



INTERNAL AUDIT DEPARTMENT

Audit Report on

EXECUTIVE MANAGEMENT

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Population Management

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INTERNAL AUDIT DEPARTMENT

TO: Ed Owens, Conservator
Dimitria Pope, Acting Executive Director, Texas Youth Commission

FROM: Karin Hill, Internal Audit Director

DATE: June 18, 2007

RE: Results of the Population Management Audit

Attached is our report on the Texas Youth Commission's (TYC's) audit of Population Management. This audit began in October 2006 and the majority of the analyses accomplished prior to recent changes in the agency. As a result, some of the processes and concerns discussed in this report were addressed prior to the completion of the audit. Management continues to make improvements in this area.

The objectives of this audit were to: determine the cause of delays in moving youth out of the Marlin Orientation and Assessment Unit (Marlin); and to determine whether youth are moved when they meet criteria, including movement into and out of specialized treatment programs and release from institutions.

Proper management of population is key to providing a safe and therapeutic environment for the youth in the TYC's care. Population management begins with the Centralized Placement Unit (CPU) and continues on until a youth is discharged from Parole. It includes initial placement of youth to ensure they are assigned to a facility that best meets their needs; managing specialized treatment beds and population to ensure that youth get the treatment they are required to have for release; and releasing youth from institutions when they meet criteria to avoid overcrowding and to ensure the youth are not retained in institutions when they do not represent a danger to the community.

Youth were not being moved out of the Marlin unit in a timely manner once their assessments were completed. Review of youth who entered and left Marlin during FY 2006 determined that they were staying an average of two weeks after the assessment process was concluded before being moved to their permanent location. Delaying youth movement out of Marlin was primarily done to maintain population levels at Marlin to meet the Average Daily Population performance measure. Agency management addressed this practice as a part of a project to streamline the process at Marlin and move youth through more quickly.

Many of the youth in TYC institutions have difficulties meeting the release requirements. The agency has established a variety of policies under which youth may be released. They address release for program completion, as well as the realities of over-crowding in

the institutions and that some youth will not progress through the phase system. This allows for early release of youth to manage population pressure and the release of youth who are well in excess of their Minimum Length of Stay and have not progressed. Regardless of release type, the agency requires that the youth have completed any mandatory specialized treatment and exhibit a minimum level of control over their behavior as evidenced by going at least 30 days without a major rule violation. Many of the youth reviewed were ineligible for release under any of the release policies due to an inability to meet this behavioral expectation. To ensure that the youth whose releases are being delayed due to behavior truly represent a danger if released, the agency should review the types of behavior that is considered a major rule violation so that youth are not kept in institutions unnecessarily.

Oversight of institutional population management needs to be formalized. Restrictions on placement at various institutions are not being effectively tracked and monitored. While there is a process in place for institutional superintendents to request limitations on placements to their facilities, this process is not formally documented. In most cases, the superintendents are not required to submit action plans for addressing the issues underlying the need to reduce population and management in Central Office has not been monitoring conditions to ensure placement restrictions are removed when no longer needed. At the time of the audit, Juvenile Corrections had established a formal meeting process to review institutional population data and placement restrictions. This process should be continued and refined with formal documentation required.

Specialized Treatment beds are being effectively managed to ensure that youth are placed into these programs. Because the agency has a limited number of specialized treatment beds and many youth are required to complete treatment as a condition of release, it is important that these beds are managed and that youth are moved into and out of the programs in a timely manner. The agency has developed a reporting process whereby each week staff in Treatment and Rehabilitation Services review youth who are eligible for specialized treatment and their current location. The report is used to ensure youth are moved into programs in a timely manner once they are eligible and if necessary moved between institutions to ensure they are at a location that offers the program they need. The result is that youth are moved into specialized treatment programs in a timely manner once they meet the phase requirements for program entry. Over-population and a lack of general population bed space at some institutions impact the ability to move youth out of specialized treatment programs. However, even given these constraints, youth are moved out in a timeframe that does not appear to impact the ability of the agency to move new youth into the programs. The review process developed by Treatment and Rehabilitation Services has been included as a part of the Juvenile Corrections population management meetings discussed above with staff from Treatment and Rehabilitation Services included in these meetings to specifically cover population issues related to specialized treatment.

Management concurs with the results of our work and has provided responses to the recommendations, which are included in the report. We appreciate the cooperation and assistance provided to us during our work.

This report presents the results of our audit of Population Management. There were two objectives for this audit. For each objective specific scopes and methodologies were developed. The first objective was to determine the cause of delays in moving youth out of the Marlin Orientation and Assessment Unit (Marlin). Concerns over the time to place youth were raised during the recent Assessment and Evaluation audit that were outside the scope of that audit and as a result included as an objective for this audit. To accomplish this objective we flowcharted the placement and transportation processes, evaluated workflow at Marlin from the completion of the CCF-004 – Initial Placement Form, through transport to the receiving institution, and evaluated the impact of moratoriums and limitations on placing youth. The scope for this objective included youth who either entered or left Marlin during fiscal year 2006.

The second objective was to determine whether youth are moved when they meet criteria. This included both moving youth into and out of specialized treatment as well as releasing youth from institutions. To accomplish this objective we reviewed youth information from the Correctional Care System (CCS) to determine release eligibility and time to release and information on youth with high priority for specialized treatment to determine time to place them into and release them from specialized treatment programs. The scope for this objective included youth who were in institutions during fiscal year 2006 whose Minimum Length of Stay (MLOS) date was prior to September 1, 2006, and youth in institutions during that same time period who were priority 1 for any specialized treatment program.

This audit was conducted in accordance with the *International Standards for the Professional Practice of Internal Auditing* and with *Generally Accepted Government Auditing Standards*.

Proper management of population is key to providing a safe and therapeutic environment for the youth in the Texas Youth Commission's (TYC) care. Population management begins with the Centralized Placement Unit (CPU) and continues on until a youth is discharged from parole. It includes initial placement of youth to ensure they are placed in the facility that best meets their needs; managing specialized treatment beds and population to ensure that youth get the treatment they are required to have for release; and releasing youth from institutions when they meet criteria to avoid overcrowding and to ensure the youth are not retained in institutions when they do not represent a danger to the community.

Some youth were retained at Marlin after their assessments were completed to meet the Average Daily Population performance measure for that facility.

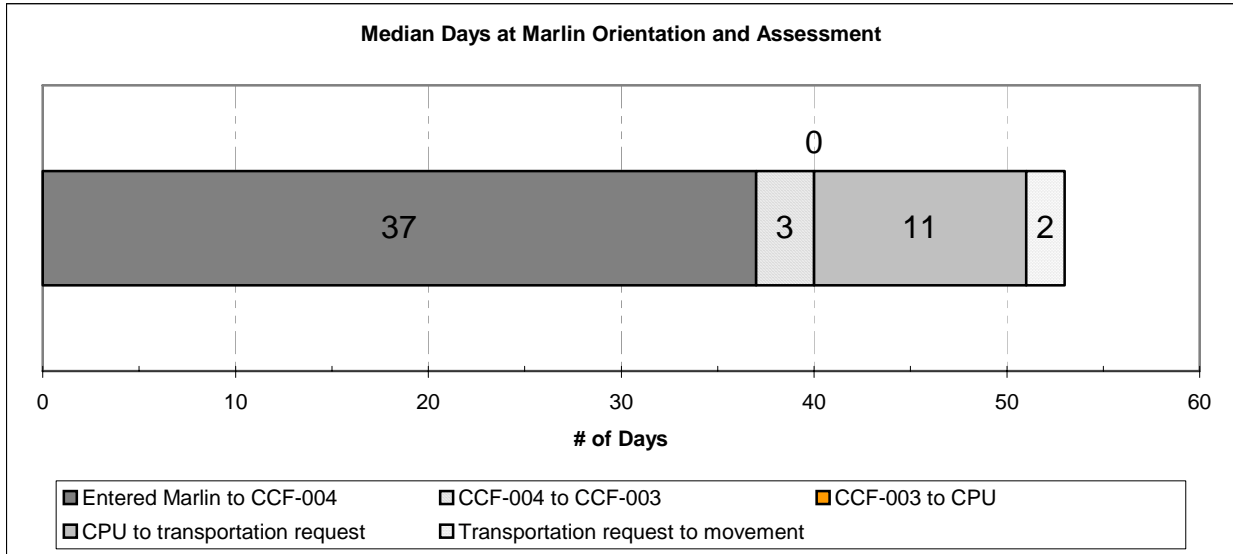
Completing the assessment and placement processes in a timely manner ensures that youth move on to their permanent placement more quickly, allowing them more time to connect with and develop a therapeutic relationship with the staff that will be working with them during their time at TYC. Because youth are not allowed to progress past Phase 1 of Resocialization[®] while at Marlin, any excess time they spend at that facility can delay progress through treatment. Delays in placement can also increase the Average Daily Population (ADP) at Marlin, potentially impacting their ability to keep the assessment process moving.

The agency has developed a process for assessing youth needs and placing them in institutions based on those needs. The agency has implemented a process for assessing and placing youth that is intended to keep them at Marlin for no more than 45 days. For approximately the first month of their stay, the youth go through a battery of tests including educational, psychological, and chemical dependency screenings as well as a detailed history all aimed at determining the youth's needs. Once the evaluations are complete, the youth's Assessment Case Manager summarizes the results and assigns a risk score based on the youth's history and behavior at Marlin on the CCF-004 – Initial Placement form. Once this is completed, the Psychology Department completes the CCF-003 – Priority Placement for Specialized Treatment, which documents any psychological diagnoses the youth may have; determines the youth's priority level for the agency's specialized treatment programs; and determines which takes priority for youth with multiple specialized needs.

Upon completion of the CCF-003, the CPU reviews the youth's file and determines which facility to place youth at based on institutional population and the youth's needs and forwards the youth's name and destination to the Statewide Transportation Unit to be scheduled for transport. Under the current system, requests for transportation are made by the CPU and the weekly transportation schedule completed on Mondays and youth are transported Tuesday through Friday.

The time from when the Centralized Placement Unit receives the file to requesting transportation accounts for most of the delay in moving youth to their initial placement. To ensure files are reviewed in time to request transportation on Monday mornings, the CPU has set a deadline of 3:30 p.m. on Wednesday afternoon for youth files to be submitted for review to move the youth the following week. Files are reviewed by CPU staff as they arrive to determine whether youth are eligible for bootcamp and to identify those with specialized treatment needs and the CPU Administrator reviews the youths' information and finalizes placement decisions on Thursday and Friday.

However, analysis of timelines for youth transportation from Marlin in fiscal year 2006 identified that the median number of days from the completion of the CCF-004 to transporting the youth to their next location was 16 days. Eleven of which were spent in the CPU.



Source: Internal Audit Analysis, 2007

Not only is this excessive, it is not in line with timelines described by CPU staff for review of youth files. According to the current process, files they receive on Monday through Wednesday should be forwarded to the Statewide Transportation Unit for movement the following week (5 to 7 days). For files received after the Wednesday deadline - Thursday or Friday - this increases to 10 to 11 days. Analysis of files received by the CPU in fiscal year 2006 identified that just over 80 percent are received between Monday and Wednesday. If the process described by the CPU was working as intended, these youth would be moved much more quickly than currently achieved. Further analysis identified that 57 percent of files received on Monday through Wednesday were not sent to Statewide Transportation for movement within 5 to 7 days, but were held until the following Monday – 12 to 14 days after the CPU received the file.

Follow-up with CPU staff indicated that for much of 2006 the placement process was being utilized to help keep Marlin’s ADP close to budget. Rather than moving youth out of Marlin the week after their assessments were complete, many youth were being held an additional week to balance Marlin’s population. While the CPU was prioritizing those youth who had been at Marlin the longest for movement, holding up movement of other youth impacted their overall time spent at Marlin and may have delayed their progress in correctional therapy. Analysis of the number of files reviewed by CPU staff, Marlin’s population, and intake and transport numbers suggests this to be true. In July 2006 this practice was changed as agency management emphasized moving youth through Marlin more quickly – aiming for them to spend no more than 45 days at Marlin to include the time to transport them.

While they make placement a challenge, moratoriums and placement limitations do not delay assignment decisions. Moratoriums are population caps that limit the number of youth that can be housed at an institution to a number lower than the budgeted population. Placement limitations constrain placement of specific types of youth, for example temporarily not placing youth with a particular specialized treatment need at an institution that has more of that type of youth than it has bed space for in its specialized programs.

While the CPU moves youth regardless of moratoriums or placement limitations, they attempt to work around both in making the placement decisions for youth coming out of Marlin. Their goal is to place youth at facilities that meet their needs and that also have open bed space. However, if the youth needs to go to a specific institution for services that are not available elsewhere, the CPU places them at that facility even if it is on moratorium.

Most youth do not meet programming requirements for release.

Youth may be released from institutions under a variety of circumstances – for successful completion of program, for population management, or if they have not completed the program and are well past their Minimum Length of Stay (MLOS). In each case the youth must have completed required specialized treatment (or had the requirement waived). For successful completion or youth who are being released under the Maximum Length of Stay policy, there are also requirements for how long the youth must have gone without a serious rule violation. These requirements are in place to ensure that youth are able to control their behavior upon release; however, they can also result in keeping youth in institutions past their MLOS.

The agency has established minimum requirements for successful completion of program.

Youth are considered to have successfully completed the TYC program and are eligible for release when they have achieved Phase 4 of Resocialization[®], gone 90 days without a major rule violation, and completed required specialized treatment. The majority of youth we reviewed did not yet meet the criteria for release for successful program completion. In some instances the youth had not yet begun specialized treatment. A variety of factors can impact the ability to place youth into specialized treatment, including limited bed space in the programs and the youth not meeting the phase-based requirements to enter the program. Though the phase requirements to begin specialized treatment are low, youth still must meet them to begin treatment and for some youth controlling their behavior to achieve the required phase may be difficult. This issue does not just affect entry into specialized treatment as many youth are removed from treatment due to behavior problems and have to subsequently work their way into the program again. Many youth also have difficulty meeting the behavior-related release criteria, particularly the requirement to go 90 days without a major rule violation. Most of the youth in institutions during fiscal year 2006 did not meet these release criteria – either they had never achieved Phase 4 of Resocialization[®], had not completed required specialized treatment, or they had been unable to maintain their behavior for 90 days. However, for those youth who did meet the criteria, they were released in a timely manner.

The Maximum Length of Stay policy was developed to release youth who are not able to achieve Phase 4 of Resocialization[®]. To be eligible for this type of release youth must be between four months and one year past their MLOS depending on their phase, have completed any required specialized treatment, and gone one month without a major rule violation. This policy is in place to release youth who have not progressed through the program over an extended period of time and have not shown evidence that they are likely to do so. One documentation requirement before the agency can release youth is to notify the committing judge at least 15 days prior to release. Review of youth released under the Maximum Length of Stay

(LOS) release criteria determined that they are usually released in around 15 days. While the notification process could be started sooner to reduce the time to release the youth, this might not always be feasible given the behavior problems of these youth that have contributed to their lack of progress and often impact their release eligibility. While 18percent of the youth in our review were far enough past their MLOS to meet the time requirements for a Maximum LOS release, 30 percent of them could not be released under this policy due either to not completing specialized treatment, or more often because they had not gone 30 days without a major rule violation.

As behavior often keeps youth in institutions past their Minimum Length of Stay, which type of behavior delays their release should be reviewed. As discussed earlier, youth must refrain from committing a serious rule violation for established timeframes prior to their release. Analysis identified that 70 percent of youth remain in institutions at least 30 days past their MLOS, with many well in excess of that because of their behavior.

Not all rule violations result in a youth remaining in an institution past his MLOS. Rule violations are separated into two categories. Category 1s are more serious rule violations, generally involving harm to staff or youth and Category 2s are considered less serious and include infractions such as failure to follow instructions, failure to abide by the dress code, contraband that is not drugs or weapons, and other less serious offenses. Category 1 rule violations are considered more severe and therefore affect a youth’s time at TYC. However, review of Category 1 rules identified instances where inconsistent interpretation and application of the rule could result in youth inappropriately being retained. For example, assaulting a staff member or other youth, swinging at them and missing, and threatening to harm someone are all considered Category 1 rule violations. However, while committing an assault is a clear rule violation that can indicate a youth’s inability to control himself, threatening to “beat down” a staff member or balling up fists with no physical action taken is not as clear cut, and in fact could be considered a level of control by not following through with an assault. This type of variation in what is classified as a Category 1 rule violation combined with poor documentation in some incident reports may make it difficult to justify keeping youth in the institutions in some instances. Consistent classification of incidents and a review of what is considered a Category 1 offense to ensure that they truly reflect behavior that makes the youth a danger to the community are needed to ensure that youth are not necessarily kept in excess of their MLOS.

Oversight of institutional population management needs to be formalized.

Good population management practices are important in ensuring a safe and therapeutic environment. When population is not well managed, it can result in over-crowding at some institutions, which in turn results in poor staff-to-youth ratios and a potentially unsafe environment for staff and youth. Inadequate population management can also result in releasing youth who may not be ready as a means of relieving population pressure at the institutions. This impacts dorm culture and safety as staff have to work with and try to maintain control over a higher percentage of lower phase youth who often present behavior problems.

Moratoriums should be monitored to ensure that field managers address their causes.

Moratoriums are caps placed on institutional population. Moratoriums are put in place when circumstances dictate that an institution cannot run safely or effectively at its budgeted capacity. They may be the result of such issues as severe staffing shortages or the need to close dorms for repairs. To obtain a moratorium, the facility superintendent must submit a request to their Director of Juvenile Corrections explaining the reasons for needing the moratorium. The Director takes the request to the Assistant Deputy Executive Director of Juvenile Corrections for approval and it is submitted for final approval to the Executive Director.

While some superintendents have been required to submit a corrective action plan outlining steps to address the causes underlying the moratorium request, this has not been a consistent requirement and documentation was not available for any of those in effect in fiscal year 2006. Moratoriums had a significant impact on institutional population in 2006, during which 13 of the 15 institutions had a placement moratorium – seven of them for ten or more months of the year. This resulted in an average of almost 200 beds per month that were budgeted but could not be used, requiring some facilities to operate over-populated. Review of ADP and moratoriums throughout fiscal year 2006 identified that in the absence of moratoriums, over-populating facilities would not have been necessary. By addressing the underlying causes of moratoriums and decreasing the need for them, the agency could reduce overpopulation and the need to release youth early to control population.

When institutional population significantly exceeds capacity, the agency has to release lower phase youth for population management. These releases are referred to as population control releases. Criteria for these releases are found in GAP 85.45 – Movement Without Program Completion. Youth must have completed any required specialized treatment, must be at least at Phase 3 of Resocialization[®], and must have completed their MLOS. The most serious offenders (Sentenced Offenders, Violent A Offenders, and Violent B Offenders who were adjudicated for manslaughter, criminally negligent homicide, or intoxication manslaughter) are not eligible for population control releases. Superintendents may begin population control releases when their facility is at three percent over its budgeted population and must conduct population control releases at five percent over.

Most of the agency's institutions suffered from overpopulation during FY 2006. Eleven of the 15 institutions used population control releases at some point during the year, with eight of the institutions on population control for at least 10 of the 12 months. Of youth released to parole in fiscal years 2005 and 2006, one-third were released for population control.

Youth at Phase 4 of Resocialization[®] who had not met the behavior requirements for successful completion of program as well as Phase 3 youth are released when institutions release for population management. Release of a large number of higher phase youth has an impact on institutional culture as these are youth who are expected to have established themselves as leaders on the dorm. It leaves lower phase youth without youth role models who understand the group process and can help them with their behavior and thinking errors. It also leaves the staff to supervise a higher percentage of lower phase youth who are likely to exhibit more severe

behavior problems, putting both staff and youth at greater risk.

Management has recently begun an initiative to more closely monitor and manage population. The Juvenile Corrections Division has spearheaded a process where Corrections staff, along with staff from Rehabilitation Services and Research as needed, meet on a bi-weekly basis to review population. The broad purpose of the group is to determine if the right numbers, of appropriate youth are in the various locations based on bed space and the availability of special treatment programs and to monitor where youth are located to determine if the process is working to place them in the appropriate facility. If necessary, this group can change the placement criteria and move youth between facilities.

As a part of this process, the group reviews the weekly report from the CPU that lists the current moratoriums and placement limitations. As a result of these reviews, Juvenile Corrections anticipates that they will be more involved in the future in ensuring that moratoriums and placement limitations are only used when needed and that they are monitored to ensure that steps are taken to remove them when they are no longer needed.

One area that needs to be specifically addressed at these population management meetings is documentation of moratoriums and placement limitations. Historically, institutions have not been required to formally document the reasons for requesting moratoriums or placement limitations. While in some cases, corrective action plans have been required for addressing the underlying issues causing the need, this has not always been the case. Juvenile Corrections has noted that one result of the population management meetings may be requirements for documenting the reasons for moratoriums, the criteria for them ending, and any action the institution will be required to take to address the cause of moratorium. This type of formal documentation and ongoing monitoring is needed to ensure that moratoriums and placement limitations are only used when and for as long as they are needed.

In addition to reviewing the CPU report, the members of this group are developing a new population management report that combines information from several reports into a single, more useful format. This report will be used to monitor current population in all programs, identify areas that may be overcrowded or underutilized, and adjust placement criteria on an ongoing or temporary basis to correct any imbalance. It will also include information on release eligible youth, and will list youth who have been in specialized treatment for an “excessive” amount of time to help manage specialized populations. It is currently in the development stages and is not expected to be completed until the summer of 2007.

Specialized Treatment beds are being effectively managed.

For each youth who enters TYC, the assessment process includes a determination of whether the youth has a need for specialized treatment for Chemical Dependency, Sexual Behavior, or Capital and Serious Violent Offender treatment. Youth with the most serious need for these programs are classified as Priority 1 and are required to complete the relevant specialized treatment program as a condition of being released. Because the agency has limited bed space to

treat these youth, it is important that these beds are managed and their use maximized to ensure that youth who are required to have treatment can get into the programs in a timely manner.

Management has developed and utilizes a tool for tracking youth required to complete specialized treatment to ensure they are placed when they meet criteria. Because specialized treatment beds are limited and many youth are required to complete treatment as a condition of release, the agency requires a means of tracking youth to ensure that specialized treatment beds are being utilized as effectively as possible. To accomplish this the agency developed a report that lists all Priority 1 youth and whether they are eligible for entry into specialized treatment at the current time. The report also lists youth by institution so management can see whether they have a youth who is eligible who may need to be transferred to another facility to receive treatment.

This report is generated on a weekly basis and reviewed by staff in Treatment and Rehabilitation Services to get information on individual programs as well as an agency-wide view of utilization of program beds. The length of the waiting list at different facilities is reviewed to see if youth need to be moved to other locations. Conversely, if there are open beds in a program, but no youth who are eligible, staff can also choose to waive some of the entry requirements to get youth moved into the programs. Rehabilitation Services staff bring this information to the bi-weekly population management meetings conducted by Juvenile Corrections to ensure that issues specific to managing bed space at institutions with specialized treatment are considered and addressed.

Once youth meet criteria, they are moved into specialized treatment in a timely manner. For youth to be moved into specialized treatment, several factors must be in place. Youth must meet the phase requirements for entry into the program and while these are low, they require that the youth achieve some control of their behavior. There must also be an empty bed in the treatment program or a youth who is completing the program who can be moved out.

Moving youth out of the program is complicated by the over-population discussed earlier in this report. Over-crowding at institutions with specialized treatment makes it difficult to find beds in their general population dorms to move youth coming out of specialized treatment into. For the Capital Offender program, youth move through the program as a group so that youth who are Priority 1 for this program must also wait for the next cohort to start the program. Analysis of youth placed in specialized treatment during fiscal year 2006 determined that youth are placed into specialized treatment between 13 and 16 days after they meet the phase requirements depending on the program, even given the constraints just discussed.

Most youth are being moved out of specialized treatment in a timeframe that does not impact the ability to move youth into the programs. Once youth have successfully completed specialized treatment it is important to move them out in a timely manner so that another youth can begin treatment. Before a youth who has completed specialized treatment can be moved to another dorm, he must go through a Phase Assessment Team (PAT) meeting and the Special Services Committee (SSC). Youth are scheduled for review by the PAT every 28 days. This review generally covers the youth's phase progress in Resocialization[®]. For youth to be released

from specialized treatment for successful completion, the PAT must ensure that the youth has completed all of the program requirements, that they have internalized the program, and that they are phase appropriate. The youth must then meet with the SSC for further confirmation that they have met the program completion criteria and to determine which dorm they will be moved to. Analysis of youth who successfully completed specialized treatment during fiscal year 2006 determined that it took between 20 and 25 days to move youth out of the Chemical Dependency and Sexual Behavior treatment programs. With the time required to complete the PAT and SSC processes, these times are not considered excessive. In addition, they do not appear to be delaying youth being placed into the programs as evidenced by the time it takes to move youth into specialized treatment.

The number of days to move youth was considerably higher for the cohort reviewed from the Capital and Serious Violent Offender Treatment Program (CSVOTP) at over 90 calendar days. This issue was identified by Treatment and Case Management during their 2006 program review and a corrective action plan was required. The Giddings State School, where this specialized treatment program is operated, was informed that they should not be keeping youth on the that dorm after they had completed the program unless they were in the middle of the release process and would be moved out of the institution soon. Reasons identified for the delay in moving youth out included a lack of beds to move them into on the Giddings campus and a lack of eligible youth to move into the program to replace them. The Capital Offender program for boys was reduced from two dorms to one due to a lack of trained clinical staff and in the process opened up a dorm of general beds to move youth into after they had completed CSVOTP. Completion of the corrective action plan was recently verified and youth should now be moving out of this program in a timelier manner.

Youth may also be moved out of specialized treatment without completing the program. Youth may be removed from specialized treatment for behavior problems (such as assaulting staff and other youth) or for prolonged lack of progress, though this is only to be done after multiple interventions have been tried and failed. The decision to move the youth out of specialized treatment involves both the PAT and the SSC, which adds time to the process for moving the youth. For a sample of youth who were removed from treatment for unsuccessful completion, the median time to move the youth out to another dorm was eight days. By moving these youth in the timely manner, the agency is freeing up bed space for other youth who are eligible and need to complete specialized treatment before release.

RECOMMENDATION	MGT RESPONSE CURRENT STATUS PROJ. COMPLETION DATE
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<p>1. To ensure that the most serious rule violations are applied in a fair and consistent manner, the Assistant Deputy Executive Director for Juvenile Corrections should coordinate a team to review what is considered a Category 1 rule violation and redefine as necessary to ensure that the criteria are objective and serious enough to warrant continued incarceration.</p>	<p style="text-align: center;">CONCUR Underway August 31, 2007</p> <p>As part of the agency's reform, rule violations and their impact on the youth are being reviewed and revised as necessary.</p>
<p>2. To ensure that the moratorium process is being managed to minimize the impact on population at other institutions, the Assistant Deputy Executive Director for Juvenile Corrections should establish policies and procedures for requesting moratoriums and monitoring progress in addressing the reasons the moratoriums were requested.</p>	<p style="text-align: center;">CONCUR Planned August 31, 2007</p> <p>It is not anticipated that moratoriums will be needed as often with the decreased youth population. However, specific processes for requesting and monitoring moratoriums will be developed for future needs.</p>

PLANNED: Management concurs with the recommendation but actual implementation of the recommendation has not begun.

UNDERWAY: The implementation process of the recommendation has been started.

IMPLEMENTED: All new procedures, policies, systems, processes, related documents, and other elements relevant to the audit recommendation have been prepared, approved, and put into operation.

UNABLE TO IMPLEMENT: Management concurs with the recommendation; however, due to resource constraints and competing priorities is not able to implement or can only partially implement the recommendation.