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June 11, 2021

Director Freddie Pough
Department of Juvenile Justice
Post Office Box 21069
Columbia, South Carolina 29221-1069

Via Email: FBPoug@scdj.net

RE: House Legislative Oversight Committee's Study of the Legislative Audit Council's April 2021 follow up audit of the Department of Juvenile Justice

Dear Director Pough:

The House Legislative Oversight Committee's Law Enforcement and Criminal Justice Subcommittee (House Subcommittee) appreciates your participation in the review of the Legislative Audit Council's (LAC) April 2021 report on the Department of Juvenile Justice (DJJ).

In preparation for the House Subcommittee's next meeting with the agency, which will be scheduled after receipt of the agency's response to this letter, below are questions of interest to various members. Please provide this information by Monday, July 12, 2021.

As a reminder, formal written responses provided are considered sworn testimony. Please do not include information in DJJ's responses, which may endanger the safety of juveniles or agency staff. Additionally, please inform us, prior to responding, of any information requested that cannot be published online due to provisions in contract or law.

Implementation Status

1. Please complete the attached Excel chart, to provide the status of the agency's implementation of the recommendations from the LAC report.
2. Of the recommendations noted in the LAC report in which DJJ concurs, which are the three highest priority to resolve and why?
3. How are you focusing agency resources on achieving those priorities?
4. Please explain where you would prioritize additional non-restricted funds given to the agency.

Management Decisions

5. What do you consider your primary responsibility as director of the agency?
6. Please provide a list of the individuals you chose to retain, or add to, what you consider your executive management team, including division heads, from the time you were in authority to make those decisions (please include this date) to the present. For each, please state their responsibilities as it relates to decisions about the operations of DJJ (i.e., the expertise and data on which you rely upon them) and their three prior positions, whether at DJJ or elsewhere.
7. What actions did you take to learn the type of information/data that may be important for you to review on a daily, weekly, or monthly basis to monitor the overall status of DJJ?
8. What information/data do you review on a daily, weekly, and monthly basis?
 - a. In what format is the information provided to you?
 - b. What do you look for when reviewing each aspect of it?
 - c. Is there additional information or a different format in which current information could be provided, if technology and/or funds were available, that you believe may improve your ability to monitor, and continuously improve, the status of DJJ operations? If so, please explain.
9. Why did the agency prioritize maintaining funds in carry forward instead of upgrading the security camera network?¹

¹ In fiscal year 2019-20 and 2020-21, DJJ requested \$1,925,000 in non-recurring funds for a complete upgrade of the security camera network in its budget requests. According to the April 2021 LAC Report, DJJ's general and special carry forward in fiscal year 2017-18 was \$8,564,315, in 2018-19 it was \$6,453,256 and in 2019-20 it was \$11,415,499.

Management Decisions (cont.)

10. Based on DJJ's response to the LAC audit, it appears DJJ is partnering with the Center for Children's Law and Policy (CCLP) on numerous aspects of operations for which DJJ is responsible (e.g., recruitment and retention of staff; training; clinical services; and programming).² When did DJJ seek assistance from CCLP with these core agency operations, in particular, recruitment, retention, and training of staff, all of which were included as issues in the 2017 LAC Audit?
 - a. Has CCLP provided any similar tasks for DJJ in the past? If so, please explain.
 - b. How was this partnership chosen?
 - c. Did this partnership go through the normal procurement process?
11. During your tenure as agency head, please provide a list of the national experts to which the agency reached out and the year in which each occurred.³
12. Please explain whether there is any leadership training offered or required for agency supervisors (e.g., eligibility; frequency; trainer; etc.).⁴
 - a. If none are currently offered/required, will the agency offer/require it when additional contract security staff are in place to assist supervisors?

Data and Information available to the public

13. Please provide printed copies of PbS monthly data reports for each of the last three years.⁵

² See, DJJ's response to 2021 LAC Audit, "DJJ has partnered with the Center for Children's Law and Policy (CCLP) to provide technical assistance to DJJ in analyzing data on justice-involved youth, revising policies in critical areas such as use of isolation, facilitating culture change, improving recruitment and retention of DJJ staff, enhancing training for staff in critical areas, enhancing DJJ's incentive-based behavior management system, improving delivery of clinical services, increasing programming for committed youth, and tracking implementation of all reforms."

³ See, DJJ's response to 2021 LAC Audit, "DJJ is committed to working collaboratively with national experts to update protocols, practices, policies, and training programs to bring organizational change that will positively impact the culture of DJJ, both for youth served by DJJ and for DJJ staff."

⁴ As part of its study of the Department of Probation, Parole, and Pardon Services, the Subcommittee learned leadership training was previously part of DJJ's practices. See, Question #6 in PPP's June 4, 2021 letter to the Subcommittee, [https://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee/AgencyWebpages/ProbationParoleandPardon/SCDPPPS%20letter%20to%20Subcommittee%20with%20attachments%20\(5.28.21\).pdf](https://www.scstatehouse.gov/CommitteeInfo/HouseLegislativeOversightCommittee/AgencyWebpages/ProbationParoleandPardon/SCDPPPS%20letter%20to%20Subcommittee%20with%20attachments%20(5.28.21).pdf), accessed June 10, 2021.

⁵ A February 5, 2020 United States Department of Justice report states, "The frequency of assaults on youth is high compared to assaults at other juvenile justice facilities. BRRC uses Performance-based Standards (PbS), a program designed to assist juvenile justice facilities across the country to track key metrics and identify problem areas, as indicated by red flags. Facilities participating in the program receive reports comparing their performance on those metrics to the performance of their peers. Facilities receive a 'red flag' for indicators on which their performance is at least 25% worse than the national average. PbS reports the State provided, including from the spring and fall of 2018, indicate that BRRC's performance was significantly worse than the national average for assaults on youth, injuries to youth by youth, and percent of youth who reported fearing for their safety within the previous six months. For example, BRRC received a red flag for number of injuries to youth by youth per 100 days of confinement. BRRC also received a red flag for the percentage of youth who were forced to engage in sexual activity within six months of the report. Based on this evidence of regular assaults, fights, and injuries at BRRC, we conclude that youth at BRRC are not housed in reasonably safe conditions. See Alexander S., 876 F. Supp. At 797-98; cf. Youngberg, 457 U.S. at 315-16 (recognizing the rights to be held in safe conditions and to be free from undue restraint)."

Data and Information available to the public (cont.)

14. If any information related to incidents or incident reports is scanned and transmitted to different divisions at DJJ, please explain why this is occurring instead of the information flowing through the electronic Event Reporting Management Information System (ERMIS) the agency alleges it updated.⁶
15. Where on the agency website can the public and members find the number of incidents and other similar information, in aggregate and by facility?⁷
16. Will you publish the above information about incidents so policy makers and the public may monitor DJJ's performance? If yes, when? If no, why not?
17. When incidents occur at DJJ, please explain what information you are able to make available to the public, and when, regarding the following:
 - a. fact that an incident occurred;
 - b. action the agency is taking to correct/prevent/improve in the future; and
 - c. basis/explanation for deciding upon that action.

Human Resources and Finances

18. Provide the job criteria for each level of Correctional Officer at DJJ.
19. Why was Correctional Officer II the category with the highest turnover?⁸
20. Has the agency analyzed turnover by supervisor level (e.g., division head, facility administrator, building/shift ranking personnel, etc.)? Why or why not? If yes, please summarize any trends.

⁶ DJJ employee testified in the June 9, 2021 Senate meeting that supervisors sign paperwork, then scan and send it to PbS and hearing officers.

⁷ In a February 8, 2021 letter Director Pough states DJJ has developed several internal resources that will make the information it previously provided in its monthly reports available to members of the House Legislative Oversight Committee and the general public through the agency's website. Specifically, the [letter](#) states, "similar data points will be accessible on our DJJ Data Hub webpage. This innovative resource will go live February 15, 2021. In addition to static data, users will have the ability to run trend reports and access biannually published Performance-based Standards (PbS) Reports and annual Prison Rape Elimination Act (PREA) findings."

Information in monthly reports included, but was not limited to, the number of: (1) deaths, (2) escapes, (3) security staff assigned to the site, (4) assaults on staff by juvenile, (5) injuries to staff, (6) assaults on juvenile by juvenile, (7) fights, (8) assaults on juvenile by staff, (9) physical restraint use, (10) mechanical restraint use, etc.

Also, on September 19, 2019, a media article notes DJJ is launching a new website. Director Pough is quoted in one [article](#) as saying, "We were very intentional about the design and content of our new website, placing new emphasis on serving all potential end users – parents, lawmakers, community partners, media, etc. ... We see this site as a valuable resource and a platform to showcase the incredible, empowering work taking place at our Agency. We thank SC Interactive for helping to make our new site possible."

⁸ See page 41 of the 2021 LAC report.

Human Resources and Finances (cont.)

21. What avenues are available for agency personnel to express concerns about agency operations and how many have availed themselves of each of these opportunities over the last twelve months?
22. Does the agency have a policy limiting the number of consecutive hours an employee is permitted to work? If so, please provide a copy of the policy and explain how it is enforced.
23. Please explain the agency's policy, and steps it takes to ensure sufficient staffing levels are maintained at all facilities during normal and emergency situations, including, but not limited to, times of high absenteeism.
24. Please provide, in an Excel Chart, information on the items below for FY2020 and FY20201 with date, position number, position classification, agency facility, building number or name, and total hours worked. Please maintain documented records on this information for production if requested.
 - a. Every shift worked over 12 hours; and
 - b. Every shift worked consecutively.
25. Please list all unused funds in FY2020 and FY2021, and, for each amount, please indicate whether it is recurring or non-recurring, restrictions on its use, if any, and reasons, if any, it could not be used to increase pay for frontline employees at the agency.
26. Will there be any requirement that current or new agency personnel be current with all required training as a prerequisite to receiving any new bonuses that may come available? Why or why not?
27. Please provide the number of JCOs on duty at each of the agency's schools each month from the start of your tenure as interim director to the present.

Raise the Age (RTA)

28. Please provide a timeline explaining actions the agency took to create an implementation plan, dependent on the availability of different amounts of funding, during the three year period from the time RTA was passed until the time it went into effect, to identify and address changes that would occur as a result of the legislation.⁹
29. In fiscal year 2018-19 budget, DJJ requested 567 FTEs for implementation of RTA at a cost of approximately \$32.6M. In fiscal year 2019-20, DJJ's request dropped to 348 FTEs at a cost of approximately \$17.6M. Why was there a decrease in the number of FTEs requested?
30. Please explain what DJJ has learned since implementation of RTA.

⁹ The legislature unanimously passed [Act No. 268 of 2016](#), commonly known as Raise the Age Act (RTA) in May 2016. The Governor signed the legislation into law on June 6, 2016. The effective date was July 1, 2019, contingent upon the Department of Juvenile Justice having received any funds that may be necessary for implementation.

Regionalization

31. Please explain how, or if, implementation of a regionalization plan will impact the issues noted in the LAC report in which DJJ concurs, including, but not limited to, staffing, training, and security.

National Certification

32. Has DJJ considered seeking national certification through an organization like Commission on Accreditation for Law Enforcement Agencies, Inc.? If so, what are challenges for the agency in obtaining accreditation? If not, why not?

Please note, we are requesting representatives from the Department of Administration's State Human Resources Division and the Criminal Justice Academy attend the next meeting to clarify any potential questions related to hiring and training. We look forward to working collaboratively with DJJ to improve safety and outcomes for our juveniles and staff. Thank you and your team for your service to the citizens of South Carolina.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Wooten", is written over a light blue horizontal striped background.

Chris Wooten
Chair, House Legislative Oversight Law Enforcement and Criminal Justice Subcommittee

cc: Honorable Wm. Weston J. Newton, House Legislative Oversight Committee Chair
House Legislative Oversight Law Enforcement and Criminal Justice Subcommittee

Enclosures

LAC Audit of DJJ: Implementation Status

Accurate as of:

LAC Audit Report Year	Rec. Number	Recommendations	Recommendations to:	Anticipated cost to Implement (attach explanation of how costs were calculated)	Agency Responses						
					Status of Implementation	General Assembly assistance needed, if any	Actual or Anticipated Date of 100% Completion	Estimated Net Financial Savings, Realized or Anticipated, in the 5 Years Following Implementation*	Non-Financial Benefits Realized or Anticipated from Implementing Recommendation	Non-Financial Drawbacks Realized or Anticipated from Implementing Recommendation	Additional Comments (optional)
		Sample	Choices: (1) Agency under study; (2) General Assembly; (3) Other entity		Choices: (1) Complete; (2) In progress; (3) Partially Implemented; (4) Not Yet Started - Agency plans to implement; (5) Not Started - No plans to implement						
2021	1	DJJ should ensure that Prison Rape Elimination Act and internal staffing standards are regularly met.	Agency under study								
2021	2	DJJ should ensure that security staff remain eligible to earn paid overtime when covering essential shifts at secure facilities.	Agency under study								
2021	3	DJJ should standardize facility staffing plans and re-evaluate these plans on an annual basis.	Agency under study								
2021	4	DJJ should standardize the contents of shift reports, including the number of juveniles and staff present throughout the shift.	Agency under study								
2021	5	DJJ should ensure that these shift reports are disseminated to all levels of management, including the director, on a daily basis.	Agency under study								
2021	6	DJJ should increase the number of employees with event reporting system categorization responsibilities, including employees with specialized gang training.	Agency under study								
2021	7	DJJ should implement clear standards for events that should be assigned for criminal investigation.	Agency under study								
2021	8	DJJ should record what action is taken in cases referred to management for follow up, and use that information to monitor whether these cases are addressed appropriately.	Agency under study								
2021	9	DJJ should modify its investigations' policy to improve the timeliness and transparency of administrative investigations.	Agency under study								
2021	10	DJJ should implement a comprehensive gang intervention program that adopts the strategies of the Office of Juvenile Justice and Delinquency Prevention Comprehensive Gang Model.	Agency under study								
2021	11	DJJ should consult with solicitors local to DJJ facilities to establish standards for notification of criminal incidents and recommendation of criminal cases.	Agency under study								
2021	12	DJJ should discontinue its policy of requesting probable cause determinations from local solicitors regarding pending criminal investigations.	Agency under study								
2021	13	DJJ should allow Performance-based Standards' (PbS) staff and other staff who review and handle incidents access to all relevant evidence, including video camera footage.	Agency under study								
2021	14	DJJ should develop a plan to address each limited compliance and failed compliance quality measure to achieve satisfactory compliance levels in a timely manner.	Agency under study								
2021	15	DJJ should address systemic problems identified by the quality assurance reports and other external reviews regarding the secure facilities.	Agency under study								
2021	16	DJJ should review previous Correctional Consulting Services, LLC and Legislative Audit Council recommendations to ensure they are addressed and implemented.	Agency under study								
2021	17	DJJ should hold facility management and relevant management at agency headquarters accountable for the implementation and compliance of all quality assurance corrective action plans.	Agency under study								
2021	18	DJJ should ensure that the quality assurance reports are completed annually for each secure facility.	Agency under study								
2021	19	DJJ should ensure all security-related policies are maintained and updated at the state and facility levels.	Agency under study								
2021	20	DJJ should ensure that the surveillance system covers the blind spots at every secure facility.	Agency under study								
2021	21	DJJ should, with the upgrade of the system, change its procedures concerning the retention of the videos to ensure their availability for investigations.	Agency under study								
2021	22	DJJ should increase recruitment efforts to ensure that there is sufficient staff to address the increase of Raise the Age juveniles.	Agency under study								
2021	23	DJJ should develop a formal housing plan for Raise the Age juveniles to ensure the agency complies with the requirements of the state constitution.	Agency under study								
2021	24	DJJ should expand its Youth in Transition program to address the needs of all Raise the Age juveniles.	Agency under study								
2021	25	DJJ should develop and implement a standard operating procedure prioritizing greater salary increases for front-line employees on an annual basis.	Agency under study								
2021	26	DJJ should reallocate funds to ensure that front-line, essential employees receive raises at the same rate as the other job classes.	Agency under study								
2021	27	DJJ should modify agency policy to require that start and end times for dually-employed staff are used to track hours worked, not net hours.	Agency under study								
2021	28	DJJ should conduct an Employee Performance Management System process for all employees who are overdue for performance reviews as soon as possible.	Agency under study								
2021	29	DJJ should develop policy and implement standard operating procedures for performance reviews of non-covered employees, including its deputy directors.	Agency under study								
2021	30	DJJ should follow state regulations and its policy to ensure all covered employees undergo the Employee Performance Management System process annually.	Agency under study								
2021	31	DJJ should implement an annual agencywide Employee Performance Management System date to ensure compliance.	Agency under study								
2021	32	DJJ should ensure that each position description contains a thorough and accurate description of that position's job duties.	Agency under study								
2021	33	DJJ should develop and implement standard operating procedures to ensure that all employees have had an opportunity to review and sign their position descriptions.	Agency under study								
2021	34	DJJ should annually review all position descriptions to ensure accuracy and completeness.	Agency under study								
2021	35	DJJ should develop and implement standard operating procedures to ensure that position descriptions, for positions not subject to the agency's delegated authority, are sent to the S.C. Department of Administration's Division of State Human Resources as the position descriptions are updated.	Agency under study								
2021	36	DJJ should conduct an audit of its human resources files to ensure that all employees claiming a degree have an official transcript demonstrating receipt of the degree in their files.	Agency under study								
2021	37	DJJ should ensure that each employee claiming a degree has an official transcript demonstrating receipt of the degree prior to hiring.	Agency under study								
2021	38	DJJ should always conduct a full applicant search to ensure that the most qualified individuals are hired, especially for deputy director positions.	Agency under study								
2021	39	DJJ should include clearer definitions in its policy for all offenses for which an employee may be disciplined.	Agency under study								
2021	40	DJJ should modify its employee progressive discipline policy to include a clear timeframe for adjudication of employee infractions to increase the timeliness of suspensions pending investigation.	Agency under study								
2021	41	DJJ should review employee disciplinary actions to determine whether employees should work for the agency in a security position.	Agency under study								
2021	42	DJJ should enforce all disciplinary actions as outlined in its employee progressive discipline policy.	Agency under study								

LAC Audit of DJJ: Implementation Status

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2021	43	DJJ should revise its recruitment and retention plan(s) to include all recruitment and retention benefits.	Agency under study								
2021	44	DJJ should immediately implement the rapid hire event toolkit of the Division of State Human Resources and the critical recruitment process into the agency's recruitment and retention efforts.	Agency under study								
2021	45	DJJ should identify the security staff who leave for another law enforcement/correctional agency, determine the cost of mandatory training that was completed within a two-year period of resignation, and request reimbursement from the receiving organization.	Agency under study								
2021	46	DJJ should develop and utilize a tracking system to analyze the results of recruitment and retention efforts and include the results in the recruitment and retention plans using data-based information.	Agency under study								
2021	47	DJJ should identify selection and process requirements that can be included in the posting process.	Agency under study								
2021	48	DJJ should examine its current practices for posting and hiring vacant juvenile correctional officer positions to eliminate unnecessary reviews.	Agency under study								
2021	49	DJJ should change criminal background, driver's license, and prior DJJ employment reference checks to be part of the human resources screening prior to authorizing hiring officials to conduct interviews.	Agency under study								
2021	50	DJJ should, in its postings, have the hiring salary and a list of what additional qualifications would make an applicant eligible for a higher salary.	Agency under study								
2021	51	DJJ should authorize the human resources and institutional services' divisions to post and hire entry-level juvenile correctional officer pre-approved vacant positions in bands one through four without oversight by senior leadership.	Agency under study								
2021	52	DJJ should review the employment tests used by North Carolina, Florida, and Georgia to determine their feasibility for South Carolina.	Agency under study								
2021	53	DJJ should evaluate Florida and Georgia's basic training and certification requirements and implement pertinent aspects into its basic training curriculum and certification requirements.	Agency under study								
2021	54	DJJ should analyze which job fairs generate the most hires to determine where they should be held.	Agency under study								
2021	55	DJJ should expand the tracking spreadsheets to include the number of staff members involved, the job fair fees, and travel costs to determine a rate on return of hires compared to cost.	Agency under study								
2021	56	DJJ should add outcomes, deadlines, and potential costs to the written recruiting plan.	Agency under study								
2021	57	DJJ should identify, collaborate, and participate with other agencies and workforce partners including the S.C. Department of Social Services, the S.C. Department of Employment and Workforce, and other community organizations (such as food banks) in drive-through job fairs.	Agency under study								
2021	58	The General Assembly should consider amending Title 9 of the S.C. Code of Laws: Retirement Systems regarding participation in the Police Officer's Retirement System to better clarify positions considered "peace officers."	General Assembly								
2021	59	The General Assembly should amend Title 9 of the S.C. Code of Laws: Retirement Systems to require the S.C. Public Employee Benefit Authority to provide oversight regarding employees entering the state retirement system, including, but not limited to, verification of membership requirements before enrolling an employee into a state retirement plan.	General Assembly								
2021	60	DJJ should review the current capabilities of its Medcat system and immediately implement changes to better track medical histories of the juveniles, refusal of medical care, and missed medical appointments.	Agency under study								
2021	61	DJJ needs to develop a transportation plan by identifying staff and protocols for efficiently transporting juveniles to medical appointments.	Agency under study								
2021	62	DJJ should update and implement a policy on transporting juveniles to improve current practices.	Agency under study								
2021	63	DJJ should hire more full-time nursing staff instead of relying on contract nurses.	Agency under study								
2021	64	DJJ should identify adequate mental health training and require its security staff to complete this training annually.	Agency under study								
2021	65	DJJ should expedite its plans to open an intensive group home.	Agency under study								
2021	66	DJJ should include the procedures and standards for enrolling students into the GED course of study in its policies and/or standard operating procedures.	Agency under study								
2021	67	DJJ should implement a formal document retention policy for end-of-year final grade calculations and credit awards.	Agency under study								
2021	68	DJJ should adopt quality assurance review procedures for end-of-year final grade calculations and credit awards.	Agency under study								
2021	69	DJJ should work with the S.C. Department of Education to modify its student transfer policies, including defining the records to be transferred and shortening the deadline to send records after receiving a request.	Agency under study								
2021	70	DJJ should work with the S.C. Department of Education to identify recommendations to make to the General Assembly to amend its adult education regulations to remove the family court certification and re-enrollment feasibility requirements for certain DJJ youth.	Agency under study								
2021	71	DJJ should ensure all officers assigned to work at the Juvenile Detention Center graduate from the three-week basic detention training at the S.C. Criminal Justice Academy within one year of their hire dates.	Agency under study								
2021	72	DJJ should immediately schedule the Juvenile Detention Center officers who are not currently certified to complete the required training.	Agency under study								
2021	73	DJJ should ensure that training is scheduled to maintain JDC officers' recertification.	Agency under study								
2021	74	DJJ should ensure that all juvenile correctional officers receive the mandated training within the required time for certification (first six months of employment) and annual recertification.	Agency under study								
2021	75	DJJ should ensure that officer training is required for anyone acting in a security officer capacity.	Agency under study								
2021	76	DJJ should determine what additional defensive countermeasures are needed to properly handle the current population of juveniles.	Agency under study								
2021	77	DJJ should implement better defensive countermeasures once identified.	Agency under study								
2021	78	DJJ should ensure that non-security employees complete training, as required by policy.	Agency under study								
2021	79	DJJ should ensure the South Carolina Enterprise Information System's learning management system has not duplicated trainings.	Agency under study								
2021	80	DJJ should require employees to complete refresher trainings/certifications once notifications are received from the South Carolina Enterprise Information System learning management system.	Agency under study								
2021	81	DJJ should ensure all employees annually complete the ethics/code of conduct course offered by the S.C. Department of Administration.	Agency under study								
2021	82	DJJ should have its internal audit function report directly to the agency director.	Agency under study								
2021	83	DJJ should update its policies to require that the internal audit function reports directly to the agency director in order to maintain independence in accordance with the Institute of Internal Auditors standards.	Agency under study								
2021	84	DJJ should update its policies and standard operating procedures to align with the reorganization of the internal audit function.	Agency under study								
2021	85	DJJ should continue to follow the Institute of Internal Auditors standards, despite the reorganization of the internal audit function.	Agency under study								
2021	86	DJJ should review its processes and procedures and implement steps to improve the accuracy of the data entered into South Carolina Enterprise Information System.	Agency under study								
2021	87	DJJ should continue to streamline its processes and train staff to issue payments in a more timely fashion.	Agency under study								

LAC Audit of DJJ: Implementation Status

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2021	88	DJJ should provide guidance to applicable staff regarding its expectations of timelines for the submission of invoices, goods receipts, and all other aspects of the payment processes.	Agency under study								
2021	89	DJJ should work with the S.C. Enterprise Information System to correct grant expenditures for the issues identified in the statewide accounting system.	Agency under study								
2021	90	DJJ should develop more comprehensive guidance and procedures for the reconciliation of grants and end-of-year close out.	Agency under study								
2021	91	DJJ should only charge a grant for costs incurred during its period of performance.	Agency under study								
2021	92	DJJ should only charge a grant for costs that fall within allowable categories under grant guidance.	Agency under study								
2021	93	DJJ should have a full, independent audit of grant expenditures and adjustments from FY 16-17 through FY 19-20 for all educational grants.	Agency under study								
2021	94	DJJ should reimburse the S.C. Department of Education for any federal funding used for unallowable costs.	Agency under study								
2021	95	DJJ should provide training to staff in response to the findings of the state auditor's FY 18-19 report and future findings, if training has not already been provided.	Agency under study								
2021	96	DJJ should, to help lower insurance premiums, ensure juveniles are supervised at all times and unable to gain access to staff personal property, including staff vehicles.	Agency under study								
2021	97	DJJ should develop internal, written procedures governing the periodic review of role assignments in the statewide accounting system and other agency accounting systems.	Agency under study								
2021	98	DJJ should continue to review segregation of duties on an annual basis, at a minimum, and when role changes occur for new or current employees to ensure responsibilities are separated as much as possible.	Agency under study								
2021	99	DJJ should separate the oversight of the accounts receivable and accounts payable functions to increase segregation of duties.	Agency under study								
2021	100	DJJ should separate the trust accounting functions to increase segregation of duties.	Agency under study								
2021	101	DJJ should utilize existing funds to support the agency's needs, as appropriate and allowable by state law, and minimize its end-of-year carry forward funds.	Agency under study								

Notes: * If implementation of a recommendation will result in a net cost to the agency, please include that as a negative number in column E.