

PERFORMANCE AUDIT
OF
EARLY INTERVENTION SERVICES FOR DELINQUENT YOUTHS

JUDICIARY AND
FAMILY INDEPENDENCE AGENCY

October 2001

EXECUTIVE DIGEST

EARLY INTERVENTION SERVICES FOR DELINQUENT YOUTHS

INTRODUCTION

This report, issued in October 2001, contains the results of our performance audit* of Early Intervention Services* for Delinquent Youths, Judiciary and Family Independence Agency (FIA).

AUDIT PURPOSE

This performance audit was conducted as part of the constitutional responsibility of the Office of the Auditor General. Performance audits are conducted on a priority basis related to the potential for improving effectiveness* and efficiency*.

BACKGROUND

In the State of Michigan, delinquent youths adjudicated for an offense may remain under circuit court jurisdiction (Judiciary), may be committed* or referred* to FIA, or, beginning in January 1999, may be committed to county juvenile agencies. In any case, delinquent youths who are placed in community-based settings* may receive early intervention services in an attempt to rehabilitate* the youths.

"Early intervention services," as used in this report, refers to community-based services and programs provided to delinquent youths who were initially placed in community-based settings.

* See glossary at end of report for definition.

Judiciary

The mission* of the State Court Administrative Office (SCAO) is to provide leadership and promote effective, efficient, equitable, uniform, and accessible court and justice system services to advance the highest quality of justice in Michigan. Inherent in the mission of the SCAO is the responsibility of providing administrative oversight and management or technical assistance to judges and trial court staff on matters relating to the management of judicial functions. The SCAO also analyzes court rules and legislation affecting the administration of the court and proposes changes to rules and statutes where appropriate.

Section 712A.18(1) of the *Michigan Compiled Laws* states that, if a juvenile is adjudicated for an offense, the court ". . . may enter any of the following orders of disposition that are appropriate for the welfare of the juvenile and society in view of the facts proven and ascertained" The Section contains a list of possible orders of disposition, including placing the youth on probation or under supervision in the youth's home or the home of a relative, placing the youth in a residential treatment facility, committing or referring the youth to FIA, and committing the youth to a county juvenile agency.

As of September 30, 2000, there were 57 circuit courts throughout the State. During fiscal year 1999-2000, approximately 40,800 delinquent youths were under circuit court jurisdiction for part or all of the fiscal year. Approximately 1,100 of these youths were either immediately or subsequently committed or referred to FIA. Delinquent youths remaining under court jurisdiction are generally placed in community-based settings and may have received early intervention services.

* See glossary at end of report for definition.

FIA

FIA administers juvenile justice services, including early intervention services, for youths committed to FIA for services or referred to FIA for care and supervision. The Child and Family Services Administration oversees policy development for services provided to youths and families through FIA county offices. Juvenile justice specialists are located within the Field Operations Administration.

The purpose of providing juvenile justice services is to carry out Section 712A.1(3) of the *Michigan Compiled Laws*, which mandates that each youth under court jurisdiction be provided:

. . . care, guidance, and control, preferably in his or her own home, conducive to the juvenile's welfare and the best interest of the state. If a juvenile is removed from the control of his or her parents, the juvenile shall be placed in care as nearly as possible equivalent to the care that should have been given to the juvenile by his or her parents.

FIA directs adjudicated delinquent youths* through the continuum of treatment services determined to provide safe and proper care that is appropriate to the youths' individual needs while taking into account community safety. The treatment services are meant to provide youths and families with the knowledge and skills needed to reduce delinquent behavior, promote appropriate attitudes, and strengthen the youths' capacity for self-sufficiency to enable them to function responsibly in their home communities and become contributing members of society.

As of September 30, 2000, FIA was responsible for 4,233 delinquent youths, of which approximately 1,270 (30%)

* See glossary at end of report for definition.

were initially placed in community-based settings. Juvenile justice services were administered by 40 central office staff and 171 staff at FIA county offices.

**AUDIT OBJECTIVES
AND CONCLUSIONS**

Audit Objective: To assess the effectiveness of the circuit courts' and FIA's intake and placement processes.

Conclusion: We concluded that the circuit courts' and FIA's intake and placement processes were moderately effective. Pertaining to the circuit courts, our assessment disclosed reportable conditions* related to social studies, goals and action steps, out-of-State residential placements*, and staffing and caseload issues (Findings 1 through 4). Pertaining to FIA, our assessment disclosed reportable conditions related to initial risk assessments* and needs assessments*, substance abuse* assessments, and the security level of initial placements (Findings 9 through 11).

Audit Objective: To assess the circuit courts' and FIA's efforts to determine the availability of early intervention services for delinquent youths under court jurisdiction or committed or referred to FIA.

Conclusion: We concluded that the circuit courts and FIA made limited efforts to formally determine and/or document the availability of early intervention services for delinquent youths under court jurisdiction or committed or referred to FIA. Our assessment disclosed a reportable condition for the circuit courts and for FIA related to the availability of early intervention services (Findings 5 and 12).

* See glossary at end of report for definition.

Audit Objective: To determine whether delinquent youths under court jurisdiction or committed or referred to FIA received early intervention services for identified needs.

Conclusion: We concluded that delinquent youths under court jurisdiction sometimes may not receive and youths committed or referred to FIA often did not receive early intervention services for their identified needs. Pertaining to the circuit courts, our assessment disclosed reportable conditions related to court-ordered services and programs and the identification of youths' needs, services, and programs (Findings 6 and 7). Pertaining to FIA, our assessment disclosed reportable conditions related to quarterly risk and needs reassessments, initial and updated service plans*, service referral grids, and the provision of early intervention services (Findings 13 through 16).

Audit Objective: To assess the circuit courts' and FIA's efforts to evaluate the effectiveness of early intervention services provided to delinquent youths.

Conclusion: We concluded that the circuit courts and FIA made limited efforts to evaluate the effectiveness of early intervention services provided to delinquent youths. Our assessment disclosed a reportable condition for the circuit courts and for FIA related to the assessment of early intervention services (Findings 8 and 17).

**AUDIT SCOPE AND
METHODOLOGY**

Our audit scope was to examine the program and other records related to early intervention services for delinquent youths. The audit scope included the examination of case file and other records at six circuit courts and six Family Independence Agency county offices: Muskegon, Oakland, Ottawa, St. Clair, Wayne, and Wexford. Our

* See glossary at end of report for definition.

audit was conducted in accordance with *Government Auditing Standards* issued by the Comptroller General of the United States and, accordingly, included such tests of the records and such other auditing procedures as we considered necessary in the circumstances.

Our audit procedures included examination of records and activities pertaining to early intervention services for delinquent youths primarily for the period April 1, 1998 through April 30, 2000.

To accomplish our objectives, we reviewed pertinent legislation; court rules; administrative orders; court, the SCAO, and FIA policy; and authoritative literature. Also, we interviewed staff at the SCAO and FIA's central office. We visited six circuit courts and interviewed probation officers* and supervisory staff. We also visited six FIA county offices and interviewed FIA juvenile justice specialists and supervisory staff.

In connection with our first objective pertaining to the circuit courts, we assessed the appropriateness of social studies conducted to make intake recommendations, analyzed the identification of goals* and action steps, reviewed out-of-State residential placements, and assessed staffing and caseload issues.

In connection with our first objective pertaining to FIA, we evaluated the use of FIA's structured decision-making tools and reports related to the intake and placement of selected youths. Also, we analyzed the security levels of initial placements.

In connection with our second objective pertaining to both the circuit courts and FIA, we evaluated efforts to assess

* See glossary at end of report for definition.

the availability of the predominant types of needed early intervention services. Also, we reviewed the availability of early intervention services and the sources of funding for early intervention services.

In connection with our third objective pertaining to the circuit courts, we examined case files to determine that youths were provided with court-ordered services and that youths' needs, services, and programs were identified.

In connection with our third objective pertaining to FIA, we reviewed case files to determine that youths received needed services.

In connection with our fourth objective pertaining to both the circuit courts and FIA, we reviewed program evaluations and discussed efforts to evaluate the effectiveness of early intervention services with staff in the counties we visited.

AGENCY RESPONSES

Our audit report includes 17 findings and 20 corresponding recommendations. The SCAO's preliminary response indicated that it agreed with all but 1 of its 8 findings and with all but 1 of the 10 corresponding recommendations. FIA's preliminary response indicated that it agreed with all 9 of its findings and with the 10 corresponding recommendations.

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October 11, 2001

The Honorable Maura D. Corrigan
Chief Justice of the Supreme Court of Michigan
G. Mennen Williams Building
Lansing, Michigan
and
Mr. John D. Ferry, Jr.
State Court Administrator
Michigan Supreme Court
309 N. Washington Square
Lansing, Michigan

Mr. Douglas E. Howard, Director
Family Independence Agency
Grand Tower
Lansing, Michigan

Dear Chief Justice Corrigan, Mr. Ferry, and Mr. Howard:

This is our report on the performance audit of Early Intervention Services for Delinquent Youths, Judiciary and Family Independence Agency.

This report contains our executive digest; description of agencies and services; audit objectives, scope, and methodology and agency responses; comments, findings, recommendations, and agency preliminary responses; and a glossary of acronyms and terms.

Our comments, findings, and recommendations are organized by agency by audit objective. The agency preliminary responses were taken from the agencies' responses subsequent to our audit fieldwork. The *Michigan Compiled Laws* and administrative procedures require that the audited executive branch agency develop a formal response within 60 days after release of the audit report.

We appreciate the courtesy and cooperation extended to us during this audit.

AUDITOR GENERAL

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Description of Agencies and Services

In the State of Michigan, delinquent youths adjudicated for an offense may remain under circuit court jurisdiction (Judiciary), may be committed or referred to the Family Independence Agency (FIA), or, beginning in January 1999, may be committed to county juvenile agencies. In any case, delinquent youths who are placed in community-based settings may receive early intervention services in an attempt to rehabilitate the youths.

"Early intervention services," as used in this report, refers to community-based services and programs provided to delinquent youths who were initially placed in community-based settings. Community-based settings include placement in the youth's own home with biological or adoptive parent(s); placement in a home-like setting with relatives, a legal guardian, or adoptive parents before an adoption is finalized; or placement in a foster home or an independent living situation. "Early intervention services" does not refer to services and programs provided to delinquent youths placed in residential treatment facilities or placed in community-based settings after release* from residential treatment facilities. Also, "early intervention services" does not refer to supervision or other incidental services provided to delinquent youths by probation officers or by FIA juvenile justice specialists (JJSs).

Judiciary

The mission of the State Court Administrative Office (SCAO) is to provide leadership and promote effective, efficient, equitable, uniform, and accessible court and justice system services to advance the highest quality of justice in Michigan. Inherent in the mission of the SCAO is the responsibility of providing administrative oversight and management or technical assistance to judges and trial court staff on matters relating to the management of judicial functions. The SCAO's authority and responsibilities, and services provided, are subject to the direction of the Michigan Supreme Court. The services of the SCAO are also subject to the practical limitations imposed by its allocated budget.

The SCAO also analyzes court rules and legislation affecting the administration of the court and proposes changes to rules and statutes where appropriate. In addition, the SCAO collects, analyzes, and distributes management information regarding the

* See glossary at end of report for definition.

operations of trial courts. This information is used by the Supreme Court and the SCAO to evaluate the performance of Michigan courts and to make decisions regarding operations and necessary changes in operations and administrative policy.

The SCAO's Family Division Unit of the Trial Court Services Division provides specific management assistance to circuit courts in the implementation of the Family Division of the Circuit Court. This includes review and approval of operations' plans and plan amendments, direct management assistance, monitoring of operations, and development of policies and guidelines for administrative operations to improve judicial services to families.

Section 712A.18(1) of the *Michigan Compiled Laws* states that, if a juvenile is adjudicated for an offense, the court ". . . may enter any of the following orders of disposition that are appropriate for the welfare of the juvenile and society in view of the facts proven and ascertained" The Section contains a list of possible orders of disposition, including placing the youth on probation or under supervision in the youth's home or the home of a relative, placing the youth in a residential treatment facility, committing or referring the youth to FIA, and committing the youth to a county juvenile agency.

Section 712A.18(1)(b) also states that, when a youth is on probation or under supervision in the youth's home or the home of a relative, the court shall order the terms of probation or supervision, including reasonable rules for the conduct of the parents, as the court determines necessary for the physical, mental, or moral well-being and behavior of the youth. The court frequently orders, as part of the terms of probation, that a youth receive or attend a particular type of program(s), such as substance abuse treatment, psychological counseling, or community service projects. Also, the court usually orders that a youth abide by any additional terms of probation or supervision set by the probation officer.

As of September 30, 2000, there were 57 circuit courts throughout the State. During fiscal year 1999-2000, approximately 40,800 delinquent youths were under circuit court jurisdiction for part or all of the fiscal year. Approximately 1,100 of these youths were either immediately or subsequently committed or referred to FIA, and 360 youths were committed to a county juvenile agency. Delinquent youths remaining under court jurisdiction are generally placed in community-based settings and may have received early intervention services.

FIA

FIA administers juvenile justice services, including early intervention services, for youths committed to FIA for services or referred to FIA for care and supervision. The Bureau of Juvenile Justice is within FIA's Child and Family Services Administration. JJSs are located within the Field Operations Administration.

The Child and Family Services Administration oversees policy development for services provided to youths and families through FIA county offices. The Bureau of Juvenile Justice, known as the Office of Juvenile Justice prior to February 2000, develops and interprets policy and procedures for programs to serve the needs of delinquent youths. The Bureau of Juvenile Justice also serves as the fiduciary for multiple funding sources, including federal grants and reimbursements from the State's Child Care Fund for approved services to delinquent youths. The Field Operations Administration oversees JJSs.

The purpose of providing juvenile justice services is to carry out Section 712A.1(3) of the *Michigan Compiled Laws*, which mandates that each youth under court jurisdiction be provided:

. . . care, guidance, and control, preferably in his or her own home, conducive to the juvenile's welfare and the best interest of the state. If a juvenile is removed from the control of his or her parents, the juvenile shall be placed in care as nearly as possible equivalent to the care that should have been given to the juvenile by his or her parents.

The goals of FIA's juvenile justice services are to:

1. Protect the public safety by providing a range of supervision and security measures appropriate to the assessed risk level of the juveniles.
2. Provide restorative/healing responses to individual victims and victimized communities by a focus on holding offenders accountable to victims.
3. Empower victims and communities to be active in the juvenile justice processes and practices.
4. Provide training and services to juvenile offenders to enable them to become competent in basic life skills needed to prevent reoffending.

FIA directs adjudicated delinquent youths through the continuum of treatment services determined to provide safe and proper care that is appropriate to the youths' individual needs while taking into account community safety. The treatment services are meant to provide youths and families with the knowledge and skills needed to reduce delinquent behavior, promote appropriate attitudes, and strengthen the youths' capacity for self-sufficiency to enable them to function responsibly in their home communities and become contributing members of society.

As of September 30, 2000, FIA was responsible for 4,233 delinquent youths, of which approximately 1,270 (30%) were initially placed in community-based settings. Juvenile justice services were administered by 40 central office staff and 171 staff at FIA county offices.

Audit Objectives, Scope, and Methodology and Agency Responses

Audit Objectives

Our performance audit of Early Intervention Services for Delinquent Youths, Judiciary and Family Independence Agency (FIA), had the following objectives:

1. To assess the effectiveness of the circuit courts' and FIA's intake and placement processes.
2. To assess the circuit courts' and FIA's efforts to determine the availability of early intervention services for delinquent youths under court jurisdiction or committed or referred to FIA.
3. To determine whether delinquent youths under court jurisdiction or committed or referred to FIA received early intervention services for identified needs.
4. To assess the circuit courts' and FIA's efforts to evaluate the effectiveness of early intervention services provided to delinquent youths.

Audit Scope

Our audit scope was to examine the program and other records related to early intervention services for delinquent youths. The audit scope included the examination of case file and other records at six circuit courts and six Family Independence Agency county offices: Muskegon, Oakland, Ottawa, St. Clair, Wayne, and Wexford. Our audit was conducted in accordance with *Government Auditing Standards* issued by the Comptroller General of the United States and, accordingly, included such tests of the records and such other auditing procedures as we considered necessary in the circumstances.

Audit Methodology

Our audit procedures, performed from June 1999 through June 2000, included examination of records and activities pertaining to early intervention services for delinquent youths primarily for the period April 1, 1998 through April 30, 2000.

To accomplish our objectives, we reviewed pertinent legislation; court rules; administrative orders; court, the SCAO, and FIA policy; and authoritative literature.

Also, we interviewed staff at the SCAO and FIA's central office. We visited six circuit courts and interviewed probation officers and supervisory staff. We also visited six FIA county offices and interviewed FIA juvenile justice specialists and supervisory staff. During these visits to both the courts and the FIA county offices, we reviewed case files for delinquent youths who were committed or referred to FIA between April 1, 1998 and June 30, 1999. Our review included services provided and information in the case files through September 30, 1999. The sample of case files for delinquent youths who were committed or referred to FIA was selected separately for the five outstate counties and Wayne County. We used weighting to combine and report the FIA case file sample results from the outstate counties and Wayne County by their proper proportions in the entire population. We did not use weighting to combine and report the circuit court case file sample results. We also examined case files for certain delinquent youths who were under court jurisdiction at the time of our visits, but had not been committed or referred to FIA.

In connection with our first objective pertaining to the circuit courts, we assessed the appropriateness of social studies conducted to make intake recommendations for placement and services. Also, we analyzed youths' case files related to the identification of goals and action steps. In addition, we reviewed the placement of youths in out-of-State residential placements. Further, we obtained and assessed staffing and caseload issues.

In connection with our first objective pertaining to FIA, we evaluated the use of FIA's structured decision-making tools and reports related to the intake and placement of selected youths. In particular, we reviewed risk and needs assessment tools related to initial placement and treatment decisions and the use of substance abuse assessments. In addition, we analyzed the compliance of the security levels of initial placements with security levels mandated by court orders and established by initial risk assessments after any overrides*.

In connection with our second objective pertaining to both the circuit courts and FIA, we evaluated efforts to assess the availability of the predominant types of needed early intervention services for delinquent youths in the counties we visited. Also, we reviewed the availability of early intervention services through discussions with staff in the counties visited and reviewed case file documentation of services' availability. In

* See glossary at end of report for definition.

addition, we reviewed sources of funding for early intervention services, including local funds needed to satisfy match requirements.

In connection with our third objective pertaining to the circuit courts, we examined case files to determine that youths were provided with court-ordered services. We also examined case files to determine that youths' needs, services, and programs were identified.

In connection with our third objective pertaining to FIA, we reviewed case files to determine that youths received needed services. Specifically, we examined risk and needs reassessments, initial and updated service plans, service referral grids, and documentation to support the receipt of needed services.

In connection with our fourth objective pertaining to both the circuit courts and FIA, we assessed efforts to evaluate the effectiveness of early intervention services provided to delinquent youths. We reviewed program evaluations of certain programs in the counties visited. Also, we discussed the circuit courts' and FIA's efforts to evaluate the effectiveness of early intervention services with staff in the counties we visited.

Agency Responses

Our audit report includes 17 findings and 20 corresponding recommendations. The SCAO's preliminary response indicated that it agreed with all but 1 of its 8 findings and with all but 1 of the 10 corresponding recommendations. FIA's preliminary response indicated that it agreed with all 9 of its findings and with the 10 corresponding recommendations.

The agency preliminary response which follows each recommendation in our report was taken from the agencies' written comments and oral discussion subsequent to our audit fieldwork. Section 18.1462 of the *Michigan Compiled Laws* and Department of Management and Budget Administrative Guide procedure 1280.02 require FIA to develop a formal response to our audit findings and recommendations within 60 days after release of the audit report.

COMMENTS, FINDINGS, RECOMMENDATIONS, AND AGENCY PRELIMINARY RESPONSES

EFFECTIVENESS OF CIRCUIT COURTS' INTAKE AND PLACEMENT PROCESSES

COMMENT

Background: Circuit courts' intake and placement processes for each youth who is under court jurisdiction and placed in his or her own home include the completion of an appropriate social study and individual case plan with time frames, when appropriate. The social study and other documents in the youth's case file provide an information base for the planning and the delivery of services to each youth and family and provide documentation for making appropriate recommendations for placement and services.

Audit Objective: To assess the effectiveness of the circuit courts' intake and placement processes.

Conclusion: We concluded that the circuit courts' intake and placement processes were moderately effective. Our assessment disclosed reportable conditions related to social studies, goals and action steps, out-of-State residential placements, and staffing and caseload issues.

FINDING

1. Social Studies

Circuit courts need to improve social studies on youths under court jurisdiction by obtaining, evaluating, and documenting information regarding youth and family characteristics.

Supreme Court Administrative Order 1985-5 requires courts to conduct an "appropriate social study" on all youths under court jurisdiction. The Administrative Order states that the social study and other documents that make up the youth's case file should provide an information base for planning and the delivery of services to each youth and family and provide documentation for making appropriate recommendations for placement and services. However, the

Administrative Order does not provide guidance indicating which youth and family characteristics should be evaluated in the social study.

Each of the 6 circuit courts that we visited had developed their own processes to obtain information regarding pertinent youth and family characteristics. These processes to complete a "social study" may have included the use of structured interviews, written questionnaires completed by the youth and/or family, and various other assessment tools.

During our visits to the 6 circuit courts, we reviewed case file information for 150 delinquent youths. Our review disclosed that the circuit courts' social studies did not obtain and evaluate the following information regarding youth and family characteristics:

- a. Family relationships for 8 (5%) youths. Family relationships include such issues as disciplinary measures, decision making within the family, and roles among family members.
- b. Emotional stability for 21 (14%) youths. Emotional stability includes such issues as emotional responses and anger management.
- c. Substance abuse for 31 (21%) youths. Substance abuse includes such issues as substance use, treatment, and the selling of drugs by the youth or family members.
- d. Social relations for 9 (6%) youths. Social relations include such issues as peer groups, adult role models, and social skills.
- e. Education for 7 (5%) youths. Education includes such issues as grade level functioning, school attendance, and behavior in school.
- f. Victimization for 83 (55%) youths. Victimization includes such issues as sexual abuse, physical abuse, sexual exploitation, and neglect.
- g. Sexuality for 87 (58%) youths. Sexuality includes such issues as responsible sexual behavior by the youth and family members.

- h. Life skills for 46 (31%) youths. Life skills include such issues as ability to deal effectively with authority figures, assertiveness, and decision making.
- i. Employment for 52 (35%) youths. Employment includes such issues as appropriately following instructions, setting realistic employment goals and plans, and obtaining work experience.
- j. Health care/hygiene for 23 (15%) youths. Health care/hygiene includes such issues as chronic illnesses, physical disabilities, and personal care and cleanliness.

Staff at all 6 circuit courts informed us that they agreed with the importance of obtaining, evaluating, and documenting information on the above characteristics. Staff also informed us that, in some cases, information on these characteristics may have been obtained and evaluated, but not documented in the case file.

By providing guidance related to the youth and family characteristics to be included in the social study, the State Court Administrative Office (SCAO) could assist circuit courts in ensuring that they have pertinent information needed to help plan and deliver services to each youth. This guidance would be consistent with the SCAO's mission.

Since 1995, FIA has provided guidance regarding the evaluation and documentation of treatment needs for delinquent youths committed or referred to FIA by requiring the use of a structured decision-making process developed in conjunction with the National Council on Crime and Delinquency. The structured decision-making process includes an initial needs assessment, which is a standardized tool used to assess family relationships, emotional stability, substance abuse, social relations, education, victimization, sexuality, life skills, employment, and health care/hygiene.

RECOMMENDATION

We recommend that the SCAO provide guidance to help circuit courts improve social studies on youths under court jurisdiction by obtaining, evaluating, and documenting information regarding youth and family characteristics.

AGENCY PRELIMINARY RESPONSE

The SCAO agreed with the finding and recommendation and responded that it agreed that social studies provide important information for a judge to use in the disposition of cases and directing the delivery of services to juveniles. The SCAO also responded that there is every indication that courts are fulfilling all current social studies performance requirements. However, since the benefit of additional social studies information requirements may outweigh the time and resources necessary for collection of the information, the SCAO agreed that it would be helpful to review the issue of what information ideally should be included in social studies as well as the procedures for documenting that information.

FINDING

2. Goals and Action Steps

Circuit courts should formally identify goals and action steps for delinquent youths placed in community-based settings.

Supreme Court Administrative Order 1985-5 requires the case record for each youth under court jurisdiction, who is placed in his or her own home or out-of-home, to contain an individual case plan with time frames, when appropriate, and semiannual progress reports. For youth in an out-of-home placement, the Administrative Order also requires the case record, when appropriate, to contain additional information pertaining to goals and action steps. The Administrative Order does not require the case record for youths in a community-based setting to contain goals and action steps.

During our visits to 6 circuit courts, we reviewed case files for 150 delinquent youths who were initially placed in community-based settings. Thirty-nine of the youths had been immediately committed or referred to FIA. Our review of case files for the 111 youths who were or had previously been under court jurisdiction disclosed that the circuit courts did not formally identify:

- a. Goals for 75 (68%) of the 111 youths.
- b. Action steps for 16 (14%) of the 111 youths.

Amending Supreme Court Administrative Order 1985-5 to require that case records for delinquent youths in community-based settings include goals and action steps would help to determine needed changes for the youths and applicable services. Also, by providing related guidance, the SCAO could assist circuit courts in formally identifying goals and action steps for all youths under court jurisdiction. This guidance would be consistent with the SCAO's mission.

FIA provides guidance pertaining to delinquent youths committed or referred to FIA through FIA Services Manual item 813.3, which requires that goals and action steps be identified for all youths and that each youth's progress be reassessed every three months.

RECOMMENDATION

We recommend that the SCAO seek a change to Supreme Court Administrative Order 1985-5 and provide related guidance to help circuit courts formally identify goals and action steps for delinquent youths placed in community-based settings.

AGENCY PRELIMINARY RESPONSE

The SCAO agreed with the finding and recommendation and responded that it agreed that the identification of goals and action steps for delinquent youths can be an important part of youth's rehabilitation. The SCAO also responded that the courts identify these goals and action steps in both formal and informal ways and that there is every indication that courts are in compliance with all relevant current performance requirements. In addition, the SCAO agreed that there is a benefit to formally identifying such goals and action steps as resources permit. The SCAO will review this issue to determine what changes to Supreme Court Administrative Order 1985-5 should be recommended.

FINDING

3. Out-of-State Residential Placements

Circuit courts need to improve several aspects of the placement of and services for youths in out-of-State residential treatment facilities.

Section 712A.18a of the *Michigan Compiled Laws* provides that, if desirable or necessary, the court may place a youth in an out-of-State facility that is approved

or licensed by the state in which it is located. Also, Michigan Court Rule 5.943(E)(2) requires that, before a youth is placed in an out-of-State facility, the court must find that residential care is in the best interests of the youth, equivalent facilities to meet the youth's needs are not available within Michigan, and the placement will not cause undue hardship. However, the rule does not specify the particular issues that should be evaluated to determine whether the placement would cause undue hardship. In contrast, Section 803.304(5) of the *Michigan Compiled Laws*, effective January 12, 1999, which pertains to youths committed to FIA, and FIA Services Manual item 825, which pertains to both youths committed and referred to FIA, require that such youths only be placed in out-of-State facilities that meet Michigan child care licensing standards. Michigan child care licensing standards include issues such as health, safety, education, family involvement, treatment, staffing levels, training, physical environment, behavior management, and staff qualifications.

Three of the 6 circuit courts that we visited placed youths under their jurisdiction in out-of-State residential treatment facilities. At the time of our visits, the 3 circuit courts had approximately 20 youths placed in out-of-State facilities. We determined that the 3 circuit courts did not conduct comprehensive evaluations of the out-of-State facilities and, therefore, were not aware of whether the facilities met pertinent Michigan child care licensing standards. Also, staff interviewed at the 3 circuit courts informed us that the circuit courts did not have formal policies regarding such placements, services to be provided by the out-of-State facilities, and county probation officers' and parental visits to youths.

By providing guidance based on Michigan child care licensing standards, the SCAO could assist circuit courts in ensuring the appropriateness of out-of-State placements. Compliance with such guidance may necessitate amendatory legislation. Providing this guidance would be consistent with the SCAO's mission.

RECOMMENDATION

We recommend that the SCAO seek to improve several aspects of the placement of and services for youths in out-of-State residential treatment facilities and provide circuit courts with related guidance.

AGENCY PRELIMINARY RESPONSE

The SCAO disagreed that it should seek a change to the regulations governing out-of-State placements, although it will continue to provide guidance to courts on the nature of those regulations. The SCAO responded that the requirements for placement of a youth in an out-of-State residential facility are already outlined in Michigan Court Rule 5.943(E)(2), and this rule requires the judge to make a finding that the conditions set forth in the rule are met. Moreover, the Legislature (Section 712A.18a of the *Michigan Compiled Laws*) allows for placement of youths in residential facilities licensed in their home states.

FINDING

4. Staffing and Caseload Issues

Circuit courts sometimes did not maintain the minimum number of probation officer/casework staff per applicable youths in the county as required by Supreme Court Administrative Order 1985-5. Also, circuit courts' probation officer/casework staff caseloads frequently exceeded the level recommended by several national organizations. In addition, circuit courts' probation officers sometimes did not possess the minimum educational requirements defined by Supreme Court Administrative Order 1985-5.

Our visits to 6 circuit courts disclosed:

- a. Two (33%) circuit courts did not maintain the required 1:6,000 staff to youth ratio.

Supreme Court Administrative Order 1985-5 requires circuit courts to maintain a minimum of one probation officer/casework staff for every 6,000 youths under 19 years of age in the county. Such staff primarily consist of intake workers, probation officers, intensive probation officers, and supervisors. A U.S. Department of Justice Bulletin, dated November 1999, stated that there was no better indicator of need for court personnel, including probation officers, than the court's eligible youth population.

Based on the most recent U.S. Bureau of the Census population estimates (July 1, 1998), we determined that, as of June 30, 1999, two circuit courts had

81% and 87% of the required staff which resulted in probation officer/casework staff to youth ratios of 1:7,370 and 1:6,894, respectively.

- b. In 5 circuit courts, 39 (53%) of the 74 probation officers reviewed had caseloads that exceeded the level recommended by several national organizations. As of June 30, 1999, the caseloads for these 39 staff ranged from 36 to 92 cases.

In 1967, the President's Commission on Law Enforcement and Administration of Justice established 35 cases per staff as the ideal caseload. Also, the National Probation Association, American Correctional Association, National Council on Crime and Delinquency, U.S. Children's Bureau, and National Council of Juvenile and Family Court Judges have endorsed the 35-caseload standard since 1967.

We recognize that there may be justification for staff supervising larger caseloads, such as caseloads with youths needing minimal supervision. A U.S. Department of Justice Bulletin, dated November 1999, featuring best practices describes various methods of measuring workload. Workload refers to the amount of work assigned to or done by a worker in a given period of time. Also, the American Probation and Parole Association's Issues Committee has encouraged the use of workload models.

By providing caseload and/or workload guidance, the SCAO could assist circuit courts in ensuring that caseloads and/or workloads are reasonable and that staff have sufficient time to supervise youths. This guidance would be consistent with the SCAO's mission.

- c. Three (11%) of 28 probation officers employed by 2 circuit courts did not possess the minimum educational requirements.

Supreme Court Administrative Order 1985-5 requires that each probation officer possess, at a minimum, a bachelor's degree in social sciences or a related human services field. These 3 probation officers had bachelor's degrees in business administration, business management and organization, and journalism.

Maintaining a sufficient number of qualified probation officer/casework staff and assigning them reasonable caseloads and/or workloads is essential to effectively provide services to delinquent youths.

RECOMMENDATIONS

We recommend that the SCAO take appropriate action to help ensure that circuit courts maintain the minimum number of probation officer/casework staff per applicable youths in the county as required by Supreme Court Administrative Order 1985-5.

We also recommend that the SCAO provide circuit courts with probation officer/casework staff caseload and/or workload guidance.

We further recommend that the SCAO take appropriate action to help ensure that circuit courts employ probation officers who possess the minimum educational requirements defined by Supreme Court Administrative Order 1985-5.

AGENCY PRELIMINARY RESPONSE

The SCAO agreed with the finding and recommendations.

The SCAO responded that it agreed that the minimum staff-to-eligible-youth ratio guidelines in Supreme Court Administrative Order 1985-5 provide a good employment target for courts. The SCAO also responded that most courts meet or exceed these guidelines and that the SCAO will continue to provide information and assistance to courts to assist them in securing adequate staffing levels.

In addition, the SCAO responded that currently there is no binding caseload or workload performance measure with which courts can be in or out of compliance. Given the different types and intensities of probation, the SCAO believes that adequate staffing levels for supervision of youth are properly measured on a workload basis. In the interests of attempting to improve services to youth, the SCAO will determine the levels of staffing of courts Statewide and provide assistance to courts and funding units as necessary to secure appropriate resources. The SCAO will also provide current information on workload standards to courts.

The SCAO further responded that the employment standards in Supreme Court Administrative Order 1985-5 are helpful guidelines and the SCAO will continue to monitor the qualifications of persons employed in trial court positions. The SCAO also reported that most probation officers in Michigan's courts meet or exceed the guidelines laid out in Supreme Court Administrative Order 1985-5. Since the identification of the instances of noncompliance mentioned in this audit, the SCAO has contacted the relevant courts and apprised officials of the issues.

CIRCUIT COURTS' EFFORTS TO DETERMINE THE AVAILABILITY OF EARLY INTERVENTION SERVICES FOR DELINQUENT YOUTHS UNDER COURT JURISDICTION

COMMENT

Background: Circuit courts frequently fund early intervention services from the State's Child Care Fund, which reimburses them for 50% of the cost of services. Resources to fund the circuit courts' 50% share of the cost of services are often limited. County boards of commissioners determine the amount of the funds to be allocated to specific county programs, including early intervention services for delinquent youths.

Audit Objective: To assess the circuit courts' efforts to determine the availability of early intervention services for delinquent youths under court jurisdiction.

Conclusion: We concluded that circuit courts made limited efforts to formally determine and/or document the availability of early intervention services for delinquent youths under court jurisdiction. Our assessment disclosed a reportable condition related to the availability of early intervention services.

FINDING

5. Availability of Early Intervention Services

Circuit courts should collaborate with State and local agencies to improve the formal identification of the predominant types of early intervention services that are needed by delinquent youths in their counties. This would enable the circuit courts to advocate for early intervention services.

Early intervention services include a variety of community-based programs used to address youths' identified needs. The types of programs include psychological

counseling, intensive supervision, sexual offender* programs, and community service projects. Research has shown that services or programs that address identified needs appear to make a difference in youths' behavior. Therefore, the circuit courts' provision of these services or programs could be critical to the overall rehabilitation of delinquent youths.

FIA annually distributes approximately \$16.3 million from the State's Child Care Fund for circuit courts (or other coordinating entities) to purchase in-home services to treat problems of delinquency and abuse or neglect. County boards of commissioners determine the amount of the funds to be allocated to specific types of programs, including early intervention services. Also, circuit courts fund services from State, federal, and private grants and circuit court revenues, including local tax revenues. In addition, some services are funded through private sources, community mental health programs, and youths' medical insurance. A joint initiative between the circuit courts, FIA county offices, community mental health programs, law enforcement, and other pertinent agencies to identify needed early intervention services should result in improved services to delinquent youths.

As described in Findings 6 and 7, our review of case files indicated that circuit courts did not always document whether delinquent youths received ordered services and did not always order services for identified needs. During our visits to 6 circuit courts, we identified the following conditions that may have contributed to youths not receiving services and programs:

- a. Circuit courts often did not have a formal process to determine the predominant types of early intervention services that are needed in their counties and to identify whether these services were available. Therefore, circuit courts may not have had the information necessary to advocate for needed early intervention services.
- b. When not specified in the youths' court orders, probation officers usually did not specify in the youths' case files which types of early intervention services they concluded were most applicable to the youths' identified needs, which particular services the youths should receive, and whether the services were available. Therefore, circuit courts may not have had readily available the

* See glossary at end of report for definition.

information needed to determine the predominant types of early intervention services needed in their counties.

Circuit courts frequently fund early intervention services from the State's Child Care Fund, which reimburses them for 50% of the cost of services. Resources to fund the circuit courts' 50% share of the cost of services are often limited. Based on the best available data, we estimate that, for fiscal year 1998-99, the 6 circuit courts that we visited expended \$100, \$104, \$127, \$180, \$215, and \$380 of local revenues per youth, under circuit court jurisdiction, on services paid for with the assistance of the Fund. Although specific conclusions cannot be drawn from this variance, such a variance, and the relatively small dollar amounts expended by several of the circuit courts, could indicate that sufficient quantity and variety of early intervention services may not be available in some counties.

- c. Staff interviewed at the circuit courts informed us that the quantity and variety of early intervention services available in their counties were somewhat appropriate. However, staff at 5 of the 6 circuit courts indicated that they did not have an appropriate quantity and/or variety of certain types of early intervention services. Specifically, substance abuse, mental health, gender specific, wraparound*, sex offender, and/or anger management programs were mentioned.

By providing guidance related to periodic identification of the types of early intervention services needed, the SCAO could assist circuit courts in determining the level of resources needed for early intervention services. This guidance would be consistent with the SCAO's mission.

RECOMMENDATION

We recommend that the SCAO collaborate with State and local agencies to provide guidance to help circuit courts improve the formal identification of the predominant types of early intervention services that are needed by delinquent youths in their counties.

* See glossary at end of report for definition.

AGENCY PRELIMINARY RESPONSE

The SCAO agreed with the finding and recommendation and responded that it agreed that the identification of the predominant types of early intervention services that are needed by local delinquent youths is important. The SCAO also responded that courts identify these service needs in both formal and informal ways and that there is every indication that courts are in compliance with all relevant current performance requirements. Assessment of needs should be a joint initiative of the court, the local FIA, and other county agencies. The SCAO, in collaboration with other State and local agencies, plans to review the issue in order to develop a strategy that will assist trial courts, in collaboration with other community justice and child welfare agencies, in identifying needed local early intervention resources.

RECEIPT OF EARLY INTERVENTION SERVICES FOR IDENTIFIED NEEDS OF DELINQUENT YOUTHS UNDER COURT JURISDICTION

COMMENT

Background: Early intervention services provide supervision and support services to youth in community-based settings. Supervision is provided by the probation officer or other casework staff, and support services are contracted for by the circuit court. Examples of contracted early intervention support services include psychological counseling, intensive supervision, and community service projects.

The case record for each youth under court jurisdiction, who is placed in his or her own home, is required to contain an individual case plan with time frames, when appropriate, and summary reports of the youth's progress completed at least semi-annually.

Audit Objective: To determine whether delinquent youths under court jurisdiction received early intervention services for identified needs.

Conclusion: **We concluded that delinquent youths under court jurisdiction sometimes may not receive early intervention services for their identified needs.** Our assessment disclosed reportable conditions related to court-ordered services and programs and the identification of youths' needs, services, and programs.

FINDING

6. Court-Ordered Services and Programs

Circuit courts need to improve their case file documentation regarding whether youths received services and attended programs ordered by the court.

Section 712A.18(1)(b) of the *Michigan Compiled Laws* states that the court shall order the terms and conditions of probation or supervision as the court determines necessary for the physical, mental, or moral well-being and behavior of the juvenile. Courts frequently order that youths receive various contracted services and/or attend programs such as shoplifters' treatment programs, substance abuse counseling and services, psychological counseling, and community service projects.

During our visits to 6 circuit courts, we reviewed case files for 150 delinquent youths who were initially placed in community-based settings. Thirty-nine of the youths had been immediately committed or referred to FIA. Our review of case files for the 111 youths who were or had previously been under court jurisdiction disclosed that the youths were ordered to participate in 323 services or programs. The case files did not contain documentation that the youths received services or attended programs, or had the opportunity to receive services or attend programs, for 69 (21%) of the 323 services or programs ordered. As a result, 36 (32%) of the youths may not have participated in one or more of the court-ordered services or programs.

Circuit court staff informed us that they sometimes rely on contracted agencies to provide them with documentation (such as attendance or progress reports) as to whether a youth participated in the contracted service or program. Staff also said that some contracted agencies do not report or only report on youths when they do not participate in the services or programs. Staff further informed us that they usually know whether youths are cooperating with services or programs ordered by the court.

By providing guidance related to complete documentation of actual services received and programs provided to youths, the SCAO could assist circuit courts in ensuring that they have accurate information as to the youths' compliance with the terms and conditions of probation or supervision. Also, such information would be useful for determining the effectiveness of the services and progress in meeting the

identified needs of the youths. In addition, this information would be useful in determining any future services or programs for the youths. This guidance would be consistent with the SCAO's mission.

RECOMMENDATION

We recommend that the SCAO provide guidance to help circuit courts improve their case file documentation regarding whether youths received services and attended programs ordered by the court.

AGENCY PRELIMINARY RESPONSE

The SCAO agreed with the finding and recommendation and responded that it agreed that the determination of whether youths received services or attended programs ordered by the court can be an important part of youths' rehabilitation and that it is important to document such compliance and noncompliance. The SCAO also responded that courts make this determination in both formal and informal ways, and there is every indication that courts are in compliance with all relevant current performance requirements. The SCAO will review the issue and develop guidelines by which courts can document compliance with ordered services.

FINDING

7. Identification of Youths' Needs, Services, and Programs

Circuit courts need to improve several aspects of the formal identification of delinquent youths' needs and the resulting services and programs provided for such youths.

Probation officers or other court staff usually identify youths' needs during the completion of the social study. Each of the 6 circuit courts that we visited had developed its own processes to gather and summarize information pertaining to youths' identified needs. From this information, probation officers typically prepared narrative summaries which included recommendations to judges for certain programs or services for the youths. Using judicial discretion, judges may determine the extent of youths' needs and order early intervention services that are either directly related to the youths' needs, such as substance abuse treatment, or indirectly related to the youths' needs, such as community service or short-term

detention. Also, judges may authorize the probation officer to arrange for early intervention services and/or provide only general supervision or probation.

At the 6 circuit courts visited, we reviewed all information available for 107 of the 111 youths who were initially placed in community-based settings and were or previously had been under court jurisdiction. (Case files for 4 youths did not contain social studies or other documentation of identified needs.) Our review disclosed:

- a. Narrative summaries provided to judges usually did not identify specific needs for the youths.

Identification of specific needs helps define the problems that led to the youths' delinquent behaviors. Research has shown that services or programs that address identified needs appear to make a difference in youths' behavior. Therefore, providing judges with narrative summaries that include youths' specific needs could allow judges to make more informed decisions regarding services and/or programs ordered by the court.

Based on our review of the 107 case files, after excluding youths who had services directly related to needs ordered by the court (Finding 6), it appeared that:

- (1) Eight (7%) youths with 18 identified needs were not provided with any early intervention services or programs.
- (2) Ninety-nine (93%) youths had 219 identified needs and were provided with various services and programs. However, 26 (26%) of the 99 youths were not provided with early intervention services or programs for 47 (21%) of their 219 identified needs.

The lack of narrative summaries that include youths' specific needs may have contributed to these youths not having been provided with services for the identified needs.

- b. Circuit courts usually did not document which services or programs were intended to address certain identified needs. Also, circuit courts usually did not document the reason for not providing youths with services or programs

for certain identified needs. Such documentation would help to ensure that the circuit court and/or any other agency involved in the youths' continuum of services has pertinent information needed to help plan and deliver services to each youth.

Providing guidance related to the identification of delinquent youths' needs and the resulting services or programs provided for such youths would be consistent with the SCAO's mission.

Since 1995, FIA has provided guidance regarding the evaluation and documentation of treatment needs for delinquent youths committed or referred to FIA. FIA requires the use of a structured decision-making process developed in conjunction with the National Council on Crime and Delinquency. The structured decision-making process includes an initial needs assessment, which is a standardized tool used to assess and separately report youths' specific treatment needs and to help plan services directly related to those needs.

RECOMMENDATION

We recommend that the SCAO provide circuit courts with guidance pertaining to the formal identification of delinquent youths' needs and the resulting services and programs provided for such youths.

AGENCY PRELIMINARY RESPONSE

The SCAO agreed with the finding and recommendation and responded that it agreed that the identification and documentation of youth needs and of services available to meet certain needs can be important to the rehabilitation of youth. The SCAO also responded that courts identify these needs and services through fact-finding hearings and in informal ways, and there is every indication that courts are in compliance with all relevant current performance requirements. The SCAO will review the issue and develop guidelines by which the courts can identify the services in the community available to meet various needs.

CIRCUIT COURTS' EFFORTS TO EVALUATE THE EFFECTIVENESS OF EARLY INTERVENTION SERVICES PROVIDED TO DELINQUENT YOUTHS

COMMENT

Audit Objective: To assess the circuit courts' efforts to evaluate the effectiveness of early intervention services provided to delinquent youths.

Conclusion: We concluded that the circuit courts made limited efforts to evaluate the effectiveness of early intervention services provided to delinquent youths. Our assessment disclosed a reportable condition related to the assessment of early intervention services.

FINDING

8. Assessment of Early Intervention Services

Circuit courts need to improve the assessments of the effectiveness of early intervention services provided to delinquent youths.

Youths may receive various types of early intervention services, which are either ordered by the courts or arranged by probation officers. The court orders may state that a youth receive a specific service through a particular provider or state that the youth receive a general type of service, such as counseling. Probation officers may also arrange for youths to receive either specific or general types of services.

Circuit courts frequently fund early intervention services with the assistance of the State's Child Care Fund. Circuit courts submit to FIA an annual plan and budget for proposed Child Care Fund expenditures. Also, FIA requires that the annual plan include an evaluation of each program funded during the previous fiscal year or proposed for the next fiscal year as a new, revised, or continued program. The program evaluations are to include an assessment of the program's strengths, weaknesses, problem areas, intended impact areas, and results.

For the 6 circuit courts visited, we reviewed annual plans and evaluations for selected fiscal year 1998-99 programs. Our review disclosed that some program evaluations were not completed, consisted of subjective assessments of program effectiveness, and/or referred to prior research on similar programs. Also, the

completed evaluations sometimes measured outputs*, such as the number of youths completing a program, rather than outcomes*, such as positive changes in youths' behavior or attitudes. In addition, the evaluations that measured outcomes frequently pertained to youths' behavior only during the period of time they were receiving the early intervention services and, thus, did not measure longer term impacts.

Staff interviewed at the 6 circuit courts that we visited informed us that 5 of the 6 circuit courts sometimes (2), rarely (2), or never (1) assessed the effectiveness of individual early intervention programs used in their counties. These responses were not inconsistent with the evaluations that we reviewed for selected programs at these 6 circuit courts.

Also, when not specified in the court order, probation officers generally did not indicate in a youth's case file which type of early intervention service they concluded was the most applicable to the youth's identified needs or specify which particular service a youth should receive and whether the service was available. Therefore, any assessment of the effectiveness of services actually received would not necessarily evaluate the effectiveness of the most applicable (preferred) services.

By providing guidance related to periodically evaluating the effectiveness of early intervention services provided to delinquent youths, the SCAO could assist circuit courts in ensuring that they have the ability to make informed decisions regarding the continued use of the services. This guidance could include the need to define sufficient performance indicators* and performance standards* and to compare actual data with desired outputs and outcomes. Also, this guidance would be consistent with the SCAO's mission.

RECOMMENDATION

We recommend that SCAO provide circuit courts with guidance to help improve the assessments of the effectiveness of early intervention services provided to delinquent youths.

* See glossary at end of report for definition.

AGENCY PRELIMINARY RESPONSE

The SCAO agreed with the finding and recommendation and responded that it agreed that evaluating the effectiveness of early intervention services can be important to a court's successful provision of services. The SCAO also responded that courts evaluate such effectiveness in individual cases in both formal and informal ways, and there is every indication that courts are in compliance with all relevant current performance requirements. The SCAO further responded that formal program assessments would be useful for planning future services and that assessments, where possible, should be conducted by courts in collaboration with executive agencies using the same or similar programs. The SCAO, after collaboration with FIA, will provide technical assistance to courts in the use of existing program assessment methods and models.

EFFECTIVENESS OF FIA'S INTAKE AND PLACEMENT PROCESSES

COMMENT

Background: The courts commit delinquent youths to FIA for services under Act 150, P.A. 1974, as amended (Sections 803.301 - 803.309 of the *Michigan Compiled Laws*). These youths are public wards. Prior to January 12, 1999, these youths were known as State wards. Also, the courts refer certain court wards to FIA for care and supervision under Act 280, P.A. 1939, as amended (Sections 400.1 - 400.122 of the *Michigan Compiled Laws*). These youths remain court wards. Beginning January 12, 1999, the courts could also commit delinquent youths to county juvenile agencies. However, such commitments were not made until February 2000.

FIA's intake process for both State and court wards includes the use of a structured decision-making process to evaluate each youth's characteristics pertaining to his/her risk of reoffense, security needs, and treatment needs. Standardized assessment tools, such as forms for making initial risk and needs assessments and reassessments, are used to provide systematic application of established standards and criteria to evaluate the risk and needs of delinquent youths. The use of standardized assessment tools lessens individual discretion and the subjective nature of decisions by organizing decision-making criteria to promote greater consistency and equity.

Juvenile justice specialists (JJSs) or, when applicable, other designated personnel are responsible for making the assessments. The placement process for both State and

court wards consists of a JJS or, when applicable, one of two placement committees, determining each youth's placement in a community-based or residential setting.

Audit Objective: To assess the effectiveness of FIA's intake and placement processes.

Conclusion: We concluded that FIA's intake and placement processes were moderately effective. Our assessment disclosed reportable conditions related to initial risk and needs assessments, substance abuse assessments, and the security level of initial placements.

FINDING

9. Initial Risk and Needs Assessments

JJSs sometimes did not prepare, or cause to be prepared, the initial risk and needs assessments for youths in compliance with FIA policy.

FIA Services Manual item 814.1 requires that JJSs or, where applicable, other designated personnel complete an initial risk assessment and an initial needs assessment for each youth after they review all pertinent information regarding the youth and evaluate the youth's family situation. These assessments provide a standardized method of evaluating factors critical to making placement and treatment decisions for each youth. Item 814.1 states that, in all instances, these assessments are to be completed prior to placement, and the JJSs must ensure their completion.

The initial risk assessment evaluates the severity of a youth's adjudicated offense and the risk of his/her continued delinquent activity. The risk assessment also provides a recommendation for the youth's security level placement. The recommended placement may be altered through an override process when extenuating circumstances indicate that an escalation (increase) or a mitigation (decrease) in a youth's security level is appropriate. Supervisory approval of risk assessments is needed to help ensure the accuracy of the preparers' conclusions and is particularly important when a youth's computed security level is being altered by an override.

The initial needs assessment evaluates a youth's treatment needs. This assessment ensures that certain types of problems are consistently considered,

aids in formulating the treatment plan, and is used in making placement decisions. FIA Services Manual item 813.2 requires that the initial needs assessment be prepared within 15 working days from the date the youth is committed or referred to FIA. Effective August 1, 2000, FIA amended the requirement to 30 calendar days. Timely preparation of initial needs assessments assists with the initiation of treatment.

Our performance audit report on Juvenile Justice Services, Family Independence Agency, issued in April 1999, included a finding and recommendation on the preparation of initial risk and needs assessments for youths primarily placed in State-owned and private residential treatment facilities. FIA agreed with the finding and recommendation and informed us that it had provided training sessions between June 3, 1998 and October 1, 1998 on the preparation of initial risk and needs assessments.

During this audit, we visited 6 FIA county offices and reviewed case files for 90 delinquent youths who were committed or referred to FIA between April 1, 1998 and June 30, 1999 and placed in community-based settings. Forty-two of these 90 youths were committed or referred to FIA before the completion of training on October 1, 1998 and the other 48 youths were committed or referred to FIA after the training was completed. As shown in the following table, our review disclosed continued noncompliance with FIA policy regarding the preparation of initial risk

and needs assessments, although compliance had somewhat improved after the training:

	Youths Committed or Referred			
	Prior to Training		After Training	
	Number	Weighted* Percentage	Number	Weighted* Percentage
Total Youths Reviewed	42		48	
Initial Risk Assessments Not Prepared	5	13%	2	4%
Completed Initial Risk Assessments Not Dated	10	24%	3	6%
Completed Initial Risk Assessments Without Documentation of Supervisory Review	20	47%	14	30%
Completed Initial Risk Assessments With Overrides Without Documentation of Supervisory Review	8	24%	3	14%
Initial Needs Assessments Not Prepared	3	7%	8	17%
Completed Initial Needs Assessments Not Dated	2	5%	1	2%
Completed and Dated Initial Needs Assessments Not Prepared Within 30 Calendar Days	22	60%	21	53%
Completed and Dated Initial Needs Assessments 10 or More Days Late	16	59%	13	45%

In addition, our review noted specific concerns involving the preparation of assessments:

- a. Neither the required initial risk assessment nor the required initial needs assessment was prepared for 2 of the 90 youths. One youth was committed prior to FIA staff training and one youth was committed after the training. Without the assessments, FIA may not have properly placed these youths and

* See glossary at end of report for definition.

these youths or other youths could have been at physical risk or not received appropriate treatment.

- b. One FIA county office informed us that the supervisor generally signed only one document when staff submitted several documents at the same time. Therefore, when staff submitted more than one assessment, the supervisor did not sign each document. This practice, which affected 7 youths in our sample, did not provide assurance of proper supervisory review.
- c. A private contractor, under contract for a variety of community-based treatment programs with one of the FIA county offices that we visited, frequently prepared the initial needs assessments for youths. The FIA contract with this contractor stated that the contractor shall complete initial risk and needs assessments. This practice is contrary to FIA Services Manual item 814.1, which provides that a contractor may complete only reassessments. Also, we question the propriety of the contractor determining a youth's treatment needs and then placing the youth in one of its treatment programs.

JJSs' compliance with FIA policy regarding initial risk and needs assessments is essential to help ensure that appropriate levels of security and treatment services are provided to all the youths.

RECOMMENDATION

We recommend that JJSs prepare, or cause to be prepared, the initial risk and needs assessments for all youths in compliance with FIA policy.

AGENCY PRELIMINARY RESPONSE

FIA agreed with the finding and recommendation and responded that it will take appropriate action to ensure that JJSs prepare, or cause to be prepared, initial risk and needs assessments for all youths in compliance with FIA policy.

FINDING

10. Substance Abuse Assessments

FIA needs to improve its assessment of substance abuse for delinquent youths.

Obtaining information on substance abuse is essential to determining the treatment needs of delinquent youths. JJSs assess youths' substance abuse during the completion of initial needs assessments. Also, FIA Services Manual item 813.3 requires delinquent youths to complete a substance abuse assessment instrument in the presence of the JJS or, when applicable, other designated personnel. The assessment instrument consists of a series of questions designed to identify substance abuse problems. Eight or more "yes" answers indicate a need for further assessment.

During our visits to 6 FIA county offices, we reviewed case files for 90 delinquent youths committed or referred to FIA between April 1, 1998 and June 30, 1999 and placed in community-based settings. Our review of the case files and other issues related to the substance abuse assessments disclosed:

- a. JJSs did not complete initial needs assessments for 11 (12% weighted) of the 90 youths.
- b. Nine (82% weighted) of the 11 youths did not complete the required substance abuse assessment instrument.
- c. Sixty-eight (86% weighted) of the remaining 79 youths also did not complete the required substance abuse assessment instrument.
- d. The FIA Services Manual does not require and the assessment instrument does not provide for youth to sign and date the assessment instrument. As a result, 5 (25% weighted) of the 13 assessment instruments that youth had completed were not signed and dated.

Without a thorough substance abuse assessment for each youth, the intake process may not have identified all substance abuse problems and determined appropriate needed services for the youths.

RECOMMENDATION

We recommend that FIA improve its assessments of substance abuse for delinquent youths.

AGENCY PRELIMINARY RESPONSE

FIA agreed with the finding and recommendation and responded that, as of August 2000, it had discontinued requiring the completion of the substance abuse assessment instrument. FIA also responded that it believes that this discontinuation, in combination with incorporating the needs assessment into the initial services plan, will improve the substance abuse assessment process.

FINDING

11. Security Level of Initial Placements

FIA sometimes did not initially place youths in security levels mandated by court orders or established by initial risk assessments and did not maintain documentation to support the appropriateness of its alternate placements.

FIA Services Manual item 814.1 requires that JJSs or, when applicable, other designated personnel, complete an initial risk assessment on each youth. The assessment evaluates the severity of a youth's adjudicated offense and the risk of his/her continued delinquent activity and provides a recommendation for the youth's security placement. The recommended placement may be altered through an override process when extenuating circumstances indicate that an escalation (increase) or a mitigation (decrease) in a youth's security level is appropriate. Overrides include a judge's/referee's order to escalate or mitigate. Item 814.1 also provides that, unless ordered by the court, youths will be referred to only programs that fall within the level of security established by the risk assessment after any override.

In addition, FIA Services Manual item 813.2 requires that a youth's placement be in the least restrictive, most family-like setting appropriate to the needs of the youth and the youth's family and to the interest and safety of the community.

During our visits to 6 FIA county offices, we analyzed initial placements for 155 delinquent youths committed or referred to FIA between April 1, 1998 and June 30, 1999. Ninety of these youths were initially placed in community-based settings and

65 were initially placed in residential treatment facilities. Our analysis of compliance with security levels mandated by court orders and security levels established by initial risk assessments after any overrides determined:

- a. FIA placed 3 (2% weighted) of the 155 youths in community-based settings, which was contrary to these youths' court orders that mandated placement at residential treatment facilities with specific security levels. The court orders for 2 of the youths required placement at low security level* facilities, and the court order for the third youth required placement at a medium security level* facility.

The 3 youths were placed in community-based settings for between five and seven months while awaiting placement at a suitable facility. However, the case files did not contain any documentation that the court had been notified of the situation or that the court agreed with the extended placements in community-based settings.

- b. FIA placed 9 (5% weighted) of the 155 youths, all 9 of whom did not have security levels mandated by court orders, in placements with security levels that were contrary to the security levels established by the initial risk assessments after any overrides. Specifically:
 - (1) FIA placed 4 youths in community-based settings when the initial risk assessments established that 3 of the youths needed low security level facilities and the fourth youth needed a medium security level facility.
 - (2) FIA placed 5 youths in residential treatment facilities with higher security levels than the initial risk assessments established were needed. Four of the youths were placed in medium security facilities when the risk assessments established that the youths needed low security facilities, and the fifth youth was placed in a low security level facility when the risk assessment established that the youth needed placement in a community-based setting.

FIA Services Manual item 814.1 provides that, when appropriate placement is not available and waiting for an appropriate security level placement will result

* See glossary at end of report for definition.

in inordinate delays in treatment, safe placement at another security level may be allowed, with supervisory approval, through the override process. The reasons for such actions must be documented. However, the case files for these nine youths did not contain documentation that appropriate placements were not available or that supervisory approval had been obtained.

The proper placement in security levels mandated by court orders or established by initial risk assessments is necessary to ensure the safety of the youths, other youths, and the community.

RECOMMENDATION

We recommend that FIA initially place youths in security levels mandated by court orders or established by initial risk assessments or maintain documentation to support the appropriateness of its alternate placements.

AGENCY PRELIMINARY RESPONSE

FIA agreed with the finding and recommendation and responded that it will take appropriate action to ensure that youths are placed in the security levels mandated by court orders or established by initial risk assessments or it will maintain documentation to support the appropriateness of its alternative placements.

FIA's EFFORTS TO DETERMINE THE AVAILABILITY OF EARLY INTERVENTION SERVICES FOR DELINQUENT YOUTHS COMMITTED OR REFERRED TO FIA

COMMENT

Background: FIA distributes State and federal funds for family preservation, reunification and family support services, and/or adoption promotion and support services. FIA central and county offices and/or local multipurpose collaborative bodies determine the amount of the funds allocated to each of these programs. FIA county offices use the funds to contract for services including early intervention services for delinquent youths.

Audit Objective: To assess FIA's efforts to determine the availability of early intervention services for delinquent youths committed or referred to FIA.

Conclusion: We concluded that FIA made limited efforts to formally determine and/or document the availability of early intervention services for delinquent youths committed or referred to FIA. Our assessment disclosed a reportable condition related to the availability of early intervention services.

FINDING

12. Availability of Early Intervention Services

FIA county offices should improve the formal identification of the predominant types of early intervention services that are needed by delinquent youths in their counties to enable FIA county directors to advocate for early intervention services.

Early intervention services include a variety of community-based programs used to address youths' particular treatment needs. The types of programs include psychological counseling, intensive supervision, sexual offender programs, and community service projects. Research has shown that services or programs that address individual treatment needs appear to make a difference in youths' behavior. Therefore, FIA's provision of these services or programs could be critical to the overall rehabilitation of delinquent youths.

FIA annually distributes approximately \$68.2 million of State and federal funds for family preservation, reunification and family support services, and/or adoption promotion and support services. The FIA central office, FIA county offices, and/or the local multipurpose collaborative bodies, within certain restrictions, determine the amount of the funds allocated to each of these programs and then use the funds to contract for services, including early intervention services for delinquent youths.

As described in Finding 16, FIA did not provide a number of delinquent youths with early intervention services or did not provide services on a timely basis. During our visits to 6 FIA county offices, we identified the following conditions that may have contributed to youths not receiving, or not receiving on a timely basis, needed services:

- a. FIA county offices often did not formally determine the predominant types of early intervention services needed in their counties and identify whether these services were available. Therefore, FIA did not have the information necessary to advocate for needed early intervention services.

- b. FIA policy did not specifically require that JJSs specify, and JJSs usually did not specify, in the youths' case files the types of early intervention services that they concluded were most applicable to the youths' identified treatment needs, the particular services that the youths should receive, and whether the services were available. Therefore, FIA did not have readily available the information needed to enable FIA to determine the predominant types of early intervention services needed in their counties.
- c. Staff interviewed at FIA county offices informed us that the quantity and variety of early intervention services available in their counties was somewhat appropriate. However, staff at 5 of the 6 county offices indicated that they did not have an appropriate quantity and/or variety of certain types of early intervention services. Specifically, mental health, sex offender, day treatment, and/or substance abuse programs were mentioned.

Without periodically identifying the types of early intervention services needed, FIA county offices have limited information available to determine the level of resources needed for early intervention services.

RECOMMENDATION

We recommend that FIA county offices improve the formal identification of the predominant types of early intervention services that are needed by delinquent youths in their counties to enable FIA county directors to advocate for early intervention services.

AGENCY PRELIMINARY RESPONSE

FIA agreed with the finding and recommendation and responded that it will take appropriate action to ensure that county offices improve the formal identification of the predominant types of early intervention services that are needed by delinquent youths in their counties. FIA also responded that it believes that local office staff are aware of the intervention services available in their communities and that FIA assessments of youths' strengths and needs provide each local office with identified needs for intervention within their communities. FIA further stated that local office directors are kept informed by JJS staff and that directors advocate for these services at Multi-Purpose Collaborative Body Committee meetings. FIA also agreed that local office directors have not always documented this process.

RECEIPT OF EARLY INTERVENTION SERVICES FOR IDENTIFIED NEEDS OF DELINQUENT YOUTHS COMMITTED OR REFERRED TO FIA

COMMENT

Background: Early intervention services provide supervision and support services to youth in community-based settings. Supervision is provided by the JJSs and support services are contracted for by the FIA county offices. Examples of contracted early intervention support services include psychological counseling, intensive supervision, and community service projects.

JJSs are required to complete quarterly risk and needs reassessments and initial and updated service plans when youths are placed in community-based settings. The quarterly reassessments evaluate the appropriateness of the security level of a youth's placement and the youth's remaining treatment needs. The service plans evaluate the youth's strengths and weaknesses, define treatment goals*, evaluate progress toward achieving previously established treatment goals, and are used to establish new treatment goals.

Audit Objective: To determine whether delinquent youths committed or referred to FIA received early intervention services for identified needs.

Conclusion: We concluded that delinquent youths committed or referred to FIA often did not receive early intervention services for their identified needs. Our assessment disclosed reportable conditions related to quarterly risk and needs reassessments, initial and updated service plans, service referral grids, and the provision of early intervention services.

FINDING

13. Quarterly Risk and Needs Reassessments

JJSs frequently did not prepare quarterly risk and needs reassessments for youths in compliance with FIA policy.

FIA Services Manual item 814.1 requires JJSs to complete quarterly risk and needs reassessments when a youth is in a community-based placement. Quarterly

* See glossary at end of report for definition.

risk reassessments evaluate whether a youth is eligible for a different security level and, in conjunction with other relevant information about the youth's adjustment and treatment progress, are used to determine whether the youth should be moved to a higher or lower security level. Also, risk reassessments are used in treatment decision making and help ensure that each youth is placed in the least restrictive security level appropriate to the needs of the youth and the safety of the community. Quarterly needs reassessments evaluate the youth's remaining treatment needs. The needs reassessments help ensure that certain types of problems are periodically and consistently considered when determining treatment needs and are used by the JJSs in preparing the youth's ongoing treatment plan.

During our visits to 6 FIA county offices, we reviewed case files for 90 delinquent youths committed or referred to FIA between April 1, 1998 and June 30, 1999 and placed in community-based settings. Our review disclosed:

- a. JJSs did not prepare any of the 24 required quarterly risk reassessments for 13 (14% weighted) of the 90 youths. Also, JJSs did not prepare 46 of the 100 required quarterly risk reassessments for 30 (33% weighted) of the 90 youths. As a result, these youths' continued security level may not have been appropriate.
- b. JJSs did not prepare any of the 31 required quarterly needs reassessments for 15 (17% weighted) of the 90 youths. Also, JJSs did not prepare 47 of the 102 required quarterly needs reassessments for 28 (31% weighted) of the 90 youths. As a result, these youths' continued treatment may not have been appropriate.
- c. For 11 of the youths identified in items a. and b., JJSs did not prepare any of the required quarterly risk and needs reassessments. Therefore, these youths may have continued both at security levels and in treatment that were not appropriate.

JJSs' compliance with FIA policy pertaining to the preparation of quarterly risk and needs reassessments is essential to help ensure that appropriate levels of security and treatment services are provided to all youths.

RECOMMENDATION

We recommend that FIA ensure that JJSs prepare quarterly risk and needs reassessments for all youths in compliance with FIA policy.

AGENCY PRELIMINARY RESPONSE

FIA agreed with the finding and recommendation and responded that it will take appropriate action to ensure that JJSs prepare quarterly risk and needs reassessments for all youths in compliance with FIA policy.

FINDING

14. Initial and Updated Service Plans

JJSs frequently did not prepare initial and updated service plans for youths in compliance with FIA policy.

FIA Services Manual item 813.3 requires JJSs to complete an initial service plan within 30 calendar days and an updated service plan every three months following the initial service plan. An initial service plan is to include an evaluation of the youth's strengths and weaknesses as they relate to the youth's needs, specific treatment goals to remedy the youth's problems, action steps for the youth, and services to be provided to the youth. Updated service plans are to include an evaluation of a youth's progress toward achieving treatment goals established in the previous service plan and any changes in the service plan, including new problems and new goals to remedy the youth's problems.

To help identify service plan treatment goals, FIA Services Manual item 814.1 requires that JJSs complete an initial needs assessment and needs reassessments every three months thereafter. The standardized initial needs assessment and reassessment forms consist of questions in various treatment categories, including family relationships, emotional stability, substance abuse, victimization, and social relations. Also, FIA Services Manual item 813.3 states that treatment goals should address areas prioritized on the initial needs assessment and reassessments.

During our visits to 6 county FIA offices, we reviewed case files for 90 delinquent youths committed or referred to FIA between April 1, 1998 and June 30, 1999 and placed in community-based settings. Our review disclosed:

- a. JJSs did not prepare 5 (6% weighted) of the 90 required initial service plans.
- b. JJSs did not prepare any of the 20 required updated service plans for 12 (13% weighted) of the 90 youths. Also, JJSs did not prepare 40 (48% weighted) of the 80 required updated service plans for 25 (28% weighted) of the 90 youths.
- c. For 1 (1% weighted) of the youths identified in items a. and b., the JJS did not prepare any of the required initial and updated service plans. Therefore, it appears that no evaluation or re-evaluation of the youth was completed and the youth may not have received appropriate treatment.
- d. JJSs did not include 47 (19% weighted) of the 254 treatment needs identified on youths' needs assessments or reassessments as treatment goals in service plans. As a result, 19 (21% weighted) of the youths had at least 1 treatment need identified on a needs assessment or reassessment that was not included in the youths' service plans.

In accordance with FIA Services Manual item 813.3, JJSs may prioritize certain treatment needs as treatment goals. However, we concluded that 29 of the 47 treatment needs that were not prioritized should have been included as treatment goals.

- e. Thirty-six (19% weighted) of the 187 treatment goals were excluded from subsequent updated service plans. As a result, 13 (14% weighted) of the youths had at least 1 goal established that was not included as a treatment goal in the youths' subsequent updated service plans. A consistent listing of treatment goals, and documentation explaining the exclusion of prior goals, is needed to maintain the treatment focus and to facilitate management review of the service plan.
- f. JJSs did not state conclusions in the service plans as to whether the youths' activities and related progress resulted in achieving 20 (11% weighted) of the 187 established treatment goals. This affected 8 (9% weighted) youths in our

test. As a result, the youths' progress or lack of progress in achieving the 20 treatment goals could not be determined.

We noted in certain instances when JJSs did not consistently list treatment goals, conclusions were sometimes included in other descriptive sections of the updated service plans. As described in item e., a consistent listing of treatment goals and related documentation is needed to maintain the treatment focus and to facilitate management review.

Service plans formalize the youths' treatment goals and action steps to achieve these goals. Defining appropriate treatment goals is critical to ensuring that a youth's treatment plan focuses on the treatment needs pertinent to rehabilitating the youth. A quarterly update of treatment progress is also critical to evaluating the appropriateness of the youth's continued placement in a community-based setting.

In addition, service plans are often used to demonstrate to a court a youth's treatment progress in achieving specific goals that directly relate to changing the behavior that led to the youth's commitment or referral and the youth's readiness for release. Unless initial and updated service plans are properly prepared in accordance with established policy, they most likely are of limited value for these purposes.

RECOMMENDATION

We recommend that FIA ensure that JJSs prepare initial and updated service plans for youths in compliance with FIA policy.

AGENCY PRELIMINARY RESPONSE

FIA agreed with the finding and recommendation and responded that it will take appropriate action to ensure that JJSs prepare initial and updated service plans for youths in compliance with FIA policy.

FINDING

15. Service Referral Grids

JJSs frequently did not prepare service referral grids for youths in compliance with FIA policy.

FIA Services Manual item 814.1 requires that JJSs prepare a service referral grid for each youth in conjunction with the initial service plan and each updated quarterly service plan. The service referral grid provides a chronology of each service provided to the youth and family, the treatment need to be addressed by each service, and an evaluation of each service planned and/or provided. JJSs are to record on the service referral grids all plan-related services provided to the youth. Types of services include family counseling, drug abuse rehabilitation, sex offender programs, individual therapy, mental health services, etc.

The grids provide JJSs and FIA management with a reference of the youth's service plan progress at each reassessment and at the termination of FIA supervision. FIA also aggregates the information and uses it to identify the most common types of service referrals, the types of services being used to address particular needs, and service deficiencies. In addition, FIA uses the information to evaluate the success or failure of various types of services provided to youths with similar treatment needs.

During our visits to 6 FIA county offices, we reviewed case files for 90 delinquent youths committed or referred to FIA between April 1, 1998 and June 30, 1999 and placed in community-based settings. We reviewed service referral grids prepared for the 62 youths that had both needs assessments and service plans. Our review disclosed:

- a. JJSs did not prepare any service referral grids for 16 (26% weighted) of the 62 youths. As a result, FIA did not have this required tool to provide it with information as to the services provided to these youths and the needs that the services were to address. JJSs had identified 54 treatment needs on the needs assessments for 12 of the 16 youths.
- b. JJSs partially completed service referral grids for 11 (18% weighted) of the 62 youths. These grids did not include the needs that the services provided were to address. As a result, FIA did not have all of the required information as to the needs addressed by the services provided to these youths. JJSs identified 44 treatment needs on the needs assessments for these 11 youths.
- c. The service referral grids prepared for the remaining 35 youths included information pertaining to both treatment needs and services provided. The grids did not indicate that services were provided to address 77 (44%

weighted) of the 156 needs identified on the needs assessments for these youths.

JJSs at the FIA county offices informed us that they sometimes prioritize certain treatment needs. However, based on the scores on the needs assessments, we concluded that 45 of the 77 treatment needs that were not prioritized should have been included on the grids.

- d. The service referral grids prepared for 22 (35% weighted) of the 62 youths indicated that services were to address 36 treatment needs that were not assessed as needs on the needs assessments. This practice may provide JJSs and FIA management with misleading information pertaining to the types of services used to address particular needs and the success or failure of these services when provided to youths with similar treatment needs.

Based on items a. through d., we conclude that the service referral grids often did not provide a reliable source of information for use in correlating treatment needs with services provided.

The preparation of complete and accurate service referral grids is necessary to support decision making on whether the youths and parents have resolved the major treatment needs identified in the needs assessments and to provide FIA with reliable information for planning services and programs available.

RECOMMENDATION

We recommend that FIA ensure that JJSs prepare service referral grids for youths in compliance with FIA policy.

AGENCY PRELIMINARY RESPONSE

FIA agreed with the finding and recommendation and responded that it will take appropriate action to ensure that JJSs prepare service referral grids for youths in compliance with FIA policy. The service referral grids were designed to provide data to the National Council on Crime and Delinquency (NCCD) in lieu of an FIA management information system that could collect and process the services information. The requirements for JJSs' completion of the service referral grids will be discontinued when the Bureau of Juvenile Justice's new management

information system (JJOLT) is able to provide the statistical analysis that NCCD had been contracted to provide.

FINDING

16. Provision of Early Intervention Services

FIA should improve its provision of early intervention services to delinquent youths. Also, FIA should maintain documentation of the reasons for youths not receiving services or not receiving services in a timely manner.

Early intervention services include a variety of community-based programs used to address youths' particular treatment needs. Types of programs include psychological counseling, intensive supervision, sexual offender treatment, and community service projects. Research has shown that services or programs that address individual treatment needs appear to make a difference in youths' behavior. Therefore, FIA's provision of these services or programs could be critical to the overall rehabilitation of delinquent youths.

FIA Services Manual item 817 provides that, when youths are placed in community-based settings, the JJS may be the primary service provider or a variety of early intervention services may be purchased.

During our visits to 6 FIA county offices, we reviewed case files for 90 of the 635 delinquent youths committed or referred to FIA between April 1, 1998 and June 30, 1999 and initially placed in community-based settings. Our review disclosed:

- a. Fourteen (16% weighted) youths with 56 treatment needs identified in their initial needs assessments did not receive any early intervention services. Also, JJSs usually did not document the reason for not providing youths with services or programs.

All 14 of these youths had one or more identified treatment needs in their initial needs assessment, and 11 of the 14 youths had 3 or more identified needs. Based on their needs assessment scores, we concluded that these youths should have received early intervention services to address their identified treatment needs.

- b. Sixteen (21% weighted) of the 76 youths who received early intervention services did not receive services within 30 days and 6 (8% weighted) of the 76 youths did not receive services within 60 days. Also, JJSs usually did not document the reason for not providing youths with services or programs in a timely manner.

Although the FIA policy did not have a time requirement for providing youths with services for identified treatment needs, providing needed services in a timely manner would appear to be in the best interest of the youths.

Providing youths with timely early intervention services for identified treatment needs most likely would improve the effectiveness of the youths' overall rehabilitation and, therefore, help to reduce subsequent recidivism.

RECOMMENDATIONS

We recommend that FIA improve its provision of early intervention services to delinquent youths.

We also recommend that FIA maintain documentation of the reasons for youths not receiving services or not receiving services in a timely manner.

AGENCY PRELIMINARY RESPONSE

FIA agreed with the finding and recommendations and responded that it will take appropriate action to improve its provision of early intervention services to delinquent youths. FIA also agreed that, when a need is identified in the strengths/needs assessment, there should be documentation of FIA's response to the need and, if no treatment or intervention was provided, the reason it was not provided.

FIA'S EFFORTS TO EVALUATE THE EFFECTIVENESS OF EARLY INTERVENTION SERVICES PROVIDED TO DELINQUENT YOUTHS

COMMENT

Audit Objective: To assess FIA's efforts to evaluate the effectiveness of early intervention services provided to delinquent youths.

Conclusion: We concluded that FIA made limited efforts to evaluate the effectiveness of early intervention services provided to delinquent youths. Our assessment disclosed a reportable condition related to the assessment of early intervention services.

FINDING

17. Assessment of Early Intervention Services

FIA should improve its assessment of the effectiveness of early intervention services provided to delinquent youths.

Youths may receive various types of early intervention services, which are either ordered by the courts or arranged by JJSs. The court orders may state that a youth receive a specific service through a particular provider or state that the youth receive a general type of service, such as counseling. JJSs may also arrange for youths to receive either specific or general types of services.

Our review of FIA's and other coordinating entities' efforts to evaluate the effectiveness of early intervention services provided to delinquent youths disclosed that expected outcomes and methods for evaluating outcomes are defined for some of the programs. Also, annual evaluations of outcomes are to be prepared for some of the programs. However, our review of selected evaluations disclosed that these evaluations often measured outputs, such as the number of youths completing a program, rather than outcomes, such as positive changes in youths' behavior or attitudes.

In addition, FIA analyzes annual statistical data on certain countywide performance indicators, such as the number of delinquent youths in out-of-home placements. Although useful as broad indicators of performance, these indicators and analyses do not isolate performance specific to individual early intervention programs.

Our visits to 6 FIA county offices disclosed that none of the 6 FIA offices formally assessed the effectiveness of individual early intervention services used in their counties. Also, when not specified in the court order, JJSs generally did not indicate, in a youth's case file, which type of early intervention service they concluded was the most applicable to the youth's identified treatment needs or specify which particular service a youth should receive and whether the service was available. Therefore, any assessment of the effectiveness of services actually

received would not necessarily evaluate the effectiveness of the most applicable (preferred) services.

FIA had not developed guidance for FIA county offices' use in assessing the effectiveness of their early intervention services. This guidance could include the need to define sufficient performance indicators and performance standards and to compare actual data with desired outputs and outcomes.

Without periodically evaluating the effectiveness of early intervention services provided to delinquent youths, FIA county offices have limited ability to make informed decisions regarding the continued use of the service(s).

RECOMMENDATION

We recommend that FIA improve its assessment of the effectiveness of early intervention services provided to delinquent youths.

AGENCY PRELIMINARY RESPONSE

FIA agreed with the finding and recommendation and responded that it will take appropriate action to improve its assessment of the effectiveness of early intervention services provided to delinquent youths.

Glossary of Acronyms and Terms

adjudicated delinquent youth	A child or adolescent who exhibits antisocial or criminal behavior and the court has decided that the youth committed an offense.
committed	Delinquent youths are "committed" by courts to FIA as public wards under Act 150, P.A. 1974, as amended.
community-based setting	A living arrangement that includes placement in: the youth's own home with biological or adoptive parent(s); a home-like setting with relatives, a legal guardian, or adoptive parents before an adoption is finalized; or a foster home or an independent living situation.
early intervention services	Community-based services and programs provided to delinquent youths who were initially placed in community-based settings.
effectiveness	Program success in achieving mission and goals.
efficiency	Achieving the most outputs and outcomes practical for the amount of resources applied or minimizing the amount of resources required to attain a certain level of outputs or outcomes.
FIA	Family Independence Agency.
goals	The agency's intended outcomes or impacts for a program to accomplish its mission.
JJS	juvenile justice specialist.
low security level	The security level of a facility that is campus or noncampus based. It relies upon external resources, i.e., public school, recreation, employment, and specialized treatment services.

Supervision is provided by treatment staff, guardians, or others, such as teachers or counselors. Youths are allowed frequent (often daily) unsupervised contact with the community. The outside perimeter is not secured and the facility is not locked.

medium security
level

The security level of a facility that is self-contained and campus-based, including all necessary resources for the youths within its boundaries. The outside perimeter may not be secured or the facility may not be locked; however, other forms of deterrents to leaving the facility, such as treatment modality and staffing, must be in place. Staff or guardians supervise the youths at all times. In the event of community contacts, such as home visits or while in community services, the youths are supervised by staff or temporarily placed in the direct care and supervision of a guardian or designated program representative. Community contacts are limited and based upon a youth's progress in treatment and continued evaluation of risk. Some youths may remain in a medium security placement yet be allowed daily unsupervised community contact for educational or treatment purposes.

mission

The agency's main purpose or the reason the agency was established.

NCCD

National Council on Crime and Delinquency.

needs assessment

An evaluation of the problems that led a youth to delinquent behavior and a determination of which services can be utilized to eliminate or control problems.

outcomes

The actual impacts of a program. Outcomes should positively impact the purpose for which the program was established.

out-of-State
residential placement

Any residential placement outside of the State of Michigan.

outputs	The products or services produced by a program. The program assumes that producing its outputs will result in favorable program outcomes.
override	To allow a change to be made because there were extenuating circumstances resulting in an escalation (increase) or mitigation (decrease) of a youth's security level. "Policy overrides" are based on specific criminal offenses and/or other factors and are mandatory.
performance audit	An economy and efficiency audit or a program audit that is designed to provide an independent assessment of the performance of a governmental entity, program, activity, or function to improve public accountability and to facilitate decision making by parties responsible for overseeing or initiating corrective action.
performance indicators	Information of a quantitative or qualitative nature indicating program outcomes, outputs, or inputs. Performance indicators are typically used to assess achievement of goals and/or objectives.
performance standards	A desired level of output or outcome as identified in statutes, regulations, contracts, management goals, industry practices, peer groups, or historical performance.
probation officer	An employee of the circuit court who manages the cases of delinquent youths under court jurisdiction.
recidivism	Rearrest after discharge from court, FIA, or county juvenile agency supervision.
referred	Delinquent court wards are "referred" by courts to FIA for care and supervision under Act 280, P.A. 1939, as amended.

rehabilitate	To change a youth's behavior so that the youth functions responsibly in his/her home community and maintains a crime-free lifestyle.
release	Termination of a residential placement.
reportable condition	A matter coming to the auditor's attention that, in the auditor's judgment, should be communicated because it represents either an opportunity for improvement or a significant deficiency in management's ability to operate a program in an effective and efficient manner.
risk assessment	An assessment of the risk that a youth poses to the community (i.e., reoffending).
SCAO	State Court Administrative Office.
service plans	Presentation of factual and assessed information about a ward and the ward's family used by a JJS and others to help the ward and the ward's family become rehabilitated. The initial service plan is the first plan written, and it is updated periodically by updated service plans. Updated service plans include the youth's progress toward achieving the goals established in the previous service plan and any changes in the service plan.
sexual offender	A youth adjudicated by the courts for criminal sexual conduct.
substance abuse	A drug or alcohol problem.
treatment goals	A written description of the desired changes in a youth's attitude and academic skills.
weighted	Presentation of FIA case file sample results from the outstate counties and Wayne County by their proper proportions in the entire population. We used weighting to combine and

report case file sample results because the sample was selected separately for the five outstate counties and Wayne County.

wraparound

A process to meet individual needs through a plan that "wraps" services around the youth and family. Development of the plan requires commitment from all members of the family's professional and informal support network.