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June 11, 2021

Director Earl Powell
Legislative Audit Council
1331 Elmwood Ave. Suite 315
Columbia, SC 29201

Via Email: epowell@lac.sc.gov

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 Powell:

As follow-up from the May 5, 2021, meeting below are questions of interest to various members of the House Legislative Oversight Committee's Law Enforcement and Criminal Justice Subcommittee. Please provide this information by Monday, July 12, 2021.

Implementation Status

1. In the attached Excel Chart, please categorize the recommendations from the Legislative Audit Council's (LAC) 2017 audit and 2021 audit, into core groupings as if they were all included in a single report, to illustrate any common issues among the audits.
2. Also, in the attached Excel chart, for each recommendation, please note the documentation necessary to assist LAC in verifying whether DJJ has implemented the recommendation. We intend to ask DJJ to submit this documentation when providing updates to the Subcommittee or full Committee on implementation status.

Director Powell
Page 2

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 positioned above a horizontal line.

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 Audits of Department of Juvenile Justice: 2017 and 2021

Audit Year	Chpt.	Sub-Category	Rec #	Recommendation	Status	LAC Comment (Included in Chapter 7 of its 2021 Audit Report)	DJJ Response (Included in its response to LAC's 2021 Audit)	Documents needed to assist LAC in verifying whether DJJ has implemented the recommendation
2017	Security and Safety	Training and Certification of Juvenile Correctional and Detention Officers	1	DJJ should immediately submit its juvenile correctional officer training curriculum to the S.C. Criminal Justice Academy for approval by the Law Enforcement Training Council.	Implemented	DJJ submitted its correctional officer training curriculum to the S.C. Criminal Justice Academy (CJA) for approval in April 2017 and CJA approved it on April 28, 2017. The curriculum must be formally reviewed every two years. DJJ submitted its curriculum again in April 2019 and received CJA approval until April 2021.		
2017	Security and Safety	Training and Certification of Juvenile Correctional and Detention Officers	2	DJJ should work with the S.C. Criminal Justice Academy to incorporate material from the academy's Basic Detention curriculum into its own training program for juvenile correctional officers, particularly in the areas of defensive countermeasures, spontaneous knife defense, tactical handcuffing, and pressure point control.	Partly Implemented	DJJ reported that certain components of CJA training had been incorporated into DJJ training classes that include some defensive countermeasures, but not pressure point controls. Handle with Care is self-described as, "teaches a patented de-escalation and restraint technique that is more effective, safer, and requires fewer staff to safely manage a crisis than any other restraint training program in the world." We requested training documentation to confirm this; however, it was not provided. Handle with Care was initially developed for use in hospitals, not a correctional setting. According to a CJA official, the agency had no knowledge of DJJ using these defensive countermeasures. Specifically, DJJ has not added pressure point control, tactical handcuffing, or spontaneous knife defense.	DJJ has incorporated numerous components of CJA trainings into the JCO training curriculum and has deemed this item fully implemented. As previously indicated, DJJ utilizes the HWC training program, which CJA has approved as part of the curriculum for juvenile correctional officers. While this training does not utilize pressure point control, it does contain defensive countermeasures (personal defense techniques), primary restraint techniques and take downs, use of handcuffs and other mechanical restraints, and techniques for protection against use of various weapons.	
2017	Security and Safety	Training and Certification of Juvenile Correctional and Detention Officers	3	DJJ should ensure that all officers assigned to work at the juvenile detention center attend the three-week Basic Detention training at the S.C. Criminal Justice Academy as soon as the academy can accommodate them.	Not Implemented	DJJ has failed to ensure that all of the juvenile correctional officers assigned to the Juvenile Detention Center attend and complete the three-week basic detention training at the S.C. Criminal Justice Academy. In our January 2017 audit, we found that only 28% (23 of 81 officers) of the JDC JCOs were certified by the Criminal Justice Academy, as required. As of December 31, 2019, only 38% (20 of 52) of JDC JCOs had current certifications.	The LAC inaccurately included JDC officers who were already hired and working when the requirement to attend CJA was implemented in the total of JDC officers who had not attended CJA training within their one year of hire. As indicated above, JDC officers were not required to attend CJA training until 2015; therefore, there are numerous officers who were already hired and working well before 2015 so were already beyond their one-year date of hire when that requirement was implemented. According to DJJ records, as of March 31, 2021, there are nine JDC officers who have not met there one-year CJA certification requirement. Some who not able to attend CJA training because of medical reasons (pregnancy, workers compensation, etc.). To include these officers in a count of staff who are delinquent in attending training is inaccurate and misleading.	
2017	Security and Safety	Handling of Major Disturbances at DJJ Facilities	4	DJJ should enter into memorandums of agreement with the S.C. Law Enforcement Division and the S.C. Department of Corrections to outline coordinated responses to major disturbances at any DJJ facilities and the sharing of resources during these incidents.	Not Implemented	DJJ does not have a MOA addressing coordinating responses to major disturbances with either the S.C. Law Enforcement Division (SLED) or the S.C. Department of Corrections (SCDC). In February 2017, DJJ sent a letter to SCDC requesting an MOA; however, DJJ did not provide any response from SCDC. There is an MOA between DJJ and SLED, but only in regards to the investigation of criminal cases and escapes. We contacted SLED and SCDC and both agencies said they would be amenable to having a MOA with DJJ, within certain parameters, to outline coordinated responses to major disturbances. SLED stated that it would respond, if requested, without an MOA.	Both recommendations pertain to MOAs with various law enforcement entities. A MOA with SLED is not necessary for the response to an incident at a facility as SLED would respond as necessary to a call for assistance by DJJ Public Safety, just as SLED does to any other law enforcement agency in South Carolina. A MOA with SCDC also would be inappropriate and could create potential liability for DJJ to allow adult correctional officers who are not trained in dealing with minors to handle such incidents. SCDC officers, experienced in dealing with adults and untrained in dealing with youth, may respond with greater force and tactics than would be acceptable in a juvenile justice environment.	
2017	Security and Safety	Handling of Major Disturbances at DJJ Facilities	5	DJJ should implement a policy to establish clear guidelines to determine at what point outside assistance should be requested.	Implemented	DJJ revised its policy entitled Management of Facility Disturbance in July 2017. The revised policy stated that the deputy director of security operations, the inspector general, and the agency director would assess and confer to determine whether to obtain additional assistance from an outside law enforcement agency. The policy seemed to only cover BRRC and does not stipulate whether this outside assistance would be from SLED, SCDC, or a county sheriff's department. We inquired if this policy also covered the Upstate Evaluation Center and the Coastal Evaluation Center since these facilities were not mentioned in the policy. In response, we received a directive dated October 26, 2020 indicating the previous policy had been amended to include UEC and CEC.		
2017	Security and Safety	Handling of Major Disturbances at DJJ Facilities	6	DJJ Office of Inspector General should ensure that its communications division employees record all details of communications and responses during major disturbances at any DJJ facilities.	Implemented	During our previous audit, agency policy noted two forms that were to be completed during major disturbances. It was conceded by DJJ that these forms had never been used. We were told that unfolding events would be recorded in the ledger. DJJ provided a February 2017 directive stating that telecommunications operators should follow proper procedure and document all necessary information during disturbances that occur on the DJJ-BRRC campus. This directive did not address procedures for the Upstate and Coastal Evaluation Centers and no other directive was provided. We received a directive dated October 26, 2020 stating that the evaluation centers were now included regarding the disturbances on DJJ premises. When asked how the details of communications and responses during major disturbances are recorded now, we were told that actions during incidents were recorded in a ledger. We requested these records for two major incidents occurring in late 2019 and found that the police blotters indicated at what time assistance was called and if juveniles or staff needed transport for medical attention; however, there was no indication as to when the incident had been cleared and normal operations resumed.		
2017	Security and Safety	Investigation of a Juvenile's death at wilderness camp	7	DJJ Office of Inspector General should fully cooperate with, and actively assist, local and state law enforcement agencies investigating the death of a juvenile in the custody of the agency.	NA	Since January 2017, the publication date of our previous audit, we could not verify that there had been any juvenile deaths at any of the secure facilities, camps, or other DJJ locations.		
2017	Security and Safety	Investigation of a Juvenile's death at wilderness camp	8	DJJ should revise its policy to include the death of juveniles in agency custody who are placed in contracted, residential facilities.	Implemented	On November 30, 2017, DJJ replaced its old policy with a new policy, which includes guidelines for handling the death of any juvenile in DJJ custody, including those placed in community-based residential facilities.		
2017	Security and Safety	Investigation of a Juvenile's death at wilderness camp	9	DJJ should revise its policy to apply to the death of any juvenile in agency custody regardless of whether declarations of death or signs of life occur on or off DJJ property.	Implemented	The November 30, 2017 policy mentioned in Recommendation 8 addresses "death of a juvenile in agency custody and ... placed in community-based facilities" in addition to juveniles in secure facilities.		

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2017	Security and Safety	DJJ Police Department	10	DJJ should disband its police department and consider reassigning police officers to supervisory juvenile correctional officer positions based on their training and experience.	Not Implemented	DJJ has renamed the police department to the Department of Public Safety. According to the position descriptions provided during our follow-up review, the officers are performing the same or similar duties as they did during our previous audit.	The DJJ Police Department was, in fact, disbanded and reclassified as DJJ Public Safety in 2017. Careful consideration was given to the second part of this recommendation which suggested that the former police officers be reclassified as supervisory juvenile correctional officers. However, the Agency opted to reclassify this staff as Public Safety Officers as they provide, among other functions, an extra layer of support to all secure hardware facilities, assistance with secured transports of JDC youth, and supervision for interstate compact transports.	
2017	Security and Safety	DJJ Police Department	11	DJJ should enter into memorandums of agreement with state and local law enforcement agencies to establish that these law enforcement agencies are the first responders to incidents that cannot be handled by juvenile correctional officers.	Not Implemented	DJJ did not provide any MOAs with any state or local law enforcement agencies, excepting the MOA with SLED for it to investigate criminal cases and escapes.	Both recommendations pertain to MOAs with various law enforcement entities. A MOA with SLED is not necessary for the response to an incident at a facility as SLED would respond as necessary to a call for assistance by DJJ Public Safety, just as SLED does to any other law enforcement agency in South Carolina. A MOA with SCDC also would be inappropriate and could create potential liability for DJJ to allow adult correctional officers who are not trained in dealing with minors to handle such incidents. SCDC officers, experienced in dealing with adults and untrained in dealing with youth, may respond with greater force and tactics than would be acceptable in a juvenile justice environment.	
2017	Security and Safety	Prison Rape Elimination Act (PREA) Compliance	12	DJJ should seek assistance from the National PREA Resource Center and/or other states that have achieved full PREA compliance in order to develop staffing plans for all of its facilities.	Implemented	DJJ requested assistance from the National PREA Resource Center and several states that had certified full PREA compliance for the prior year. DJJ received assistance including a staffing plan white paper and sample staffing plans. DJJ also requested and received assistance from the National PREA Resource Center regarding policies relevant to PREA compliance and best practices.		
2017	Security and Safety	Prison Rape Elimination Act (PREA) Compliance	13	DJJ should ensure that any requests for funding for additional officers needed to be in compliance with the staff-to-juvenile ratios prescribed in the juvenile facility standards are accurate and based on actual needs.	NA	DJJ has not requested funding for additional officers for the specific purpose of PREA compliance in its budget requests for FYs 17-18, 18-19, 19-20, or 20-21. However, DJJ did request funding for hundreds of additional officer and direct care staff positions in FY 18-19 and FY 19-20 in anticipation of Raise the Age law implementation. Because DJJ has 159 fewer officer positions filled than in 2017, we believe this recommendation is currently not applicable.		
2017	Security and Safety	Prison Rape Elimination Act (PREA) Compliance	14	DJJ should provide annual reports to the General Assembly detailing its efforts to become PREA-compliant and provide timelines for meeting all of the standards for juvenile facilities.	Not Implemented	DJJ has not provided annual reports to the General Assembly regarding its efforts to become PREA-compliant or timelines for meeting PREA standards for juvenile facilities.	DJJ did not accept this recommendation given that PREA documentation, as required by the U.S. Department of Justice, is submitted to the Governor's Office and is published on the Agency's public website.	
2017	Security and Safety	Implementation of Security Audit Recommendations at BRRC	15	DJJ should implement all of the recommendations made by the auditors from Correctional Consulting Services, LLC by June 30, 2017, and provide written justification to the General Assembly for any recommendations that have not been implemented by this date.	Not Implemented	<p>DJJ provided us with its responses to the recommendations of the Correctional Consulting Services, LLC (CCS) audit; however, based on documentation received during this audit, as well as auditor observation, some aspects of the CCS audit have not been implemented.</p> <p>For example, the CCS audit recommended that a qualified tool control officer be selected to centralize the tool control function and that all items such as hoses, drip lines, and other items that could be used for escape are removed or secured away from juvenile access. In response, DJJ stated that a qualified tool control officer was identified to conduct quarterly audits and that DJJ had complied with the recommendation to ensure hoses, drip lines, and other escape tools are secure.</p> <p>Though the agency did identify an employee to serve as tool control officer, the employee's primary responsibility is as a video surveillance officer.</p> <p>Further, the current control and management of tools policy does not address the tool control officer or the tool control officer's responsibilities, despite being enacted in October 2017, after the CCS audit.</p> <p>We requested all tool control audits from 2018 to 2020. DJJ stated that the tool control officer conducts monthly, random tool control audits; however, the documents provided by DJJ did not support the claim that monthly or quarterly tool control audits were being conducted.</p> <p>The documents provided by DJJ did show, however, a persistent problem with hoses being left unsecured. We are not specifying the area where the hoses are unsecured due to security concerns, but it is the same area where hoses were observed unsecured during the 2017 audit of DJJ, and where we observed unsecured hoses during an auditor visit on December 5, 2019.</p> <p>The CCS audit also recommended that DJJ update several policies to add additional security</p>	DJJ clarified that the 2016 Security Audit yielded 112 recommendations, of which, the Agency did not accept 15 of the recommendations. As stated above, the agency has worked diligently, from the onset, to operationalize and incorporate all accepted recommendations into practice, and while not fully implemented, most of the accepted recommendations have been implemented.	
2017	Security and Safety	Broad River Road Complex Facilities	16	DJJ should relocate the perimeter fence at the Broad River Road Complex to isolate the administrative areas from the rest of the campus and reduce the number of staff who must drive onto the secured complex.	Partly Implemented	<p>DJJ opted to move administrative staff to 220 Executive Center Drive rather than relocate the perimeter fence at BRRC. The estimate of the cost to relocate the perimeter fence at BRRC was a little over \$1 million.</p> <p>Instead, DJJ opted to lease a facility with rental costs ranging from \$768,000 in the second year to \$973,000 in year ten. The total cost over a ten-year period will be over \$8 million.</p>	DJJ deemed this recommendation unfeasible, and although not accepted, the objective was obtained with the approval of DOA.	
2017	Security and Safety	Broad River Road Complex Facilities	17	DJJ should abandon its practice of maintaining three separate "campuses" at the Broad River Road Complex and recognize the entire facility as one campus.	Implemented	According to the documentation received and discussions with agency staff, the agency has changed so it now recognizes BRRC as one campus.		

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2017	Security and Safety	Broad River Road Complex Facilities	18	DJJ should consider selling underutilized property on Shivers Road to the S.C. Department of Corrections or another entity.	Not Implemented	While DJJ claimed that it would forward the recommendation to the S.C. Department of Administration (DOA), no supporting documentation was provided. The agency does submit the annual reporting of residential and surplus property to DOA; however, the agency has not identified the property on Shivers Road as being underutilized since it is shown as being leased property. According to DOA, an agency may request the transfer or sale of property. The property may not be sold without the approval of DOA and/or the State Fiscal Accountability Authority. According to Proviso 93.15 of the FY 19-20 appropriations act, the proceeds, if sold, would be split between DOA for deferred maintenance of state-owned buildings and DJJ.	DJJ did not accept this recommendation. While the Agency has considered selling the underutilized property on Shivers Road as recommended, the Department of Administration is responsible for the property of cabinet agencies, so this recommendation is more appropriate for DOA.	
2017	Security and Safety	Security Policies at Broad River Road Complex (BRRRC)	19	DJJ should review all security-related policies related to the Broad River Road Complex and ensure that they are updated to reflect current practices and the current population of the facility.	Not Implemented	DJJ conducted a quality assurance review of the Broad River Road Complex (BRRRC) in 2018. BRRRC failed compliance regarding whether policies and procedures were reflective of current practices, use of isolation, and security procedures and practices. BRRRC failed to initiate any actions to resolve the identified problems.	All security related policies are reviewed and updated every two years. Liaisons from the Institutional Services Division work with DJJ's Policy Management team to ensure that policies are tracked and updated. Moreover, DJJ established a uniform standard operating procedures process that is monitored by Quality Assurance. All facility standard operating procedures are analyzed and evaluated based on this process.	
2017	Security and Safety	Compliance with Security policies at Evaluation Centers	20	DJJ should review all security policies and procedures for its three regional evaluation centers and the juvenile detention center and make necessary revisions to reflect current practices and populations.	Not Implemented	DJJ conducted a total of eight quality assurance reviews of its regional evaluation centers and the juvenile detention center from 2017 through 2019. The reviews found that all facilities had areas of failed or limited compliance in the area of policy and procedures, including three reviews that found failed compliance regarding whether policies and procedures were reflective of current practices. We found that the Coastal Evaluation Center failed to address these findings during the agency's corrective action process within the allotted time.	All security related policies are reviewed and updated every two years. Liaisons from the Institutional Services Division work with DJJ's Policy Management team to ensure that policies are tracked and updated. Moreover, DJJ established a uniform standard operating procedures process that is monitored by Quality Assurance. All facility standard operating procedures are analyzed and evaluated based on this process.	
2017	Security and Safety	Compliance with Security policies at Evaluation Centers	21	DJJ Office of Inspector General or Division of Rehabilitative Services should test compliance with security policies and procedures at local facilities at least annually.	Partly Implemented	DJJ's quality assurance team, under the office of professional standards, conducted a total of eight quality assurance reviews of its regional evaluation centers and the juvenile detention center from 2017 through 2019, including a review of the security policies and procedures. However, DJJ did not conduct these reviews annually for all of these facilities. Additionally, the agency's division of institutional services (formerly rehabilitative services) conducts monthly vulnerability tests to determine whether officers can find hidden contraband at all secure facilities. Officers at DJJ's three evaluation centers found 89% of items placed during these checks in 2018 and 88% in 2019.	Security policies and procedures are tested annually. DJJ employs a full-time Safety and Compliance Specialist who is responsible for the reviewing, facilitating and testing of all security practices within each secure facility, scheduling and conducting safety training, participating in the safety and environmental orientation for new hires, developing and maintaining accident prevention systems, acting as liaison with outside organizations, devising methods to evaluate safety programs, and conducting evaluations of DJJ buildings.	
2017	Security and Safety	Recruiting Correctional Officers	22	DJJ should track the results of its participation in job fairs and other recruitment efforts to include, at a minimum, the sponsor, event date, targeted occupational group, number of contacts, number of applicants, and number of successful new hires.	Implemented	DJJ has tracked its participation in job fairs and other recruitment events since February 2017, including collecting data on all recommended characteristics and results.		
2017	Security and Safety	Recruiting Correctional Officers	23	DJJ should use those results to target recruitment venues that are most likely to attract qualified candidates.	Not Implemented	DJJ does not analyze the information it collects to target recruitment venues that are most likely to attract qualified candidates. We reviewed DJJ's recruitment plan and recruitment team goals and found that the agency continues to target venues that are less likely to result in successful hires.		
2017	Security and Safety	Recruiting Correctional Officers	24	DJJ should ensure that its recruitment efforts extend beyond the Columbia metropolitan area.	Implemented	Our analysis of DJJ's job fair tracking data for the period 2018 through March 2020 showed that 23 of 50 job fairs occurred outside of the Columbia area. This resulted in 17 of 100 successful hires from all job fairs during this time period.	The Office of Human Resources (OHR) analyzes job fairs to determine which locations are likely to generate the most hires. This strategy, in addition to the hiring of two recruitment counselors, is used to attract applicants for specific critical needs positions.	
2017	Security and Safety	Turnover among Correctional and Detention Officers	25	DJJ should review its staff listing to ensure that job class codes are consistent with internal position titles.	Implemented	In response to this recommendation, DJJ conducted an internal title data review in April of 2017; however, there is no indication that any additional reviews have been completed since 2017. DJJ should continue to conduct reviews of its staff listing to ensure job class codes are consistent with internal position titles.		
2017	Security and Safety	Turnover among Correctional and Detention Officers	26	DJJ should implement internal controls to ensure that DJJ staff update classification codes whenever positions are reclassified.	Partly Implemented	See Recommendation 27. DJJ provided us with an email from its 2017 internal title data review that listed suggestions to improve employee classification codes. It is unclear whether these suggestions were implemented, as no formal internal controls specific to classification code updates were identified in agency policy or standard operating procedures.	Processes are in place to address the LAC's finding as evidenced by OHR's Standard Operating Procedures (SOP), which were developed in 2019, and by the Classification and Compensation SOP. The roster containing employees with a salary of \$0.00 is a timing anomaly, not a DJJ issue, relating to employees who had transferred from another state agency and their files had not been transferred in SCEIS to DJJ as of the date the roster was run. OHR could have clarified this with the LAC auditors had they inquired.	
2017	Security and Safety	Turnover among Correctional and Detention Officers	27	DJJ should take steps to ensure that all data related to current and former employees are accurate.	Partly Implemented	We asked what internal controls are used by DJJ to ensure employee data are accurate. DJJ responded it relies on a series of internal employee reviews, as well as the South Carolina Enterprise Information System (SCEIS) monthly batch reports and reports sent by the Comptroller General's office to ensure that employee data are correct. During this audit, DJJ implemented a new electronic document management system and employment portal for HR developed by TEAMia. In conjunction with the electronic system, new workflow process guides and training were made available to DJJ HR employees. The workflow process guides provide step-by-step instruction for HR actions based on the employee's role in HR. The guides also indicate where approval is needed by HR managerial staff, but do not show any steps to produce reports that could be used to verify whether employee data are correct. Despite these internal controls, we received employee rosters containing inaccurate employee information over the course of our audit. For example, one employee roster incorrectly listed three employees as making an annual salary of \$0.00. An employee contact list showed employees as police officers. If DJJ has followed Recommendation 10, the police officer classification should no longer exist.	Processes are in place to address the LAC's finding as evidenced by OHR's Standard Operating Procedures (SOP), which were developed in 2019, and by the Classification and Compensation SOP. The roster containing employees with a salary of \$0.00 is a timing anomaly, not a DJJ issue, relating to employees who had transferred from another state agency and their files had not been transferred in SCEIS to DJJ as of the date the roster was run. OHR could have clarified this with the LAC auditors had they inquired.	

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2017	Security and Safety	Turnover among Correctional and Detention Officers	28	DJJ should establish internal controls in its human resources division in order to minimize the risk of inaccurate employee data.	Partly Implemented	See Recommendation 27.	Processes are in place to address the LAC's finding as evidenced by OHR's Standard Operating Procedures (SOP), which were developed in 2019, and by the Classification and Compensation SOP. The roster containing employees with a salary of \$0.00 is a timing anomaly, not a DJJ issue, relating to employees who had transferred from another state agency and their files had not been transferred in SCEIS to DJJ as of the date the roster was run. OHR could have clarified this with the LAC auditors had they inquired.	
2017	Security and Safety	Turnover among Correctional and Detention Officers	29	DJJ should, annually, calculate a turnover rate that is based on average staff size at the beginning and end of the period for which a rate is being computed.	Partly Implemented	DJJ has calculated and tracked quarterly and annual turnover rates for the agency as a whole since 2018, and performed retroactive calculations to FY 16-17. However, these calculations did not use the formula we recommended, which would result in a more accurate calculation of turnover.	Since 2018, DJJ does calculate and use the turnover rate. However, the formula the LAC recommended to determine the turnover rate is flawed and would not provide an accurate turnover rate. DJJ utilizes a more accurate turnover rate calculation provided by the Society for Human Resources Management. DJJ uses turnover information to target critical needs areas, and additionally uses healthcare employee recruitment and retention program guidelines, advanced degree increases, sign-on bonuses, and referral bonuses to attract candidates and reduce the turnover. OHR utilizes the Monthly Batch reporting to ensure employee data is accurate. DJJ managers are provided reports generated from SCEIS as needed to ensure that their employee data is accurate.	
2017	Security and Safety	Turnover among Correctional and Detention Officers	30	DJJ should annually recalculate and monitor its turnover rates for correctional officers and other occupational groups for which retention is a problem.	Not Implemented	DJJ calculated turnover rates among various position groups for FY 17-18 and FY 18-19 using the formula used by the Division of State Human Resources (DSHR), which is different than the one specified in Recommendation 29. However, these calculations were completed for the purpose of responding to our document requests as part of this follow-up audit, and DJJ does not calculate these rates in the regular course of agency business.	Since 2018, DJJ does calculate and use the turnover rate. However, the formula the LAC recommended to determine the turnover rate is flawed and would not provide an accurate turnover rate. DJJ utilizes a more accurate turnover rate calculation provided by the Society for Human Resources Management. DJJ uses turnover information to target critical needs areas, and additionally uses healthcare employee recruitment and retention program guidelines, advanced degree increases, sign-on bonuses, and referral bonuses to attract candidates and reduce the turnover. OHR utilizes the Monthly Batch reporting to ensure employee data is accurate. DJJ managers are provided reports generated from SCEIS as needed to ensure that their employee data is accurate.	
2017	Security and Safety	Turnover among Correctional and Detention Officers	31	DJJ should annually analyze turnover rates to identify problem areas and use that information to focus its recruitment and retention efforts.	Not Implemented	DJJ has considered and implemented various recruitment and retention efforts, particularly for JCOs, who had the highest turnover rates among position groups that the agency analyzed in FY 17-18 and FY 18-19. However, it is not clear that annual turnover analyses were used in these efforts because they were not conducted for position groups in the regular course of business.	Since 2018, DJJ does calculate and use the turnover rate. However, the formula the LAC recommended to determine the turnover rate is flawed and would not provide an accurate turnover rate. DJJ utilizes a more accurate turnover rate calculation provided by the Society for Human Resources Management. DJJ uses turnover information to target critical needs areas, and additionally uses healthcare employee recruitment and retention program guidelines, advanced degree increases, sign-on bonuses, and referral bonuses to attract candidates and reduce the turnover. OHR utilizes the Monthly Batch reporting to ensure employee data is accurate. DJJ managers are provided reports generated from SCEIS as needed to ensure that their employee data is accurate.	
2017	Security and Safety	Juvenile Correctional Officers Salaries	32	DJJ should identify all information it will need to evaluate its strategy for reducing employee turnover, such as age, years of service, education background, work experience, and salary.	Implemented	DJJ stated that it would consider the factors relevant to turnover that are listed in the recommendation. DJJ tracks relevant separations and demographics data, including education, years of agency and state service, and other data in SCEIS.		
2017	Security and Safety	Juvenile Correctional Officers Salaries	33	DJJ should audit its employee records to ensure that its human resources staff have an employee roster that is accurate, current, and complete.	Partly Implemented	An audit of employee records was conducted internally by DJJ in December 2017. However, employee rosters we received from DJJ over the course of the audit included inaccurate data. For example, on an employee roster received during the audit, three employees were incorrectly listed as making an annual salary of \$0.00. Another employee list showed an employee as a police officer. If DJJ has followed Recommendation 10, the police officer classification should no longer exist.	Processes are in place to address the LAC's finding as evidenced by OHR's Standard Operating Procedures (SOP), which were developed in 2019, and by the Classification and Compensation SOP. The roster containing employees with a salary of \$0.00 is a timing anomaly, not a DJJ issue, relating to employees who had transferred from another state agency and their files had not been transferred in SCEIS to DJJ as of the date the roster was run. OHR could have clarified this with the LAC auditors had they inquired.	
2017	Security and Safety	Juvenile Correctional Officers Salaries	34	DJJ should assume the responsibility to ensure that the human resources data it uses in any analysis, derived from any source including South Carolina Enterprise Information System (SCEIS/SAP®), is complete and accurate.	Partly Implemented	See Recommendation 33.	Processes are in place to address the LAC's finding as evidenced by OHR's Standard Operating Procedures (SOP), which were developed in 2019, and by the Classification and Compensation SOP. The roster containing employees with a salary of \$0.00 is a timing anomaly, not a DJJ issue, relating to employees who had transferred from another state agency and their files had not been transferred in SCEIS to DJJ as of the date the roster was run. OHR could have clarified this with the LAC auditors had they inquired.	
2017	Security and Safety	Juvenile Correctional Officers Salaries	35	DJJ should track the disciplines of study in which degrees are earned to determine, over time, whether employees who earn degrees in certain fields are more likely to stay with the agency than those receiving degrees in other fields of study.	Implemented	In February 2019, DJJ issued a notice to employees modifying the use of additional skills and knowledge salary increases to require that the degree obtained aligns with the employee's current job duties. In April 2019, DJJ Policy 231—Employee Salary Levels—was enacted, including a requirement that additional skills or knowledge gained must be directly related to the employee's job. A review of a statistically valid sample of 2019 salary increases given for additional skills or knowledge shows that DJJ is requiring and maintaining copies of transcripts for salary increases based on employees earning degrees.		
2017	Security and Safety	DJJ Office of Inspector General	36	DJJ should properly dispose of surplus law enforcement equipment.	Implemented	Based on the documentation provided by DJJ, in February 2017, the agency disposed of OC spray and transferred the grenade launcher, guns, ammunition, and tear gas canisters to SLED. DJJ also provided a standard operating procedure, effective October 2019, regarding the disposal of OC spray.		
2017	Use of Funds	DJJ Funding and Expenditures	37	DJJ should be more consistent in recording financial transactions in order to improve the agency's ability to manage costs.	Not Implemented	While DJJ provided documentation of actions that have been taken in an effort to provide more consistency in recording financial transactions, we continued to find data issues during this audit. In our sample of 100 vendor payments, covering FY 16-17 through May 18, 2020, 15 were keyed with the wrong invoice date. Journal entry errors were identified in our review of grant activity. In addition, the S.C. State Auditor's Office identified the incorrect classification of non-federal grant revenue in a federal grant revenue account and an \$8,500 expenditure classified incorrectly as educational cost during the FY 18-19 agreed-upon procedures engagement. Furthermore, \$466,000 of FY 18-19 salary expenditures for unclassified positions were miscoded as classified positions. The agency needs to continue to assess the fiscal functions and staffing levels in order to minimize data errors.	DJJ is committed to accuracy in the recording of financial transactions. While every effort is made to ensure that accounting data is entered into the SCEIS accounting system accurately, keying or transactional errors are not completely preventable as human errors occur. Staff spend 99% - 100% of their day performing data entry. On average, the team enters 15,000-20,000 transactions in a given year. Given this level of volume, errors will occur. To find 15 errors in a specific set of data is less than 2 tenths of 1% of all data entered.	

LAC Audits of Department of Juvenile Justice: 2017 and 2021

Audit Year	Chpt.	Sub-Category	Rec #	Recommendation	Status	LAC Comment (Included in Chapter 7 of its 2021 Audit Report)	DJJ Response (Included in its response to LAC's 2021 Audit)	Documents needed to assist LAC in verifying whether DJJ has implemented the recommendation
2017	Use of Funds	Capital Assets	38	DJJ should have an independent audit of the agency's fixed assets.	Partly Implemented	The documentation provided by the agency reflects partial steps in completing an independent audit of the agency's fixed assets; however, a full independent audit has not been completed. The state auditor found various issues, as reported in its agreed-upon procedures reports for FY 16-17, FY 17-18, and FY 18-19, such as: assets that were improperly valued, assets that could not be located, missing inventory tags, and insufficient documentation for disposals. In addition, DJJ's internal auditor found asset corrections for land, buildings, and lease hold improvements in FY 17-18. DJJ personnel stated the agency has initiated an internal review of fixed assets; however, the review had not been completed. An internal review by the agency should still be audited appropriately.	All issues that were outlined in the previous audits (LAC, IT, SAO) have been corrected. DJJ considers the Office of the State Auditor (SAO) as independent. The Fiscal Affairs team audits one cost center per month by physically traveling to the facility and documenting every asset, beginning September of 2019. The Assets team also has worked with SCEIS to clean up decades old incorrect data, and the asset data is correct on our books (i.e. SCEIS). DJJ continues to follow up with DOA's Real Property Services Division regarding their completion of the load of the reconciled assets into their system.	
2017	Use of Funds	Capital Assets	39	DJJ should enforce its capital assets policy to include the appropriate signature and dating of forms, as well as unannounced, random audits by the internal auditor and/or the Office of the State Auditor.	Implemented	DJJ provided documentation regarding various reviews of fixed assets by the Department of Administration's State Real Property Services Unit, the S.C. State Auditor's Office, and DJJ's internal auditor. Issues were identified that resulted in corrections to land and building and asset valuation errors. The state auditor included additional testing of supporting documentation for asset inventories and asset retirements in FY 17-18 and FY 18-19, which resulted in asset valuation findings. No issues were reported regarding the signature and dating of forms.		
2017	Use of Funds	Capital Assets	40	DJJ should continue to work with the South Carolina Enterprise Information System to resolve the outstanding construction-in-progress assets.	Implemented	Based on documentation received from DJJ and SCEIS, the construction-in-progress issues have been resolved.		
2017	Use of Funds	Retirement Incentive and Voluntary Separation Programs	41	DJJ should forego any employee separation program(s) involving correctional officers and other employee groups difficult to recruit.	Implemented	As of August 2020, we received documentation from DJJ and the Division of State Human Resources indicating that DJJ has not implemented any voluntary separation or retirement incentive programs since January 2017.		
2017	Use of Funds	Retirement System Eligibility	42	The General Assembly should consider amending S.C. Code of Laws Title 9: Retirement Systems regarding participation in the Police Officer's Retirement System to clarify positions considered "peace officers."	Not Implemented	The General Assembly has not proposed or amended state law Title 9 to clarify the positions considered to be "peace officers."	DJJ did not accept these recommendations as they are more appropriately addressed to the General Assembly. DJJ cannot be held accountable for implementing a recommendation that is beyond its control and better directed towards an external entity.	
2017	Use of Funds	Retirement System Eligibility	43	The General Assembly should amend S.C. Code of Laws Title 9: 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.	Not Implemented	State law regarding retirement systems has not been amended to include the requirement that PEBA 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.	DJJ did not accept these recommendations as they are more appropriately addressed to the General Assembly. DJJ cannot be held accountable for implementing a recommendation that is beyond its control and better directed towards an external entity.	
2017	Use of Funds	Retirement System Eligibility	44	The General Assembly should consider whether the S.C. Board of Juvenile Parole should be included with S.C. Department of Mental Health, S.C. Department of Corrections, and the S.C. Department of Juvenile Justice in considering whether any of its employees qualify as being eligible for the Police Officer's Retirement System.	Not Implemented	The General Assembly has not proposed or amended state law Title 9 to clarify the positions considered to be "peace officers," which currently includes employees of DMH, DJJ, and SCDC but does not include the S.C. Board of Juvenile Parole.	DJJ did not accept these recommendations as they are more appropriately addressed to the General Assembly. DJJ cannot be held accountable for implementing a recommendation that is beyond its control and better directed towards an external entity.	
2017	Use of Funds	Retirement System Eligibility	45	DJJ should complete a comprehensive review of all staff, including the S.C. Board of Juvenile Parole personnel, regarding retirement system eligibility based on the requirements of state law.	Partly Implemented	In our 2017 audit, DJJ indicated that its interpretation of the membership requirements included assignment to a secure work location, employees in full-time equivalent positions who do not perform the duties of police officer, fire fighter, peace officer, coroner, magistrate, and probate judge, but their work locations are assigned and located behind one of DJJ's secure locations, would be able to enroll in PORS. DJJ reviewed its handling of employee eligibility and determined that it would place all full-time, permanent employees in PORS effective July 2018. In October 2019, DJJ requested an eligibility review for certain positions from PEBA and noted its intent to classify all permanent, full-time personnel to PORS effective July 2018. DJJ did not acknowledge the relocation of administrative staff to a non-secure office location at Synergy Office Park in the letter sent to PEBA. While DJJ reviewed its classification of employees in PORS, it does not appear that staff of the S.C. Board of Juvenile Parole (parole board) were reviewed. In this instance, those individuals are not listed as one of the "exception" agencies in state law that can be classified as a peace officer. Based upon our review in 2017, some personnel of that agency were in PORS and others were not. DJJ provides administrative support to the parole board and would need to review any necessary changes to the retirement status of those employees based on this recommendation.	The South Carolina Board of Juvenile Board is its own state entity with a separate organizational unit from DJJ	

LAC Audits of Department of Juvenile Justice: 2017 and 2021

Audit Year	Chpt.	Sub-Category	Rec #	Recommendation	Status	LAC Comment (Included in Chapter 7 of its 2021 Audit Report)	DJJ Response (Included in its response to LAC's 2021 Audit)	Documents needed to assist LAC in verifying whether DJJ has implemented the recommendation
2017		Education	46	DJJ should implement a policy that defines a procedure for periodic monitoring of the instruction of juveniles at the wilderness camps to ensure that juveniles are being taught by staff who possess certifications required by state law.	Implemented	DJJ adopted a policy in February 2017 defining a procedure for regular monitoring of the instruction of juveniles at alternative program sites, which includes a review of teacher certifications during site visits.		
2017	Oversight of Juvenile Services	Education	47	DJJ should develop a system, based on policy, for monitoring the instruction of juveniles placed at the camps that includes random visits, a checklist for items to monitor, and a review of the documentation of the qualifications of instructional staff.	Implemented	In February 2017, DJJ adopted a policy defining a procedure for regular monitoring of the instruction of juveniles at alternative program sites, which includes regular announced and unannounced visits, a checklist to be completed by the monitor, and a review of teacher certifications during site visits.		
2017	Oversight of Juvenile Services	Education	48	DJJ should ensure that the information from all site visits are stored in a way that is accessible and secure for the purpose of conducting follow-up and detecting trends that could necessitate the need for DJJ to take corrective action.	Implemented	DJJ's alternative site monitoring policy includes a requirement that information gathered during site visits be reported to DJJ and site management, and retained for three years. Documents are retained on an internal, shared network organized by school year and site.		
2017	Oversight of Juvenile Services	Education	49	DJJ should develop and maintain a roster of certified teachers that includes name, teacher certification number, date of certification, state where certification was last issued, area of certification, and any other information necessary to document qualifications required by state law.	Partly Implemented	DJJ does maintain a roster of certified teachers; however, the roster is lacking data for two of the categories listed in the recommendation (date of certification and state where certification was last issued). Additionally, based on a review of a statistically-valid sample of teachers, the roster includes inaccurate data. Discrepancies observed include incomplete areas of certification, conflicting class data, and incorrect expiration date data. Further, we were unable to locate several teachers in the State Department of Education's certification search feature using the certification numbers provided by DJJ in its teacher roster. During our exit process, DJJ provided a new copy of the roster of certified teachers that included the date of certification and state where certification was last issued.	DJJ provided the LAC with an updated teacher certification roster which reflects both the date and state of teachers' certification. However, the LAC refuses to consider the recommendation fully implemented.	
2017	Oversight of Juvenile Services	Education	50	DJJ should audit its staffing data to ensure that the information stored by the South Carolina Enterprise Information System (SCEIS) is correct.	Implemented	In response to our recommendation, DJJ's Office of Human Resources and district office personnel conducted a SCEIS internal audit on February 8, 2017. DJJ has not conducted a similar audit since; however, DJJ has indicated that internal controls are in place to review district office staff data on a regular basis. DJJ should continue to conduct reviews of its staffing data for district office personnel to ensure information in SCEIS is correct.		
2017	Oversight of Juvenile Services	Education	51	DJJ should schedule and conduct unannounced visits to the wilderness camps specifically to monitor the instruction of juveniles.	Partly Implemented	In 2017, DJJ conducted seven unannounced visits to five wilderness camps pursuant to its alternative site monitoring policy. In 2018, DJJ conducted a total of 18 unannounced visits to all nine wilderness camps. In 2019, DJJ conducted a total of nine visits to seven wilderness camps.	The LAC's own report states that the practice of conducting unannounced visits has been implemented; therefore, it is inexplicable as to why the LAC is still deeming this recommendation as only partially implemented.	
2017	Oversight of Juvenile Services	Education	52	DJJ should arrange to receive, from schools attended by juveniles placed in group homes, reports of educational progress.	Implemented	DJJ receives student growth results, which include skills assessment results, from camps on a monthly basis.		
2017	Oversight of Juvenile Services	Education	53	DJJ should develop a system to identify those juveniles in alternative placements who are not making adequate progress.	Implemented	DJJ adopted a standard operating procedure that identifies juveniles placed in camps who are below grade level, develops interventions for those students, and tests progress. DJJ staff also are able to review grades for students placed at camps on a regular basis.		
2017	Oversight of Juvenile Services	Education	54	DJJ should require, as part of its contracts with wilderness camp service providers, that the department will have access to student growth test results.	Implemented	DJJ's contract with camps requires that camps comply with DJJ's education standards, including sharing achievement and grade information.		
2017	Oversight of Juvenile Services	Quality Assurance of Case Management	55	DJJ should allocate sufficient resources to more thoroughly review the contacts recorded in the Juvenile Justice Management System (JJMS) in order to determine whether, in fact, a problem exists in failing to document, and whether that failure is merely a clerical failure or indicative of more systemic problems of oversight within the community.	Partly Implemented	From 2017 through 2018, DJJ implemented a regular case file review process for county offices that included a review of contacts. DJJ also conducted case file audits for each county office between April 2018 and May 2019, which included a review of contacts. However, neither process identified whether contact issues, if any, were substantive in nature or mere clerical errors.	DJJ has taken the necessary steps to address this recommendation by hiring four Case Management Monitors in May 2020 to assist with oversight of case management and the statewide audit function. The audit team is currently being trained to identify policy violations and to specifically identify if the problem is a contact issue or clerical issue.	
2017	Oversight of Juvenile Services	Quality Assurance of Case Management	56	DJJ's director, deputy director for community services, and regional administrators should be notified of the results of all reviews of county office compliance with agency policy.	Partly Implemented	DJJ notified the deputy director for community services and regional and county office administrators of the results of all case file reviews via email, but did not include or notify the agency's director.	The Agency Director has access to data referred to in this recommendation at any time through the Agency's Information and Data Hub which went live in February 2019. Therefore, emailing the Director is unnecessary.	
2017	Oversight of Juvenile Services	Quality Assurance of Case Management	57	DJJ should incorporate the results of a review of a county office's compliance with DJJ policy into an improvement plan for the county, when deficiencies are identified, complete with a description of the problem, strategies aimed at improving performance, and a timetable for corrective action and follow-up.	Partly Implemented	DJJ created improvement plans to be completed by county office management following the completion of case file reviews at county offices. However, not all plans satisfactorily addressed the recommended elements of our recommendation, and plans did not include a timetable for follow-up review, although the frequency of subsequent reviews depends on the results of each county office's last case file review.	DJJ has taken the necessary steps to address the issues that necessitated this recommendation. All the county offices determined to have severe deficiencies were issued corrective action plans and were given sixty-days to address deficiencies.	
2017	Oversight of Juvenile Services	Probation and Parole Hearings and Juvenile Caseloads	58	DJJ should increase the use of video conferencing for juvenile parole hearings.	Implemented	According to communications with DJJ and the S.C. Board of Juvenile Parole (board), video conferencing began being used for parole hearings in March of 2017. The board should continue to use video conferencing.		

LAC Audits of Department of Juvenile Justice: 2017 and 2021

Audit Year	Chpt.	Sub-Category	Rec #	Recommendation	Status	LAC Comment (Included in Chapter 7 of its 2021 Audit Report)	DJJ Response (Included in its response to LAC's 2021 Audit)	Documents needed to assist LAC in verifying whether DJJ has implemented the recommendation
2017	Oversight of Juvenile Services	Probation and Parole Hearings and Juvenile Caseloads	59	DJJ should adhere to its policy requiring nine members on the Release Authority.	Implemented	According to the documentation received from DJJ in April 2019, the Release Authority had nine members. Three seats were vacated in January 2020; however, updated information provided by DJJ as of August 2020 indicates that the Release Authority had all nine seats filled. However, during this review, we found that the Release Authority manager position, which is not a board member position, has been vacant since July 31, 2020. Two individuals are sharing the manager responsibilities in the interim. We encourage the appointment of a Release Authority manager as soon as possible.		
2017	Oversight of Juvenile Services	Probation and Parole Hearings and Juvenile Caseloads	60	DJJ should consider upgrading community equipment that would improve staff safety, including, but not limited to, cellular phones.	Implemented	Based on documentation received from DJJ, the community division has replaced flip phones with data phones for staff. The upgraded phones (iPhone 7 and newer) provide for added security with a built-in 911 functionality. The phones are also equipped with an app for GPS tracking. In addition, laptops include Microsoft Office 365 products and enable virtual team meetings and case management flexibility. We encourage the community division to continue to evaluate and modify equipment with a focus on improving staff security as appropriate.		
2017	Oversight of Juvenile Services	Probation and Parole Hearings and Juvenile Caseloads	61	DJJ should complete a manual audit of the Juvenile Justice Management System caseload data.	Implemented	DJJ conducted a comprehensive case file review, by county office, in 2018, and regular caseload reviews in 2018 and 2019.		
2017	Oversight of Juvenile Services	Probation and Parole Hearings and Juvenile Caseloads	62	DJJ should monitor juvenile cases and work with county solicitors to ensure that juveniles do not languish in the system without receiving rehabilitative support services when needed.	Not Implemented	DJJ reviewed data regarding juvenile referrals that were pending solicitor decisions in February and March 2017, including how long they were pending decisions, but did not continue the practice. Data from September 2019 showed only that the total number of juveniles who were pending solicitor decisions had decreased.	The current Interim Deputy Director for the Division of Community Services is committed to establishing a uniform approach to addressing the issue of languishing cases. While the scheduling cases for court is the sole responsibility of the Solicitor's Office, each county has a different process for following up on "languishing" cases. DJJ is working to create a statewide process to address this issue.	
2017	Oversight of Juvenile Services	Performance Based Standards	63	DJJ should determine whether the data collected through Performance-based Standards are consistent with what DJJ needs to collect to identify problems and make improvements in its secured facilities.	Implemented	DJJ has determined that the data collected through PbS are consistent with the agency's needs to identify problems and make improvements in its secure facilities.		
2017	Oversight of Juvenile Services	Performance Based Standards	64	DJJ should use the data collected through Performance-based Standards to analyze trends, alter operational strategies, and determine areas of improvement in staff training.	Partly Implemented	DJJ has continued to use the data collected through PbS to analyze trends and recommend changes in facility operations. However, we found in interviews with agency staff that PbS recommendations may not be considered constructively or implemented effectively at the facility level.	This has been fully implemented. PbS continues to work in partnership with all facilities and leadership teams across DJJ to implement data-driven continuous improvement processes by conducting weekly meetings with facility administrators and monthly multi-disciplinary team meetings where incidents are discussed, by developing plans of actions, and by presenting to the Executive Management Team on a monthly basis. DJJ utilizes PbS data to not only analyze trends but make programmatic changes to include staff training enhancements.	
2017	Oversight of Juvenile Services	Performance Based Standards	65	DJJ should reduce the number of site coordinators at BRRC to one for the entire Broad River Road Complex.	Implemented	DJJ has reduced the number of site coordinators at BRRC to one. However, given the size of BRRC relative to other secured facilities, it may be beneficial for DJJ to hire additional PbS staff (such as an assistant) to best implement PbS at BRRC.		
2017	Oversight of Juvenile Services	Performance Based Standards	66	DJJ should continue to cross-check event reports with daily shift reports to ensure that critical information affecting security is not overlooked.	Implemented	PbS staff continue to reconcile event reports with shift reports to ensure completeness and accuracy.		
2017	Oversight of Juvenile Services	Outcome measures and penalties in contracts	67	DJJ should develop an objective tool to measure outcomes of juveniles placed in the camps.	Implemented	DJJ developed a spreadsheet-based tool that has tracked five outcome measures for juveniles placed in camps since September 2017.		
2017	Oversight of Juvenile Services	Outcome measures and penalties in contracts	68	DJJ should include outcome measures expected of all contracted camps and programs in its contracts.	Implemented	DJJ provided signed change orders, dated March 2017, that reflected the inclusion of outcome and output measures.		
2017	Oversight of Juvenile Services	Outcome measures and penalties in contracts	69	DJJ should include penalties for camps and programs which do not meet the established outcome measures in its contracts.	Implemented	While DJJ did implement outcome measures, the agency indicated that it will not implement penalties for not meeting those outcome measures until new contracts are established. During our exit process, however, DJJ provided the RFP for camp contracts awarded in August 2020. DJJ added language imposing penalties for any contractual requirement not corrected according to an approved action plan within specific timelines.		
2017	Oversight of Juvenile Services	Complaint boxes at DJJ camps	70	DJJ should implement a written policy to require the camps check the complaint boxes weekly and relay significant issues to DJJ.	Not Implemented	DJJ has not implemented a policy to either prohibit informal complaint boxes or have submissions to such boxes forwarded to DJJ.	This has been fully implemented. On September 24, 2019, and more recently on March 4, 2021, DJJ provided the LAC with a copy of the Juvenile Grievance Process Policy, which mandates that the community-based facilities and programs fax or email Juvenile Grievance Forms.	
2017	Oversight of Juvenile Services	Escapes from camps	71	DJJ needs to clarify, in written procedures, protocol to follow in the event of an escape and clearly communicate them to camp staff.	Implemented	DJJ created written protocols for responding to escapes in February 2017 and May 2018 and communicated them to camp management.		
2017	Oversight of Juvenile Services	Escapes from camps	72	DJJ needs to formalize its monitoring process and have camp management acknowledge its understanding of a juvenile escape protocol.	Implemented	Camp management signed and returned a memorandum from DJJ communicating juvenile escape protocol in May 2018.		

LAC Audits of Department of Juvenile Justice: 2017 and 2021

Audit Year	Chpt.	Sub-Category	Rec #	Recommendation	Status	LAC Comment (Included in Chapter 7 of its 2021 Audit Report)	DJJ Response (Included in its response to LAC's 2021 Audit)	Documents needed to assist LAC in verifying whether DJJ has implemented the recommendation
2017	Oversight of Juvenile Services	Escapes from camps	73	DJJ should include penalties in its contracts for failure to follow established escape protocol.	Implemented	DJJ had not provided documentation showing that it added penalties to its contracts for failure to follow escape protocol. During our exit process, however, DJJ provided the RFP for camp contracts awarded in August 2020. DJJ added language imposing penalties for any contractual requirement, which includes failure to follow established escape protocol.		
2017	Oversight of Juvenile Services	Escapes from camps	74	DJJ needs to capture statistical data such as the number of escapes and sexual assaults at all DJJ facilities.	Implemented	DJJ's Event Reporting System records event reports for all event categories, including escapes and sexual assaults. PbS also captures and reports escape and sexual assault data.		
2021	Safety and Security	Staffing at Secure Facilities	1	DJJ should ensure that Prison Rape Elimination Act and internal staffing standards are regularly met.				
2021	Safety and Security	Staffing at Secure Facilities	2	DJJ should ensure that security staff remain eligible to earn paid overtime when covering essential shifts at secure facilities.				
2021	Safety and Security	Staffing at Secure Facilities	3	DJJ should standardize facility staffing plans and re-evaluate these plans on an annual basis.				
2021	Safety and Security	Staffing at Secure Facilities	4	DJJ should standardize the contents of shift reports, including the number of juveniles and staff present throughout the shift.				
2021	Safety and Security	Staffing at Secure Facilities	5	DJJ should ensure that these shift reports are disseminated to all levels of management, including the director, on a daily basis.				
2021	Safety and Security	Incidents and Investigations	6	DJJ should increase the number of employees with event reporting system categorization responsibilities, including employees with specialized gang training.				
2021	Safety and Security	Incidents and Investigations	7	DJJ should implement clear standards for events that should be assigned for criminal investigation.				
2021	Safety and Security	Incidents and Investigations	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.				
2021	Safety and Security	Incidents and Investigations	9	DJJ should modify its investigations' policy to improve the timeliness and transparency of administrative investigations.				
2021	Safety and Security	Incidents and Investigations	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.				
2021	Safety and Security	Incidents and Investigations	11	DJJ should consult with solicitors local to DJJ facilities to establish standards for notification of criminal incidents and recommendation of criminal cases.				
2021	Safety and Security	Incidents and Investigations	12	DJJ should discontinue its policy of requesting probable cause determinations from local solicitors regarding pending criminal investigations.				
2021	Safety and Security	Incidents and Investigations	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.				
2021	Safety and Security	Violations of Security Procedures	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.				
2021	Safety and Security	Violations of Security Procedures	15	DJJ should address systemic problems identified by the quality assurance reports and other external reviews regarding the secure facilities.				
2021	Safety and Security	Violations of Security Procedures	16	DJJ should review previous Correctional Consulting Services, LLC and Legislative Audit Council recommendations to ensure they are addressed and implemented.				
2021	Safety and Security	Violations of Security Procedures	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.				
2021	Safety and Security	Violations of Security Procedures	18	DJJ should ensure that the quality assurance reports are completed annually for each secure facility.				

LAC Audits of Department of Juvenile Justice: 2017 and 2021

Audit Year	Chpt.	Sub-Category	Rec #	Recommendation	Status	LAC Comment (Included in Chapter 7 of its 2021 Audit Report)	DJJ Response (Included in its response to LAC's 2021 Audit)	Documents needed to assist LAC in verifying whether DJJ has implemented the recommendation
2021	Safety and Security	Violations of Security Procedures	19	DJJ should ensure all security-related policies are maintained and updated at the state and facility levels.				
2021	Safety and Security	Inadequate Camera Surveillance	20	DJJ should ensure that the surveillance system covers the blind spots at every secure facility.				
2021	Safety and Security	Inadequate Camera Surveillance	21	DJJ should, with the upgrade of the system, change its procedures concerning the retention of the videos to ensure their availability for investigations.				
2021	Safety and Security	Raise the Age Implementation	22	DJJ should increase recruitment efforts to ensure that there is sufficient staff to address the increase of Raise the Age juveniles.				
2021	Safety and Security	Raise the Age Implementation	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.				
2021	Safety and Security	Raise the Age Implementation	24	DJJ should expand its Youth in Transition program to address the needs of all Raise the Age juveniles.				
2021	Human Resources	Employee Compensation	25	DJJ should develop and implement a standard operating procedure prioritizing greater salary increases for front-line employees on an annual basis.				
2021	Human Resources	Employee Compensation	26	DJJ should reallocate funds to ensure that front-line, essential employees receive raises at the same rate as the other job classes.				
2021	Human Resources	Employee Compensation	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.				
2021	Human Resources	DJJ Supervisors - Employee Performance Management System	28	DJJ should conduct an Employee Performance Management System process for all employees who are overdue for performance reviews as soon as possible.				
2021	Human Resources	DJJ Supervisors - Employee Performance Management System	29	DJJ should develop policy and implement standard operating procedures for performance reviews of non-covered employees, including its deputy directors.				
2021	Human Resources	DJJ Supervisors - Employee Performance Management System	30	DJJ should follow state regulations and its policy to ensure all covered employees undergo the Employee Performance Management System process annually.				
2021	Human Resources	DJJ Supervisors - Employee Performance Management System	31	DJJ should implement an annual agency wide Employee Performance Management System date to ensure compliance.				
2021	Human Resources	DJJ Supervisors - Position Descriptions	32	DJJ should ensure that each position description contains a thorough and accurate description of that position's job duties.				
2021	Human Resources	DJJ Supervisors - Position Descriptions	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.				
2021	Human Resources	DJJ Supervisors - Position Descriptions	34	DJJ should annually review all position descriptions to ensure accuracy and completeness.				
2021	Human Resources	DJJ Supervisors - Position Descriptions	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.				
2021	Human Resources	DJJ Supervisors - Educational Transcripts	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.				
2021	Human Resources	DJJ Supervisors - Educational Transcripts	37	DJJ should ensure that each employee claiming a degree has an official transcript demonstrating receipt of the degree prior to hiring.				

LAC Audits of Department of Juvenile Justice: 2017 and 2021

Audit Year	Chpt.	Sub-Category	Rec #	Recommendation	Status	LAC Comment (Included in Chapter 7 of its 2021 Audit Report)	DJJ Response (Included in its response to LAC's 2021 Audit)	Documents needed to assist LAC in verifying whether DJJ has implemented the recommendation
2021	Human R	DJJ Supervisors - Deputy Director Hiring	38	DJJ should always conduct a full applicant search to ensure that the most qualified individuals are hired, especially for deputy director positions.				
2021	Human R	Employee Progressive Discipline - Offenses Not Defined	39	DJJ should include clearer definitions in its policy for all offenses for which an employee may be disciplined.				
2021	Human R	Employee Progressive Discipline - Length of Suspensions Pending Investigation	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.				
2021	Human R	Employee Progressive Discipline - Disciplinary Actions	41	DJJ should review employee disciplinary actions to determine whether employees should work for the agency in a security position.				
2021	Human R	Employee Progressive Discipline - Disciplinary Actions	42	DJJ should enforce all disciplinary actions as outlined in its employee progressive discipline policy.				
2021	Human R	Recruitment and Retention	43	DJJ should revise its recruitment and retention plan(s) to include all recruitment and retention benefits.				
2021	Human R	Recruitment and Retention	44	DJJ should immediately implement the rapid hire event toolkit of the Division of State Human Resources and the critical recruitment proviso into the agency's recruitment and retention efforts.				
2021	Human R	Recruitment and Retention	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.				
2021	Human R	Recruitment and Retention	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.				
2021	Human R	Hiring Process	47	DJJ should identify selection and process requirements that can be included in the posting process.				
2021	Human R	Hiring Process	48	DJJ should examine its current practices for posting and hiring vacant juvenile correctional officer positions to eliminate unnecessary reviews.				
2021	Human R	Hiring Process	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.				
2021	Human R	Hiring Process	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.				
2021	Human R	Hiring Process	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.				
2021	Human R	Minimum Hiring Qualifications and Salaries for DJJ Juvenile Correctional Officers Compared to Other Entities	52	DJJ should review the employment tests used by North Carolina, Florida, and Georgia to determine their feasibility for South Carolina.				

LAC Audits of Department of Juvenile Justice: 2017 and 2021

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2021	Human Resources	Minimum Hiring Qualifications and Salaries for DJJ Juvenile Correctional Officers Compared to Other Entities	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.				
2021	Human Resources	Job Fairs	54	DJJ should analyze which job fairs generate the most hires to determine where they should be held.				
2021	Human Resources	Job Fairs	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.				
2021	Human Resources	Job Fairs	56	DJJ should add outcomes, deadlines, and potential costs to the written recruiting plan.				
2021	Human Resources	Job Fairs	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.				
2021	Human Resources	Retirement System Eligibility	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."				
2021	Human Resources	Retirement System Eligibility	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.				
2021	Medical	Medical Care for Juveniles	60	DJJ should review the current capabilities of its Mediacat system and immediately implement changes to better track medical histories of the juveniles, refusal of medical care, and missed medical appointments.				
2021	Medical	Medical Care for Juveniles	61	DJJ needs to develop a transportation plan by identifying staff and protocols for efficiently transporting juveniles to medical appointments.				
2021	Medical	Medical Care for Juveniles	62	DJJ should update and implement a policy on transporting juveniles to improve current practices.				
2021	Medical	Medical Care for Juveniles	63	DJJ should hire more full-time nursing staff instead of relying on contract nurses.				
2021	Medical	Medical Care for Juveniles	64	DJJ should identify adequate mental health training and require its security staff to complete this training annually.				
2021	Medical	Medical Care for Juveniles	65	DJJ should expedite its plans to open an intensive group home.				
2021	Medical	Educational Services	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.				
2021	Medical	Educational Services	67	DJJ should implement a formal document retention policy for end-of-year final grade calculations and credit awards.				
2021	Medical	Educational Services	68	DJJ should adopt quality assurance review procedures for end-of-year final grade calculations and credit awards.				
2021	Medical	Educational Services	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.				

LAC Audits of Department of Juvenile Justice: 2017 and 2021

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2021	Medical	Educational Services	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.				
2021	Staff Training	Juvenile Detention Center Juvenile Correctional Officer Training	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.				
2021	Staff Training	Juvenile Detention Center Juvenile Correctional Officer Training	72	DJJ should immediately schedule the Juvenile Detention Center officers who are not currently certified to complete the required training.				
2021	Staff Training	Juvenile Detention Center Juvenile Correctional Officer Training	73	DJJ should ensure that training is scheduled to maintain JDC officers' recertification.				
2021	Staff Training	Juvenile Correctional Officer Training	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.				
2021	Staff Training	Juvenile Correctional Officer Training	75	DJJ should ensure that officer training is required for anyone acting in a security officer capacity.				
2021	Staff Training	Juvenile Correctional Officer Training	76	DJJ should determine what additional defensive countermeasures are needed to properly handle the current population of juveniles.				
2021	Staff Training	Juvenile Correctional Officer Training	77	DJJ should implement better defensive countermeasures once identified.				
2021	Staff Training	Training for Non-Security Staff	78	DJJ should ensure that non-security employees complete training, as required by policy.				
2021	Staff Training	Training for Non-Security Staff	79	DJJ should ensure the South Carolina Enterprise Information System's learning management system has not duplicated trainings.				
2021	Staff Training	Training for Non-Security Staff	80	DJJ should require employees to complete refresher trainings/certifications once notifications are received from the South Carolina Enterprise Information System learning management system.				
2021	Staff Training	Ethics/Code of Conduct Training	81	DJJ should ensure all employees annually complete the ethics/code of conduct course offered by the S.C. Department of Administration.				
2021	Financial	Internal Audit Function	82	DJJ should have its internal audit function report directly to the agency director.				
2021	Financial	Internal Audit Function	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.				
2021	Financial	Internal Audit Function	84	DJJ should update its policies and standard operating procedures to align with the reorganization of the internal audit function.				
2021	Financial	Internal Audit Function	85	DJJ should continue to follow the Institute of Internal Auditors standards, despite the reorganization of the internal audit function.				
2021	Financial	Late Vendor Payments	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.				
2021	Financial	Late Vendor Payments	87	DJJ should continue to streamline its processes and train staff to issue payments in a more timely fashion.				
2021	Financial	Late Vendor Payments	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.				

LAC Audits of Department of Juvenile Justice: 2017 and 2021

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2021	Financial	Title I Funds	89	DJJ should work with the S.C. Enterprise Information System to correct grant expenditures for the issues identified in the statewide accounting system.				
2021	Financial	Title I Funds	90	DJJ should develop more comprehensive guidance and procedures for the reconciliation of grants and end-of-year close out.				
2021	Financial	Other Education Grants	91	DJJ should only charge a grant for costs incurred during its period of performance.				
2021	Financial	Other Education Grants	92	DJJ should only charge a grant for costs that fall within allowable categories under grant guidance.				
2021	Financial	Other Education Grants	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.				
2021	Financial	Other Education Grants	94	DJJ should reimburse the S.C. Department of Education for any federal funding used for unallowable costs.				
2021	Financial	Other Education Grants	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.				
2021	Financial	Personal Property Damage Caused by Juveniles	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.				
2021	Financial	Lack of Segregation of Duties	97	DJJ should develop internal, written procedures governing the periodic review of role assignments in the statewide accounting system and other agency accounting systems.				
2021	Financial	Lack of Segregation of Duties	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.				
2021	Financial	Lack of Segregation of Duties	99	DJJ should separate the oversight of the accounts receivable and accounts payable functions to increase segregation of duties.				
2021	Financial	Lack of Segregation of Duties	100	DJJ should separate the trust accounting functions to increase segregation of duties.				
2021	Financial	Carry Forward	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.				