

**STATE OF FLORIDA
DEPARTMENT OF JUVENILE JUSTICE**

**BUREAU OF MONITORING AND
QUALITY IMPROVEMENT**

Annual Compliance Report

**Juvenile Diversion Alternative Program (JDAP) C9, C10, and C18
*Bay Area Youth Services Florida***

**(Contract Provider)
801 S. Kirkman Suite 207
Orlando, Florida 32811**

Review Date(s): February 25-26, 2020



**Promoting Continuous Improvement and Accountability
in Juvenile Justice Programs and Services**



Rating Definitions

Ratings were assigned to each indicator by the review team using the following definitions:

Satisfactory Compliance	No exceptions to the requirements of the indicator; or limited, unintentional, and/or non-systemic exceptions which do not result in reduced or substandard service delivery; or systemic exceptions with corrective action already applied and demonstrated.
Limited Compliance	Systemic exceptions to the requirements of the indicator; exceptions to the requirements of the indicator which result in the interruption of service delivery; and/or typically require oversight by management to address the issues systemically.
Failed Compliance	The absence of a component(s) essential to the requirements of the indicator which typically requires immediate follow-up and response to remediate the issue and ensure service delivery.

Review Team

The Bureau of Monitoring and Quality Improvement wishes to thank the following review team members for their participation in this review, and for promoting continuous improvement and accountability in juvenile justice programs and services in Florida:

Kamille Payne, Office of Program Accountability, Lead Reviewer (Standard 1)

Melvin Guzman, Eckerd Connects, Program Manager (Standard 2)

Tamara Mahl-Adkins, Office of Program Accountability, Regional Monitor (Standard 2)

Paul Sheffer, Office of Program Accountability, Regional Monitor (Standard 2)

Program Name: Juvenile Diversion Alternative Program

MQI Program Code: 1274, 1275, 1299

Provider Name: Bay Area Youth Services Florida

Contract Number: 10433

Location: Orange, Osceola, Brevard, and Polk County / Circuit 9, 10, 18

Number of Beds: 220

Review Date(s): February 25-26, 2020

Lead Reviewer Code: 161

This review was conducted in accordance with FDJJ-2000 (Contract Management and Program Monitoring and Quality Improvement Policy and Procedures), and focused on the areas of (1) Management Accountability and (2) Assessment Services, which are included in the Juvenile Diversion Alternative Programs Standards.

Overall Rating Summary

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All indicators have been rated Satisfactory and no corrective action is needed at this time.

Standard 1: Management Accountability JDAP Rating Profile

Indicator Ratings		
Standard 1 - Management Accountability		
1.01	* Initial Background Screening	Satisfactory
1.02	Five-Year Rescreening	Satisfactory
1.03	Protective Action Response (PAR)	Non-Applicable
1.04	Pre-Service/Certification Training	Satisfactory
1.05	In-Service Training	Satisfactory
1.06	* Incident Reporting (CCC)	Satisfactory
1.07	* Abuse-Free Environment	Satisfactory

* The Department has identified certain key critical indicators. These indicators represent critical areas that require immediate attention if a program operates below Department standards. A program must therefore achieve at least a Satisfactory Compliance rating in each of these indicators. Failure to do so will result in a program alert form being completed and distributed to the appropriate program area (detention, residential, probation).

Standard 2: Assessment Services JDAP Rating Profile

Indicator Ratings		
Standard 2 - Assessment Services		
2.01	Youth Eligibility	Satisfactory
2.02	Case Assignment, Initial Contact, and Community Assessment Tool (CAT) Full Assessment	Satisfactory
2.03	Individual Service Plans	Satisfactory
2.04	*Referrals for Mental Health and Substance Abuse Assessment and Treatment Services	Satisfactory
2.05	Individual Service Plan Implementation/Supervision	Satisfactory
2.06	CAT Final Assessment	Satisfactory
2.07	Release	Satisfactory

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Program Overview

The Department contracts with Bay Area Youth Services (BAYS) Florida, to provide a Juvenile Diversion Alternative Program (JDAP) in Circuits 9, 10, and 18. The program provides diversion services to male and female youth up to age seventeen who are referred by the Department and/or the State Attorney's Office for behavior, which if committed by an adult, would be a criminal act. The provider serves youth residing in Orange, Osceola, Brevard, and Polk Counties. The program is contracted to provide ninety slots in Circuit 9, seventy-five slots in Circuit 10, and fifty-five slots in Circuit 18. The program's management team consists of one program supervisor in each circuit, one senior case manager in each circuit, one consulting clinician in each circuit, and three case managers in Circuit 9, three case managers in Circuit 10, and two case managers in Circuit 18. The program's objectives are aimed at minimizing a youth's risk to re-offend and to remain crime-free upon admission to the program, during their participation, and after completion of services provided. Youth eligibility for services includes any misdemeanor offenses, misdemeanor offenders with a prior adjudication, second time misdemeanor offenders with a prior adjudication, violent first degree misdemeanor offenders, and first time third degree felony offenders. Services are based upon the youth's individual needs, coupled with family needs to include scheduling, supervision, monitoring of compliance with court-ordered sanctions, individual, family, and group counseling, anger management, education, clinical services if warranted, along with substance abuse prevention services. The program utilizes the Community Assessment Tool (CAT) screening assessment to determine the youth's level of risk to re-offend. The assessment tool further enables the staff to accurately complete the youth's individualized services plans (ISP) objectives, goals, and time frames. At the time of the annual compliance review, the program had two vacancies, one consulting clinician and one case manager, both in Circuit 18.

Innovative and Exceptional Practices:

- All circuits: Each circuit operates an Employee Advisory Council to help connect various agencies and develop helpful resources for youth; provides classes for youth including life skills, social skills/anger management, and Step-Up Domestic Violence.
- Circuit 10: Participates in United Way "Agency Connect," community gang awareness meetings, Human Trafficking meetings, Department meetings, and Stand Up Polk meetings.
- Circuit 18: Participates in juvenile justice detention reviews, the Juvenile Justice Advisory Board Council, Brevard County Commissioners meetings, and Together in Partnership Community meetings to forge partnerships with community stakeholders.

Standard 1: Management Accountability

1.01 Initial Background Screening (Critical)	Satisfactory Compliance
<i>Background screening is conducted for all Department employees, contracted provider and grant recipient employees, volunteers, mentors, and interns with access to youth and confidential youth records. The background screening process is completed prior to hiring an employee or utilizing the services of a volunteer, mentor, or intern. An Annual Affidavit of Compliance with Level 2 Screening Standards is completed annually.</i>	

The program has a policy and procedures in place regarding the background screening of all newly hired staff. A review of the employment, volunteer, and intern roster found four staff and three interns eligible for a background screening. Each background screening was received prior to the hire date for each staff and intern. A review of each of the three interns' and four staff's personnel records found the program reviewed each staff's criminal history report, Staff Verification System (SVS) report, Florida Department of Law Enforcement (FDLE) Automated Training Management System (ATMS), and Central Communications Center (CCC) Person Involvement report prior to hire. Each of the four staff had documentation of completing and passing a pre-employment assessment tool. The interns were not required to complete a pre-employment assessment tool. None of the newly hired staff or interns required an exemption prior to working with youth and did not have a break in service indicated in the SVS.

1.02 Five-Year Rescreening	Satisfactory Compliance
<i>Background screening/resubmission is conducted for all Department employees, contracted provider and grant recipient employees, volunteers, mentors, and interns with access to youth and confidential youth records. Employees and volunteers are rescreened every five years from the initial date of employment. When a current provider staff member transitions into the Clearinghouse, the rescreen/resubmission date starts anew and is calculated by the Clearinghouse.</i>	

The program has a policy and procedures in place regarding the background rescreening of staff every five years of employment. A review of the employment, volunteer, and intern roster found the program had two staff eligible for background rescreenings, both of whom were employed in Circuit 10. Both staff completed an eligible background screenings in the Agency for Healthcare Administration (AHCA) Clearinghouse system within the required timeframe.

1.03 Protective Action Response (PAR)	Non-Applicable
<i>The program uses physical intervention techniques in accordance with Florida Administrative Code. Any time staff uses a physical intervention technique, such as countermoves, control techniques, takedowns, or application of mechanical restraints (other than for regular transports), a PAR Incident Report is completed and filed in accordance with the Florida Administrative Code.</i>	

There were no incidents requiring the use of Protective Action Response (PAR) in Circuits 9, 10, and 18 during the annual compliance review period; therefore, this indicator is rated as non-applicable.

1.04 Pre-Service/Certification Training**Satisfactory Compliance**

Contracted non-residential staff are trained in accordance with Florida Administrative Code. Contracted non-residential staff satisfies pre-service/certification requirements specified by Florida Administrative Code within 180 days of hiring.

Contracted non-residential staff who have not completed essential skills training, as defined by Florida Administrative Code, do not have any direct contact with youth.

Contracted non-residential staff who have not completed pre-service/certification training do not have direct, unsupervised contact with youth.

The program has a pre-service training plan which was submitted to the Department on December 19, 2018 and approved by the Department's Office of Staff Development and Training on February 7, 2019. A review of the program's employment roster found four staff were applicable for pre-service training requirements during the annual compliance review period, two from Circuit 9 and two from Circuit 18. Two of the staff were beyond their first 180-days of hire and were found to have the required number of hours of pre-service training. The two staff completed all required training in cardiopulmonary resuscitation (CPR), first aid, protective action response (PAR), professionalism and ethics, suicide prevention, emergency procedures, understanding youth, communication skills, supervision, changing offender behavior, mental health and substance abuse, risk and needs assessment, sexual harassment, human diversity, and gender-specific services. The other two staff were still within their first 180-days of hire; however, the staff had completed all required training except changing offender behavior and risk and needs assessment. One of the two staff came into employment with an active CPR/first aid certification; however, the certification expired February 2020 and the employee is not scheduled for the training until March 10, 2020. Documentation supports the staff is the program's consulting clinician and does not have contact with youth outside of groups in which there is always an accompanying staff member with an active CPR/first aid certification. All completed training were found in the Department's Learning Management System (SkillPro). Certifications were provided for all trainers utilized to conduct training in CPR/first aid and PAR during the annual compliance review period.

1.05 In-Service Training**Satisfactory Compliance**

Contracted non-residential staff completes in-service training in accordance with Florida Administrative Code. Contracted non-residential staff must complete twenty-four hours of annual in-service training, beginning the calendar year after the staff has completed pre-service training.

Supervisory staff shall complete eight hours of training in the areas listed below, as part of the twenty-four hours of annual in-service training.

The program has an in-service training plan which was submitted to the Department on December 19, 2018 and approved by the Department's Office of Staff Development and Training on February 7, 2019. A review of the employment roster found nine staff eligible for in-service training requirements, two of which were supervisors. Each of the nine staff completed between sixty-five and 129 hours of in-service training, including all required training in cardiopulmonary resuscitation (CPR), first aid, Protective Action Response (PAR), professionalism and ethics, suicide prevention, and active shooter. The two staff applicable for supervisory training completed eight and fourteen hours of supervisory training in leadership

and management respectively. All completed training was found in the Department's Learning Management System (SkillPro). Certifications were provided for all trainers utilized to conduct training in CPR/first aid and PAR during the annual compliance review period.

1.06 Incident Reporting (CCC) (Critical)	Satisfactory Compliance
<i>Whenever a reportable incident occurs, the program notifies the Department's Central Communications Center (CCC) within two hours of the incident, or within two hours of becoming aware of the incident.</i>	

The program had one Central Communications Center (CCC) report in each circuit for a total of three CCC reports during the annual compliance review period. Each CCC report was regarding program closure due to Hurricane Dorian and was called in within the required time period. A review of each circuit's internal incidents found the program has a tracking system for all incidents and did not have any additional incidents which should have been called into the CCC.

1.07 Abuse-Free Environment (Critical)	Satisfactory Compliance
<i>Any person who knows, or has reasonable cause to suspect, a youth is abused, abandoned, or neglected by a parent, legal custodian, caregiver, or other person responsible for the youth's welfare, as defined by Florida Statute, or a youth is in need of supervision and care and has no parent, legal custodian, or responsible adult relative immediately known and available to provide supervision and care, reports such knowledge or suspicion to the Florida Abuse Hotline.</i>	

The program has a policy and procedures in place regarding the provision for an abuse free environment for youth. The procedures specify the youth shall be allowed unhindered access to contact the Florida Abuse Hotline. The annual compliance review was held in the Circuit 9 program office and postings for the Florida Abuse Hotline and Central Communications Center (CCC) were found in the office. The program maintains a code of conduct in the employee handbook which outlines required conduct of staff and specifies violations of the code of conduct can result in disciplinary action up to and including termination. A review of personnel records for the thirteen reviewed staff found each signed an acknowledgement of the code of conduct.

Each program circuit maintains a binder to track CCC calls, Florida Abuse Hotline calls, and internal incidents. A review of each circuit's incident binder found the program tracks anytime the Florida Abuse Hotline is called. None of the circuits had any allegations of abuse against program staff reported during the annual compliance review period. A review of each circuit's incident binder and the twenty-three reviewed youth records found no incidents in which the Florida Abuse Hotline should have been called.

Standard 2: Assessment Services

2.01 Youth Eligibility	Satisfactory Compliance
<i>Youth admitted to the program meet the admission criteria defined by the provider's contract: The program shall serve male and female youth aged 17 and under at the time of referral. Admission/Eligibility criteria should include, but not limited to any misdemeanor offender and first-time felony offenders.</i>	

Twenty-three youth records were reviewed, nine from Circuit 9, eight from Circuit 10, and six from Circuit 18. Nineteen of the twenty-three records reviewed found the youth met eligibility requirements for the program. Three youth were eighteen years of age at the time of admission, and one youth had a charge which would make them ineligible for the program; however, each of the four youth was approved by the probation circuit, state attorney's office, and program to receive services.

2.02 Case Assignment, Initial Contact, and Community Assessment Tool (CAT) Full Assessment	Satisfactory Compliance
<i>The program shall ensure each youth is assigned a case manager and shall conduct a CAT Full Assessment on all youth within ten (10) calendar days (or as required by contract) of the date the provider receives the youth's complete referral packet.</i>	

Twenty-three youth records were reviewed, nine from Circuit 9, eight from Circuit 10, and six from Circuit 18. Each of the twenty-three records had documentation indicating the youth and parent/guardian signed the participation agreement at the initial meeting. Twenty-two records reflected the program completed the Community Assessment Tool (CAT) Full Assessment within the required timeframe. One CAT Full Assessment was completed ten days late; however, case notes in the Department's Juvenile Justice Information System (JJIS) documented barriers for completion of the CAT Full Assessment within the required timeframe.

2.03 Individual Service Plan	Satisfactory Compliance
<i>The results of the initial CAT Full Assessment will outline the risks and needs of the child and will assist in case planning. The "CAT Risk Report" must be viewed to determine if any of the dynamic domains have moderate-high or high-risk scores. For youth with no moderate-high or high-risk domain scores, case planning should be focused on a sixty-day schedule for program completion. For youth with any moderate-high or high-risk domain scores, case planning should be focused on a 90 to 120-day schedule for program completion addressing the specific identified needs. The program has 21 calendar days from program admission to develop the individualized service plan.</i>	

Twenty-three youth records were reviewed, nine from Circuit 9, eight from Circuit 10, and six from Circuit 18. Each of the twenty-three individual service plans (ISPs) includes identified needs and action steps which state the who, what, and when to complete the steps. Case notes in Department's Juvenile Justice Information System (JJIS) reflected each ISP was created with input from the youth and parent/guardian. Twenty-two of the twenty-three youth ISPs were completed within the required twenty-one day timeframe. One ISP was completed six days late; however, the case notes in JJIS documented the youth was receiving Marchman Act services and did not attend the scheduled meeting to complete the ISP. Twenty-one of the twenty-three records reviewed found the youth's ISP and projected program completion date matched the

Community Assessment Tool (CAT) Full Assessment risk results. One record reflected the youth required extra time in the program to complete prescribed sex offender therapy, and one record reflected the State Attorney’s Office required the youth to complete at least four months in the program.

2.04 Referrals for Mental Health and Substance Abuse Assessment and Treatment Services (Critical)	Satisfactory Compliance
<p><i>The program shall provide services based on individual youth and family needs. If needs are identified requiring a referral for services outside the program, staff ensure all referrals are made to address criminogenic needs and mental health and substance abuse service needs identified by the CAT. Staff develops a follow-up and monitoring plan for all outside referrals made as a result of program participation. “Provide” is defined as arranging/referring/brokering or actually providing the service directly to the youth and parent/guardian.</i></p>	

Twenty-three youth records were reviewed, nine from Circuit 9, eight from Circuit 10, and six from Circuit 18. Seventeen of the twenty-three reviewed records found the youth were applicable for referrals to outside mental health and substance abuse assessment and treatment services. Two of the youth records documented the youth did not engage in services as referred during the annual compliance review period, as one youth’s family never followed-up with services, and one youth’s parent/guardian refused services. Thirteen of the fifteen youth were applicable for services and the records reflected the youth were referred to the services and the program followed-up with the service provider within thirty days. One youth was referred to services; however, the follow-up was conducted six days late. The remaining youth record had documentation indicating the youth was engaged in services; however, documentation of a referral and follow-up could not be verified. Eight youth were applicable for negative reports from their service providers and the program followed-up on each of the negative reports.

2.05 Individual Service Plan Implementation/Supervision	Satisfactory Compliance
<p><i>Youth are supervised in a manner ensuring completion of the Individual Service Plan. Staff documents all case activities, including face-to-face interaction and telephone contact with the youth, parent(s)/guardian(s), and providers, and review of written or verbal reports from collateral sources, such as educational institutions, employers, counselors, electronic databases, etc. Case notes demonstrate compliance (or attempted compliance) with youth, parent/guardian, and staff action steps contained in the Individual Service Plan.</i></p>	

Twenty-three youth records were reviewed, nine from Circuit 9, eight from Circuit 10, and six from Circuit 18. Twenty of the twenty-three youth case notes in the Department’s Juvenile Justice Information System (JJIS) reflected all contacts and case activities were documented. Three youth’s case notes were missing follow-ups with the youth’s school, which were found in the case record. Twenty of the twenty-three youth case notes in JJIS documented the youth’s progress on each of the youth’s goal action steps. One youth record reflected the program did not conduct a follow-up on the youth’s completion of an anger management packet, and two records were missing progress on school. Nine youth were applicable for requiring assistance on finding places to complete community service hours and documentation was found the program assisted the youth in locating appropriate locations for community service completion.

2.06 CAT Final Assessment**Satisfactory Compliance**

A CAT Full Assessment shall be completed prior to the request for case closure. The CAT assessment shall document pre- and post-testing. No CAT reassessments during the program participation are required.

Nine youth closed records were reviewed, three from each circuit. Eight of the nine records reflected the program completed a Community Assessment Tool (CAT) Full Assessment prior to and within forty-eight hours of the request for case closure. One youth record documented the CAT Full Assessment was not completed, as the youth did not appear at the initial closure meeting and was in secure detention when the case was closed.

2.07 Release**Satisfactory Compliance**

The program releases youth upon completion of the program, or otherwise as indicated by the provider's contract.

Nine youth closed records were reviewed, three from each circuit. Each of the nine youth case records verified the admission and release dates in the record matched the Department's Juvenile Justice Information System (JJIS). Seven of the nine youth were successfully released from the program. Two youth were not successfully released, one youth was released unsuccessful, and one youth was administratively discharged. The youth's juvenile probation officer (JPO) and the State Attorney's Office were notified of each of the two youth's release in writing. Three youth required more than 120 days in the program and each of the three applicable youth's case records documented an extension was requested by the program to the chief probation officer in the circuit within the required timeframe.