

The October 2021 Arizona Department of Juvenile Corrections sunset review found that the Department has established processes for the statutory responsibilities we reviewed, including assessing youths’ educational needs, but had deficiencies in some processes, including not always following its requirements for supervising youth on parole and not ensuring that youth in its work incentive program were paid as required by statute. We made 23 recommendations to the Department, and its status in implementing the recommendations is as follows:

Status of 23 recommendations

Implemented	12
Implemented in a different manner	1
In process	7
Not yet applicable	1
No longer applicable	2

We will conduct an 18-month followup with the Department on the status of the recommendations that have not yet been implemented.

Sunset Factor 2: The extent to which the Department has met its statutory objective and purpose and the efficiency with which it has operated.

1. The Department should ensure that parole officers are following parole supervision requirements.

Implementation in process—The Department has taken some steps to ensure that parole officers are following parole supervision requirements. For example, the Department revised its parole officer manual to clarify its expectations for contacting a youth’s employer (see explanation for Recommendation 3). However, some Department parole officers have not consistently followed parole supervision requirements. For example, for 1 instance we reviewed in which a parole officer was unable to meet with a youth as required, the parole officer did not document whether they notified their supervisor, as required by the parole officer manual. Additionally, although parole supervisor records indicate another parole officer had been assigned to meet with the youth, the parole supervisor records also indicate that this second parole officer did not meet with the youth and, therefore, the youth supervision requirement was not met. Finally, the Department has not yet revised its parole supervisor and parole officer manuals to include all guidance and requirements we recommended (see explanations for Recommendations 2 and 3). Therefore, we will further assess the Department’s implementation of this recommendation during our 18-month followup.
2. The Department should revise and implement its parole supervisor manual to include a process for reviewing parole officers’ compliance with requirements for supervising youth, including outlining procedures and time frames for conducting reviews, documentation requirements, and how noncompliance should be addressed.

Implementation in process—The Department has revised its parole supervisor manual to require Department supervisors to address parole officer noncompliance with youth supervision requirements through corrective action plans. However, the Department has not outlined required time frames for supervisors to conduct their reviews or established guidance for how supervisors should document if and how they have determined that a parole officer has or has not complied with youth supervision requirements. We will further assess the Department’s revisions to and implementation of its parole supervisor manual during our 18-month followup.

3. The Department should revise and implement its parole officer manual to explain the intent and expectations for requirements for supervising youth, including how parole officers should handle any extenuating circumstances that would prevent them from meeting any youth supervision requirements.

Implementation in process—The Department has revised its parole officer manual to explain the intent and expectations for some youth supervision requirements. For example, the Department revised its parole officer manual to clarify its expectations for contacting a youth’s employer. However, the Department has not further clarified the intent and expectations for all youth supervision requirements, such as when contacting a youth’s school or behavioral health provider. Additionally, although the Department’s parole officer manual requires parole officers to document that they have notified their supervisor if they cannot meet a youth supervision requirement, the manual does not outline if or how supervisors should address these circumstances, such as making other arrangements to ensure the parole supervision requirement is met. We will further assess the Department’s revisions to and implementation of its parole officer manual during our 18-month followup.

4. The Department should provide training to parole supervisors and parole officers on any revisions to the parole supervisor and parole officer manuals.

Not yet applicable—The Department has not yet fully revised its parole supervisor and parole officer manuals to address our recommendations (see explanation for Recommendations 2 and 3). Therefore, this recommendation is not yet applicable.

5. The Department should continue to implement its revised youth work experience policy and procedures.

Implementation in process—The Department has continued to implement some of its revised youth work experience policy and procedure requirements. Specifically, we reviewed records for a random sample of 4 of 56 youth who participated in the work experience program between November 1, 2021 and July 7, 2022, and found that the Department maintained documentation demonstrating the youths’ work assignments were based on skill level and paid the youth according to its graduated compensation schedule. However, the Department did not always retain documentation to demonstrate that youth had been paid for all hours worked. Specifically, the Department reported that it has not fully implemented its policy to use electronic scanners to track when youth begin and end work because electronic scanners are not readily available in all work areas. Instead, we observed several instances in which youth work hours were recorded on a hard copy time sheet. In addition, for 2 of 4 youth we reviewed, the Department had either not retained the hard copy time sheet, or the hours recorded in the hard copy time sheet did not match the hours recorded in the section of the Department’s IT system where youths’ hours are recorded. The Department reported that it plans to revise its procedures for recording when a youth begins and ends work and train staff who monitor youth in the work area to ensure consistency in recording youths’ work hours. We will further assess the Department’s implementation of this recommendation during our 18-month followup.

6. The Department should revise and implement policies and procedures for reimbursing employees’ travel expenses, including:

- a. Conducting monthly and annual reviews of ETC charges and payments as required by SAAM.

Implementation in process—The Department has revised its policies and procedures for reimbursing employees’ travel expenses to require Department staff to monthly and annually review employee travel card (ETC) charges and payments. However, the Department’s policies and procedures lack some guidance for how to conduct these reviews, as required by the State of Arizona Accounting Manual (SAAM). For example, SAAM requires agency staff to use the State’s payment card program website to review the charges and payments of all agency cardholders on a monthly basis, but the Department has not developed procedures that include the specific steps its staff should follow when conducting these reviews, as required by SAAM. We will further assess the Department’s revisions to and implementation of its policies and procedures for reimbursing employees’ travel expenses during our 18-month followup.

- b. Conducting reviews of ETC and CTA travel reimbursement documentation to help ensure all required documents are obtained and requested reimbursement amounts comply with SAAM requirements.

Implementation in process—Although the Department revised its policies and procedures for reimbursing employees' travel expenses to include procedures for conducting reviews of ETC and CTA travel reimbursement documentation, it provided these revised policies and procedures in October 2022, after we had completed our work for this followup. Therefore, we will assess the Department's implementation of the revised policies and procedures during our 18-month followup.

- 7. The Department should revise and continue to implement its policies and procedures related to its new process for monitoring employee time entries to include detailed steps for completing this process.

Implemented at 6 months

- 8. The Department should continue to implement its written plan for implementing its newly developed IT security policies and regularly review and update the plan, as appropriate, based on progress.

Implementation in process—As of August 2022, the Department has further revised its written plan to include additional action items for implementing its newly developed IT security policies. Specifically, the written plan includes updated completion dates for action items and specifies individuals responsible for completing the action items. The Department reported that it anticipates completing all action items in its written plan by the end of calendar year 2022. We will further assess the Department's implementation of its written plan for implementing its newly developed IT security policies during our 18-month followup.

- 9. The Department should revise and implement its QA policies and procedures to ensure its quality assurance team reviews all uses of TSU over 24 hours.

Implemented at 6 months

- 10. The Department should evaluate and revise its method for measuring and reporting recidivism to further align it with additional practices recommended by literature, such as reporting youth recidivism defined as adjudication/conviction for a new crime and other recidivating events and reporting recidivism data by youth demographics, recidivism risk, and/or other factors that may provide important context.

Implemented at 6 months

- 11. The Department should modify and implement its policies and procedures to:

- a. Require Department staff to electronically record youth movement as an exclusion when youth are placed in their rooms for exclusion.

Implemented at 6 months

- b. Use the electronic exclusion data to follow up on any discrepancies between the electronic exclusion data and paper exclusion time sheets and to track information on the use of exclusion in the Facility, as needed.

Implemented in a different manner at 6 months—The Department has modified and implemented its policies and procedures to require Department staff to electronically record youth movement as an exclusion when youth are placed in their rooms for exclusion (see Recommendation 11a). Additionally, the Department reported that it no longer uses paper logbooks to record exclusions. As a result, Department housing unit staff only record youth exclusions electronically and the Department has implemented procedures for its quality assurance staff to use the electronic exclusion data to evaluate whether housing unit staff complied with the Department's exclusion policies and procedures.

Sunset Factor 3: The extent to which the Department serves the entire State rather than specific interests.

12. The Department should enhance its conflict-of-interest process to help ensure compliance with State conflict-of-interest requirements by revising and implementing its policies and procedures to:
- a. Remind its employees/public officers at least annually to complete a new disclosure form when their circumstances change, such as by requiring its employees and RSAC members to complete an annual conflict-of-interest disclosure form.
Implemented at 6 months
 - b. Require RSAC members to complete a disclosure form when they are appointed to the committee by the Department Director that includes an “affirmative no” attestation and requires disclosure of substantial decision-making interests.
Implemented at 6 months
 - c. Establish a process for remediating any disclosed conflicts of interest.
Implemented at 6 months

Sunset Factor 5: The extent to which the Department has encouraged input from the public before adopting its rules and the extent to which it has informed the public as to its actions and their expected impact on the public.

13. The Department should consult with the Solicitor General’s Office within the Attorney General’s Office to determine if RSAC is required to comply with open meeting law.
Implemented at 6 months—The Department consulted with the Solicitor General’s Office to determine if RSAC is required to comply with open meeting law. The Department reported determining that RSAC is not required to comply with open meeting law and that RSAC will no longer follow the requirements set forth in open meeting law.
14. The Department should do the following if it determines RSAC is required to comply with open meeting law:
- a. Include a disclosure on its website stating where all public meeting notices will be posted.
No longer applicable—The Department reported determining that RSAC is not required to comply with open meeting law (see explanation for Recommendation 13). Therefore, this recommendation is no longer applicable.
 - b. Develop and implement policies and procedures for complying with open meeting law, including posting meeting notices at least 24 hours prior to meetings, ensuring meeting agendas and meeting minutes contain all necessary elements, and making public meeting minutes or meeting recordings available for public inspection within 3 working days after the meeting, as required by statute.
No longer applicable—The Department reported determining that RSAC is not required to comply with open meeting law (see explanation for Recommendation 13). Therefore, this recommendation is no longer applicable.
15. The Department should discontinue actions that could lead the public to believe it is legally permitted to attend RSAC meetings, such as citing open meeting law in RSAC meeting notices, if it determines RSAC is not required to comply with open meeting law.
Implemented at 6 months

Sunset Factor 6: The extent to which the Department has been able to investigate and resolve complaints that are within its jurisdiction and the ability of the Department to timely investigate and resolve complaints within its jurisdiction.

16. The Department should follow the time frames for reviewing and resolving youth grievances outlined in its youth grievance policy and procedures.

Implemented at 6 months

17. Develop and implement a youth grievance supervisory review policy and procedures that outlines roles and responsibilities for reviewing grievances for compliance with the Department's policy and procedures and time frames for these reviews.

Implemented at 6 months

18. Continue to implement its AIR policy and procedures.

Implemented at 6 months