

RECOMMENDATIONS

The following recommendations are made based upon the events and allegations that occurred at RiverBend, as well as other control processes that were recognized as necessary improvements for sufficient internal control. Senior management should continue to monitor outcomes of ongoing reviews for additional recommendations to prevent instances of this type occurring in the future.

Purchasing and Property Control

1. Senior management should ensure that the current effort to review and update property control policy and procedures is expanded and completed and adequately addresses the key areas of:
 - a) Identification of property under \$5,000.00 that is of sufficient risk to warrant
 - Tracking (i.e., recording, periodic physical verification)
 - Securing goods from public access,
 - Establishing a custodial process for control, and
 - Marking/engraving, etc.
 - b) Assignment of responsibilities and authority to specific staff,
 - c) Determination of process necessary for compliance reviews and subsequent reporting of compliance,
 - d) Determination of consequences for staff non-compliance.

2. Senior management should ensure purchasing policies and procedures are developed and/or improved to help ensure appropriate use of state resources and address the key areas of:
 - a) Degrees of limitations on purchasing authority to items only in their area of responsibility and for which they know the use, with a procedure for rare exceptions,
 - b) Clarification of responsibility and accountability involved when signing documents indicating purchasing approval or receipt of items,
 - c) Determination of a process necessary for compliance reviews and subsequent reporting of compliance,
 - d) Determination of consequences for staff non-compliance.

3. Senior management should ensure policy and procedures are developed related to the provision of meals and snacks to agency staff and visitors that addresses the key areas of:
 - a) Food purchased by the agency is state property and as such should only be used to further the goals of the agency,
 - b) Identify agency personnel eligible to eat prepared meals with youth and those that need to purchase meals,
 - c) Accounting for meal purchases and handling cash from those purchases.

4. Senior management should ensure a policy is developed to prohibit staff from bringing personal property on to facility grounds or other OYA property (except items routinely placed in lockers or desks, or otherwise determined excludable) or loaning personal property to OYA for any purpose.

5. Senior management should ensure training processes are established and/or updated to ensure policies and procedures related to property control, purchasing, the provision of meals/snacks, and personal property are understood and enacted according to management expectations.

6. State property issued to employees must be tracked per Oregon Accounting Manual 10.55.00.PO Internal Control, Employee Assigned Property.

Working and Tracking Overtime

7. Senior management should hold all supervisors accountable to follow OYA Policy I-B-1.0 Payroll Reporting/Issuance of Checks, requiring supervisors appropriately approve and justify overtime for direct subordinates.

Youth Work Projects

8. Senior management should ensure youth work project and program policies and procedures are developed and/or updated to address the key areas of:

- a) Purchasing of materials and supplies for work projects for non-OYA entities should be done by the entity to avoid OYA liability,
- b) Ensuring OYA employees do not benefit from projects in a manner not available to the general public (ORS 244),
- c) Fair and timely payment to youth for work performed and related accounting processes,
- d) Formalizing the authorization process for youth work projects.

State Vehicle Tracking and Use

9. Senior management should ensure a policy be developed and implemented that:

- a) Requires logs for all state vehicles that track trip details including: names of driver and all passengers, date and time of departure and return, beginning and ending mileage, reason for the trip, and pre-trip completion of contraband inspection,
- b) Requires each facility and field office to designate a custodian of the logs and keys to ensure staff complete the logs, vehicles are properly checked out, and mileage discrepancies are identified and investigated,
- c) Identifies proper action for custodian to report potential misuse.

Travel Supervision, Tracking, and Reimbursement

10. Senior management should hold all supervisors accountable to conduct a reasonable review of travel reimbursement requests from subordinates.

11. Senior management should hold all supervisors accountable for approving private vehicle use only when there is a legitimate business reason that further OYA's mission.

Cell Phone Use

12. Senior management should hold all supervisors accountable to conduct a reasonably sufficient review of subordinates' cell phone bills, in accordance with OYA Policy I-C-9 Use of Cellular Phones.

13. Senior management should ensure that the agency's cell phone bill policy is reviewed for possible amendments, including:

- a) Ensure that Business Services is in charge of setting up all plans and issuing all phones for all employees within the agency;
- b) Developing a process in which a periodic review of cell phone invoices would take place by Business Services.

Administrative Leave Process

14. Senior management should ensure administrative leave procedures are developed and address the key areas of:

- a) Immediate retrieval of state property issued to the employee,
- b) Immediate revocation of all system authority,
- c) Notification protocols (e.g., coworkers, youth, families, providers, system administrators).

Supervision and Oversight

15. Senior management should ensure that onsite visitation schedules are developed for Central Facility and Field Operations staff, in order to prevent any one facility or field office from going several months or years without a site visit. During these visits, tools and/or techniques should be used by the Central Operations staff in order to measure staff climate and culture and to facilitate the reporting of any concerns.

16. Senior management should reinforce, to all management staff, the importance of maintaining a professional working relationship with subordinate managers and staff in order to remove even the appearance of a well established friendship with subordinates or superiors so that other staff will not fear reporting impropriety because of the perception that corrective action or shared information will not be handled objectively.

Concerns not Reported by Staff

17. Senior management should facilitate the creation of an effective and anonymous means (i.e., surveys) to periodically assess staff climate, culture and management practices in facilities and offices. Action plans should then be developed to address any areas where change is needed.

18. Senior management should continue to ensure that subordinate staff are instructed as to the established channels for reporting improper activities and behaviors both within and outside the agency. Senior management should ensure that the agency's response functions are sufficiently staffed and supported to respond to the complaints received.

Control Environment

19. Senior management should continually reinforce through their discussions and expectations and communicate in all appropriate forums throughout the agency the importance of proper and expected conduct of all OYA employees regarding the following:

- a) Timesheet reporting, leave and overtime requests, work time expectations,
- b) Proper use of state vehicles and travel reimbursement policy,
- c) Cell phone usage, use of state property, property control,
- d) Youth work projects,
- e) Duty to Report vs. Code of Silence,
- f) Supervision expectations and requirements,
- g) Ethical behaviors.
- h) Conflict of Interest

20. Senior management should ensure all managers and staff be held accountable to conduct a reasonable review of documents prior to signing them when indicating approval.

21. Senior management should ensure there is a system in place to guarantee all staff receive appropriate training. Specific outcomes include:

- a) Identification of training that must be provided to each employee based on their assigned duties, with a timeframe for each type of training that depends on the agency's risk,
- b) Procedures to track and timely report attendance at trainings,
- c) Managers at all levels held accountable for providing and reporting training they are required to provide to their staff,
- d) All staff who supervise employees should be held accountable for attending the OYA Supervisor Course within the first two years, as required by the agency.

22. Senior management should ensure there is sufficient Central Office administrative oversight and monitoring related to financial, property control, personnel, and programmatic activities in facilities and field offices by redirecting resources and/or responsibilities as needed (i.e., Central Office administrative review team audits.)

23. Senior management should ensure practices and policies are in place to ensure appropriate records retention regarding written and electronic records.

Security

24. Senior management should take appropriate steps to ensure that facility staff are making specific, accurate and timely entries to facility unit logs on JJIS. Entries should provide detailed information of when, reason why, and where the youth are being transported and who is conducting the transport when youth are transported out of the facility and what vehicle is being used. Return trips should also be documented on JJIS.

25. Senior management should consider researching the cost benefit analysis of implementing the following security measures:

- a) Thumb print key lock system at each facility that would track extended history of when staff access and replace facility keys. Staff would not be able to use each others lock box codes to retrieve keys. Information Services would keep access history on server for review. All keys should be attached to key ring that will not open in order to ensure keys are not removed from facility.
- b) An all inclusive swipe card/ID badge system should be installed at each facility that would open access doors to the facility. Access could be limited per position and an extensive history of individual access should be kept by Information Services.
- c) Larger capacity to track emails, computer and JJIS log on information by Information Services Section.
- d) Review of all current security cameras at each facility and need for additional surveillance.
- e) Currently, how keys are manufactured and distributed to the different facilities. How has access to making keys and locks or ordering them to be made? If such a person is put on administrative leave, what procedures are in place to maintain security at particular facilities?

26. Senior management should take appropriate steps to adjust the current key lock box security access storage systems in all facilities in order to maintain an electronic usage history longer than 10 days.