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Theodore R. Kulongoski
Governor

James E. Scott, MM
Audit Manager, Oregon Audits Division
Office of the Secretary of State
255 Capitol Street NE, Suite 500
Salem, OR 97310

Dear Mr. Scott:

The Oregon Commission on Children and Families (OCCF) appreciates that your office made a survey of our agency specifically as it relates to supporting the Juvenile Crime Prevention Advisory Committee (JCPAC) and administering the High-Risk Juvenile Crime Prevention (JCP) Grant.

Your risk assessment process and summary provide valuable management information. We appreciate your office identifying potential mitigating actions the commission can take to address each risk.

As we mentioned in our meetings together we welcome your review and believe the JCP program can be an excellent investment that not only reduces expensive services for offenders, but also their offenses and the victims affected by them. Your information has provided an excellent framework for a work plan that we are developing to strengthen each aspect of this program. We are providing a summary of action we have taken or will be taking to address the identified risks.

We appreciate the time and effort you and your staff took in completing this process. Should you have any question regarding our response, please feel free to contact me at (503) 378-5128.

Sincerely,


Mickey Lansing
Executive Director

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.

Approval and Payment – OCCF is working with JCPAC to develop specific criteria for information to be submitted prior to approving local uses of Prevention Grant funds. OCCF has initiated ongoing technical assistance to local commissions, juvenile departments, tribal agencies, and service providers on selection, implementation, and evaluation of appropriate evidence based practices for the target population defined by JCPAC guidelines. The OCCF is also conducting a series of training sessions during March and April to support local communities in identifying evidence based approaches that will meet the expectations of SB 267 regarding both evidence and cost effectiveness. Effective tools will be in place for state and local staff to use in monitoring services and implementation of evidence based approaches.

Local planning requirements for JCP funds will include: identifying the target youth population, and describing the processes to identify youth and evidence based interventions to be funded. The requirements will be aligned with the process for approval of reimbursements. Local requests for reimbursement will be compared to the plan approved by JCPAC.

Monitoring and Feedback – JCPAC Researcher member Kelly Dedel has been assisting the committee and staff to develop processes for tracking performance at the program level. The information will be used by the state and local communities to identify performance trends and improve results. Individual service costs will be tracked to be included in the SB 267 reporting and cost effectiveness analysis. Cost information will help the state and local communities define levels of efficiency in services.

OCCF will monitor the impact of programs on decreasing risk factors and increasing protective factors of youth receiving services. More extensive feedback will help identify service providers performing exceptional work so that their practices can be emulated.

OCCF staff meets regularly with the JCP program evaluator, NPC Research, and data base developer, 2HSystems, to identify improved ways to track key information with the goals of closely monitoring outcomes and establishing foundations for training and technical assistance. Staff is also exploring possibilities for comparisons with JJIS data to more frequently monitor offenses committed by program participants.

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.

OCCF staff is working with Kelly Dedel, NPC and several juvenile justice experts to develop a training and technical assistance plan that will ensure a complete and accurate performance measurement system. Training includes initial orientation for new county directors; ongoing and required training for staff who administer the risk assessment tool; and quarterly training in database entries. OCCF understands that risk assessments must be administered in a consistent, standardized way in order to produce an objective analysis of program performance based on risk assessments. OCCF agrees that standardized training for risk assessors is a critical control.

OCCF staff, in collaboration with NPC and H2Systems, has developed procedures for tracking enrollment, initial risk screens and reassessments for all program participants. In the process reasons emerged explaining why data reflected significantly lower numbers of reassessments compared to the number of initial assessments during 2005-2007 biennium. Reports will be developed to track and ensure that a reassessment is either conducted for each client, or a reason is documented when there is not a reassessment. These steps will lead to a more complete picture of the use of grant funds.

A technical issue in tracking reassessments during 2005-07 was also discovered. This error matching data will account for a number of reassessments that were legitimately not done. Several counties use a minimum of 3 risk domains – instead of only 2 as the minimum required by statute. Therefore, youth in some counties who had risk factors in only 2 domains were not eligible for services and for reassessments. The 2005-07 data will be updated to reflect this finding.

A data team will watch for trends through quarterly reports, such as:

- reassessment number are low, by program, staff and county
- youth are typically assessed with higher or lower risks by program, staff or county
- youth are consistently assessed at only 2 domains (screening only until eligible without completing screens)

When these conditions or other trends occur training and technical assistance will be offered on:

- developing intervention service components
- tools for local monitoring of programs

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.

The following response is provided by the JCPAC executive committee:

JCPAC will fulfill each of its duties outlined in governing documents and determine how each JCPAC duty is to be fulfilled. JCPAC acknowledges these Governing documents to include ORS Chapter 417 and Executive Order 98-09. JCPAC understands the expectation that it will coordinate its roles and responsibilities with the Oregon Youth Authority, the Governor, the Legislature, and counties.

JCPAC will take responsibility for reviewing each county's intended use of High-Risk Juvenile Crime Prevention Grant funds. JCPAC is in the process of establishing and publishing criteria for reviewing and assessing local high-risk juvenile crime prevention plans. Criteria will be clear about how the high-risk plan can be incorporated in the local coordinated comprehensive plan, but also be available as a stand alone and complete document for the JCPAC review.

JCPAC is working to clarify how OCCF will administer Prevention Grant funds based on JCPAC recommendations for the county's uses of the grant funds. Any duties that are assigned by JCPAC to be the responsibility of OCCF will be clearly delineated. JCPAC understands it has the responsibility to outline specific responsibilities for its members and staff supporting the JCPAC. JCPAC will clearly describe a process and responsibilities in the processes for the following:

- 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;
- 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.

JCPAC appreciate the review of its roles and responsibilities and intends to carry out these in a thorough and compliant manner.

This concludes the response from OCCF and JCPAC. Thank you again for your assistance in this important work.