



OFFICE OF THE STATE AUDITOR



September 3, 2019

DIANNE E. RAY, CPA
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STATE AUDITOR

DIVISION OF YOUTH SERVICES REPORTING – STATUS REPORT

Members of the Legislative Audit Committee:

Attached is the status report from the Department of Human Services (Department) on the implementation of recommendations contained in the Office of the State Auditor's (OSA) *Division of Youth Services Reporting Performance Audit*.

OSA REVIEW OF DOCUMENTATION

As part of the status report process, we requested and received supporting documentation for each recommendation that the Department reported as having been implemented. Specifically, we reviewed the following documentation:

- The 2019 *Educational Outcomes Evaluation of the Colorado Division of Youth Services* report.
- The 2019 *Recidivism Evaluation of the Colorado Division of Youth Services* report.
- Department of Human Services' policies concerning the collection and reporting of education outcomes results from contract facilities.
- Contract amendments for the residential facilities requiring them to report the education outcomes for those youth placed in their custody.
- Division of Youth Services quality control and data retention procedures for ensuring the accuracy of its reports.

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- The memorandum of understanding between the Division of Youth Services and the Denver County Court for the sharing of data in order to include adult misdemeanor convictions in the recidivism evaluation.
- The methodologies developed and reported by the Division of Youth Services for identifying recidivist acts that are classified under the Victim's Rights Act and delineating misdemeanors and felonies.

Based on our review, the supporting documentation substantiates the Department's reported implementation status.



COLORADO
Department of Human Services

August 2, 2019

Dianne E. Ray, CPA
State Auditor
Colorado Office of the State Auditor
1525 Sherman Street, 7th Floor
Denver, CO 80203

Dear Auditor Ray:

In response to your request dated June 26, 2019, we have prepared the attached status report on the implementation status of audit recommendations contained in the January 2019 *Division of Youth Services Reporting Performance Audit*. The status report provides a brief explanation of the actions taken by the Colorado Department of Human Services to implement each recommendation.

If you have any questions about this status report and the Department's efforts to implement the audit recommendations, please contact Minna Castillo Cohen, Director of the Office of Children, Youth & Families, at (303) 866-4544 or minna.castillocohen@state.co.us.

Sincerely,

Perry May
Deputy Executive Director of Health Facilities



AUDIT RECOMMENDATION STATUS REPORT

AUDIT NAME	Division of Youth Services Reporting
AUDIT NUMBER	1813P
AGENCY	Department of Human Services
DATE OF STATUS REPORT	August 2, 2019

SECTION I: SUMMARY

REC. NUMBER	AGENCY'S RESPONSE	ORIGINAL IMPLEMENTATION DATE	CURRENT IMPLEMENTATION STATUS	CURRENT IMPLEMENTATION DATE
1A	Agree	July 2019	Implemented	July 2019
1B	Agree	July 2019	Implemented	July 2019
1C	Agree	July 2019	Implemented	July 2019
1D	Agree	July 2019	Implemented	July 2019
2A	Agree	January 2019	Implemented	January 2019
2B	Agree	July 2019	Implemented	July 2019
2C	Agree	July 2019	Implemented	July 2019

SECTION II: NARRATIVE DETAIL

RECOMMENDATION 1A

The Department of Human Services should improve the accuracy and completeness of its *Education Outcomes at the Colorado Division of Youth Services* report by:

- A Enforcing Division policies and contract requirements that facilities operated by contractors measure and report on the educational outcomes of youth in their custody.

CURRENT IMPLEMENTATION STATUS	Implemented	CURRENT IMPLEMENTATION DATE	July 2019
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AGENCY UPDATE

Effective May 1, 2019, the Division of Youth Services (DYS or Division) implemented a new policy (DYS Policy C17.8) that relates to educational programs in residential contract facilities. Pursuant to this policy, contract programs must report “audit, compliance, and licensing performance information to DHS Program Management.” DHS facility contracts were amended as of July 2019 to include this language. Additionally, this policy states that programs will provide “individual youth achievement reports or achievement information from initial test to last test within the fiscal year as measured on standardized and validated assessment tools. Achievement should be reported on all assessment tools used which may include but are not limited to Star 360, NWEA MAP, and Colorado Measures of Academic Progress (CMAS).”

RECOMMENDATION 1B

The Department of Human Services should improve the accuracy and completeness of its *Education Outcomes at the Colorado Division of Youth Services* report by:

- B Implementing a mechanism for measuring and reporting on the educational advancement of youth who score at grade 12 or above on the pre-test.

CURRENT IMPLEMENTATION STATUS	Implemented	CURRENT IMPLEMENTATION DATE	July 2019
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AGENCY UPDATE

The Division has adopted alternative performance measures for those youth who score at grade 12 or above on the pre-test. In lieu of the previous approach, the Division reports *Vocational Courses/Certificate* and *Post-Secondary Coursework* for these youth who fall into this category.

RECOMMENDATION 1C

The Department of Human Services should improve the accuracy and completeness of its *Education Outcomes at the Colorado Division of Youth Services* report by:

- C Implementing uniform, written methodologies for evaluating the educational outcomes of youth discharged from its custody and maintaining documentation of the data used for the evaluation.

CURRENT IMPLEMENTATION STATUS	Implemented	CURRENT IMPLEMENTATION DATE	July 2019
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AGENCY UPDATE

The Division has implemented a uniform, written methodology for evaluating the educational outcomes of youth discharged from its custody, entitled *Technical Methods*. This methodology is outlined in Appendix D of the *Education Outcomes at the Colorado Division of Youth Services* report, published by the Division on July 1, 2019. Data retention is addressed in the DYS Quality Control Process for the Annual DYS Educational Outcomes Evaluation.

RECOMMENDATION 1D

The Department of Human Services should improve the accuracy and completeness of its *Education Outcomes at the Colorado Division of Youth Services* report by:

- D Establishing a quality control process designed to ensure the accuracy of the report. The process should include verifying that the data used, calculations, and statements describing academic results are complete, reliable, and accurate, and that documentation of the actual data and methodology are maintained.

CURRENT IMPLEMENTATION STATUS	Implemented	CURRENT IMPLEMENTATION DATE	July 2019
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AGENCY UPDATE

The accuracy of the *Education Outcomes at the Colorado Division of Youth Services* report was enhanced by the re-design of a rigorous quality control process. National experts were consulted prior/during/after report production. Experts reviewed the results prior to dissemination. Data retention is addressed in the DYS Quality Control Process for the Annual DYS Educational Outcomes Evaluation. In addition, the DYS Quality Control Process for the Annual DYS Educational Outcomes Evaluation addresses which data is used for the report, the calculations performed, and the conclusions are complete, reliable and accurate. Moreover, it sets forth data retention procedures and timeframes to ensure the actual data and methodology used are maintained.

RECOMMENDATION 2A

The Department of Human Services should improve the completeness of the recidivism rates and recidivist offense information that it includes in its *Recidivism Evaluation of the Colorado Division of Youth Services* report by:

- A Requesting adult misdemeanor convictions from the Denver County Court to add to the data collected from the Judicial Branch to include in its recidivism rate calculations.

CURRENT IMPLEMENTATION STATUS	Implemented	CURRENT IMPLEMENTATION DATE	January 2019
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AGENCY UPDATE

Division staff met with representatives from the Denver County Court System on January 3, 2019, to request adult misdemeanor conviction data. Both agencies worked to develop a five-year data-sharing agreement (DSA) and memorandum of understanding (MOU). On February 13, 2019, the DSA/MOU was finalized and signed by both agencies. Although the DSA/MOU agreement allows for the inclusion of adult misdemeanor convictions from Denver County Courts in future DYS recidivism evaluation reports, the Department is fully dependent upon the Denver County Court System to provide the needed information in time for report inclusion.

RECOMMENDATION 2B

The Department of Human Services should improve the completeness of the recidivism rates and recidivist offense information that it includes in its *Recidivism Evaluation of the Colorado Division of Youth Services* report by:

- B Implementing a written methodology for using the Judicial Branch’s data to identify and report recidivist offenses that fall under the Victim Rights Act.

CURRENT IMPLEMENTATION STATUS	Implemented	CURRENT IMPLEMENTATION DATE	July 2019
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AGENCY UPDATE

The Division provided a written methodology for using the Judicial Branch’s data to identify and report recidivist offenses that fall under the Victim Rights Act (VRA) in the report published on July 1, 2019. The written methodology is included both in the recidivism evaluation report body (pages 23, 27, 28-32), and detailed in Appendix C (pages 49-50) of the report.

RECOMMENDATION 2C

The Department of Human Services should improve the completeness of the recidivism rates and recidivist offense information that it includes in its *Recidivism Evaluation of the Colorado Division of Youth Services* report by:

- C Establishing a process for reviewing data on youth identified as recidivists during the first year after discharge to determine if they have any subsequent convictions during the second and third year after discharge and including information on these additional convictions and their severity level (i.e., misdemeanor or felony) in the report.

CURRENT IMPLEMENTATION STATUS	Implemented	CURRENT IMPLEMENTATION DATE	July 2019
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AGENCY UPDATE

The Division included and examined all recidivist offenses that occurred within the three year follow-up time period in the recidivism evaluation report published on July 1, 2019. The report delineates felonies and misdemeanors for recidivist offenses committed one to three years after discharge.