
December 19, 2018

Performance Audit
Recommendations and
Corrective Actions for Audit:
15-5

DEPARTMENT OF
CORRECTIONS

Improved Oversight Needed for
Transitional Housing Program

Dated: June 23, 2015

Overview

The State Auditor's Office (SAO) makes recommendations designed to improve the operations of state government. For our work to produce benefits, auditees or the General Assembly must implement these recommendations, although we cannot require them to do so. Nevertheless, a measure of the quality and persuasiveness of our performance audits is the extent to which these recommendations are accepted and acted upon. The greater the number of recommendations that are implemented, the more benefit will be derived from our audit work.

In 2010, the SAO began to follow-up on the recommendations issued in our performance audits. Experience has shown that it takes time for some recommendations to be implemented. For this reason, we perform our follow-up activities one and three years after the calendar year in which the audit report is issued. Our annual performance reports summarize whether we are meeting our recommendation implementation targets.

<http://auditor.vermont.gov/about-us/strategic-plans-and-performance-reports>

This report addresses the requirements of Act 155 (2012) to post the results of our recommendation follow-up work on our website. The report does not include follow-up on recommendations issued as part of the state's financial statement audit and the federally mandated Single Audit, which are performed by a contractor. However, our current contract for this work requires the contractor to provide the results of its recommendation follow-up.

Audit Number & Name	Rec #	Recommendation	Follow-Up Date	Status	Review Comments	
15-5 Department of Corrections: Improved Oversight Needed for Transitional Housing Program	1	Require the Probation and Parole Offices (POs) to establish a process to confirm grantees are completing service plans for all offenders and that these plans are being approved by PO's.	2016	Implemented	The Department of Correction's (DOC) Transitional Housing (TH) Program provided grantees with access and training on the Offender Management System (OMS). As of late 2015, grantees can upload offender service plans directly into the OMS which will allow POs immediate access to review and approve the service plans. DOC provided the processes used by three Probation and Parole Offices to review and approve service plans. In February 2016, DOC hired a part-time housing coordinator who performed a baseline review of the OMS in June 2016 to check for completed service plans and evidence of PO approvals. As of September 2016, 90 percent of participants' records have been reviewed.	
	No further follow-up is required because the recommendation was implemented.					
	2	Require the TH program to review and approve service plan templates utilized by grantees to ensure they include a designated area to list services to be provided to the offender as well as an area for PO signature.	2016	Implemented	DOC created a new service plan template in August 2016 to be used by all grantees. This template includes a detailed section to indicate the services the grantee will provide along with a signature line for PO approvals. In the event a grantee wishes to use their own format, rather than DOC's template, they must obtain prior approval from DOC.	
	No further follow-up is required because the recommendation was implemented.					
	3	Ensure that POs are trained in the new DOC TH directive.	2016	Implemented	DOC provided minutes from staff meetings held at seven Probation and Parole offices which show that training on the TH Directive 503.01 was completed in 2015.	
	No further follow-up is required because the recommendation was implemented.					
	4	Include in future TH grant agreements penalties for not developing service plans.	2016	Not Implemented	DOC has not implemented our recommendation. DOC reported it's relying instead on quality assurance processes, ongoing communications with grantees and regular reviews of service plans in OMS to address this issue. If this process fails to ensure service plans are completed, DOC will include relevant penalty provisions in future TH grant agreements.	
	2018	Not Implemented	DOC's grant agreements do not include penalty provisions. Instead, DOC reported that it is relying on other actions, such as increased quality assurance capacity.			
	5	Convene a task group to include TH grantee representatives to (1) reconsider and, where appropriate, redefine service category definitions, and (2) develop guidance on what constitutes acceptable documentation to support services provided to offenders.	2016	Not Implemented	DOC has not implemented our recommendation. DOC reported that it's currently evaluating supportive services and documentation requirements within their FY 2018 grant agreements.	
			2018	Partially Implemented	In the first and second quarter of 2017, DOC convened a task group that included housing grantee representatives and considered service category definitions to support services provided to offenders. The meetings resulted in new Results Based Accountability performance measures that were added to grant agreements. DOC did not provide guidance to grantees on what constitutes acceptable documentation although DOC reported that it has multiple checks on grantees to ensure that services are being delivered.	

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15-5 Department of Corrections: Improved Oversight Needed for Transitional Housing Program	6	Develop a plan for monitoring TH grantees in compliance with the Agency of Human Services (AHS) Plan for Monitoring State Grants.	2016	Implemented	According to DOC, they are using the standardized grant monitoring checklist from AHS' plan for monitoring state contracts to document discussion with grantees during quarterly meetings. DOC is also conducting audit reviews to ensure grant documentation is in place. Although DOC did not develop a specific TH monitoring plan, they appear to be utilizing the approved AHS monitoring plan and its checklist.
	No further follow-up is required because the recommendation was implemented.				
	7	Enforce penalties provided in the grant agreements for untimely submissions of service data in Service Point.	2016	Not Implemented	DOC provided examples of reviews that were conducted in ServicePoint (prior to June 30, 2016) and in the new OMS to ensure grantees were inputting service data on a monthly basis. At this time, DOC will not be implementing our recommendation to enforce the penalties for late submissions of service data. Instead, DOC believes accountability can be achieved with the implementation of OMS-based data entry by grantees, a better-defined service menu, comprehensive grantee training and a more robust quality assurance process. If this process fails, DOC will invoke the penalty provisions which are contained in the TH grants amended on November 1, 2015 to reflect the OMS data submission expectations.
			2018	Partially Implemented	Grant agreements do not have penalty clauses, but state that not providing required data can result in liquidated damages. In addition, DOC reported that it will require a corrective action plan and, if there is no demonstrable compliance or improvement, the grant will be terminated or not-renewed.
8	Develop an action plan to improve the accuracy and completeness of Service Point data to ensure that DOC is using reliable data to manage the program.	2016	Partially Implemented	DOC has not developed a formal action plan but has taken some measures to improve data reliability. For example, DOC hired a part-time housing coordinator in February 2016 to provide data management and quality assurance. As of September 2016, over 90 percent of participants' records have been reviewed for completeness. DOC has also drafted checklists for both the POs and the grantees which provide outlines for the timely submission of required documents.	
		2018	Implemented	DOC has provided training on submitting data directly into the OMS database. In addition, the Housing Coordinator position, which is responsible for the quality assurance of the information submitted to OMS, is now a full-time position. There is also a new full-time Corrections Housing Administrator that is responsible for the direct supervision and quality of the Corrections Housing Coordinator in addition to preparing and managing TH grants, supporting the reporting of performance metrics, and providing technical assistance or training to staff and community partners. The Housing Coordinator conducts regular and on-going data quality reviews for accuracy and reliability by cross-checking grantee data against OMS data.	

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15-5 Department of Corrections: Improved Oversight Needed for Transitional Housing Program	9	Survey the grantees to identify problems they encounter with Service Point and determine how to alleviate these problems through, for example, changes to the system.	2016	No Longer Applicable	DOC discontinued ServicePoint as of June 30, 2016 and is currently using the OMS for grantee data submissions, i.e., offender service plans, case notes, etc. Therefore, this recommendation is no longer applicable.
	No further follow-up is required because the recommendation is no longer applicable.				
	10	Develop a process for determining whether and the extent to which the TH program is meeting its goals by: a) creating performance measures for each goal, b) setting targets, and c) collecting data on actual results.	2016	Partially Implemented	DOC continues to work on developing goals for the TH Program and provided a draft of goals and measures using the Results Based Accountability (RBA) model. However, as of September 2016, targets or benchmarks have not been developed nor has a process been established for collecting data on actual results.
			2018	Implemented	DOC created performance measures and set the targets, which are included in the grant agreements. A DOC housing coordinator is responsible for regularly collecting the data on actual results.
	11	Develop written procedures to validate that performance data reported by grantees are accurate and reliable.	2016	Not Implemented	DOC reported that it has not developed procedures to validate that performance data reported by grantees are accurate and reliable. These procedures will be created and implemented alongside setting goals and performance measures referenced in recommendation #10.
			2018	Implemented	DOC has added language to grants that includes performance measures, including how they are to be measured. There is also a new full-time Corrections Housing Administrator that is responsible for the direct supervision and quality of the Corrections Housing Coordinator in addition to preparing and managing TH grants, support the reporting of performance metrics, and provide technical assistance or training to staff and community partners. The Housing Coordinator conducts regular and on-going data quality reviews for accuracy and reliability by cross-checking grantee data against OMS data.