for the secure facilities personnel appropriate for their job responsibilities. The training programs should encompass policies, procedures, de-escalation/resident behavior management techniques, decision-making and other skills desired of and expected to be implemented by staff in their daily duties, as appropriate for their positions.									
<ul style="list-style-type: none"> Utilizing updated job descriptions, evaluate each facility staff for areas of needed training Establish facility staff training modules to address areas of need Conduct quarterly facility staff trainings to review overall policies and procedures. Also include situational analyses which would apply to all positions Conduct quarterly trainings by departments/staff positions to review policies, procedures, and desired and expected skills which are specific to different positions. Also include situational analyses which would apply to that position Review annual facility staff evaluations/appraisals to determine if training is on target and effective 	Facility Staff Supervisors/Facility HR Manager								
	Facility HR Manager								
	Facility HR Manager								
	Facility HR Manager/Facility Staff Supervisors								
	Superintendent/Facility HR Manager								
Recommendation #4c - Hold discussions/meetings with staff specifically to convey the strategic goals and objectives of OJA. The goal of the discussions/meetings should be to ensure that staff understand the importance of the strategic issues, goals and objectives of OJA and allow staff to ask questions and offer feedback for management's consideration.									
<ul style="list-style-type: none"> Schedule staff meetings by department to discuss current/updated strategic goals and objectives Discuss with staff the strategic goals and objectives, making sure to include what plans are in place to meet those goal and objectives Create a plan of action to address feedback from staff, as appropriate At next scheduled department staff meeting, discuss changes to strategic goals and objectives given staff feedback 	Superintendent								
	Superintendent								
	Superintendent								
	Superintendent								

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

FACILITIES									
Task	Responsible Party	Timeframe (quarters)							
		Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8
Recommendation #5 - Review available case studies/research regarding common contributors to high turnover in impacted secure facility positions, and what can reasonably be done to address identified issues.									
<ul style="list-style-type: none"> Review available case studies/research and contact other juvenile facilities such as those in Oregon and Kansas Consider results of facility staff exit reviews to determine if there are other specific issues contributing to turnover Review results of research and prioritize list of concerns, taking into consideration what the employees stated could be done to reduce/eliminate those reasons Create a plan of action to reduce/eliminate causes of concern which would cause potential staff turnover Monitor facility staff exit interviews to determine if implemented plan of action is have the desired impact 	Facility HR Manager								
	Facility HR Manager								
	Facility HR Manager								
	Superintendent/Facility HR Manager								
	Superintendent/Facility HR Manager								
Recommendation #6 - Conduct a salary survey for secure facility positions to determine appropriate pay scales to attract and retain qualified staff. Plans, timelines and budgets should then be established to move toward appropriate pay scales. Projected cost saving to be generated by the NGF should be considered as a potential funding source. - IN PROCESS									
<ul style="list-style-type: none"> Determine if cost benefit to conducting internal salary survey of secure facility positions vs hiring third party service Compile a listing of average compensation for each position at all levels Compile a listing of comparable market average compensation for each position and level Compare the OJA compensation to market average compensation to determine any deficits Review budget and determine plausibility of increasing compensation for positions where a deficit to the market average exists Create a plan a timeline to move compensation levels of existing and future employees to those of the market average Implement plan and timeline of moving compensation levels to those of the market average 	Superintendent/Facility HR Manager								
	Facility HR Manager/Consultant								
	Facility HR Manager/Consultant								
	Facility HR Manager/Consultant								
	Deputy Director of Finance & Administration (F&A)								
	Deputy Director F&A								
	Deputy Director F&A								
Recommendation #7 - FY2020 budget request for a \$500,000 funding change for employee incentives to the direct care staff to improve the hiring pool and retention. The funding change request also includes costs associated with performance pay, virtual health visits and a 20 year retirement plan for direct care workers. - COMPLETED									

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

FACILITIES									
Task	Responsible Party	Timeframe (quarters)							
		Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8
<ul style="list-style-type: none"> Create a budget showing amounts to go towards employee incentives, performance pay, virtual health visits and retirement plan - COMPLETED Make budget request through OJA Budget Work Program submitted to OMES - COMPLETED 	Deputy Director F&A Deputy Director F&A								
Recommendation #8 - Complete the plans for the construction of the NGF. - IN PROCESS									
<ul style="list-style-type: none"> Let Request for Proposal (RFP) 9.21.18 - COMPLETED Mandatory pre-bid meeting/tour on Tecumseh campus 10.9.18 - COMPLETED Owner addenda Issued 10.12.18 - COMPLETED DBE questions due 10.19.18 - COMPLETED Responses due DBE questions 10.26.18 - COMPLETED RFP response due date at 3:00pm 12.14.18 DBE interviews 12.19.18 Clarifications for DBE 1.4.19 Announce DBE selection 1.11.19 Project contracting Preliminary design phase Schematic design phase Design development phase Construction documents phase Construction phase Review monthly progress reports and pay applications Project close-out phases 	Deputy Director F&A/OMES Deputy Director F&A/OMES Deputy Director F&A/OMES DBEs Deputy Director F&A/OMES DBEs Deputy Director F&A/OMES/Selection Committee Deputy Director F&A/OMES/Selection Committee Deputy Director F&A/OMES Deputy Director F&A/OMES/DBE Deputy Director F&A/OMES/DBE								
Recommendation #9 - As part of the AE1/DBE team, hire a security consultant to assist with designing the security features at the NGF. - IN PROCESS									
<ul style="list-style-type: none"> R&N System Designs is the designated electronic security consultant as part of the AE1 team for the NGF - COMPLETED Successful DBE team to include a Security Systems Designer. Security design to be evaluated as part of the RFP selection process 	Deputy Director F&A/OMES Deputy Director F&A/OMES/Selection Committee								

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

FACILITIES									
Task	Responsible Party	Timeframe (quarters)							
		Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8
Recommendation #10 - Hire a work efficiency (time and effort) consultant to study the current staff processes to take into account how those processes will need to change to be optimized in the new facility.									
<ul style="list-style-type: none"> Discuss vision, expectation and needs of what is to be accomplished with hiring of a work efficiency consultant Determine if competitive bid process must be utilized or if OJA can utilize the current vendor through OMES Either open position up for bid or work with vendor available through OMES Select work efficiency consultant that best fits the vision, expectation and needs of the OJA Work efficiency consultant to perform study Review results of work efficiency consultant and prioritize results Create a plan of action to address results of work efficiency consultant, beginning with the highest priority items Follow-up on actions taken and determine if results are positive or if more/different action needs to be taken 	Deputy Director RPS/Facility Superintendents								
	Deputy Director RPS								
	Deputy Director RPS								
	Deputy Director RPS								
	Work Efficiency Consultant								
	Deputy Director RPS/Facility Superintendents								
	Deputy Director RPS/Facility Superintendents								
	Deputy Director RPS/Facility Superintendents								
	Deputy Director RPS/Facility Superintendents								
Recommendation #11 - As part of the AEI/DBE team, hire a technology consultant to advise on the most appropriate hardware/software to assist in security and work efficiency efforts for the new facility.									
<ul style="list-style-type: none"> Discuss vision, expectation and needs of what is to be accomplished with the hiring of a technology consultant Determine if competitive bid process must be utilized Either open position up for bid or research technology consultant Review bids or contact multiple technology consultants and initiate discussions to determine cost and if they fit the needs of OJA Select technology consultant that best fits the need of advising on hardware/software to assist in security and work efficiency efforts Technology consultant to perform study Follow-up on actions taken and determine if results are positive or if more/different action needs to be taken 	Deputy Directors RPS and F&A/Facility Superintendents/OMES IT								
	Deputy Director F&A								
	Deputy Director F&A/OMES								
	Deputy Directors RPS and F&A/Facility Superintendents/OMES IT								
	Deputy Directors RPS and F&A/Facility Superintendents/OMES IT								
	Technology Consultant								
	Deputy Director RPS/Facility Superintendents								

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

FACILITIES									
Task	Responsible Party	Timeframe (quarters)							
		Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8
Recommendation #12 - Design a formalized data analytics process to coincide with its ability to collect/store electronic data through enhanced hardware/software resources.									
<ul style="list-style-type: none"> Consider using the assistance of outside parties, such as the "Data Science for Social Good" fellowship at the University of Chicago (See note) Determine strategic questions of importance to OJA (focus on goals, objectives and pain points) that can be answered or tracked with the assistance of collected data Determine objectives or steps necessary to aid in answering strategic questions (what are you trying to accomplish and how will you know when you get there?) Determine key performance measures for each of the chosen strategic questions (what is important to track, why it is important to track and how to track it) Determine where the necessary data is housed and who "owns" it (both internal and potentially external to OJA) Determine availability of necessary software tools (e.g., Standard analysis-Excel & Access; Data analytics - ACL, IDEA, Arbutus; Data visualization-Tableau & NodeXL; Artificial intelligence) Develop and apply data analytic procedures Analyze collected data and present results Review results of data analytics Implement plans of action and review as necessary for needed refinements and revisions 	Executive Director/ Deputy Directors of RPS and F&A								
	Executive Director/ Deputy Directors of RPS and F&A								
	Executive Director/ Deputy Directors of RPS and F&A								
	Executive Director/ Deputy Directors of RPS and F&A								
	Deputy Directors of RPS and F&A								
	Deputy Directors of RPS and F&A								
	Deputy Directors of RPS and F&A/IT Analyst								
	IT Analyst								
	Executive Director/ Deputy Directors of RPS and F&A								
	Executive Director/ Deputy Directors of RPS and F&A								
Recommendation #13 - Initially build 7 of the 9 residential cottages allowed for in the masterplan due to the declining trend in population in Oklahoma secure detention facilities and Oklahoma State Bureau of Investigation (OSBI) juvenile arrest data. - IN PROCESS									
<ul style="list-style-type: none"> Continue with plan to build four residential cottages in phase 1 of construction and three residential cottages in phase 2 of construction - COMPLETED After phase 1 and 2 of construction, re-evaluate the population trend for juveniles in Oklahoma secure detention facilities to determine if remaining 2 cottages should be built 	Deputy Director F&A								
	Executive Director/ Deputy Directors of RPS and F&A								

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

FACILITIES									
Task	Responsible Party	Timeframe (quarters)							
		Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8
Recommendation #14 - Consider utilizing construction audit services during the construction of the NGF to assist in minimizing the risks associated with a construction project and to control costs. - IN PROCESS									
<ul style="list-style-type: none"> • Discuss if external construction audit services would be beneficial for the NGF project - COMPLETED • If it is decided to utilize external construction audit services: <ul style="list-style-type: none"> • Determine if competitive bid process must be utilized - COMPLETED • Either go through sole-source or RFP process - COMPLETED • Award contract - COMPLETED • Contracting process - COMPLETED <ul style="list-style-type: none"> • Phase 1: Contract review (Ensure all essential terms & conditions are in contract to protect owner; identify any contradictory language, etc.) • Phase 2: Pay application reviews (review project in close to real time; review monthly pay apps (labor, equipment, rental, overhead, etc.); review all change orders; independently track project process and budget, etc.) • Phase 3: Closeout review (Verification for retention payouts; review project checklists; obtain all lien waivers, post-project checklist/punch list, etc.) 	Deputy Director F&A/ OMES CAP								
	Deputy Director F&A								
	Deputy Director F&A/OMES								
	Deputy Director F&A/OMES								
	Deputy Director F&A/OMES								
	Construction Audit Consultant/OMES								
	Construction Audit Consultant/OMES								
	Construction Audit Consultant/OMES								

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

OKLAHOMA YOUTH ACADEMY CHARTER SCHOOL

OKLAHOMA YOUTH ACADEMY CHARTER SCHOOL									
Task	Responsible Party	Timeframe (quarters)							
		Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8
Recommendation #1 - Consider providing a virtual option for the OYACS curriculum online for students after they leave OJA secure facilities. Innovation Tournament Winner – IN PROCESS									
• Draft legislative language pertaining to the virtual OYACS curriculum. IN PROCESS	Superintendent, Executive Director								
• Meet with legislators to present the language and gain feedback.	Chief Operating Officer								
• Submit legislation for approval	Chief Operating Officer								
• Evaluate current service providers approved by the Oklahoma legislature and determine which ones meet the needs and vision for the OYACS virtual option	Superintendent, Deputy Director F&A								
• Select service provider that best meets the need of the OJA and the OYACS virtual option	Superintendent, Deputy Director F&A								
• Work with service provider selected to develop the online OYACS classroom	Superintendent, Deputy Director F&A								
• Determine and create a policy for the online OYACS classroom and qualifications to attend the online classroom	Superintendent, Deputy Director F&A								
• Promote and launch the online OYACS classroom	Superintendent, Deputy Director F&A								
Recommendation #2 - Adopt new processes to ensure smooth and timely transition of educational records, ideally in advance of the youth's placement.									
• Inquire about the developed electronic files for educational records that many states and local education agencies have developed through the Oklahoma State Department of Education.	IT Director, Superintendent								
• Determine any costs associated with building a system to utilize electronic education records for adjudicated students, and time/cost associated with converting to the program	IT Director, Superintendent								
• Order the system to be built	IT Director, Superintendent								
• Migrate to electronic files system by utilizing for all new juveniles and transferring files of those juveniles previously or currently educated by the OJA	IT Director, Superintendent								
Recommendation #3 - Develop tools to collect and assess student and school performance on a range of key metrics, blending institutional performance, psychological tests, and other metrics that would be beneficial.									

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

OKLAHOMA YOUTH ACADEMY CHARTER SCHOOL									
Task	Responsible Party	Timeframe (quarters)							
		Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8
<ul style="list-style-type: none"> Meet with stakeholders to discuss metrics that are currently being monitored, and how the output of those results are being accessed. Determine which key metrics will be beneficial to the stakeholders to track, such as student academic achievement, student engagement, student behavior plan, psychological testing, etc. 	Superintendent								
<ul style="list-style-type: none"> Conduct a cost/benefit analysis on implementing key metrics tracking tool 	Superintendent								
<ul style="list-style-type: none"> Select tool which best fits the needs of the OJA 	Superintendent								
<ul style="list-style-type: none"> Create a plan of action/timeline for implementing the collection, tracking, and assessing of selected key metrics 	Superintendent								
<ul style="list-style-type: none"> Review results of key metrics and identify strengths and weakness 	Superintendent								
Recommendation #4 - Perform an assessment of operations to evaluate current programs, identify areas of improvement and possible expand, enhance or create new educational programs that can strengthen the programs and curriculum available at the Charter School. Possible expansion may include community based group homes and detention centers.									
<ul style="list-style-type: none"> Conduct a research on various Quality Assessment Tools (QAT) and determine which best fits the needs of OYACS 	Superintendent								
<ul style="list-style-type: none"> Complete QAT for OYACS 	Superintendent								
<ul style="list-style-type: none"> Review results of QAT and identify areas of success or in need of professional development 	Superintendent								
<ul style="list-style-type: none"> Prioritize results in need of professional development in order to take action on these results 	Superintendent								
<ul style="list-style-type: none"> Create a plan an timeline to take actions on those results that are in need of professional development, beginning with the highest priority 	Superintendent								
<ul style="list-style-type: none"> Create policies and procedures for completing the QAT in the future (at least annually) and actions taken on results 	Superintendent								
Recommendation #5 - Consider reviewing and possibly enhancing existing professional development programs.									
<ul style="list-style-type: none"> Create and conduct a survey to determine the success and struggles of the professional development programs 	OYACS Principle								
<ul style="list-style-type: none"> Compile results from survey and identify and prioritize the areas where staff has identified the professional development programs are struggling 	OYACS Principle								
<ul style="list-style-type: none"> Create a plan of action to enhance the areas of struggle 	OYACS Principle								

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

ACCOUNTING AND FINANCE

ACCOUNTING AND FINANCE									
Task	Responsible Party	Timeframe (quarters)							
		Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8
Recommendation #1 - OJA work with the State Office of Management and Enterprise Services (OMES), which provides IT support for OJA, to determine the feasibility and cost of using electronic approval for all invoices to make payment of invoices more efficient.									
<ul style="list-style-type: none"> IT department to install Adobe Sign software for all OJA personnel who process invoices. All of the impacted personnel will need to do training to learn how to effectively use the Adobe Connect software. All of the impacted personnel will submit feedback and troubleshooting issues to the OJA IT department. IT department to resolve any trouble shooting issues with the Adobe Connect software. Finance policies and procedures manual to be updated to reflect electronic routing and approval of all invoices. 	OJA IT Department								
	All Impacted Personnel								
	All Impacted Personnel								
	OJA IT Department								
	OJA Finance Team								
Recommendation #2 - OJA work with the State (OMES) which provides IT support for OJA to determine if they could develop an electronic expense reimbursement process that could do the following:									
<ul style="list-style-type: none"> a. Enter beginning location/office and destination for online mapping site to automatically put time and mileage for the trip b. Enter other employees in the vehicle so their travel time will match other employees on the same trip c. Use a camera phone to take picture of meal and lodging receipts to save time scanning in receipts at a later point, as well as limiting the chance of receipts getting lost d. Connect to travel website to ensure flights are booked within the limits set by the state and save documentation of flight pricing/options at the time the flight was booked. e. Have error messages for when support/descriptions are missing or if an expense is not recorded correctly 									
<ul style="list-style-type: none"> IT department to develop internal program that loads information into the OMES expense reimbursement form. Expense reimbursement policies and procedures manual to be updated to reflect updated expense reimbursement process. Create training manuals to be used as references for the updated expense reimbursement process. All of the impacted personnel will need to do training to learn how to effectively use the expense reimbursement system. 	OJA IT Department								
	OJA Finance Team								
	OJA Finance Team								
	All Impacted Personnel								

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

ACCOUNTING AND FINANCE

Task	Responsible Party	Timeframe (quarters)							
		Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8
<ul style="list-style-type: none"> OJA to consult with other agency CFO's to determine if a universal expense reimbursement program can be developed on a multi-agency basis. 	Deputy Director F&A								
Recommendation #3 - OJA evaluate responsibilities within grant reporting to determine how to best obtain additional funding to help their mission and to make sure adequate staffing is available to complete any grant administration requirements.									
<ul style="list-style-type: none"> OJA Community Based Support team to determine if additional federal grants are available to support OJA's mission. OJA Community Based Support team to determine the skill level and personnel needed of additional team members if additional grants were applied for and administered by OJA. OJA Community Based Support team to either research or contact other states who administer similar community based support programs to determine the level of staffing used by other states to administer similar federal programs. OJA Finance team to perform a comprehensive cost/benefit analysis to determine the financial viability of additional personnel to apply, administer and manage grants. If financial viability of adding additional personnel is determined to be warranted, OJA Community Based Support team will need to develop job descriptions and qualifications to be used for seeking out additional personnel. 	Community Based Support Department Community Based Support Department Community Based Support Department OJA Finance Team Community Based Support Department								
Recommendation #4 - OJA use technology resources available, JOLTS or another tool, to streamline grant reports. This would save time for OJA staff as well as provide consistent reporting of any OJA program's funded by grants.									
<ul style="list-style-type: none"> OJA IT department and OJA Community Based Support department to collaborate to determine the performance based metrics information needed to be extracted from JOLTS for federal grant reporting purposes. OJA IT department to implement reporting system in JOLTS OJA to update policies and procedures for electronic reporting in JOLTS. CBYS recipients to receive training on new reporting tools in JOLTS. 	Community Based Support Department/IT Department IT Department Community Based Support Department								

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

ACCOUNTING AND FINANCE

Task	Responsible Party	Timeframe (quarters)							
		Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8
Recommendation #5 - Implement dual control over mail opening to ensure all checks are properly accounted for.									
<ul style="list-style-type: none"> Deputy Director of Finance and Administration to revise the procedures for opening the mail to ensure that two personnel are opening the mail and properly logging all checks received. Update internal policies and procedures and provide relevant training to individuals assigned to open the mail and prepare the check log. 	Deputy Director F&A								
	Deputy Director F&A								
Recommendation #6 - With the help of OMES, integrate the time keeping system and PeopleSoft. This will reduce the chance of human error and the amount of employee time involved with each payroll run.									
<ul style="list-style-type: none"> OJA IT department to continue to monitor OMES' implementation of the cloud-based Oracle system at OMES level. Once cloud-based Oracle system is fully implemented at the OMES level, OJA IT department to receive technical aspects for TMS to Oracle integration from OMES IT department. OJA IT department to review technical aspects for TMS to Oracle integration and revise coding and TMS platform for integration. OJA IT department to perform integration tests in a test-run environment to ensure that all data is properly transferred from TMS into Oracle. 	IT Department								
	IT Department								
	IT Department								
	IT Department								

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

BUDGET

BUDGET									
Task	Responsible Party	Timeframe (quarters)							
		Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8
Recommendation #1a Initial Analysis: BKD recommends that the OJA should work with DHS and OKHCA to review potential additional federal funding sources for OJA-type activities.									
<ul style="list-style-type: none"> Conduct informal discussions with HHS Region 6 peer agencies as to their use of federal funding sources to support juvenile justice-related activities Specifically investigate the use of Title IV-E reimbursement, as used by the Texas Juvenile Justice Department (TJJD) Consider the potential impact of recent changes (10/2018) to federal law that allow for the use of Medicaid funds (for up to 30 days) to support services for those non-elderly individuals with substance use disorders who are in "institutions for mental disease" (IMDs) Discuss with the Oklahoma Department of Human Services (DHS) and Oklahoma Health Care Authority (OKHCA) executives and/or grant staff these and any other sources of federal funding that could be accessed to support OJA services and programs With OKHCA, determine whether the potential federal funding stream(s) under review (if secured) would require changes to the State's Medicaid Plan or whether they could be implemented administratively Based on this information, make determination whether to move forward to conduct "due diligence" on the potential use of the new federal funding stream(s) 	Deputy Director F&A								
	Deputy Director F&A								
	Deputy Director F&A								
	Deputy Director F&A								
	OKHCA/Deputy Director F&A								
	Deputy Director F&A								
Recommendation #1b Administrative Adjustment Path: BKD recommends that the OJA should work with DHS and OKHCA to review potential additional federal funding sources for OJA-type activities.									
<ul style="list-style-type: none"> Conduct a site visit(s) to other states to inspect exactly how such additional federal funds are used; discuss with other state executives the pros and cons of such usage 	Deputy Director F&A								

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

BUDGET									
Task	Responsible Party	Timeframe (quarters)							
		Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8
<ul style="list-style-type: none"> Conduct a detailed assessment as to how the federal funding would be used if secured, including: required changes to the OJA program, reporting requirements, State matching fund requirements, analysis of whether it would be State- or contractor-operated program, whether there is a viable vendor base to provide the service (if contractor operated), audit requirements, and the risk of non-compliance 	Deputy Director F&A								
<ul style="list-style-type: none"> Confirm adequacy of financial tracking tools to support the requirements of any new funding, if secured 	Deputy Director F&A								
<ul style="list-style-type: none"> Develop the business case for the use of the new federal funding stream(s) 	Deputy Director F&A								
<ul style="list-style-type: none"> If necessary, brief and secure support from OK legislative representatives on the necessity of state matching funds, if the additional federal funding stream(s) are secured 	Deputy Director F&A								
<ul style="list-style-type: none"> Determine OJA's go/no go on whether to formally pursue the targeted federal funding stream(s) 	Deputy Director F&A								
<ul style="list-style-type: none"> Determine the timing around the receipt of the targeted federal funds, if received 	Deputy Director F&A								
<ul style="list-style-type: none"> If needed, coordinate with federal representatives (House and Senate) to make them aware of OJA's intent to pursue additional federal funding streams and request assistance (if needed) 	Deputy Director F&A								
<ul style="list-style-type: none"> Apply to the appropriate agency(ies) for the additional federal funds 	Deputy Director F&A								
<ul style="list-style-type: none"> Draft effective oversight/audit procedures based on the particular funds received 	Deputy Director F&A								
<ul style="list-style-type: none"> If additional federal funds are approved, develop an implementation plan consistent with the business case developed 	Deputy Director F&A								
<ul style="list-style-type: none"> If necessary, work with OK legislative leaders to secure appropriation of any required state matching funds 	Deputy Director F&A								
<ul style="list-style-type: none"> Implement new programs/policies supported by the new federal funds 	Deputy Director F&A								
<ul style="list-style-type: none"> Bill for federal reimbursement 	OKHCA								

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

INFORMATION TECHNOLOGY

INFORMATION TECHNOLOGY									
Task	Responsible Party	Timeframe (quarter)							
		Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8
Recommendation #1 - Complete its plans for information security awareness training for OJA employees.									
• Develop rotating plan for employee security information awareness training (quarterly is normal)	IT Director								
• Consider using OMES resources for training or a third party like security mentor (securitymentor.com) or KnowBe4 (knowbe4.com)	IT Director								
• Begin awareness training	IT Director								
Recommendation #2 - Develop a process for periodically reviewing and approving system administrative accounts.									
• Develop plan for sample size and frequency (normally 25%, quarterly)	IT Director								
• Develop inventory of applications and network(s) subject to review	IT Director								
• Conduct periodic system admin reviews									
Recommendation #3 - Complete the process of moving all IT policies and procedures over to the state-level policies and procedures to be consistent with the rest of the state.									
• Complete the inventory of policies and procedures	IT Director								
• Determine which of final policies and procedures can be removed or superseded to OMES or other state policies and procedures	IT Director/OMES								
• Complete move of policies and procedures	IT Director								
Recommendation #4 - Complete its plans for disaster recovery for all OJA assets and systems.									
• Complete inventory of applications and systems subject to DR plans	IT Director/OMES								
• Complete listing of responsible parties for DR for OJA and OMES personnel	IT Director/OMES								
• Develop Risks and Business Impact Analysis	IT Director/OMES								
• Coordinate with OMES resources between OJA and OMES	IT Director/OMES								
• Complete documentation for DR plan (Risk Assessment, BIA, Inventory, testing plan)	IT Director/OMES								
• Conduct initial test of DR plan	IT Director/OMES								

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

INFORMATION TECHNOLOGY									
Task	Responsible Party	Timeframe (quarter)							
		Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8
Recommendation #5 - Incorporate certain additional processes into the OMES Media Destruction policies.									
• Evaluate information types (paper, electronic) subject to federal and state laws	IT Director/OMES								
• Evaluate inventory and location of data subject to federal and state laws	IT Director/OMES								
• Enhance media destruction polices to reflect analysis	IT Director/OMES								
Recommendation #6 - Work with the State (OMES) to determine if supervisors can get notified when an employee works 35 hours that week so they can determine how much, if any, overtime their employees are going to be working.									
• Review positions subject to employee alerts	IT Director/OMES								
• Review changes needed to systems for forecasting and incorporating planning for overtime	IT Director/OMES								
• Enhance systems to provide functionality	IT Director/OMES								
Recommendation #7 - Work with the State (OMES) and other system partners to identify and pilot a technology project that leverages recent technology developments.									
• Conduct assessment with help of OMES and system partners	IT Director/OMES								
• Conduct assessment with other similar states to determine other users of technology with similar missions to OJA	IT Director/OMES								
• Continue to attend association and other conferences to determine technologies which may be applicable	IT Director/OMES								
• Conduct evaluations of emerging technologies for applicability	IT Director/OMES								
Recommendation #8- Consider licensing JOLTS to similar agencies in other states to provide a revenue stream for OJA in exchange for licensing fees. Innovation Tournament Finalist									
• Work with legal to determine requirements needed legislatively to allow concept to be launched	IT Director								
• Determine estimate for "productizing" JOLTS application for license	IT Director								
• Determine support and ongoing maintenance requirements	IT Director								
• Determine potential partners (I2E, for example) to provide guidance, funding, potential vendors	IT Director								
• Present legislation with language to launch concept	IT Director								
Recommendation #9 - Provide the district attorneys with limited access to JOLTS to be able to electronically sign documents to make the Juvenile's adjudication process through OJA system more efficient.									

PERFORMANCE ASSESSMENT OF THE OFFICE OF JUVENILE AFFAIRS

INFORMATION TECHNOLOGY										
Task	Responsible Party	Timeframe (quarter)								
		Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	
• Evaluate legal requirements, as applicable	IT Director									
• Determine access list of new users to system	IT Director									
• Determine changes needed, if any, to logical access rules for proper controls	IT Director									
• Spec changes needed, if any, to applications and determine plan for implementation and responsibility	IT Director									