

The October 2021 Arizona Department of Juvenile Corrections sunset review was the final of 3 audit reports of the Department we issued as part of the Department’s sunset review. The first performance audit determined whether the Department’s use of temporary stabilization units for delinquent youth committed to its care is consistent with Department policies and best practices for rehabilitating delinquent youth, and the second audit evaluated whether the Department had assessed fidelity for some treatment intervention components, implemented some treatment programming recommended improvements, and tracked a comprehensive set of outcome measures for its treatment programming.¹

For this third audit, the October 2021 Arizona Department of Juvenile Corrections sunset review, we found that the Department has established processes for the statutory responsibilities we reviewed, including assessing youths’ educational needs, but had deficiencies in some processes, including not always following its requirements for supervising youth on parole and not ensuring that youth in its work incentive program were paid as required by statute. We made 23 recommendations to the Department, and its status in implementing the recommendations is as follows:

Status of 23 recommendations

Implemented	14
Implemented in a different manner	1
In process	3
No longer applicable	3
Not implemented	2

We will conduct a 48-month followup with the Department on the status of the recommendations that have not yet been implemented.

Sunset Factor 2: The extent to which the Department has met its statutory objective and purpose and the efficiency with which it has operated.

1. The Department should ensure that parole officers are following parole supervision requirements.

Implementation in process—Although the Department has established a process to help ensure that parole officers are following parole supervision requirements, its parole supervisors have not consistently adhered to this process. Specifically, the parole supervisor manual requires Department supervisors to address parole officer noncompliance with youth supervision requirements through corrective action plans. Our review of all 21 instances between July 2022 to September 2023 in which supervisors identified noncompliance found that 20 instances had a corresponding action plan that included details related to the nature of the noncompliance, the date it was assigned for corrective action, and the due date for the corrective action, as required by the parole officer manual. However, 9 of 20 action plans did not include a completion date, and 11 of 20 action plans did not document how the parole officer and supervisor resolved the incident, inconsistent with the parole supervisor manual. Finally, for 1 of 21 instances, the supervisor did not prepare an action plan to address the noncompliance. We will further assess the Department’s implementation of this recommendation during our 48-month followup.

¹ For more information on the other performance audits we issued as part of the Department’s sunset review, including any applicable follow-up reports, see [Report 21-104](#) and [Report 21-121](#).

2. The Department should revise and implement its parole supervisor manual to include a process for reviewing parole officers' compliance with requirements for supervising youth, including outlining procedures and time frames for conducting reviews, documentation requirements, and how noncompliance should be addressed.

Not implemented—The Department has not made further progress toward implementing this recommendation since the initial followup. Specifically, as we reported in the initial followup, the Department had revised its parole supervisor manual to require Department supervisors to address parole officer noncompliance with youth supervision requirements through corrective action plans. However, since the initial followup, it has not further revised its parole supervisor and parole officer manual to include our recommended guidance, such as outlining required time frames for supervisors to conduct their reviews and establishing guidance for how supervisors should document if and how parole officers have complied with youth supervision requirements. We will assess the Department's continued development and implementation of its parole supervisor manual during our 48-month followup.

3. The Department should revise and implement its parole officer manual to explain the intent and expectations for requirements for supervising youth, including how parole officers should handle any extenuating circumstances that would prevent them from meeting any youth supervision requirements.

Implementation in process—The Department has further revised its expectations and requirements for supervising youth in its parole officer manual since the initial followup. For example, the Department revised the parole officer manual to include specific time frames in which parole officers should contact all associated service providers for a youth, including contacting education providers to verify enrollment and attendance monthly. However, the Department still has not made further revisions to its parole officer manual to explain the intent and expectations for parole supervisors when addressing extenuating circumstances, such as making other arrangements to ensure the parole supervision requirement is met. We will continue to assess the Department's implementation of this recommendation during our 48-month followup.

4. The Department should provide training to parole supervisors and parole officers on any revisions to the parole supervisor and parole officer manuals.

Not implemented—Although the Department has made some revisions to its parole supervisor and parole officer manuals consistent with our recommendations, it has not trained its parole supervisors and officers on these revisions. Instead, the Department provided an email showing that it requested parole supervisors and parole officers to sign the cover page of the revised manuals to indicate that they are aware they can access the manual and the manual's requirements. Additionally, the Department provided documentation demonstrating that parole supervisors and officers signed the revised manuals' cover pages. However, without receiving training on the specific revisions the Department made to the manuals, parole supervisors and parole officers may not fully understand the revisions and any related requirements. For example, as discussed in Recommendation 1, the Department's parole supervisors have not consistently adhered to its process for addressing parole officer noncompliance. Finally, the Department has not yet fully revised and implemented its manuals consistent with Recommendations 2 and 3 and therefore is not yet able to provide training in areas such as how parole supervisors should document if and how parole officers have complied with youth supervision requirements. We will continue to assess the Department's implementation of this recommendation during our 48-month followup.

5. The Department should continue to implement its revised youth work experience policy and procedures.

Implemented at 36 months—The Department has revised its policies to explain the expectations and responsibilities for supervisors and their role in the review process for time cards in the youth work experience program. Specifically, the revised policy requires that the program be overseen by a Juvenile Work Program Administrator and that the Department use a wristband electronic scanning system to track when youth begin and end a work shift by scanning each youth's wristband upon arrival and departure. Additionally, youth are required to review their time card for accuracy and digitally sign the time card at the end of each pay period. Finally, Department staff are required to review the time card for accuracy, digitally sign it, then submit it into the Department's electronic banking system. Our August 2024 observation found that the Department staff implemented its revised youth work experience policies and procedures to help ensure that youth are accurately paid for the time they work and that it had hired a Juvenile Work Program Administrator to oversee the program.

We also observed a random sample of 2 youths electronically clocking in and out for their work assignment and reviewed these youths' time cards for the 2 preceding pay periods and found that the youths signed their time cards verifying they were accurately paid for the time worked.

6. The Department should revise and implement policies and procedures for reimbursing employees' travel expenses, including:
 - a. Conducting monthly and annual reviews of employee travel card (ETC) charges and payments as required by SAAM.

No longer applicable—As of July 2024, the Department had deactivated all its ETCs and reported that it does not plan to issue ETCs to its staff in the future.

- b. Conducting reviews of ETC and CTA travel reimbursement documentation to help ensure all required documents are obtained and requested reimbursement amounts comply with SAAM requirements.

Implemented at 36 months—As indicated in our initial followup, the Department revised its policies and procedures for reimbursing employees' travel expenses to include procedures for conducting reviews of ETC and CTA travel reimbursement documentation. Our review of travel reimbursement documentation, including travel claims, submitted by 6 Department employees who attended an out-of-State conference in July 2023 found that these employees submitted, and the Department reviewed and approved, all documentation required by Department policies and procedures and the SAAM prior to reimbursing these employees' travel expenses.²

Additionally, consistent with the SAAM, Department policy requires its staff to obtain approval from the State Comptroller to pay for conference lodging rates that exceed the lowest single-occupancy lodging rate listed in the applicable conference brochure. The Department provided documentation demonstrating that the lodging rates for conferences attended by its employees were the lowest single-occupancy lodging rates available according to official conference documentation and that it did not need to obtain approval from the State Comptroller.

7. The Department should revise and continue to implement its policies and procedures related to its new process for monitoring employee time entries to include detailed steps for completing this process.

Implemented at 6 months

8. The Department should continue to implement its written plan for implementing its newly developed IT security policies and regularly review and update the plan, as appropriate, based on progress.

Implementation in process—The Department has developed and is implementing a detailed written plan and tracker for implementing its IT security policies. During the initial followup, the Department reported that it anticipated completing all action items in its written plan by the end of calendar year 2022. According to the Department's tracker, as of October 2024, it was still in process of completing 1 of 55 action items in its written plan and indicated that the final action item will be completed by December 2024. The Department attributed the delay in completing these action items to an oversight on its part. We will further assess the Department's implementation of its written plan and completion of its various action items during our 48-month followup.

9. The Department should revise and implement its QA policies and procedures to ensure its quality assurance team reviews all uses of TSU over 24 hours.

Implemented at 6 months

10. The Department should evaluate and revise its method for measuring and reporting recidivism to further align it with additional practices recommended by literature, such as reporting youth recidivism defined as

² Although our review found that 2 of 6 employees did not submit their travel reimbursement documentation within 5 days after travel as required by Department policy, the late submissions did not prevent the Department from processing these travel claims within the time frame required by SAAM. The 2 employees submitted the documentation 6 and 9 days after travel.

adjudication/conviction for a new crime and other recidivating events and reporting recidivism data by youth demographics, recidivism risk, and/or other factors that may provide important context.

Implemented at 6 months

11. The Department should modify and implement its policies and procedures to:

- a. Require Department staff to electronically record youth movement as an exclusion when youth are placed in their rooms for exclusion.

Implemented at 6 months

- b. Use the electronic exclusion data to follow up on any discrepancies between the electronic exclusion data and paper exclusion time sheets and to track information on the use of exclusion in the Facility, as needed.

Implemented in a different manner at 6 months—The Department has modified and implemented its policies and procedures to require Department staff to electronically record youth movement as an exclusion when youth are placed in their rooms for exclusion (see Recommendation 11a). Additionally, the Department reported that it no longer uses paper logbooks to record exclusions. As a result, Department housing unit staff only record youth exclusions electronically, and the Department has implemented procedures for its quality assurance staff to use the electronic exclusion data to evaluate whether housing unit staff complied with the Department’s exclusion policies and procedures.

Sunset Factor 3: The extent to which the Department serves the entire State rather than specific interests.

12. The Department should enhance its conflict-of-interest process to help ensure compliance with State conflict-of-interest requirements by revising and implementing its policies and procedures to:

- a. Remind its employees/public officers at least annually to complete a new disclosure form when their circumstances change, such as by requiring its employees and RSAC members to complete an annual conflict-of-interest disclosure form.

Implemented at 6 months

- b. Require RSAC members to complete a disclosure form when they are appointed to the committee by the Department Director that includes an “affirmative no” attestation and requires disclosure of substantial decision-making interests.

Implemented at 6 months

- c. Establish a process for remediating any disclosed conflicts of interest.

Implemented at 6 months

Sunset Factor 5: The extent to which the Department has encouraged input from the public before adopting its rules and the extent to which it has informed the public as to its actions and their expected impact on the public.

13. The Department should consult with the Solicitor General’s Office within the Attorney General’s Office to determine if RSAC is required to comply with open meeting law.

Implemented at 6 months—The Department consulted with the Attorney General’s Office, Solicitor General, to determine if RSAC is required to comply with open meeting law. The Department reported determining that RSAC is not required to comply with open meeting law and that RSAC will no longer follow the requirements set forth in open meeting law.

14. The Department should do the following if it determines RSAC is required to comply with open meeting law:
- a. Include a disclosure on its website stating where all public meeting notices will be posted.
No longer applicable—The Department reported consulting with the Attorney General’s Office, Solicitor General, to determine that RSAC is not required to comply with open meeting law (see explanation for recommendation 13). Therefore, this recommendation is no longer applicable.
 - b. Develop and implement policies and procedures for complying with open meeting law, including posting meeting notices at least 24 hours prior to meetings, ensuring meeting agendas and meeting minutes contain all necessary elements, and making public meeting minutes or meeting recordings available for public inspection within 3 working days after the meeting, as required by statute.
No longer applicable—The Department reported consulting with the Attorney General’s Office, Solicitor General, to determine that RSAC is not required to comply with open meeting law (see explanation for recommendation 13). Therefore, this recommendation is no longer applicable.
15. The Department should discontinue actions that could lead the public to believe it is legally permitted to attend RSAC meetings, such as citing open meeting law in RSAC meeting notices, if it determines RSAC is not required to comply with open meeting law.
- Implemented at 6 months**

Sunset Factor 6: The extent to which the Department has been able to investigate and resolve complaints that are within its jurisdiction and the ability of the Department to timely investigate and resolve complaints within its jurisdiction.

16. The Department should follow the time frames for reviewing and resolving youth grievances outlined in its youth grievance policy and procedures.
- Implemented at 6 months**
17. Develop and implement a youth grievance supervisory review policy and procedures that outlines roles and responsibilities for reviewing grievances for compliance with the Department’s policy and procedures and time frames for these reviews.
- Implemented at 6 months**
18. Continue to implement its AIR policy and procedures.
- Implemented at 6 months**