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**Department of Law and Public Safety
Juvenile Justice Commission**

July 1, 2009 to December 31, 2011

**Stephen M. Eells
State Auditor**

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Enclosed is our report on the audit of the Department of Law and Public Safety, Juvenile Justice Commission for the period of July 1, 2009 to December 31, 2011. If you would like a personal briefing, please call me at (609) 847-3470.

A handwritten signature in black ink that reads "Stephen M. Eells".

Stephen M. Eells
State Auditor
August 30, 2012

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Scope

We have completed an audit of the Department of Law and Public Safety, Juvenile Justice Commission for the period of July 1, 2009 to December 31, 2011. Our audit included financial activities accounted for in the state's General Fund and the 13 resident trust funds utilized by the residential programs (residential centers). The New Jersey Training School for Boys and the Juvenile Medium Security Facility were excluded from the scope of our audit.

Expenditures of the commission for fiscal year 2011 were \$78.8 million. The commission's juvenile community programs provide both day and residential programs to juvenile offenders. Their mandate is to protect the public from juvenile criminal offenders, to develop a community network of services to reduce commitments to state institutions and programs, and to provide services which encourage rehabilitation and reintegration into the community. Revenues of the commission were \$30.8 million in fiscal year 2011 and the major component of revenue was \$25.6 million in education aid transferred from the Department of Education.

Objectives

The objectives of our audit were to determine whether financial transactions were related to the commission's programs, were reasonable, and were recorded properly in the accounting systems.

This audit was conducted pursuant to the State Auditor's responsibilities as set forth in Article VII, Section I, Paragraph 6 of the State Constitution and Title 52 of the New Jersey Statutes.

Methodology

Our audit was conducted in accordance with *Government Auditing Standards*, issued by the Comptroller General of the United States.

In preparation for our testing, we studied legislation, the administrative code, circular letters promulgated by the Department of the Treasury, and policies of the commission. Provisions we considered significant were documented and compliance with those requirements was verified by interview, observation, and through our testing of financial transactions. We also read the budget messages, reviewed financial trends, and interviewed commission personnel to obtain an understanding of the programs and the internal controls.

A nonstatistical sampling approach was used. Our samples of financial transactions were designed to provide conclusions about the validity of transactions, as well as internal control and compliance attributes. Sample populations were sorted and transactions were judgmentally selected for testing.

Conclusions

We found that the financial transactions included in our testing were related to the commission's programs, were reasonable, and were recorded properly in the accounting systems except for recording of activity in the resident trust funds. In making these determinations, we noted internal control weaknesses related to resident trust funds and a lack of detailed recidivism rates to be used in determining the effectiveness of program services provided to the residential centers. In addition, there is an opportunity for potential cost savings if additional residential centers can be consolidated.

Cost per Resident

Consolidating residential centers may reduce overall operating costs.

The Juvenile Justice Commission maintains 13 residential centers for some of its juvenile population. Over the last 12 years, the population of residents in residential centers decreased by 176 residents (45 percent). During our audit period, the Juvenile Detention Alternatives Initiative has contributed to the population decrease. The commission expended approximately \$22.3 million during calendar year 2011 for the care and education of 215 residents at the residential centers. As depicted in the following chart for calendar year 2011, operation of the residential centers is not performed in the most cost-effective manner because each center is under-utilized. The annual cost per resident at the centers ranges from \$63,000 to \$180,000, excluding fringe benefits and other indirect expenses. The average cost per resident was \$104,000. The commission should make a determination on the efficient use of its residential centers to enhance its cost effectiveness. Residential per capita cost reports have not been prepared for management's use to assist in determining whether populations at certain residential centers should be consolidated and whether certain centers should be closed.

CY 2011 Cost and Excess Capacity Analysis

Residential Center	Annual Cost (in millions)	Average Population	Annual Cost Per Resident	Building Capacity	Excess Capacity
D.O.V.E.S.	\$1.8	10	\$180,000	24	14
Fresh Start	\$1.8	12	\$150,000	20	8
Warren	\$1.7	12	\$142,000	30	18
Green	\$1.8	14	\$129,000	28	14
Costello	\$1.9	16	\$119,000	50	34
Essex	\$1.5	13	\$115,000	25	12
Camden	\$2.3	20	\$115,000	30	10
Voorhees	\$1.5	13	\$115,000	28	15
Pinelands	\$1.5	15	\$100,000	18	3
Southern	\$1.7	20	\$85,000	32	12
Ocean	\$1.7	23	\$74,000	30	7
Albert Elias	\$1.1	15	\$73,000	18	3
Campus	\$2.0	32	\$63,000	40	8
Total	\$22.3	215	\$104,000	373	158

During our field work, we suggested that management consider consolidating under-utilized residential centers. In May 2012, the commission took the initiative by relocating the Campus and Camden centers to one state-owned facility in Vineland. The commission estimated an annual savings of \$620,000 due to lease cancellations.

Recommendation

We recommend that the commission further reduce its costs by determining whether additional under-utilized residential centers can be consolidated. We also recommend that the commission's central office fiscal unit prepare annual per capita cost reports by residential centers so that management can better assess fiscal operating results.



Resident Trust Funds

Internal controls over resident trust funds need substantial improvements.

A resident trust fund is maintained at each of the 13 residential centers. A resident trust fund comprises all resident saving accounts funded by resident wages and visitor cash receipts. The funds are subsequently used for each resident's personal expenses. The Juvenile Information Management System (JIMS) trust module is the commission's accounting system that records trust fund transactions and calculates savings balances for residents. In addition, JIMS maintains group trip expenses for residents where a youth worker is provided a cash advance check for residents' shopping, dining, and/or recreational activities. All trust fund checks, per commission practice, contain two signatures. After the trip, the youth worker must account for the cash advance with receipts and returned cash, if due.

As a custodian of the resident trust fund, each residential center has a fiduciary responsibility for establishing internal controls and accounting procedures that will protect the fund against fraud, ensure the proper recording of timely transactions, provide accurate bank reconciliations, and maintain adequate segregation of duties. In addition, the commission's central office fiscal unit is responsible for monitoring and evaluating internal controls for each residential center's trust fund. Our review of the residential centers' trust funds revealed the following internal control weaknesses related to bank reconciliations, bookkeeping, computer operations, and specific testing at the Ocean residential center.

Bank Reconciliations

Monthly bank reconciliations must be completed and reconciled timely to JIMS to aid in ensuring that cash receipts, cash disbursements, and resident saving balances are accurate. Only Green, Fresh Start, and Pinelands residential centers were reconciled to JIMS. The remaining ten residential centers reconcile transactions from bank statements to manual checkbooks, but not to JIMS. Our bank reconciliations to JIMS for the month of December 2011 disclosed cash balance discrepancies for 10 of the 13 residential centers' trust funds. Specifically, five residential centers had cash shortages ranging from \$602 to \$19,400 and five residential centers had excess cash ranging from \$227 to \$6,004.

Resident Trust Fund Reconciliation as of December 2011

Residential Center	Book Balance	JIMS Cash Balance	Cash Difference (Shortage)/Excess
Ocean	\$ (744)	\$ 18,656	\$ (19,400)
D.O.V.E.S.	\$ 2,297	\$ 11,984	\$ (9,687)
Essex	\$ 547	\$ 4,929	\$ (4,382)
Campus	\$ 25,326	\$ 29,137	\$ (3,811)
Voorhees	\$ 6,344	\$ 6,946	\$ (602)
Fresh Start	\$ 2,127	\$ 2,127	\$
Green	\$ 867	\$ 867	\$
Pinelands	\$ 7,570	\$ 7,570	\$
Warren	\$ 3,840	\$ 3,613	\$ 227
Camden	\$ 7,435	\$ 6,622	\$ 813
Costello	\$ 12,125	\$ 11,223	\$ 902
Southern	\$ 15,332	\$ 13,365	\$ 1,967
Albert Elias	\$ 15,847	\$ 9,843	\$ 6,004
Total	\$ 98,913	\$ 127,882	\$ (27,969)

Bookkeeping

From our field visits and surveys of the 13 residential centers, the following examples of internal control weaknesses relating to bookkeeping were identified.

- The secretary maintaining and reconciling the resident trust checkbook also signs the checks at seven residential centers.
- There were pre-signed “blank” checks at three residential centers.
- In contrast to the commission fiscal policy number 10FIS:8.04:
 - Pre-numbered receipts were not used at five residential centers. Pre-numbered receipts provide a chronological sequence and audit trail that can be used to track and reconcile receipts to bank deposits.
 - One residential center deposited cash receipts untimely in May 2011. In our testing of 57 checks representing five bank deposits totaling \$4,700, we found the average check deposit occurred 34 days from the JIMS posting date. Furthermore, a \$350 cash bank deposit could not be tracked to the JIMS accounts by the center’s secretary because of the nonexistence of pre-numbered receipts.

Ocean Residential Center

Our bank reconciliations disclosed that the Ocean residential center had the highest cash shortage among all the residential centers. Therefore, we performed additional tests at Ocean. For March 2011, we tested 42 checks totaling \$7,725 and found 18 checks totaling \$2,924 were not posted to JIMS. Since the center does not reconcile its activity to JIMS, these items would not be identified.

A youth worker who requests and receives group trip cash advances is generally the person who obtains residents' signatures authorizing the withdrawals. JIMS does not provide resident digital signatures as an independent verification when reviewing resident signature authenticity. We found 11 questionable resident signatures on approved group trip advances (business remit forms). This matter will be referred to the Department of Law and Public Safety, Division of Criminal Justice, for further investigation.

Fiscal Monitoring and Segregation of Duties

The commission's central office fiscal unit was not monitoring, enforcing, and evaluating internal controls over trust fund activities at the residential centers. In addition, the residential centers' reconciliations were not independently performed. Generally, the secretary at each center prepares the monthly reconciliations and also performs all bookkeeping functions such as recording and making bank deposits, recording and signing checks, recording JIMS transactions, receiving bank statements directly from the bank and maintaining a manual checkbook balance. Realistically, due to limited staff at each residential center, bank reconciliation preparations cannot be segregated; therefore, it would be advantageous if the commission transfers this responsibility to the central office fiscal unit.

Computer Operations

The JIMS application has a print check module which includes "positive pay" that is used by the two juvenile facilities but not by the residential centers. Positive pay is a theft deterrent process that provides advanced data of check numbers and check amounts to the bank that result in a "positive pay" when a check is cashed. The print check module provides a transaction audit trail of check issued to payee, amount, and check number, and an assurance that computerized checks are posted to JIMS. As evidenced by the 18 manual checks not posted by Ocean residential center, there is no assurance that all manual checks are posted to JIMS. Computerized printed checks, supplemented with "positive pay", also aid in decreasing check forgery versus manual written checks. During our fieldwork, a \$6 manual check from Essex residential center was forged for \$3,500 and cashed successfully at a bank. Subsequently, the commission discovered the forgery and it was referred to the commission's investigative unit. The overpayment was recouped. Positive pay could have prevented the forged amount from being honored by the bank.

Because of a lack of edits, JIMS allows unrestricted backdated transactions, which results in a timing difference between the transaction date and actual accept date (transaction date stamp). Unauthorized backdated transaction errors may distort the commission's financial statements. Although these dated fields are available in the JIMS database, the central office fiscal unit cannot monitor backdated transactions timely because a backdated transaction report is not readily available. This type report might detect erroneous backdating of transactions, determine timeliness of entering transactions, and aid in preparing bank reconciliations.

Recommendations

We recommend the commission improve internal controls over resident trust funds by:

- Preparing accurate, timely bank reconciliations to JIMS by the commission's central office fiscal unit. Furthermore, the central office fiscal unit should determine the causes of the applicable shortage or excess cash in each resident trust fund.
- Prohibiting secretaries from signing trust fund checks and making deposits when they are also in charge of trust bookkeeping.
- Prohibiting the signing of blank trust checks.
- Enforcing the policy over pre-numbered receipts and timely deposits.
- Posting the 18 checks to JIMS at Ocean residential center.

We also recommend the commission research the possibility to make the following system enhancements to JIMS:

- Provide digital signatures for residents.
- Print computerized checks with "positive pay" for the residential centers.
- Provide backdated transaction reports.



Recidivism Rates

The commission is not able to use the recidivism report to make management decisions on residential center program services.

In our prior audit report, we recommended that the commission measure recidivism as one tool for determining the effectiveness of all their programs, which includes residential centers. Public Law 2009, Chapter 329, approved in January 2010, states "The Commissioner of Corrections, in conjunction with the Juvenile Justice Commission and the State Parole Board, shall establish a program to record and analyze the recidivism of all inmates and juveniles adjudicated delinquent...The purpose of this program shall be to assist in measuring the effectiveness of the State's reentry initiatives and programs". The first semi-annual recidivism report, entitled "Release Outcome 2007: A Three-Year Follow-Up", disclosed that at one and three years following the 2007 release of juveniles from the commission's custody, recidivism

rates for new offenses resulting in adjudication/conviction were 53.9 percent and 75.1 percent, respectively. However, the report did not categorize the recidivism rates by individual residential center. As a result, the commission's management cannot determine the effectiveness of program services provided at the residential centers at an annual cost of \$22.3 million.

Recommendation

We recommend the commission include the recidivism rates for the individual residential centers in the semi-annual recidivism report and use such information to evaluate the effectiveness of the program services provided at the residential centers.





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August 10, 2012

John J. Termyna
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Dear Mr. Termyna:

On behalf of the Juvenile Justice Commission, I wanted to thank you for the opportunity to provide comments to the draft audit report issued by your office on July 9, 2012. Enclosed please find our comments.

Please do not hesitate to contact me if you have any questions or need further information.

Kindest regards.

Sincerely,

A handwritten signature in black ink that reads "Howard J. McCoach".

Howard McCoach
Administrator

c: Gloria R. Hancock, Ed. D., Acting Executive Director
J. Peter Traum, Director of Strategic Planning



Cost per Resident

Consolidating Residential Centers may reduce overall operating costs.

Recommendation:

We recommend the Commission further reduce its costs by determining whether additional under-utilized Residential Centers can be consolidated.

Response:

The Juvenile Justice Commission (Commission) has reviewed, and continues to review these centers referred to hereafter as residential community housing centers within the context of the classification system already established for the placement of juveniles. This continuum of care requires careful evaluation of the individual needs to ensure that the graduated (step down) system currently in place continues to be effective; the juvenile is in an appropriate setting based on the level of security/safety needed; the physical and mental health needs of the resident are appropriately addressed; completion of an educational assessment has occurred; and a review of bed capacity availability has taken place.

The Commission has demonstrated over the course of several years its commitment to closing costly or non-effective programs and consolidating when appropriate to reduce costs. Since 2008, the Commission has consolidated or closed several underutilized or costly programs with cost savings of approximately \$1.5 million.

It should be noted that bed spaces at residential community housing centers are not interchangeable. For example, certain centers are designated as specialty programs. While bed capacity may be available at these sites, it would not be appropriate to place certain juveniles at some of these locations. The classification of the juveniles must take precedence over other lesser criteria in determining where they are to be assigned.

While the OLS report noted an average daily population of 215 residents at 13 sites, taken by itself this figure does not offer a complete depiction of the Commission's sites and their population. During 2011, the Commission had an average daily population of 675 residents across *all* programs and serviced 2,842 residents during this same period. The actual annual cost per juvenile served at the 13 sites ranged from a low of \$13,464 to a high of \$48,773.

As always, the Commission will continue in its efforts to evaluate the infrastructure needs to better serve our residents utilizing the most cost effective means. Currently, we are actively engaged in creating regional schools at a number of residential community housing centers which will provide additional cost savings.

Recommendation:

We also recommend that the Commission's central office fiscal unit prepare annual per capita cost reports by Residential Centers so that management can better assess fiscal operating results.

Response:

The Budget Unit within the centralized Fiscal Office already provides expense data per capita for residents at the New Jersey Training School for Boys ("NJTSB"), the Johnstone Campus, and the community programs as a whole. The Commission will explore the feasibility to further break down the per capita costs by individual residential community housing center; however as mentioned above, the classification of the juveniles must dictate where they are assigned.

Resident Trust Funds

Internal controls over resident trust funds need substantial improvements.

Recommendation:

We recommend the Commission improve internal controls over resident trust funds by preparing accurate, timely bank reconciliations to JIMS by the Commission's central office fiscal unit. Furthermore, the central office fiscal unit should determine the causes of the applicable shortage or excess cash in each resident trust fund.

Response:

The Commission's Central Fiscal Office (Fiscal Office) has assumed the responsibility for the Community Programs' Residential Trust Accounts. This centralization has resulted in monthly reconciliations. This reconciliation process includes a thorough review of the accounts and correcting any errors posted to the JIMS in order to provide a more accurate statement of the accounts.

Below is the most recent reconciliation of the funds including any changes made to the JIMS as a result of the audit.

Current Resident Trust Fund Reconciliation

Residential Center	Book Balance	JIMS Cash Balance	Cash Difference (Shortage)/Excess
Ocean	\$ 3,430	\$ 20,103	\$ (16,673)

D.O.V.E.S.	\$ 3,525	\$ 3,525	\$ 0
Essex	\$ 4,012	\$ 4,012	\$ 0
Campus	\$ 25,400	\$ 27,842	\$ (2,442)
Voorhees	\$ 26,038	\$ 26,038	\$ 0
Fresh Start	\$ 2,868	\$ 2,868	\$ 0
Green	\$ 2,780	\$ 2,780	\$ 0
Pinelands	\$ 7,981	\$ 7,981	\$ 0
Warren	\$ 8,731	\$ 8,731	\$ 0
Camden	\$ 11,104	\$ 11,104	\$ 0
Costello	\$ 12,483	\$ 12,483	\$ 0
Southern	\$ 14,014	\$ 14,014	\$ 0
Albert Elias	\$ 11,453	\$ 11,453	\$ 0
Total	\$133,819	\$ 152,934	\$ (19,115)

As the above chart indicates, the reviews and corrections done by the Fiscal Office have resulted in a reduction from 10 accounts to 2 accounts having a cash balance discrepancy for the current reconciliation. Notably, each account contains sufficient funds required to cover all current obligations. While we will continue in our efforts to reconcile these 2 accounts, the passage of time and the lack of reliable records may hinder our efforts to do so.

The Commission will re-examine all of its fiscal policies with respect to Residential Trust Funds and make additional changes as appropriate.

Recommendations:

- *Prohibiting secretaries from signing trust fund checks and making deposits when they are also in charge of trust bookkeeping.*
- *Prohibiting the signing of blank trust checks.*

Response:

The community program secretaries of the seven residential programs cited have ceased bookkeeping responsibilities and this function has been centralized within the Fiscal Office. Additionally, this data entry is now being performed by the Fiscal Office, and all paper checkbooks have been removed from the community programs and are in the custody of the Fiscal Office. To generate trust fund checks, community programs must now make a request to the Fiscal Office. The Fiscal Office then electronically creates the trust fund checks and the checks are then hand-delivered to the requestor or printed by the Fiscal Office at the needed remote location.

Recommendation:

Enforcing the policy over pre-numbered receipts and timely deposits.

Response:

As part of the recent reorganization, the Fiscal Office will, within 90 days, establish new policies to assure compliance. The policies will be available for on-site review.

Recommendation:

Posting the 18 checks to JIMS at Ocean residential center.

Response:

The Fiscal Office is in the process of reviewing the information recently provided by the Office of the State Auditor with regard to the 18 transactions. Once this review is completed, appropriate postings of transactions will take place. A procedure has been established to ensure that all residential community housing center transactions are posted into JIMS by the Fiscal Office, and that reconciliations are done in a timely manner.

Recommendations:

We also recommend the Commission research the possibility to make the following system enhancements to JIMS:

- *Provide digital signatures for residents.*
- *Print computerized checks with "positive pay" for the residential centers.*
- *Provide backdated transaction reports.*

Response:

The Commission's Information Technology Section (IT Section) is exploring the best method for collecting a resident's digital signature and attaching the information to the JIMS.

The Commission agrees that printing computerized checks with positive pay will not only improve internal controls over the residential trust accounts, but will also assist making the accounts more secure. The Fiscal Office is currently exploring the best method to achieve this objective.

The IT Section is currently developing a report that can track the backdated transactions for the Fiscal Office's use in monitoring and aiding in the preparing of bank reconciliations.

NOTE: The audit report mentioned that 11 questionable resident signatures were found on business remit forms used for approved group trip advances. The information

provided has been forwarded to the Commission's Internal Affairs Unit for appropriate review. The Commission's Internal Affairs Unit will also apprise the Division of Criminal Justice of its review.

Recidivism Rates

The Commission is not able to use the recidivism report to make management decisions on residential center program services.

Recommendation:

We recommend the Commission include the recidivism rates for the individual Residential Centers in the semi-annual recidivism report and use such information to evaluate the effectiveness of the program services provided at the Residential Centers.

Response:

The Commission is currently complying, in coordination with New Jersey's Department of Corrections (DOC) and State Parole Board (SPB), with the legislative mandate under P.L. 2009, c.329, (C.30: 4-91.15). The mandate is to undertake ongoing examinations of recidivism, and reporting findings to the public. These findings include the potential role of background and other factors relevant to offenders, and the involvement with particular services/treatment efforts in impacting recidivism. The first joint report was drafted in 2011 (following persons released in 2007) and examines recidivism rates in some detail, beginning to address the analysis of potentially relevant factors in offender recidivism. A similar joint report, examining 2008 releases, is in the process of development. The three agencies developed and are undertaking a plan for interagency collaboration in this area. An important aspect of that plan is development (through the NJ Office of Information Technology) of a Release Recidivism Data Mart that will allow for the sharing and analysis of an array of recidivism-related data, consistent with the legislative mandate. The Data Mart is under development and close to completion.

Furthermore, historically, the Commission has undertaken more detailed analyses of the implementation and impact of select initiatives and programs, including recidivism analyses. Included among these efforts was a multi-year effort to examine the (no-longer existing) "modified boot camp" run by the Commission. This included a detailed examination of both the nature and success of its implementation, and of recidivism rates compared with similar youth in other Commission correctional settings. More recently, examinations were undertaken to examine the success and recidivism rates of select residential programs. Most recently, the Commission undertook a comprehensive examination of the implementation and early impact of a mental health program created in the H-Wing of its Juvenile Medium Security facility, and utilized federal dollars to fund Rutgers-Camden/Rand Institute to undertake a comprehensive examination (currently nearing completion) of the Commission's reentry programs, policies and practices.

The Commission has in place a mechanism to examine the operational efficacy of each of its community programs, residential and day. In addition to regular review and monitoring of certain types of residential programs, the Commission initiated, more recently, a Quality Assurance and Management System to assist management in regular monitoring of operational efficacy. This comprehensive monitoring and assessment tool facilitates management's ability to monitor, control and guide improvements in a detailed manner regarding key areas of community program operation, with the objective of maximizing goal attainment regarding safety and security, accountability and rehabilitation of youth. This includes, for example, routine structured management assessments of such areas as compliance with policies and procedures, resident supervision, implementation of evidence-based programming (Cognitive Behavioral Curricula) and creative programming efforts, use of incentives/disincentives to facilitate positive program environment and modify behavior, staff development and team building, preparation for juvenile offender reentry to the community, and recordkeeping and data management.

Regarding the Recidivism Recommendation, it is the Commission's position that a delineation of recidivism rates for each residential community housing center would be inappropriate. The purpose of the recommendation, i.e., to evaluate the effectiveness of the program services provided at each of the residential community housing centers would not be served by this approach, and faulty and misleading conclusions would almost certainly be drawn by the recidivism report's audience, including the general public and government officials.

Three substantive points illustrate the position taken. The first point is the fact that Commission residents typically spend time in more than one residential community housing center, and frequently several. This includes "moving back and forth" between programs for various operational purposes. In addition, it is common for the committed population to begin their stay in a secure setting, followed by movement to one or more residential community housing centers, and, for some, placement in a Commission day program to assist with the transition to home. Consequently, it would be quite difficult to identify the "impact on recidivism" that a particular residential community housing center might have had while a juvenile was with the Commission.

The second point is the fact that the population served by the various residential community housing centers differs from residential program to residential program. This has important implications for recidivism. Two examples are provided to illustrate, i.e., age and offense history. A broad accumulation of research (including Commission research) indicates clearly that younger juveniles recidivate at lower rates than older ones, and that youth entering a correctional setting with a greater number of adjudications of delinquency recidivate at higher rates than those with fewer; and youth admitted on substance abuse offenses generally recidivate at the highest rates of any type of offense. With these and other factors often varying substantially across residential community housing centers, differences in recidivism rates are likely to be influenced greatly by these differences, independent of the efficacy of the residential program itself. This is

magnified by the fact that the Commission has several “specialty” residential community housing centers, serving particular populations (e.g., younger juveniles; youth with substance abuse problems).

Finally, on this point, separating out the impact of each of these residential program settings with regard to impact on residents’ recidivism after release, would be quite difficult and challenging as a research effort. Such an examination would require a sophisticated evaluation of an effectiveness research study to approach a reasonable treatment of the task. A recidivism report is not meant for that purpose. In conclusion, the Commission does concur that the rate of recidivism is one of several valid performance indicators, and the Commission will continue in its efforts to measure recidivism in a comprehensive and accurate manner.