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March 10, 2009

Mickey Lansing, Executive Director  
Oregon Commission on Children and Families  
530 Center Street NE, Suite 405  
Salem, Oregon 97301

Dear Ms. Lansing:

This letter summarizes the results of a survey and risk assessment process we recently completed at the Oregon Commission on Children and Families (OCCF), looking specifically at the High-Risk Juvenile Crime Prevention Grant. Through this process, we identified risks related to the Prevention Grant that we feel warrant management's attention. We have included background information, as well as potential mitigating actions the commission could take to address each risk. This summary is intended to be informational in nature and not an all-inclusive or formal presentation of audit findings or recommendations.

We appreciate the time and effort you and your staff provided as we completed this process. Should you have any question regarding this work, please feel free to contact me at (503) 986-2283.

Sincerely,  
OREGON AUDITS DIVISION

James E. Scott, MM  
Audit Manager

JES:brk

***1. Improved grant administration practices by the OCCF may provide greater assurance that High-Risk Juvenile Crime Prevention Grant funds are being spent for the most desirable service activities.***

Background

The OCCF is responsible for administering the High-Risk Juvenile Crime Prevention Grant that helps fund prevention services counties deliver. We identified the following grant administration practices that could be strengthened to better ensure that the uses of grant funds are meeting the intent of the program and maximizing available resources:

*Approval and Payment* – The OCCF appears to be approving county uses of Prevention Grant funds with inadequate information about the services to be provided. For example, statute requires a certain percentage of evidence based programs (EBP) be offered with Prevention Grant funds. However, the OCCF does not verify EBP content, methodology, or curriculum prior to approval.

Additionally, according to OCCF management, county plans for grant usage are often approved based on high-level county strategies, without the counties providing any information about the specific services to be funded. Consequently, some counties may not be identifying the services provided with Prevention Grant funds until they request reimbursement.

Further, we noted that initial reimbursements to counties are made without a comparison of OCCF approved Prevention Grant uses to the actual services for which the county is requesting reimbursement.

*Monitoring and Feedback* – Our interviews revealed that the OCCF tracks program performance only at the statewide level. The risk to the program is that while the statewide program results may indicate the overall program is doing well, there may be under-performing service providers that are not apparent in the statewide results. We also noted that information related to individual service costs was not routinely incorporated into OCCF reviews of services. Basic cost information on individual services could help identify service providers that are inefficient or ineffective.

Further, OCCF management has indicated that it provides limited feedback to counties on the results of the services the counties provide. By providing more extensive feedback, the OCCF may be able to maximize program results. For instance, the OCCF could help counties identify those service providers that are doing exceptional work so that their practices can be emulated. The OCCF could also help counties identify under-performing service providers that, with proper guidance, could provide better results.

Potential Mitigating Actions

- Review and approve county provided services prior to initial county reimbursement to ensure that Prevention Grant funds will be spent to best meet the goals of the grant.
- Ensure the development of a monitoring and feedback system to improve the delivery of services funded with the prevention grants.

***2. The reported results for the services funded by the High Risk Juvenile Crime Prevention Grant, specifically increases or decreases in youth risk factors, may not be complete and accurate.***

Background

One goal of the High-Risk Juvenile Crime Prevention Grant is to reduce risk factors in high-risk youth. The OCCF tracks this goal by comparing a risk assessment administered to a youth when he or she begins using a Prevention Grant service to a later risk assessment administered every six months or when the youth stops using the service. However, the risk assessment information must be reasonably complete and accurate in order for the performance measurement system to reflect actual service performance.

During our review, OCCF staff indicated that they did not match initial assessments to enrollment data to ensure service providers conducted a risk assessment for all participants. Without such a comparison, the OCCF may fail to detect youth who received services funded by the Prevention Grant, but did not receive a risk assessment. Moreover, in reviewing OCCF documents for the 2005-2007 biennium, we noted that the number of reassessments was significantly lower than the number of initial assessments. OCCF staff indicated that they did not check to ensure that a reassessment was conducted for each client. Although a reassessment may not always be possible, the extent of the differences we noted calls into question whether reported results provide a reasonably complete picture of the use of grant funds.

Furthermore, if risk assessments are not administered in a consistent, standardized way, an objective analysis of program performance based on risk assessments is not possible. Given the complicated nature and degree of judgment necessary to complete the assessment accurately, standardized training for risk assessors seems to be a critical control. While the OCCF has supported the development of a standardized training program for risk assessors, it has not been implemented consistently by all counties. Without the standardized training, reported changes in risk factors may be due to differences in administering the assessment rather than real changes in risk factors.

Potential Mitigating Actions

- Ensure that counties collect complete and accurate risk assessment data by:
  - periodically comparing service enrollment data to risk assessments, and initial risk assessments to re-assessments; and
  - developing a standardized training program for risk assessors and requiring all risk assessors to complete the training.
- Determine the number of reassessments that are not performed and the reasons why. Integrate those results into an evaluation of the extent to which the Prevention Grant is meeting its goal of reducing the risk factors of high-risk juveniles.
- Take steps to ensure that reassessments are performed whenever possible.

***3. The OCCF may not be receiving the policy direction and other support needed from the Juvenile Crime Prevention Advisory Committee (JCPAC) to adequately perform its grant administration duties.***

## Background

Governing documents assign the JCPAC responsibility for reviewing each county's intended use of High-Risk Juvenile Crime Prevention Grant funds incorporated in the local coordinated comprehensive plan.<sup>1</sup> The OCCF is charged with administering the Prevention Grant funds based on JCPAC's recommendations for the county's uses of the grant funds. Some of the duties assigned to JCPAC associated with this responsibility include:

- establishing and publishing criteria for reviewing and assessing local high-risk juvenile crime prevention plans;
- reviewing local high-risk juvenile crime prevention plans and making recommendations to the Governor about these plans;
- reviewing and coordinating county youth diversion plans and basic services grants with local high-risk juvenile crime prevention plans;<sup>2</sup>
- reviewing data and outcome information regarding the Prevention Grant; and
- assessing each county's high-risk juvenile crime prevention plan strategy for meeting the goal of juvenile crime reduction by evaluating it against various outcomes.

Our assessment indicates that JCPAC may not be fulfilling the duties listed above as intended. OCCF management cited budget cuts as one cause for this. However, fulfilling these responsibilities is crucial for planning and organizing service delivery efforts. The OCCF needs this support to properly administer the Prevention Grant and ensure the goals of the grant are met.

## Potential Mitigating Action

- In consultation with involved entities, either ensure that the JCPAC is fulfilling each of its duties outlined in governing documents, or decide how each JCPAC duty is to be fulfilled and align governing documents to reflect that decision.<sup>3</sup>

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<sup>1</sup> Governing documents are ORS Chapter 417 and Executive Order 98-09.

<sup>2</sup> The diversion plans, basic services grants and the high-risk juvenile crime prevention plans are state-funded grants that address different aspects of juvenile crime.

<sup>3</sup> Involved entities include the JCPAC, the Oregon Youth Authority, the Governor, the Legislature, and counties.