



**STATE OF FLORIDA  
DEPARTMENT OF JUVENILE JUSTICE**

**INTEROFFICE MEMORANDUM**

---

**DATE:** December 23, 2016

**TO:** Christina K. Daly, Secretary  
Melinda M. Miguel, CIG, Executive Office of the Governor

**FROM:** Robert A. Munson, Inspector General 

**SUBJECT:** Final Report – Audit No. A-1617DJJ-001, *Audit of Residential Living and Treatment Environment*

---

Please find attached our final audit report for the *Audit of Residential Living and Treatment Environment*. The Bureau of Internal Audit has determined that no follow-up is required, deficiencies have already been addressed by Residential Services.

We would like to thank the Office of Residential Services and private contract providers for the assistance extended to our staff during the audit process. Please feel free to contact Michael Yu, Audit Director, at 850-717-2468 if you have any questions.

RM/my/kn

Attachment

**Cc:** Timothy Niermann, Deputy Secretary  
Fred Schuknecht, Chief of Staff  
Laura Moneyham, Assistant Secretary, Residential Services  
Sherrill F. Norman, Auditor General  
Kathy DuBose, Director, Legislative Auditing Committee

2737 Centerview Drive • Tallahassee, Florida 32399-3100 • (850) 488-1850

**Rick Scott, Governor**

**Christina K. Daly, Secretary**

*The mission of the Department of Juvenile Justice is to increase public safety by reducing juvenile delinquency through effective prevention, intervention, and treatment services that strengthen families and turn around the lives of troubled youth.*

**Audit of Residential Living and Treatment Environment  
Report Number A-1617DJJ-001  
December 23, 2016**

**By**

**The Office of the Inspector General  
Bureau of Internal Audit**

Robert A. Munson  
Inspector General

Michael Yu, CIA, CIG  
Director of Auditing

Kelly Neel  
Auditor-in-Charge

Karen Miller  
Auditor

---

Christina K. Daly, Secretary

**Office of Inspector General  
Bureau of Internal Audit  
Audit of Residential Living and Treatment Environment  
Audit No. A-1617DJJ-001**

**TABLE OF CONTENTS**

EXECUTIVE SUMMARY	1
INTRODUCTION	
Background	3
Objectives, Scope, and Methodology	4
RESULTS OF AUDIT	5
APPENDIX: Management Response	

## EXECUTIVE SUMMARY

The Department of Juvenile Justice (Department), Office of the Inspector General, Bureau of Internal Audit has performed the Audit of Residential Living and Treatment Environment. The audit objectives were to provide management with reasonable assurances that the residential living and treatment environment is in compliance with Florida Statutes, Florida Administrative Codes (F.A.C.), and the Department's policies and procedures; and to assess whether the residential living and treatment environment promotes a safe, fair, and healthy environment; increases positive youth experiences; involves youth input while continuing to hold youth accountable for their actions; and teaches them skills and behaviors needed to avoid further recidivism. The audit scope was from July 1, 2015 through June 30, 2016, and related activities through the end of fieldwork.

As part of the audit process, we selected a 20% sample of residential programs for review, consisting of non-secure, high-risk, male and female programs, operated by seven different private providers under contract with the Department.

We visited and conducted audit procedures for the following programs:

- Crestview Sex Offender Program & Okaloosa Youth Academy – Crestview – Gulf Coast Treatment Centers
- Hillsborough Girls Academy – Tampa – G4S
- JoAnn Bridges Academy – Greenville – Rites of Passage
- Kissimmee Youth Academy – Kissimmee – Youth Opportunities Investments, Inc.
- Orange Youth Academy & Orlando Intensive Youth Academy – Orlando – G4S
- Palm Beach Youth Academy – Palm Beach - Sequel
- Residential Alternative for the Mentally Challenged Program – Greenville – Twin Oaks Juvenile Development, Inc.
- Youth Environmental Services – Wimauma – AMIkids

The audit disclosed that residential commitment programs had policies and procedures in place that complied with Florida Statute, Florida Administrative Code, and Department policy and procedures to promote a safe, fair, and healthy environment; increase positive youth experiences; involve youth input while continuing to hold youth accountable for their actions; and teach them skills and behaviors needed to avoid further recidivism.

It should be noted that the result of the audit is based on limited review of documents, limited interviews of facility staff and youth, and limited inspection of operations and activities at the visited facilities. Conclusions were drawn based on written documents reviewed, conditions observed at the facilities, and information provided by facility staff and youth at the time the auditors were on site. This audit report should not be used to

relieve the Department from future monitoring of the living and treatment environment in residential facilities.

## **Audit of Residential Living and Treatment Environment Audit # A-1617DJJ-001**

### **INTRODUCTION**

The Office of the Inspector General, Bureau of Internal Audit, conducted an Audit of the Residential Living and Treatment Environment from July 1, 2015 through June 30, 2016, and related activities through the end of fieldwork. This audit was initiated based on our Fiscal Year 2016-2017 Audit Plan and conducted in accordance with the *International Standards for the Professional Practice of Internal Auditing*, published by the Institute of Internal Auditors.

### **Background**

The Office of Residential Services provides continued care for youth who are committed to the custody of the Department. The Florida juvenile justice system is designed to rehabilitate offenders through supervision, counseling, and treatment. Placing youth into specialized needs programs holds youth accountable for their actions, while teaching them the skills and behaviors they need to avoid further delinquent acts. In Florida, all residential commitment programs are operated by private providers under contract with the Department. In 2015-2016, fifty-six (56) residential commitment programs were operated by nine private providers contracted with the Department.

Of the eight facilities visited, three facilities changed program providers in 2016, another facility recently hired a new director, and another was without a director and assistant director at the time of our visit.

According to Florida Administrative Code (F.A.C.) 63E-7.011(1), a residential commitment program shall establish an environment that is conducive to the effective delivery of delinquency intervention and treatment services. This environment shall promote and reinforce community values by giving youth opportunities to assume the responsibilities and experience the benefits of being part of a community. Therefore, the program shall establish a residential community, as defined in Rule 63E-7.002, F.A.C. that promotes the following:

- Each youth's personal accountability for his or her actions and how they impact others;
- Community safety through peaceful conflict resolution and youth learning to manage their behavior;
- Competency development through opportunities for youth to practice skills needed for responsible community living; and
- Youths' active participation through opportunities to make choices, assume meaningful roles, including team membership and leadership roles, and give input

into the rules and operation of the residential community. The program shall establish a formal process to promote youths' constructive input, such as a youth advisory council, that gives them experience in identifying systemic issues impacting their residential community and making recommendations for resolutions to improve conditions and enhance the quality of life for staff and youth in the program.

### **Objectives, Scope, and Methodology**

The objectives of this audit were to provide management with reasonable assurances that the residential living and treatment environment is in compliance with Florida Statutes, Florida Administrative Codes, and Department's policies and procedures; and to assess whether the Residential Living and Treatment Environment promotes a safe, fair, and healthy environment; increases positive youth experiences; involves youth input while continuing to hold youth accountable for their actions; and teaches them skills and behaviors needed to avoid further recidivism.

To achieve the audit objectives, we:

- reviewed applicable statutes and rules;
- reviewed Department policies and procedures;
- selected a sample of residential programs for review;
- reviewed the sample program's processes for creating the living and treatment environment;
- interviewed program director, staff, and youth;
- reviewed youths' files;
- reviewed Bureau of Monitoring and Quality Improvement Program Reports; and
- conducted other activities deemed necessary.

We visited and conducted audit procedures for the following programs:

- Crestview Sex Offender Program & Okaloosa Youth Academy – Crestview – Gulf Coast Treatment Centers
- Hillsborough Girls Academy – Tampa – G4S
- JoAnn Bridges Academy – Greenville – Rites of Passage
- Kissimmee Youth Academy – Kissimmee – Youth Opportunities Investments, Inc.
- Orange Youth Academy & Orlando Intensive Youth Academy – Orlando – G4S
- Palm Beach Youth Academy – Palm Beach - Sequel
- Residential Alternative for the Mentally Challenged Program – Greenville – Twin Oaks Juvenile Development, Inc.
- Youth Environmental Services – Wimauma – AMIkids

We used judgmental sampling to improve the overall efficiency of the audit. Errors or irregularities could have occurred, but not detected, because of inherent limitations associated with judgmental sampling. As such, projection of the auditors' conclusions based on our sampling method may be different from that reached if all residential commitment programs were subject to the audit procedures applied during the audit process.

## **RESULTS OF AUDIT**

According to Florida Administrative Code (F.A.C.) 63E-7.006, a residential commitment program shall establish the expectation that staff will treat youth with dignity and respect, and the program shall provide a positive quality of life for its youth by providing, at a minimum, the following:

- Shelter;
- Safety and security;
- Clothing;
- Food;
- Access to the Department of Children and Families' central abuse hotline addressed in Chapter 39, F.S., or if the youth is 18 years or older, the Department's Central Communications Center that serves as the Department's incident reporting hotline;
- Healthcare;
- Mental health and substance abuse services;
- Educational and prevocational or vocational services;
- Opportunities for recreation and large muscle exercise;
- Opportunities for expression of religious beliefs;
- Visitation;
- Access to incoming mail and opportunities to send outgoing mail;
- Telephone access; and
- Opportunity to access the courts.

During our visits, we observed facility designs that varied from one facility to the next but noted that all facilities were clean and organized in all areas; dorm rooms, day rooms, dining hall, kitchen, classrooms, and medical clinics. All facilities maintained an outside and inside area for recreation. Sanitation and pest control in the facilities were found to be acceptable. The furniture was functional and in satisfactory condition; and the temperature was comfortable in all facilities.

All facilities contained a master control station where staff controlled the locked doors and monitored video from the cameras throughout the facilities. Appropriate staff to youth ratios were observed in the classrooms, at recreation, and in the cafeteria. Tools, whether

kitchen, maintenance, or part of a vocational program are maintained on shadow boards in locked rooms and all programs utilize tool sign in/out logs and inventory logs.

According to F.A.C. 63E-7.013 (21), programs shall ensure that youth only have access to the Internet for purposes of obtaining educational materials; therefore, programs shall conduct and document monthly checks on the computer protection system. The programs rely on their local county school district, who are providing the education in the programs, for the system checks, since the youth are only accessing computers during education.

All facilities provided a visitation area for youth and their approved visitors. Of the eight facilities visited, seven offered at least one day a week visitation and one offered bi-weekly visitation. Some programs held a family day, quarterly. Hillsborough Girls Academy had been working on a step-dancing show to perform during their family day, being held the day following our visit. In addition to visitation, interviewed youth stated they were able to call parents/guardians at least once a week for ten minutes. In some facilities, youth on a higher level in the program may have longer phone calls. Additionally, youth stated they are permitted to mail and receive letters when following policies that prohibit the use of foul language and gang symbols. Youth also stated they could make telephone contact with their attorney upon request, through direct care staff or case managers.

In accordance with F.A.C. 63E-7.008, all facilities use a four-week cycle menu, serving three nutritionally balanced meals and at least one healthy snack per day. Auditors verified the menus were approved by a licensed dietitian. As per rule, at least two out of three daily meals were served hot; but in most of the facilities, posted menus and interviewed youth indicated that generally all three meals were served hot. Additionally, during interviews, youth stated the meals tasted good; and in many facilities staff were observed eating the meals with the youth.

According to F.A.C. 63E-7.007, programs are required to provide youth with individual hygiene supplies, instruction and assistance in personal hygiene activities, time on the daily schedule for youth to practice hygiene activities, clean clothing, and bedding. Additionally, youth should be able to shave daily, if males, and twice weekly, if females, unless medically contraindicated. During our site-visits, auditors observed youth had uniforms and shoes for both school and recreation that appeared in good condition. Hygiene supplies consisting of soap, deodorant, comb and/or brush, toothbrush, toothpaste, and a personal storage bin were provided individually to each youth in all facilities. Interviews with staff and youth indicated the opportunity to shave was offered upon request at three male facilities, twice a week at another male facility, and at the same time as haircuts in the other two male facilities. In the female programs, one permitted shaving bi-weekly and the other offered shaving weekly. No facilities visited offered time on the schedules for males to shave daily and females twice weekly, as written in the F.A.C. Management stated that Residential Services is currently drafting

revisions to F.A.C. 63E-7, and that the language specifying how often youth should be permitted to shave will be eliminated from the rule.

Nail clippers were available at the nurse's station and use was monitored by the nurse or direct care staff. Shampoo, lotion, and feminine hygiene supplies (where applicable), were available on the dorms, when not provided individually. Additionally, all programs had a store where name-brand personal hygiene supplies could be "purchased" by youth through the program's behavior management system when youth earned the necessary points.

Youth attended school Monday – Friday, twelve months out of the year, for approximately 6 hours a day. Some youth were working on their GED. Several youth were taking college courses. All youth, unless medically excused, participated in at least one hour of physical recreation a day, more on the weekends.

Vocational certifications were available in the programs visited, such as Home Builders Institute (HBI), ServSafe or SafeStaff (food handler training), typing, Cardio Pulmonary Resuscitation (CPR) and First Aid, Occupational Safety and Health Administration (OSHA) and hair braiding. Some programs, such as Okaloosa Youth Academy and Palm Beach Youth Academy offered youth a variety of vocational certification opportunities. Additionally, in accordance with F.A.C. 63B-1.006, all programs taught youth how to complete employment applications, write cover letters and resumes, interview, and provided assistance to youth in obtaining a job upon release. Youth Environmental Services (YES) assisted youth in scheduling job interviews, providing appropriate interview clothing and transporting youth to interviews. The facility director and transition case manager at YES indicated that youth hired for employment while at YES, upon release from the program, were generally able to transfer within that same company to their local community.

At the Residential Alternative for the Mentally Challenged (RAM-C) program, through a partnership with the Florida Department of Transportation, youth have the ability to work as crew members that perform routine maintenance to state highways and interstates. In addition to the benefit of obtaining work experience, youth earn a daily stipend that can be used to pay off restitution and court fees.

During the interviews, youth were open and did not hesitate in answering questions. In accordance with F.A.C. 63E-7.009, youth confirmed the following was explained to them during the orientation process: program's expectations, rules, and behavior management system; access to medical and mental health services; access to the Department of Children and Families central abuse hotline or Department of Juvenile Justice Central Communications Center; items considered contraband; performance planning process to develop goals for each youth; dress code and hygiene practices; procedures for visitation,

mail, and use of telephone; anticipated length of stay; community access; grievance procedures; emergency procedures for fire drills and building evacuations; physical design of the facility and areas youth are not allowed to access; assignment to a living unit, treatment team and youth group. All interviewed youth stated they were provided a program handbook. Youth in Kissimmee Youth Academy and JoAnn Bridges Youth Academy indicated they had just received new youth handbooks due to the recent change in program providers.

Youth stated they felt safe in their specific programs and were learning things that would help them when they were released, such as anger management, coping skills, choosing positive activities, respect, responsibility, thinking things through, learning to make better choices, and staying away from drugs and negative peers.

Youth also indicated they were recognized for positive behavior and programs have implemented a reward system. All programs offered a store of sorts where youth are able to “purchase” items such as hygiene products, candy, snacks, video game time, additional phone time, etc., when they earn their points. Within each program, it was noted that youth have the opportunity to earn daily, weekly, and/or monthly incentives. The programs visited provided incentive calendars and interviewed youth confirmed the incentive calendars were being followed. Non-secure programs offered incentive trips such as bowling, attending a movie theater, participating in a football tournament, dining at a restaurant, attending a sporting event, and a day at a theme park.

Programs also participated in community service projects. One youth with Orange Youth Academy mentioned he enjoyed his opportunity to feed the homeless at the shelter. Other programs have participated in making hygiene baskets for ladies at a nearby shelter, assisting Habitat for Humanity building projects, setting up and breaking down rooms for special events held in the community, crocheting items for babies, and fostering puppies until adoption.

As per Rule 63E-7.011, each program established an environment that promoted the youths’ active participation in providing input into the rules and operation of the residential community. The formal process to promote youths’ constructive input varied by program. Some programs held elections permitting the youth population to elect members of the youth advisory board or student council; other programs permitted youth to apply for peer council or dorm representative positions; and some programs held community-wide meetings, during which both staff and youth were able to make suggestions or provide input. Facility tours and interviews with youth and staff provided assurances that the youths’ suggestions were considered by management and in some instances, youth/staff recommendations were implemented. For example, Kissimmee Youth Academy’s student council made recommendations for their incentive calendar and at JoAnn Bridges Youth Academy the student council recommended specific items youth wanted available

for both their daily reward and Fun Friday reward, as part of the behavior management system.

In addition to these meetings, youth who felt their rights had been violated were encouraged to file a grievance form or file a “request to speak” form, which provided youth the opportunity to speak with a particular staff member. The grievance and “request to speak” forms promoted a peaceful conflict resolution. Youth are able to obtain both forms from direct care staff or boxes located in the dorms and common areas in each facility. In accordance with F.A.C. 63E-7.006, facilities maintained a youth grievance/request to speak file, which included the outcomes. Auditors requested and reviewed the files at each facility and noted the outcome section of the forms were completed and signed by a facility manager and the youth.

Youth care workers, shift supervisors, therapists and/or case managers, and facility directors were interviewed. Through interviews, it was determined staff have a code of conduct for interacting with youth and other staff, as well as providing a safe environment. They acknowledged their responsibilities for responding to youth’s allegations of abuse, their role if they observed staff or youth abusing another youth, and understood the program’s grievance process. Staff also indicated they participate by providing guidance to youth, to assist them in making the appropriate choice to obtain their rewards.

Auditors reviewed logs containing informal and formal counts of youth, maintained in the master control room at each facility, to ensure compliance with F.A.C. 63E-7.013 and facility operating procedures. Interviewed staff felt their program was safe for them and the youth. However, in one facility visited, interviews disclosed a possible issue with youth receiving contraband either obtained during family visitation sessions or inadvertently from facility staff. Through discussions with Department management we learned that a critical issue had been identified concerning supervision of youth, contraband, and visitation. Additionally, the follow-up verification monitoring to ensure the critical issues had been addressed was conducted on September 28, 2016, by the Department’s Program Area Operations Monitor. The Department’s preliminary review indicated the facility had taken corrective action related to the critical issues with youth supervision, contraband, and visitation.

It should be noted that the result of the audit is based on the limited review of documents, limited interviews of facility staff and youth, and limited inspection of operations and activities at the visited facilities. Conclusions were drawn based on written documents reviewed, conditions observed at the facilities, and information provided by facility staff and youth at the time the auditors were on site. This audit report should not be used to relieve the Department from future monitoring of the living and treatment environment in residential facilities.

## APPENDIX

### MANAGEMENT RESPONSE



**STATE OF FLORIDA  
DEPARTMENT OF JUVENILE JUSTICE**

**INTEROFFICE MEMORANDUM**

---

**DATE:** December 21, 2016  
**TO:** Robert A. Munson, Inspector General  
**FROM:** Laura K. Moneyham, Assistant Secretary for Residential Services  
**SUBJECT:** Audit No. A-1617DJJ-001 - Audit of Residential Living and Treatment Environment

---

Thank you for giving me the opportunity to respond to the above audit. Please be advised that we concur with the outcomes of this report. I appreciate the time and effort that your team dedicated to this endeavor.

If additional information is needed, please feel free to contact me at 850-921-4188.

Thank you.

2737 Centerview Drive • Tallahassee, Florida 32399-3100 • (850) 488-1850

**Rick Scott, Governor**

**Christina K. Daly, Secretary**

*The mission of the Department of Juvenile Justice is to increase public safety by reducing juvenile delinquency through effective prevention, intervention, and treatment services that strengthen families and turn around the lives of troubled youth.*