

YOUTH SERVICES POLICY

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| Title: Social Service Contract Monitoring | Type: D. Community Based Services Sub Type: 8. Community Placement Programs Number: D.8.1 |
| Page 1 of 6 | |
| References: La. R. S. 28:918; ACA Standards 2-CO-1C-17, 2-CO-1B-10 (Administration of Correctional Agencies), 2-7101, 2-7102, 2-7103, 2-7104, 2-7105, 2-7108, 2-7109, 2-7111, 2-7112, 2-7113, 2-7114, 2-7115 (Juvenile Probation and Aftercare Services); YS Policy Nos. A.4.1 "Contract Process", A.4.2 "Standard Operating Procedures for Contract Providers", A.4.3 "Standard Operating Procedures for Female Residential Treatment Providers" | |
| STATUS: Approved | |
| Approved By: <i>William A. Sommers, Deputy Secretary</i> | Date of Approval: 07/20/2022 |

I. AUTHORITY:

Deputy Secretary of Youth Services (YS) as contained in La. R.S. 36:405. Deviation from this policy must be approved by the Deputy Secretary

II. PURPOSE:

To establish the contract monitoring process for Community Based Services (CBS) programs within YS.

III. APPLICABILITY:

Deputy Secretary, Assistant Secretary, Undersecretary, Chief of Operations, Executive Management Advisor, General Counsel, Youth Facilities Director - Statewide, Probation and Parole Program Director, Regional Directors, CBS Program Manager, Regional Managers, and all employees of CBS.

IV. DEFINITIONS:

Case File Audit Tool – A tool utilized by the assigned contract monitor to determine contract service grid compliance on individual youth case files.

Community Based Services - Includes all regional probation and parole offices located throughout the state.

Contract Monitor – The CBS Program Specialist assigned to ensure contract compliance. (Refer to YS Policy No. D.8.1)

Contract Monitoring Tool – A comprehensive monitoring tool utilized by the assigned contract monitor to determine overall contract compliance through review of identified program areas and consolidation of Case File Audit tool data.

Juvenile Electronic Tracking System (JETS) - The centralized database utilized to track all youth under OJJ supervision or in OJJ custody and to record all case record activity.

Justice Benefits, Inc. – A company that specializes in federal entitlement programs and time studies for state and local government entities.

Local Court Contract – An agreement that allows juvenile courts to participate in the Title IV-E Federal Foster Care Reimbursement Program.

Random Sample – A sample of youth attending social service contract programs whose case files are randomly identified through the SAS database and reviewed by the assigned contract monitor during the contract monitoring process.

Program Data Report – A semi-annual report, compiled by the assigned CQIS Program Specialist, which compiles data gathered during the contract monitoring process. Program Data Reports are analyzed by executive staff for decision making purposes.

Social Service Contract – An OJJ issued contract with a community-based contractor to provide services such as non-secure residential, tracker, mentor, and/or reintegration services to youth in the custody or under the supervision of OJJ. Social service program contractors are sought and selected through the Request for Proposals process.

Title IV-E – The Federal Foster Care Reimbursement Program.

YS Central Office Executive Staff – Deputy Secretary, Assistant Secretary, Undersecretary, Chief of Operations, Youth Facilities Director - Director, Probation and Parole Program Director, Executive Management Advisor, General Counsel, and Regional Directors.

V. POLICY:

It is the Deputy Secretary's policy that the youth safely receive effective and efficient high quality services while assigned to community based treatment programs under contract with OJJ.

Safety, security, service delivery and fiscal compliance shall be continuously monitored by CBS throughout the term of the contract.

VI. PROCEDURES:

- A. Upon contract execution, each program shall be assigned a Program Risk Rating based on program type. The following guidelines are the minimum risk requirements:
 - 1. Residential programs, such as group homes and intensive residential programs shall be designated as **High** risk.
 - 2. Programs serving non-residential OJJ youth, such as tracker, mentor, and reintegration shall be designated as **Moderate** risk.
 - 3. Programs providing specialized services to OJJ youth, both residential and non-residential, and non-OJJ youth in an attempt to prevent OJJ involvement, such as counseling and diversion services shall be designated as **Low** risk.
 - 4. Local courts provide probation services to youth and receive Title IV-E funding for services rendered to youth who meet the federal funding guidelines. OJJ is responsible for semi-annual monitoring of Title IV-E eligibility determinations.
- B. Program monitoring schedules shall be based, at a minimum, upon Program Risk Ratings as follows:
 - 1. High Risk Programs shall be monitored monthly;
 - 2. Moderate Risk Programs shall be monitored bimonthly; and
 - 3. Low Risk Programs shall be monitored quarterly.
- C. At the Program Manager's discretion, or when a program is rated as "Needs Improvement" or "Noncompliant" on the Contract Monitoring Tool for two (2) consecutive monitoring visits, the program shall be monitored at a higher level of risk until all compliance deficiencies have been corrected.
- D. Annually, the Program Manager shall assign cross monitoring of High and Moderate Risk Programs. The goal is to ensure consistency in contract program monitoring.
- E. The assigned contract monitor shall be responsible for conducting all monitoring activities. Other CBS staff may assist in the monitoring process as needed.

- F. All contract monitoring activities, including site visits, sent/received correspondence, telephone calls, performance/outcome measure data reports, annual reports and correctional action plans shall be recorded/uploaded into the Contract Monitoring section of the OJJ SharePoint database by the assigned contract monitor.

VII. CONTRACT MONITORING PROCESS:

- A. The assigned contract monitor shall utilize the following methods to identify cases for review:
 - 1. For social service contract programs, the assigned contract monitor shall make a request via email to the assigned CQIS program specialist for a contract monitoring random sample based on the program risk rating described in Section VI. D. within five (5) days prior to the beginning of the monitoring month. The assigned CQIS program specialist shall submit the contract monitoring random sample to the assigned contract monitor within three (3) working days prior to the beginning of the monitoring month.
 - 2. For local court monitoring, the assigned contract monitor shall review all requests for candidacy to determine if the case is eligible for reimbursement through the Title-IV program.

In addition, twice annually, the contract monitor will audit a sample of all cases previously determined to be candidates for the Title IV-E program.

The contract monitor shall request an audit sample from Justice Benefits Inc. prior to the scheduled audit. The list shall be comprised of youth who were determined to be candidates during the period under review.

- B. The assigned contract monitor shall visit the program in accordance with the risk rating and complete a Case File Audit tool for each youth file identified in the random sample/selection.
- C. Data gathered during file review shall be consolidated and entered into the appropriate sections of the contract monitoring tool. All other sections of the contract monitoring tool shall be completed as well during the contract monitoring visit.
- D. Case File Audit Tool (CFAT) and Contract Monitoring Tool data shall be entered into the SharePoint Contract Monitoring database within five (5) working days following the monitoring/site visit. The following procedures

shall be followed when entering Case File Audit tools into the Share Point Database:

1. The assigned contract monitor shall create a folder labeled "CFAT" including the program name, monitoring month and year within the contract folder of the Share Point Contract Monitoring Database.
2. Case file audit tools completed during the monitoring month shall be saved in the appropriate "CFAT" folder.

"CFAT" folders should contain case file audit tools that correspond with the names identified in the contract monitoring random sample/selection for the monitoring month.

3. Contract monitoring data shall be entered into the "month" tab of the contract monitoring tool that corresponds with the monitoring month.
- E. All contract monitoring activities shall be memorialized in the Activity Log located in the Contract Monitoring section of the SharePoint database. The format for narrative entries shall be as follows:
1. Date of activity;
 2. Heading; and
 3. Brief narrative describing activity.

Activity Log entries for contract monitoring visits should include, at a minimum, the names of youth whose files were reviewed, a brief list of deficiencies, the name of the facility representative with whom contact was made and the program compliance score.

- F. After conducting the monitoring visit, the assigned contract monitor shall verbally notify the contractor of any area(s) of noncompliance, and may give the contractor the opportunity to correct areas of noncompliance prior to completion of the monitoring visit.
- G. Within five (5) working days, the assigned contract monitor shall follow up with a written notice, via certified mail, that identifies the remaining area(s) of noncompliance and directs the contractor to submit a plan to bring these areas into compliance with timeframe(s) for completion.
- H. Within five (5) days of receipt of the contractor's corrective action plan, the assigned contract monitor shall verify that the plan adequately addresses all areas of noncompliance within the allotted timeframe(s).

- I. The assigned contract monitor shall verify that all areas of noncompliance were corrected prior to expiration of the corrective action plan timeframe(s), and give written approval of the corrective action plan.
- J. The assigned contract monitor shall enter data from the Monthly Summary Report, submitted by each provider, into Sharepoint within 7 working days of receipt of the report.

VIII. FISCAL MONITORING:

The assigned contract monitor shall review and verify contractor invoices by the 5th day of the month following service delivery. Invoices received after the 10th day of the month following service delivery shall be reviewed within five (5) working days following receipt of the invoice.

A. Social Service Program Invoice Review and Verification

The assigned contract monitor shall do the following:

- 1. Confirm participant service dates on the invoice match service dates in JETS;
 - a. If JETS is not used to verify service dates, document the method of verification and update JETS accordingly; and
 - b. Confirm there is no per diem charged for the date of discharge.

IX. DATA ANALYSIS/VERIFICATION:

- A. Annually, and at least ninety (90) days prior to the end of the contract term, the assigned CQIS Program Specialist shall create an annual “Program Analysis Report” which compiles program performance and outcome measure data, CPC ratings and overall contract compliance scores in a “Contract Monitoring Program Analysis Report”.
- B. The “Program Analysis Report” shall be submitted to the Chief of Operations and Probation and Parole Program Director within six (6) weeks following completion of the period under review.

(Program Analysis Reports shall be uploaded to the appropriate Regional Service Area folder in the “Shared Documents” section of the SharePoint Contract Monitoring database.)

Previous Regulation/Policy Number: D.8.1

Previous Effective Date: 07/15/2021

Attachments/References: