



Richmond City Council

The Voice of the People.

Richmond, Virginia

OFFICE OF THE CITY AUDITOR

REPORT # 2012-05

AUDIT

Of the

Richmond City Department of Justice Services Truancy and Diversion

January 2012

OFFICIAL GOVERNMENT REPORT

Richmond City Council

OFFICE OF THE CITY AUDITOR

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*Committed to increasing government efficiency, effectiveness,
and accountability on behalf of the Citizens of Richmond.*

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Umesh Dalal, CPA, CIA, CIG
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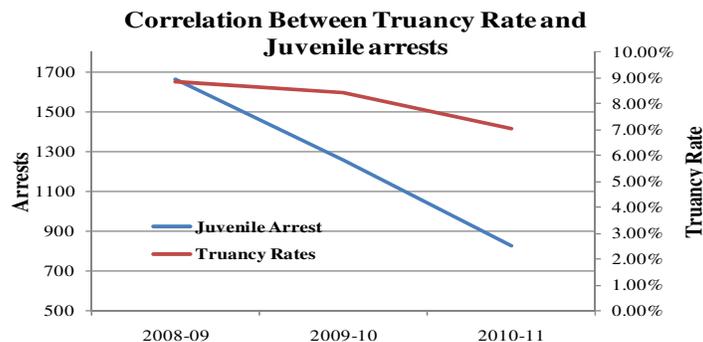
Office of the City Auditor

Executive Summary

The City Auditor's Office has completed an audit of the Truancy and Diversion Division within the Department of Justice Services. The auditors conducted this audit in accordance with generally accepted government auditing standards. The City's Truancy Reduction and Prevention Program offers youth and their families' assessments, interventions and programs to address their needs.

Salient Findings

- The auditors concluded that internal controls within the Truancy and Diversion Division were generally adequate with some room for improvement.
- The City's truancy rate has declined from 26% in FY 2004 to about 7% in FY 2011.
- This analysis showed a decrease each year in the number of juvenile arrests and the truancy rate during this same period. These two factors have a strong relationship as depicted in the following chart:



While there may be other factors that influence the truancy rates and juvenile arrests, the data above shows that the Truancy Division, in partnership with RPS and RPD, has been successful in their efforts to reduce the truancy rate and juvenile arrests

- The program's sweep process was effective and several students were picked-up off the street, processed through the Truancy Center, and then transported to their respective schools.

- The auditors found a need for strengthening management oversight and monitoring to ensure that employees adequately complete their job duties and sufficient documentation is maintained.

The City Auditor's Office appreciates the strong cooperation received from the Truancy and Diversion Division. Data requests were provided timely by staff. Please contact me for questions and comments on this report.

A handwritten signature in black ink, appearing to read "Umesh Dalal", written in a cursive style.

Umesh Dalal, CPA, CIA, CIG
City Auditor

Cc: Mr. Byron C. Marshall, CAO

#	<i>COMPREHENSIVE LIST OF RECOMMENDATIONS</i>	<i>PAGE</i>
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2	Properly train employees and supervisors on the new citywide timekeeping system due to be implemented in 2012.	7
3	Include in the Division's policies and procedures a requirement to review driver's licenses periodically during the school year, with the first check taking place at the beginning of the school year.	8
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7	With the help of the City Administration, forge an agreement between the Truancy Division and RPS that allows for complete and timely truancy data to be shared.	11

Overview

Introduction and Scope

The City Auditor's Office has completed an audit of the Truancy and Diversion Division within the Department of Justice Services. This audit covers the 12 - month period that ended June 30, 2011. The objectives of this audit were to:

- Determine the existence and effectiveness of internal controls;
- Evaluate the efficiency and effectiveness of operations; and
- Verify compliance with laws, regulations, and policies.

The auditors conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that the auditors plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for their findings and conclusions based on the audit objectives. The auditors believe that the evidence obtained provides a reasonable basis for their findings and conclusions based on the audit objectives.

Methodology

Auditors employed the following procedures to complete this audit:

- Reviewed relevant records, polices and regulations;
- Performed various tests;
- Conducted interviews; and
- Performed other audit procedures, as deemed necessary.

Management Responsibility

The management of the City of Richmond is responsible for ensuring resources are managed properly and used in compliance with laws and regulations, City programs are achieving their objectives, and services are being provided efficiently, economically and effectively.

Background

The U.S Department of Education, Office of Safe and Drug-Free Schools has defined “truancy” in *The Uniform Data Set, a Guide to Measures for the Uniform Management Information and Reporting System (UDS)*. According to them, truancy is a pattern of repeated unexcused absences from compulsory education. Under this definition, truancy is not a single event, but a pattern of incidents of unexcused absences, and therefore, the definition of truancy requires a distinction between excused and unexcused absences. The UDS considers a student who has accumulated 10 or more unexcused absences in a school year to be a truant.

The City of Richmond calculates truancy based on the number of youth enrolled in school compared to the number of youth with 10 or more unexcused absences. The City’s Truancy Reduction and Prevention Program provides youth and their families assessments, interventions and programs to address their needs. Other key agencies involved in the Truancy Program includes Richmond Public Schools (RPS), the Richmond Police Department (RPD), and the Richmond Courts.

The Truancy Division employs approximately 30 staff. Their focus has been to reduce the City’s overall truancy rate. The Division seeks to accomplish this by educating their customers on the importance of school attendance, and offering programs and services to improve character and relationship building.

City Wide Strategy:

The Division conducts daily truancy sweeps in an effort to detect truant students. Their efforts are intended to raise awareness of truancy throughout the City. The Truancy Division partners with RPS to

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complete intervention plans for students with three and five unexcused absences. This process re-engages students and their families into the educational process in an effort to address unexcused absences and mitigate future occurrences. The Division also conducts assessments, counseling and other support services with families to address the root cause of school attendance issues.

Targeted Intensive Neighborhood Strategy:

The Truancy Division provides targeted intervention in select neighborhoods where there is a strong correlation suspected between high truancy rates and crime. The Division partners with RPD to address and identify needs and services in the following three targeted schools:

- Armstrong High School,
- Boushall Middle School, and
- Martin Luther Jr. Middle School.

Observations and Recommendations

Internal Controls

According to Government Auditing Standards, internal control, in the broadest sense, encompasses the agency's plan, policies, procedures, methods, and processes adopted by management to meet its mission, goals, and objectives. Internal control includes the processes for planning, organizing, directing, and controlling program operations. It also includes systems for measuring, reporting, and monitoring program performance.

Based on the results and findings of the audit methodology employed, auditors concluded that internal controls within the Truancy and Diversion Division were generally adequate. However, some opportunities exist to enhance current controls.

What is working well?

The City's Truancy Rate is Declining

The Truancy Program was launched at the beginning of the 2005-2006 school year. The program has been successful in reducing the City's truancy rate through a collaborative effort with RPS and RPD. During the 2003-2004 school year (two years before the program's inception) the City's truancy rate was at 26%. During the 2010-2011 school year (five years after the program's inception), the truancy rate was at 7.06%.

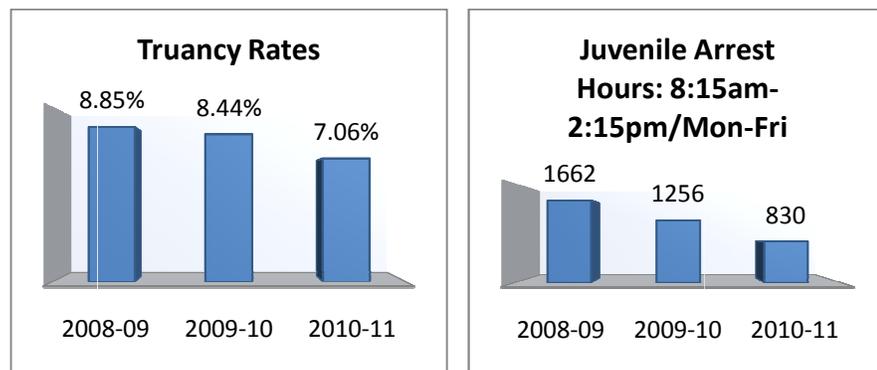
Using data obtained from RPD, the auditor performed a comparison between the number of juvenile arrests during normal school hours for the City and the truancy rates for the City over the last three school years. This analysis showed a decrease each year in the number of juvenile arrests and the truancy rate during this same period. The

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coefficient correlation between the truancy rate and juvenile arrest was 0.96. Statistically, this means that these two factors have a strong relationship. A decrease in the truancy rate is likely to result in a decrease in juvenile arrests. While there may be other factors that influence the truancy rates and juvenile arrests, the following data shows that the Truancy Division, in partnership with RPS and RPD, has been successful in their efforts to reduce the truancy rate and juvenile arrests:



The Truancy “Sweep” Process is Effective in Identifying and Processing Truants

As part of the Division’s intervention strategies, truancy officers conduct daily citywide “sweeps.” Once a week, truancy officers also partner with RPD officers to perform a “precinct sweep” of a designated police precinct. The purpose of these sweeps is to check specific areas where truants have a history of gathering, such as railroad tracks, athletic fields and courts, convenience stores, housing and complexes.

The Division has sound internal policies and procedures that provide guidance for staff. These procedures govern how to conduct the

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sweeps and process truants when they are picked up and brought to the Truancy Center. Based on the auditor's observations when riding along with the Truancy staff, it appeared that staff were in compliance with the procedures. The sweep process was effective and several students were picked-up off the street, processed through the Truancy Center, and then transported to their respective schools.

The Division has Adequate Documentation

The Truancy Division's policies and procedures require various types of documentation to be completed. Auditors selected samples of this required documentation for truant students and determined it was processed timely and maintained properly. Examples of this documentation included the following:

- RPS notifies the Truancy Division when individual students reach their fifth unexcused absence. The Truancy Division is responsible for completing intervention plans within seven days of RPS' notification. These intervention plans provide an avenue for Truancy staff to work with the student's parents to discuss the reasons for the absences and develop strategies to eliminate future truancy. No exceptions were noted when the auditors reviewed a sample of these intervention plans.
- The Truancy Division conducts assessment interviews with truant students and their parents when the truant students are processed in the Truancy Center. Certain forms are required to be completed based on the results of this initial assessment. Examples of the required forms include a Family Profile and an Attendance Report. Auditors reviewed the applicable

documentation for a sample of truant students' case records and noted all the required documents were present.

What are opportunities for improvement?

Inadequate Monitoring of Employee Work Hours

Employees' attendance and hours are recorded on sign-in/out sheets. The auditor determined that all of the sign-in/out sheets did not reflect supervisory review and approval. The Truancy Division has many employees who spend the majority of their work hours in the field. Establishing sufficient management oversight and monitoring is critical to ensure the employees are productive and they adequately complete their job duties.

The auditor learned that management was aware of this inadequacy. During the 2011-2012 school year, management implemented a process where employees notify their supervisor using an email when they arrive and depart to/from work. The auditor did not test this process since the timeframe it was implemented in was outside the scope of this audit.

The auditor also noted that written policies and procedures regarding timekeeping and supervisory review did not exist. Not providing written policies and procedures may lead to unclear job duties and inconsistent job performance by employees.

Recommendations:

- 1. Develop written policies and procedures regarding proper timekeeping, including requirements for supervisory review and approval, to ensure proper staff accountability and monitoring.*
- 2. Properly train employees and supervisors on the new citywide timekeeping system due to be implemented in 2012.*

Inadequate Monitoring of Employee Driver's Licenses and Training

Truancy staff is responsible for transporting youth using City owned vehicles. City policy requires them to maintain a good driving record and a valid driver's license. Truancy management indicated that the City's Risk Management Department conducts license checks on all Truancy staff at least once per school year. During the license checks, the employees' driving records are obtained from DMV and reviewed for any negative infractions. If anything negative is found, the employees are required to receive eight hours of training in the City's Safety Driving Course.

The auditor reviewed the license check that was conducted during the 2010-2011 school year and noted one employee had negative points on his record and was ordered to attend the training. Truancy management did not have any documentation available to demonstrate that the employee with the negative driving record actually attended/completed the training. Management unsuccessfully attempted to obtain this documentation from the Risk Management Division of the City's Finance Department. Failure to maintain adequate records of training could result in employees not receiving the necessary training and corrective actions not being addressed.

Recommendations:

- 3. Include in the Division's policies and procedures a requirement to review driver's licenses periodically during the school year, with the first check taking place at the beginning of the school year.*

4. *Maintain proper documentation (records of attendance and copies of completion certificates) to ensure that staff complete the Safety Driving Course when required.*

Inefficient Documentation of Truancy Hotline Complaint Calls

The Division maintains a hotline number for the public to report youth who they suspect may be truants. This number is also available for parents of truant youths who may need assistance from the truancy officers to get their kids in school. The Division received 883 hotline calls during the 2010-2011 school year.

When a hotline call comes in, an administrative assistant records the caller's information manually on a Complaint Form, and subsequently records the information electronically. The form is then copied and passed on to a dispatcher, who contacts a truancy officer to investigate the situation. The truancy officer investigates the situation and communicates the results back to the dispatcher, who is then responsible for documenting the actions/results on their copy of the Complaint Form.

The auditor noticed that the administrative assistant was duplicating efforts by documenting the call twice, first on the manual form and then electronically. This procedure does not add any value and results in an improper use of staff time. This duplication is compounded when the same information is handed over to a dispatcher, who is responsible for alerting truancy officers. Additionally, the results of the calls documented by the dispatcher were only captured manually on the form. This information was not available to the auditor since the dispatcher could not locate it. It appears the functions of receiving the

complaints and dispatching them needs to be streamlined. Also, there is a need for keeping complete records for management review and evaluation.

Management Analysis of the Hotline Calls is not Sufficient

The manual process of documenting hotline calls, as described above, prohibits management's ability to determine if hotline calls are responded to in a timely manner since system generated reporting would not be possible. Management is also not able to perform other analysis related to the data/results of the hotline calls since the information is not kept electronically.

Recommendations:

5. *Eliminate duplication of efforts by only documenting hotline call information electronically.*
6. *Review the hotline call information periodically to ensure calls are responded to in a timely manner and for other metrics that may be appropriate such as trending, or categorizing calls by location, etc.*

Insufficient Documentation is Received from RPS

The Truancy Division receives listings from RPS with students who have up to five unexcused absences. This data is often insufficient as to the name of the students' school, parents' names, home address, phone number, etc. The lack of sufficient data results in substantial work for the Truancy staff to track down this information. According to Truancy management, they could save approximately 12 hours per day of staff resource time if they received accurate and complete information from RPS when these listings are first distributed.

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Additionally, the Division could also respond to the truancy cases more timely. Based on discussions with Truancy management, RPS has not fully shared this data due to a legal agreement that existed during the previous Mayor's administration. RPS has an improved relationship with the City under the current administration. This cooperation may enable the Truancy Division to obtain better information to improve their efficiency. Providing the Truancy Division with read-only access to select RPS systems would enable them to obtain sufficient data and increase the efficiency of the Division.

Recommendation:

- 7. With the help of the City Administration, forge an agreement between the Truancy Division and RPS that allows for sufficient truancy data to be shared.*

**MANAGEMENT RESPONSE FORM
DEPARTMENT OF JUSTICE SERVICES**

TRUANCY DIVISION AUDIT Appendix A

#	RECOMMENDATION	CONCUR Y-N	ACTION STEPS
1	<i>Develop written policies and procedures regarding proper timekeeping, including requirements for supervisory review and approval, to ensure proper staff accountability and monitoring.</i>	Y	The Truancy Manager will develop written policies and procedures outlining timekeeping responsibilities. All Truancy staff will be responsible and held accountable for signing In/Out through the City's e-mail system and sending their daily sign In/Out times to their immediate supervisor. Also, staff will be required to sign In/Out of Rapids daily. Employees emailing their immediate supervisor In/Out times, along with signing In/Out of Rapids will ensure timesheet and attendance accuracy on a daily basis. This dual system will remain in place for 6 months until the Rapids Program is in full effect and or until further notice from Department of Justice Services Appointing Authority.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	Truancy Manager		30-Jun-12
	IF IN PROGRESS, EXPLAIN ANY DELAYS		IF IMPLEMENTED, DETAILS OF IMPLEMENTATION
#	RECOMMENDATION	CONCUR Y-N	ACTION STEPS
2	<i>Properly train employees and supervisors on the new citywide timekeeping system due to be implemented in 2012.</i>	Y	All Truancy Division staff will be properly trained on the New citywide Rapids system.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	Truancy Manager		30-Jan-12
	IF IN PROGRESS, EXPLAIN ANY DELAYS		IF IMPLEMENTED, DETAILS OF IMPLEMENTATION
#	RECOMMENDATION	CONCUR Y-N	ACTION STEPS
3	<i>Include in the Division's policies and procedures a requirement to review driver's licenses periodically during the school year, with the first check taking place at the beginning of the school year.</i>	Y	All Trauncy Division polices and procedures will include a requirement to check DMV driving records every 6 months (September and March) to ensure staff is eligible to drive City Vehicles.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	Truancy Manager		31-Mar-12
	IF IN PROGRESS, EXPLAIN ANY DELAYS		IF IMPLEMENTED, DETAILS OF IMPLEMENTATION
#	RECOMMENDATION	CONCUR Y-N	ACTION STEPS
4	<i>Maintain proper documentation (records of attendance and copies of completion certificates) to ensure that staff complete the Safety Driving Course when required.</i>	Y	The City Risk Manager will have copies of staff driving records and the Truancy Manager will have additional copies of staff attendance and completion of various Safety Driving Training courses. Classes will be scheduled yearly for staff relating to safety driving.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	Truancy Manager		30-Jun-12
	IF IN PROGRESS, EXPLAIN ANY DELAYS		IF IMPLEMENTED, DETAILS OF IMPLEMENTATION

#	RECOMMENDATION	CONCUR Y-N	ACTION STEPS
5	<i>Eliminate duplication of efforts by only documenting hotline call information electronically.</i>	Y	All Truancy Divison Hotline calls will be documented by the Assist Operator electronically, and monitored daily to check and eliminate any duplications.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	Truancy Manager		30-Jan-12
	IF IN PROGRESS, EXPLAIN ANY DELAYS		IF IMPLEMENTED, DETAILS OF IMPLEMENTATION
#	RECOMMENDATION	CONCUR Y-N	ACTION STEPS
6	<i>Review the hotline call information periodically to ensure calls are responded to in a timely manner and for other metrics that may be appropriate such as trending, or categorizing calls by location, etc.</i>	Y	All Hotline calls will be reviewed by two Truancy Supervisors and monitored at all times during the day. The Roving Supervisor will make sure all staff have responded to calls in the community in a timely manner by making spot checks from calls coming in through dispatch. Each day a supervisor will be out in the community monitoring response times for quality control.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	Truancy Manager		30-Jan-12
	IF IN PROGRESS, EXPLAIN ANY DELAYS		IF IMPLEMENTED, DETAILS OF IMPLEMENTATION
#	RECOMMENDATION	CONCUR Y-N	ACTION STEPS
7	<i>With the help of the City Administration, forge an agreement between the Truancy Division and RPS that allows for sufficient truancy data to be shared.</i>	Y	The Truancy Manager, with assistance from the CAO's office, will meet with RPS to discuss ways to enhance their partnership and increase the efficiency and effectiveness of the Truancy Division. As part of this discussion, the City will request access to select RPS systems that will assist the Truancy Division with their job duties.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	Truancy Manager		1-Mar-12
	IF IN PROGRESS, EXPLAIN ANY DELAYS		IF IMPLEMENTED, DETAILS OF IMPLEMENTATION