



DJJ Should Monitor Network and PACE Administrative Services and Revise Policies to Serve Appropriate Youth

at a glance

The Florida Network of Youth and Family Services (the Network) and PACE Centers for Girls are the two largest prevention contracts funded by the Department of Juvenile Justice. The Network is managed by an administrative service organization that subcontracts with 31 providers. This structure provides consistency, accountability, flexibility, and expertise for the programs and recognizes that the department does not currently have the resources or expertise needed to effectively manage the individual provider contracts. However, the department has not effectively monitored the Network. The department should revise its performance measures for the Network and PACE to better assess their services.

Both the Network and PACE use screening and assessment tools that effectively target their respective populations. However, the department requires these providers to use other criteria that may prevent them from serving youth who are most likely to benefit from services. While national evidence-based models for the types of programs provided by the Network and PACE have not been developed, both entities use some evidence-based practices.

Scope

As directed by the Legislature, OPPAGA reviewed contract administration, monitoring, youth assessment, and performance measures of two programs funded by the Department of Juvenile Justice: The Florida Network of Youth and Family Services, Inc. and Practical Academic Cultural Education Centers for Girls, Inc.

Background

The Florida Department of Juvenile Justice Office of Prevention and Victim Services funds a wide variety of services. Its two largest contracts are with the Practical Academic and Cultural Education (PACE) Centers for Girls and the Florida Network of Youth and Family Services (the Network).

PACE Centers for Girls combines day treatment and education, operating alternative schools in 17 centers throughout the state. Girls live at home and attend the program during the school day. The program includes a gender-specific curriculum that teaches life management skills and provides therapeutic support services, opportunities to participate in student volunteer service projects, and transition follow-up services.

The Network subcontracts with 31 member agencies across the state to provide programs to address the needs of truants, runaways, and children beyond the control of their parents. These situations endanger children and can lead to dependency, crime, and delinquency. Section 984.04, *Florida Statutes*, refers to these children and their families as Children in Need of Services/Families in Need of Services, or CINS/FINS. The Network's services include residential crisis stabilization, screening and assessment, referral to other community services, non-residential individual and family counseling, and follow-up aftercare. These services are fundamentally different from other

prevention services offered by the department because they are legislatively mandated to serve CINS/FINS youth who might not otherwise be assisted by the dependency or the delinquency systems.

For Fiscal Year 2008-09, the Legislature appropriated \$59 million and 17 FTEs to the department to administer and monitor prevention services. As shown in Exhibit 1, PACE and the Network account for the majority of prevention funding.

**Exhibit 1
For Fiscal Year 2008-09, the Legislature
Appropriated \$59 Million for Prevention Services**

Primary State Contracted Programs	Funding Amount (in millions)	Percentage of Total
Florida Network of Youth and Family Services	\$29.5	50%
Practical Academic Cultural Education (PACE) Centers for Girls	10.9	18%
Outward Bound ¹	0.9	2%
Total Contracted	\$41.3	70%
Other Prevention Funds	\$17.7	30%
Total Prevention	\$59.0	100%

¹ Outward Bound Discovery is a wilderness expedition program operating in Brevard, Dade, Monroe, Orange, Seminole, and Volusia counties. While it is technically an affiliate member of the Network, it has a separate contract with the department and does not receive funding or oversight from the Network. Source: OPPAGA analysis of data provided by the Department of Juvenile Justice Prevention and Victim Services Program.

As requested by the Legislature, this report addresses five questions.

- Is there a need for a single contractor to manage the CINS/FINS provider subcontracts?
- How effective is monitoring by the Network and the department?
- Do current screening and assessment tools effectively identify the populations targeted by the programs?
- Are the department’s current output and outcome measures the most effective way to determine Network and PACE effectiveness and costs?
- Are Network and PACE services evidence-based?

Questions and Answers — Is there a need for a single contractor to manage the CINS/FINS provider subcontracts?

Using a single contractor for CINS/FINS services provides expertise, accountability, consistency, and flexibility to the state; the department does not currently have the resources or expertise necessary to effectively manage each provider contract individually.

In 2001, the department established a single contract for CINS/FINS services, primarily due to budget and staff reductions. Prior to this time, the department contracted with each CINS/FINS provider individually, and monitored each contract separately. Under the single contract, the Network was changed from a membership association into an administrative service organization. The Network assumed responsibility for many of the contract administration and oversight functions that previously were performed by the department, including subcontracting with local service providers and processing invoices and payments to the individual providers. The department’s current role is to monitor the Network to ensure that it performs its duties as specified in the contract. This single contract is consistent with other models established by the Legislature to manage networks of service providers.¹

Prior to 2001, the department paid the Network nearly \$700,000 a year to provide technical assistance and data management to its member agencies; this data on CINS/FINS activities is provided to the Legislature and the federal government for funding purposes. Currently, the department pays the Network \$1.2 million annually, an increase of approximately \$500,000, to perform a variety of functions, several of which predate the single contract. The \$1.2

¹ The Agency for Health Care Administration and the Department of Children and Families use single contracts with networks of behavioral health providers, the Department of Children and Families uses single contracts with lead agencies for child welfare services and domestic violence services, and the Department of Elder Affairs uses single contracts with Aging Resource Centers that manage networks of elder service providers.

million represents approximately 4% of the total \$29.5 million contract.

The state derives several benefits from its single contract with the Network. It reduces the need for department staffing and places oversight responsibility and accountability with Network staff that is knowledgeable about services for truant, runaway, and ungovernable youth. In addition, the Network's centralized team of monitors provides consistency and uniformity, whereas department monitors are located in different judicial circuits across the state. The staff employed by the Network contractors has considerably more experience than the department employees performing contract monitoring duties. In addition, because the Network owns the data system it uses to report information to the department and the federal government, and can extract information from it in real time on an ad hoc basis, it can respond quickly to changes in utilization trends by shifting resources to areas with greater demand for services.

Eliminating the single contract could disrupt CINS/FINS service consistency and quality throughout the state. Prior to the single contract, department contracts with individual providers were negotiated independently at the local level, resulting in differing contract goals, objectives, and outcome standards for providers who offer the same services throughout the state.

The department would need to expand its staff if it were to resume managing and monitoring the individual CINS/FINS contracts.² OPPAGA reviews of the department have noted pervasive weaknesses in the department's contract administration and oversight.³ The department currently employs two OPS staff to manage its

² The department's Office of Prevention and Victim Services was reduced from 94 to 17 positions in 2001. Seventeen of the positions eliminated were involved with grant and contract management, which included Network and PACE local contracts, as well as state grants. Today, the department has 10 positions statewide managing its local grants. While these positions are no longer responsible for managing the individual Network and PACE contracts, their workload did not decrease under the single contract model with these providers because they assumed grant management responsibilities from the eliminated positions and now serve a wider geographic area.

³ See OPPAGA reports [96-35](#), [98-63](#), [02-62](#), [04-47](#), and [08-07](#).

existing Network and PACE contracts under the single contract model. If the department were to expand this responsibility to the 31 CINS/FINS contracts, it would most likely require additional resources to effectively manage separate contracts with each of the individual providers.

How effective is monitoring by the Network and the department?

The Network's monitoring of its subcontractors has been effective in identifying and resolving issues requiring corrective action. However, the department has not developed a process to monitor the Network's administrative services.

Under the single contract model, the Network is responsible for monitoring the effectiveness of the 31 independent service providers throughout the state, while the department is responsible for ensuring that the Network is meeting its responsibilities as an administrative service organization.

The Network has developed effective processes to monitor provider compliance with programmatic, administrative, and financial requirements. The Network uses a two-stage monitoring process. The first stage consists of periodic on-site evaluations, in which a team of three contracted monitors review each provider from one to four times per year based on the agency's quality assurance score. The second stage consists of a quarterly desk audit of required contract deliverables from each provider, including examining required data, documents, and reports. Overall, this monitoring process focuses on individual providers' compliance with department quality assurance standards and Network service and operational requirements.

The Network's monitoring process appears to comprehensively address programmatic, administrative, and fiscal aspects of local service provider operations. For example, the process examines key operational issues, such as ensuring that all youth receive their prescription medications and that youth assessments are conducted and recorded timely. The Network has improved its oversight processes over time. For example, it recently strengthened fiscal monitoring to evaluate providers' compliance

with federal and state financial requirements, rather than only reviewing the agency’s annual financial audit.

In contrast, the Department of Juvenile Justice is not effectively performing its oversight responsibilities for the single contract. Under this model, the department should monitor the Network to determine how well it is performing its administrative functions. Accordingly, it should examine the Network’s performance in administering and monitoring subcontracts, developing and monitoring corrective action plans for subcontractors, and providing training and technical assistance to provider agencies. However, the department’s current oversight efforts focus on the Network subcontractors, and include tasks such as reviewing incident reports, which is a service the department is paying the Network to perform. Such duplicative efforts are an inefficient use of department resources.

Do current screening and assessment tools effectively identify the populations targeted by the programs?

Screening and assessment tools used by the Network and PACE effectively target their respective populations. However, the department requires the Network and PACE to use other criteria to select the youth they serve, which may prevent these programs from serving those who are most likely to benefit from their services.

It is important for providers to use validated assessment and screening tools to effectively identify appropriate youth for services and diagnose their presenting problems so that the providers can tailor services based on each youth’s needs. Both the Network and PACE use screening and assessment instruments that identify presenting problems and risk factors associated with CINS/FINS youth and delinquency respectively. For example, Network providers use two nationally validated suicide risk assessment instruments and PACE conducts initial and ongoing assessments examining gender-specific risk factors including school failure, family instability and conflict, early sexual activity and arrest history.

However, the department requires both the Network and PACE to use the same selection processes that the department uses for all prevention programs, which may prevent the two programs from serving youth who could benefit the most from their services. The department uses two criteria to identify high-risk youth. First, the department examines the home addresses of youth referred to the juvenile justice system each year to determine which zip codes within each county produce the highest number of referrals. The department then requires prevention providers to serve youth from these zip codes. Because the department’s analysis is focused on the county rather than the state level, it tends to exclude urban zip codes that produce more referrals than rural zip codes. As a result, youth from these areas are excluded from the definition of “high risk.”⁴ Second, the department requires providers to serve youth who exhibit risk in at least three of four domains: individual/peer, family, school and community. However, while these domains remain relevant, the individual factors the department tracks within each of them are based on outdated research and some have been found not to be strongly predictive of delinquency.

As a result of these criteria, Network and PACE providers can be required to deny services to appropriate youth in order to maintain contract compliance. To resolve this problem, both programs should be exempted from these criteria. They are inappropriate for the Network, as the Legislature’s intent is to serve CINS/FINS youth and families, which are distinct from delinquent youth. PACE has established centers throughout Florida that serve a statewide need for programming geared specifically for at-risk girls, and it has developed more appropriate screening and assessment instruments that better identify girls who are most likely to benefit from PACE services.

⁴ This can occur because the department’s analysis only identifies the highest referral zip codes in each county. However, an urban county can have several zip codes that produce larger numbers of referrals than do any zip codes in rural counties. As the department’s analysis only identifies the highest referral zip codes in each county, large numbers of youth who do not live in an urban county’s highest referral zip codes can be excluded.

Are the department's current output and outcome measures the most effective way to determine Network and PACE effectiveness and costs?

The department should revise its outcome measures for Network and PACE to better assess their unique services, and it should include prevention programs in its Performance Accountability Measures Report.

The department uses a single outcome measure - adjudications within six months of program release - for all prevention contracts and grants as a way to consistently compare performance. However, as discussed in a recent OPPAGA report, the department should measure relevant outcomes related to the services provided.⁵

Because the Network serves the CINS/FINS population, which differs from the delinquency population, the adjudication measure is not an appropriate outcome measure. Appropriate program measures would assess the program's objectives of family preservation and reunification, improved family functioning, school attendance, and diversion from court and the dependency system.

Similarly, the adjudication outcome measure does not assess critical PACE objectives such as increased academic functioning and obtaining a high school or general equivalency diploma (GED). The Department of Education implemented a uniform entry and exit assessment test in the 2006-07 school year specifically to evaluate juvenile justice educational programs, and test results should be available by early 2009. The Department of Juvenile Justice should use these data to assess academic functioning of PACE participants. The department should also examine other data that it currently collects on the number of diplomas awarded to PACE students.

Are Network and PACE services evidence-based?

While both programs use some evidence-based practices, national evidence-based program models for the types of services provided by the Network have not been developed, and the PACE model has not been evaluated using evidence-based criteria.

Program models and services are determined to be "evidence-based" when scientific evidence from multiple evaluations using experimental or quasi-experimental research design with a matched control group shows a reduction in problem behavior that has strong, sustained effects for at least one year and has been replicated in at least one other site. Programs that follow an evidence-based model are a better use of limited prevention funds than untested programs because they are more likely to result in improved client outcomes.

Because of its unique, short-term nature, no evidence-based model has emerged from the literature for a CINS/FINS program. The Network provides shelter for runaways and short-term services, primarily assessment and referral, for truants and youth and families in crisis. Many of these services address short-term needs and are not expected to have long-term effects on problem behaviors. The Network often refers clients to other agencies for services that are designed to address underlying problem behaviors after the initial crisis has been stabilized. However, some of the services provided, such as crisis and family counseling services, which are intended to improve family functioning, can be expected to have longer term, sustained effects. The Network does incorporate evidence-based practices for these services such as cognitive-behavioral approaches that research has shown to be effective in reducing problem behaviors.

PACE's service delivery model has not been evaluated to determine its effectiveness using evidence-based criteria. However, several of its services address known risk factors for adolescent girls. These include substance abuse counseling, life management skills training, behavioral management, and alternative

⁵ *DJJ Should Better Identify At-Risk Youth, Use Proven Prevention Models, and Revise Funding Practices*, OPPAGA Report No. [08-07](#), February 2008.

education programming to enhance educational competency and skill development.

Recommendations

To ensure that the state provides efficient and effective CINS/FINS services, we recommend that the department

- restructure its monitoring of the Network to focus on the Network's administrative service functions including subcontract administration, management and monitoring and staff development, training, and technical assistance.

To ensure that the Network and PACE serve the most appropriate youth, we recommend that the department

- exempt these providers from the obligation to serve a defined percentage of youth from "high crime" zip codes and allow these providers to use their own risk assessment instruments instead of the outdated one currently used by the department to demonstrate that they are serving appropriate youth.

To improve its performance measurement of the Network and PACE, we recommend that the department

- develop output and outcome measures more directly related to the unique services offered by each entity.

Agency Response

In accordance with the provisions of s. 11.51(5), *Florida Statutes*, a draft of our report was submitted to the Secretary of the Florida Department of Juvenile Justice for review.

The Secretary's written response to this report is presented in Appendix A followed by OPPAGA comments.

Appendix A



FLORIDA DEPARTMENT OF JUVENILE JUSTICE

Charlie Crist, Governor

Frank Peterman, Jr., Secretary

January 9, 2009

Mr. Gary VanLandingham
 Director, Office of Program Policy
 Analysis and Government Accountability
 111 W. Madison Street
 Room 312 Claude Pepper Building
 Tallahassee, Florida 32399-1475

Dear Mr. VanLandingham:

Thank you for the opportunity to review the OPPAGA's draft report entitled "*DJJ Should Monitor Network and PACE Administrative Services and Revise Policies to Serve Appropriate Youth*". We appreciate your assistance as the department moves forward on the monitoring strategies and policy revisions regarding the Florida Network of Youth and Family Services (the Network) and Practical Academic Cultural Education Centers for Girls, Inc. (PACE). The following are the department's responses to the recommendations contained in the draft report:

OPPAGA Recommendation: Using a single contractor for CINS/FINS services provides expertise, accountability, consistency, and flexibility to the state; the department does not currently have the resources or expertise necessary to effectively manage each provider contract individually.

Department Response: The department concurs that using a single contractor for CINS/FINS services provides expertise, accountability, consistency, and flexibility to the state and will continue this practice. While the department does have the expertise to effectively manage each provider contract individually, we do not have the resources necessary to utilize the expertise due to previous budget and staff reductions, as the report points out.

OPPAGA Recommendation: The Network's monitoring of its subcontractors has been effective in identifying and resolving issues requiring corrective action. However, the department has not developed a process to monitor the Network's administrative services.

Department Response: The department concurs that it should provide oversight of the Network's administrative functions in the single contract model and is currently developing a monitoring tool to effectively monitor the Network Central Office and its administrative functions. The department has made great efforts to enhance monitoring and service delivery by utilizing department contract monitors.

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The mission of the Department of Juvenile Justice is to increase public safety by reducing juvenile delinquency through effective prevention, intervention, and treatment services that strengthen families and turn around the lives of troubled youth.

Response to OPPAGA Draft Report “DJJ Should
Monitor Network and PACE Administrative Services
and Revise Policies to Serve Appropriate Youth”
Page Two

OPPAGA Recommendation: Screening and assessment tools used by the Network and PACE effectively target their respective populations. However, the department requires the Network and PACE to use other criteria to select the youth they serve, which may prevent these programs from serving those who are most likely to benefit from their services.

Department Response: The department does not agree with the conclusion and the associated recommendation.

The disproportionate representation of minority youth is reflected among youth exhibiting truant, ungovernable, run-away and other dependency-related behaviors. To ensure the availability of community-based prevention services for youth, families, and communities in most need of these services; the department implemented a high-risk youth, families and communities initiative in 2001, by targeting high-delinquency-referral zip code, as recommended in previous OPPAGA review reports addressing services through the department’s prevention grants. Since 2001, the department has made great efforts to enhance monitoring and service delivery by utilizing an independent contract monitor. This effort has dramatically improved service delivery to this underserved minority population. Since the implementation of the targeting initiative, the percentage of minority youth receiving CINS/FINS non-residential services significantly increased and the number of delinquency referrals to DJJ has decreased substantially. While some local providers have reported delaying or denying services to some youth due to the zip code requirements, there have been no data documenting a youth being denied services by either the Network or PACE due to the high-risk zip code compliance requirement.

In order to more effectively target status offenders and provide appropriate services to prevent delinquency in high-risk youth, the department will review and evaluate the feasibility of incorporating additional criteria such as census tracks, referrals to local CINS/FINS providers regarding habitual truancy and runaways, school referrals and dropout rates, and the volume of calls made to the child abuse hotline for a more targeted focus. The department will work with research experts and solicit input from department provider organizations in this review.

Many risk assessment instruments incorporate four domains: individual/peer, family, community, and school. The risk of an individual youth may shift; however, these four domains represent the schema through which youth’s physical, mental, social interactions, and interpersonal activities develop. We do not agree that the department’s screening and assessment tool is outdated, but agree that the current assessment tool used by the DJJ Office of Prevention and Victim Services, PACE, and the Network should be continually validated.

Response to OPPAGA Draft Report “DJJ Should
Monitor Network and PACE Administrative Services
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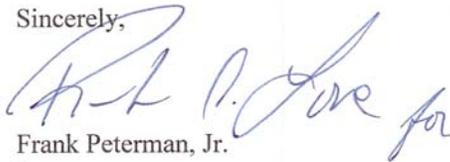
OPPAGA Recommendation: The department should revise its outcome measures for the Network and PACE to better assess their unique services, and it should include prevention programs in its Performance Accountability Measures Report.

Department Response: The department partially concurs with this recommendation. The department’s Office of Prevention and Victim Services will, in consultation with the department’s Contract Administration Office and Research and Planning will solicit input from experts in the field of gender-specific services, education, status offenders, and providers to develop and/or modify additional performance measures more relevant to the services provided by the Network and PACE that assist the department in accomplishing its mission.

We appreciate the opportunity to work with you and your team in the review of the Office of Prevention and Victim Services and the opportunity to respond to the draft report. These programs are essential in aiding the department to fulfill its mission to increase public safety by reducing juvenile delinquency through effective prevention, intervention and treatment services.

Please let me know if you have any questions and I look forward to working with your office in the future.

Sincerely,



Frank Peterman, Jr.
Secretary

FP/my/br

Cc: Ms. Melinda Miguel, Chief Inspector General, Executive Office of the Governor
Ms. Mary Eubanks, Inspector General, Department of Juvenile Justice
Mr. Rod Love, Deputy Secretary, Department of Juvenile Justice
Ms. Bonnie Rogers, Chief of Staff, Department of Juvenile Justice
Mr. Greg Johnson, Assistant Secretary, Prevention and Victim Services
Ms. Mary D. Richter, Executive Director, Florida Network of Youth and Family Services
Ms. Mary Mark, President and CEO, PACE Center for Girls

OPPAGA Comments to Agency Response

Regarding the use of high crime zip codes and risk factor domains to identify and serve Network and PACE clients, OPPAGA provides the following clarification to the agency response on page 8:

The department's efforts to target prevention grants to high crime zip codes are important; however, the Network and PACE are directed by the Legislature to serve different populations than the grants and should use different screening criteria. The department already has exempted some Network services from the grant requirements for this reason and should exempt the remaining associated services, as the Network's screening tools are validated and appropriate to the population it serves. PACE also has developed successful screening specific to its population and should continue to use these tools rather than the department's grant criteria, which are less appropriate. We agree with the department that assessment tools should be validated.

The Florida Legislature

Office of Program Policy Analysis and Government Accountability



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