

INTRODUCTION

On March 24th and March 25, 2004, a quality review team met at the Nevada Youth Training Center to collect baseline information about how the facility was operating in a number of specified areas. This report gives the background leading up to the March quality review, describes the activities that took place during the review, and summarizes the findings of that quality review.

Staff of Nevada Youth Corrections and the Nevada Youth Training Center need to be commended for the tremendous amount of work that they completed in a very short time. Even though they had limited experience with quality assurance reviews based on American Correctional Association (ACA) standards, the facility did a good of assembling the files and documentation necessary to make the review productive.

BACKGROUND

Following an investigation by the U. S. Department of Justice, the Nevada Youth Training Center agreed to improve its policy, procedures, and practices in a number of areas relating to facility operations. These areas included policy, training, the use of force, the use of restriction and confinement, discipline, the use of restraints, the issuing of medication, grievances, and the censoring of mail. Staff in Nevada Youth Corrections and at the Nevada Youth Training Center have been working for the past two years to improve practices to address concerns raised by the Department of Justice.

The Division of Child and Family Services and Nevada Youth Corrections have been working to establish a quality review process. To monitor and document changes being made at the Nevada Youth Training Center, it was decided to conduct periodic quality assurance reviews at the Elko facility. The quality review conducted on March 24th and 25th was the first of these periodic reviews.

To provide an initial emphasis on the specific issues of concern to the Department of Justice, preparations for the first quality review focused on specific areas of facility operation. The decision was made to use standards for juvenile facilities established by the American Correctional Association. Eighty-four standards were selected from the complete set of standards contained in the *Standards for Juvenile Correctional Facilities*. A list of the 84 selected standards is attached to this report.

This list of standards was provided to the Nevada Youth Training Center. It was made clear that this first review would be for two purposes. First, the review process would be used to train the people who would be involved in the review process. Second, the review would be used to examine the newly created audit files to see if the Documentation Indexes created for each of the standards was complete, and if the policies, procedures, and documents already in existence were adequate or needed altering.

PARTICIPANTS

Seven people participated as reviewers. The seven reviewers were assisted by this consultant and by Sue Bobby from Nevada Youth Corrections. The reviewers were divided into two teams. An effort was made to create two teams with interdisciplinary expertise. Please see the chart below for the titles, credentials, and areas of expertise for the team members.

Title	Credentials	Areas of Expertise
Clinical Program Planner I	Masters in Social Work; Licensed Clinical Social Worker	Extensive experience in the mental health field; identified and worked with specialized placement options for youth involved in child welfare or the delinquency side.
Social Service Program Specialist	Masters Degree (MS) in Clinical Psychology; Licensed Mental Health Counselor	Quality Assurance Reviewer for JCAHO, COA; Sexual reactivity and aggressiveness in youth - treatment and housing alternatives; Residential facilities for high-risk youth - safety and risk-reduction.
Social Services Program Specialist II	Bachelor of Arts in Social Work	Child Welfare Social Worker, Previous experience working at a youth detention center in California, Quality Assurance Work.
Mental Health Counselor III/Group Home Coordinator	Licensed Clinical Social Worker # 01851-C	Clinical consultation, direct supervision, training, & program coordination to include policy & procedure development and implementation within a 24-hour residential treatment program for youth with serious emotional and behavioral problems.
Unit Manager	Masters in Social Work Licensed Clinical Social Worker/State of Nevada/ 1988 #00388-C	Assessment/Evaluation/Classification of juvenile offenders; mental health services; case management for youth with significant mental health/substance abuse issues; training in and working with juvenile sexual offenders.
Assistant Superintendent	Masters in Social Work	Child Welfare, Juvenile Justice Programs, Licensing of Group Home and Foster Homes, and Affirmative Action.
Assistant Superintendent	Bachelors of Arts in Psychology; Masters of Education in Guidance and Counseling	Twenty seven years experience in the field of juvenile corrections including: experience at all levels of employment in secure, non-secure and community based programming; the development and start up of secure and non-secure programs; development and implementation of ACA based policies including training to policy; management of the accreditation process for halfway house; facility security - Use of Force, secure confinement, emergency planning, tool and key control, and facility cleanliness; program development and monitoring

FOCUS OF THE REVIEW

The quality review conducted on March 24th and 25th was limited in scope. It did not address all areas of facility operation. As has been mentioned, 84 standards developed by the American Correctional Association were used in this quality review. The review process focused on the documents created and compiled in the files – one file for each of the 84 standards. The review process focused on the following:

- Learning correctional practices and the review process that would be used in future quality reviews; since this was the first time several members of the review team had conducted a review at a juvenile correctional facility, it was felt time needed to be spent building a knowledgeable team.
- Assessing the completeness of the documentation index constructed for a given file to assure the policy, procedure and documentation completely addressed all elements of the standard.
- Identifying gaps in policy and documentation that needed to be addressed to assure that the facility was complying with the standard.
- Establishing a baseline of facility operations that could be used to measure progress in the coming months.

The review team did not approach staff working at the facility to question them about how they conducted their duties. A number of policies, procedures and forms of documentation were modified in the weeks prior to the review to better meet the mandates of the standards. Consequently, it was decided this review would be an assessment of documentation and that future reviews would focus more heavily on assuring practice was consistent with policy and procedure.

It should also be noted that in the months ahead the Nevada Youth Training Center (and the other two juvenile facilities) would expand their efforts and bring facility operations into compliance with all of the standards established for juvenile correctional facilities. At some point, future reviews would look at all of the standards established for a juvenile correctional facility.

ACTIVITIES

The two days were spent preparing for, conducting, and debriefing the quality review. Since this team had not worked together previously, nor had they conducted a quality review using the standards of the American Correctional Association, time was taken to orientate and prepare for the actual review. The time was spent as follows:

Wednesday Morning, March 24th - Work started. The team toured the facility. Specific issues raised in the DOJ report were reviewed, ACA standards and the compliance process associated with those standards were explained, and the review process that would be

taking place in coming months was discussed. People participating in the review process were placed in teams. The standards to be reviewed were divided between the two teams.

Wednesday Afternoon, March 24th - Teams reviewed the documentation files. A brief summary of what was found (documentation and practices for a given standard were complete, gaps existed, etc.) was drafted.

Thursday Morning, March 25th – Teams finished writing their notes and compiled their findings. Each team briefed the large group on the work they had done. Key findings were discussed.

Thursday Afternoon, March 25th - Next steps were outlined. Future visits to the Nevada Youth Training Center and to the other two juvenile correctional facilities were discussed. Work concluded.

FINDINGS

A form was created to record the conclusions of the review team as they examined each standard. The complete set of these comments sheets is available if needed. While an examination of those sheets will reveal that the comments may be overly concise, the review team members worked painstakingly to understand the standards; examine facility policy, procedures, and practices; and to assess compliance with the standards. A summary of the findings has been attached to this report. The following general comments can be made about the review.

- While the reviewers noted additions or changes that needed to be made to many of the files addressing the 84 selected standards, most are minor in nature and can be easily accomplished. Many of the recommended changes are needed to more completely address a given standard. For example, ACA standard 3-JTS-3A-16 requires that no form of restraints be used for punishment. The Nevada Youth Corrections' policy on restraints states mechanical restraints cannot be used as punishment, but does not mention soft or medical restraints. A simple change of a few words in the policy will address the concern.
- DCFS Nevada Youth Corrections statewide policies were found to be deficient in critical areas: disciplinary procedures, confinement and classification. Policy development and/or enhancements must be made to raise the quality of care for Nevada's juvenile facilities. First, statewide disciplinary procedures fail to adequately address due process requirements. Specifically, statewide policy YCS-15 on the use of time out, area or cottage restriction, and room confinement needs to be clear and more complete; youth have to be placed in one of these three conditions via either a disciplinary or a programming process that are not appropriately differentiated. While sufficient staff training has been conducted to confidently state that excessive use of force issues are likely eradicated, policies and staff manuals/guidebooks must be developed and implemented to ensure continued youth safety along with staff training/development that will change the culture of Nevada's Youth Corrections and the Nevada Youth Training Center (NYTC). Second, Nevada's statewide classification system is inadequate to ensure that youths' care and custody are based on a well-defined set of standards that are readily understandable to staff, youth, and youths' families or guardians. A statewide classification system and

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manual must be developed and implemented. Training can then be conducted with respect to the classification system. NYTC's policy 16-4 related to program decisions is really more procedural in nature – development and implementation of statewide policies will support the NYTC's continued quality improvement efforts.

- Almost a third of the standards used in this review are tied to discipline, the management of special populations (disciplinary confinement, mentally ill, security risks, etc.), and classification. Consequently, correcting these discrepancies will require more than a few word changes.

In fairness to the staff of the Nevada Youth Training Center, these deficiencies are more appropriately addressed on a statewide basis than at the local level. With three juvenile correctional facilities, a comprehensive set of statewide policies needs to be developed to assure consistency and integration of operations. Over the past two years, a series of statewide policies have been developed (19 as of this date). However, some of the existing policies do not address the need – disciplinary is most noteworthy. Three other critical areas that need to be addressed are classification, security and the management of special populations.

SUMMARY

The quality review conducted at the Nevada Youth Training Center was a solid beginning. The review team had an opportunity to learn the review process that will be used in the months ahead. The facility staff did a great job of assembling files and preparing for the review. Follow-up reviews should be able to document that gaps in policy, procedure, and documentation have been addressed. Focus can then shift to reviewing facility practice to assure staff know and are operating in accordance with established guidelines.

There are four tasks faced by the staff of Nevada Correctional Services and the Nevada Youth Training Center. They are as follows:

- Minor changes need to be made for a number of policies and procedures.
- The Document Indexes for a number of the files need to be changed and additional documentation needs to be added to the files.
- Documentation needs to be routinely added to the quality review files so future reviews can see that practice matches policy and procedure.
- A number of statewide policies need to be written and/or modified.

The date for the next formal review by the team that conducted the review in March at the Nevada Youth Training Center has not been established. However, it is anticipated a quality review (either formal or informal) will be conducted at the Elko facility every quarter.