



Auditor General’s comments on Department response

We appreciate the Department’s response including its agreement with most of the audit findings and its plan to implement or implement in a different manner our recommendations. However, the Department’s response includes several statements that necessitate the following comments and clarifications.

1. The Department makes several statements in its response indicating its existing processes are sufficient to address and/or mitigate the deficiencies we identified in our report. In addition, the Department’s response suggests that the documentation it provided was sufficient to reflect its existing processes and that we did not review some of its processes.

We disagree that the Department’s existing processes are sufficient to address and/or mitigate the deficiencies we identified in our report and that we did not review some of its processes relevant to our findings and conclusions. Throughout our audit, on multiple occasions we discussed with Department staff the deficiencies we found, the information we had reviewed to come to our conclusions, and our recommendations for correcting the identified problems. We also fully assessed any additional information the Department provided and revised our report accordingly, including reflecting any relevant information about its existing processes in our report.

2. The Department makes the following statement related to its consistent adoption of the latest research (see Department response, page 2):

“ADJC responded to a recent study mentioned in the report about Washington State Aggression Replacement Therapy by exploring available options and working to replace our program with a more effective one.”

Although we appreciate the Department reviewing the report’s example regarding Washington State Juvenile Rehabilitation Administration’s outcome evaluation of its ART program, we are concerned the Department is not fully evaluating its own programs before taking action to modify or replace those programs. We included the Washington State Juvenile Rehabilitation Administration’s outcome evaluation of its ART program in the report as an example of how another state had assessed and determined the effectiveness of its treatment programming for its youth population rather than to suggest that ART is not an effective program for the Department’s youth population. However, the Department’s response indicates that it plans to take action and replace its ART program based on Washington State’s assessment of the ART program’s effectiveness for its population. This reported action illustrates why we recommended that the Department develop and implement a plan for establishing and tracking additional outcome measures and conducting outcome evaluations related to its treatment programming to determine its effectiveness for the Department’s youth population.

3. The Department makes the following statement related to treatment programming attendance (see Department response, pages 3 through 4):

“Fidelity refers to the degree to which the treatment program is being delivered in accordance with the guidance and parameters of the program... However, missing a treatment session is not a breach of fidelity, and youth who miss treatment sessions are provided opportunities to make these sessions up.”

We disagree with the Department’s definition of fidelity and that missing treatment sessions are not a breach of fidelity. As discussed in our report (see Finding 1, page 9), literature’s definition of fidelity

includes multiple components, including participants' exposure to the prescribed amount of treatment, such as through attendance in treatment sessions at the required frequency and duration. By not attending treatment sessions, youth may not receive treatment at the required frequency and duration and thus may not receive treatment with fidelity. Further, for some of the youth who the Department identified as having missed treatment sessions, the Department stated only that the youth had an opportunity to make up the missed sessions, not that the youth completed missed treatment sessions. Providing youth the opportunity to attend treatment sessions does not ensure youth received treatment at the required frequency and duration and thus is not sufficient to ensure youth received treatment programming with fidelity. Specifically, as noted in our report, between January through March 2020, Department Quality Assurance (QA) inspection reports we reviewed found that 3 of 10 inspected housing units repeatedly failed to provide youth with the frequency and/or duration of group treatment sessions required by Department policies during this 12-week period (see Figure 1, page 11). For example, 1 housing unit did not provide the required frequency and/or duration of group treatment sessions to between 10 and 80 percent of the youth QA staff reviewed for 7 of the 12 weeks.

4. The Department's response asserts that it adheres to "industry standards" for evaluating its treatment programming's effectiveness (see pages 2 and 7).

Although the Department's response asserts that it follows industry standards, the Department failed to identify these standards during the audit and similarly failed to do so in its response. As noted in our report, we considered recommended practices from multiple sources within the juvenile and criminal justice fields, including the U.S. Department of Justice's Office of Juvenile Justice and Delinquency Prevention, the Council of State Governments Justice Center, the Justice Research and Statistics Association, the Center for Juvenile Justice Reform, the Vera Institute of Justice, and the Crime and Justice Institute.