

**A Report to the
Audit Committee**

Mayor
Freddie O'Connell

Presiding Juvenile Court Judge
Honorable Judge Sheila
Calloway

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Metropolitan
Nashville
Office of
Internal Audit

Audit of the Davidson County Juvenile Court

February 7, 2024

EXECUTIVE SUMMARY

February 7, 2024



Why We Did This Audit

The audit was conducted due to the impactful work of the Davidson County Juvenile Court.

What We Recommend

- Metropolitan Nashville Public Schools should ensure educational services provided at the Davidson County Juvenile Detention Center are being adequately provided and documented.
- Incident Reports should be submitted to the Juvenile Court by the vendor in a timely and consistent manner.
- A more advanced case management system that enhances monitoring and analysis should be explored.
- A detailed and formal monitoring program for the detention center should be established.

AUDIT OF THE DAVIDSON COUNTY JUVENILE COURT

BACKGROUND

The mission of the Davidson County Juvenile Court is to “prevent problems, promote the positive potential in all people, and pursue fairness and hope. The Juvenile Court strives to be the national model for juvenile justice by taking a holistic approach that promotes the health, well-being, and safety of children, families, and communities.” The Juvenile Court is also responsible for the operations of the Davidson County Juvenile Detention Center.

OBJECTIVES AND SCOPE

The objectives of this audit are to determine if:

- Intake and probation cases are properly tracked and monitored in accordance with applicable laws, regulations, and policies.
- Staffing levels, reporting requirements, and billing at the Davidson County Juvenile Detention Center are conducted in accordance with applicable contractual requirements, laws, regulations, and policies.
- Educational services at the Davidson County Juvenile Detention Center are provided in accordance with applicable contractual requirements, laws, and regulations.
- General and application controls are in place and operating effectively over key software application systems.

The audit scope included Juvenile Court activity from July 1, 2021, to June 30, 2023.

WHAT WE FOUND

Intake and probation cases were generally processed in accordance with Juvenile Court policies. Payments related to the operation of the detention center were monitored, accurate, and paid timely. Detention center hearings were being conducted within the required time frame.

The delivery, adequacy, and monitoring of educational services at the detention center could not be determined. Incident reports were not always submitted or not submitted timely by the juvenile detention center vendor. Staffing levels within the juvenile detention center could not be determined.

Leveraging of technology could be improved. Monitoring of the juvenile detention center could be more formalized. Reconciliations between the Metropolitan Nashville Police Department’s records and the Juvenile Court’s records were not performed.

GOVERNANCE

The Davidson County Juvenile Court is a constitutional office established and governed under the Metropolitan Charter Article IV and Tennessee Code Annotated §37-1-103. The Juvenile Court is overseen by the Juvenile Court Judge which is a publicly elected office serving an 8-year term. The current Juvenile Court Judge is the Honorable Sheila Calloway who is currently serving her second term. She has been in this role since 2014.

The Juvenile Court Judge appoints a court administrator and nine judicial magistrates. The court administrator has a deputy administrator for personnel and another deputy administrator for financial affairs. The Juvenile Court has 131 full time positions to assist in the implementation of its mission.

BACKGROUND

The Juvenile Court oversees the following juvenile proceedings: delinquency, unruly behavior, truancy, dependency, neglect, foster care, parentage for never-married parents, guardianships, and custody relinquishments. Exhibit A summarizes the Juvenile Court's budgeted and actual expenditures for fiscal years 2021, 2022, and 2023.

Exhibit A: Juvenile Court Financial Overview

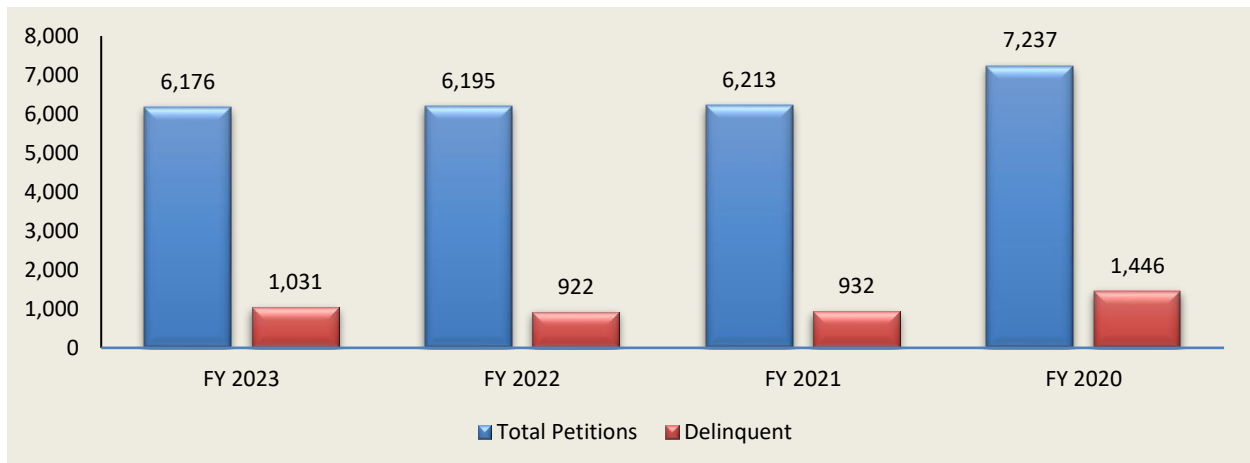
	Fiscal Year 2023	Fiscal Year 2022	Fiscal Year 2021
Budgeted Expenditures	\$ 15,600,800	\$ 14,798,700	\$ 14,169,100
Actual Expenditures	15,378,267	13,961,220	13,359,103
Variance	\$ 22,533	\$ 837,480	\$ 809,997

Source: Oracle R-12

Case Management

The Juvenile Court case process is initiated with a Metropolitan Nashville Police Department (MNPD) complaint, citation, or arrest involving a juvenile and a police report is completed. Complaints and citations are initially handled by the Juvenile Court Intake Unit while arrests are initially handled by the Davidson County Juvenile Detention Center. A lengthy process of case referral and pre-adjudication occurs. The case referral and pre-adjudication process are summarized in **Appendix C**. The subsequent court involvement process, if necessary, is summarized in **Appendix D**. Petitions by fiscal year are presented in Exhibit B.

Exhibit B: Juvenile Court Petitions by Fiscal Year

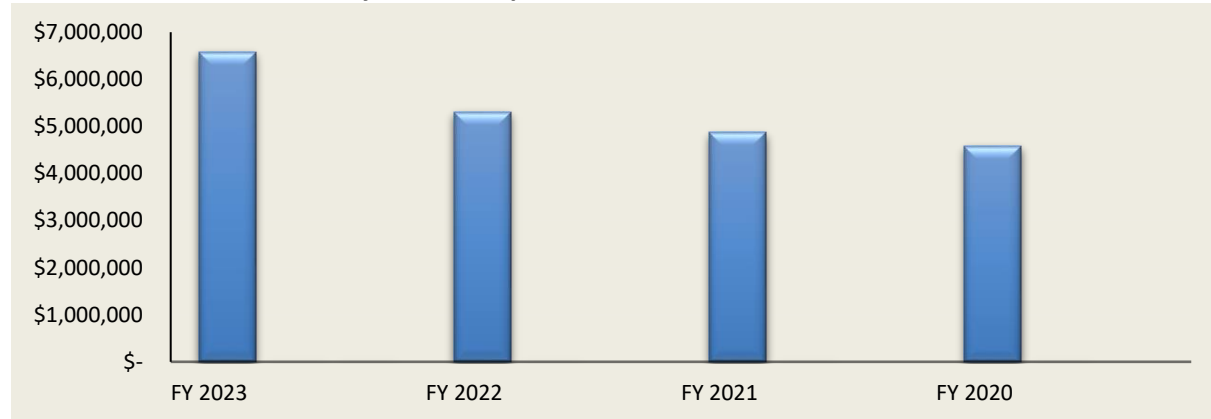


Source: Davidson County Juvenile Court

Detention Center Operations

The Juvenile Court is responsible for the operations of the Davidson County Juvenile Detention Center which houses incarcerated juveniles. The management of the juvenile detention center involves significant ethical, legal, and administrative risk. The facility has a rated capacity of 86 beds. The average daily population is 46 persons. Approximately 400 juveniles are booked through the facility monthly with 130 detainees in an average month. The Juvenile Court contracted with Youth Opportunity Investments from July 2015 until June 2022. The contractor ceased operating the facility abruptly. In response, the Juvenile Court initiated an 18-month emergency contract with Rite of Passage that concluded on December 31, 2023. Payments made to outside vendors to operate the Juvenile Detention Center for fiscal years 2020 to 2023 are summarized in Exhibit C.

Exhibit C: Outside Vendor Payments to Operate the Juvenile Detention Center

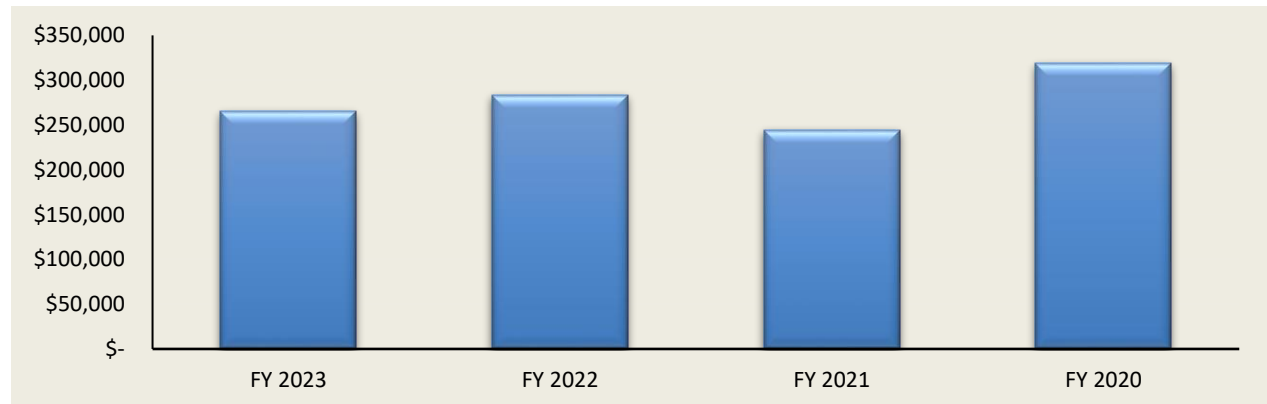


Source: Oracle R-12

Educational Services

Metropolitan Nashville Public Schools entered a contract with Ombudsman Educational Services to ensure eligible, detained juveniles are continuing their education. The contract states the contractor will, “help students progress through academic content courses and pro social skills by offering differentiated instruction of standard based curriculum in a technology rich environment to improve success toward course completion, test performance and persistence to graduation.” Metropolitan Nashville Public Schools has dedicated staff who are charged with monitoring the educational services provided at the juvenile detention center. Payments made to outside vendors to provide educational services at the juvenile detention center for fiscal years 2020 to 2023 are summarized in Exhibit D.

Exhibit D: Educational Services Payments to Outside Vendors



Source: Oracle R-12 Reports

Primary Software Systems

The Juvenile Court relies upon two software systems - the Juvenile Information Management System and the Juvenile Case Management system.

The Juvenile Information Management System is the software application used to record the life cycle of individual cases processed by the Juvenile Court. The Juvenile Information Management System maintains information on juveniles organized primarily by name and petition. The Juvenile Case Management system is primarily utilized by probation officers and serves as a repository of individual case notes and action plans on applicable juveniles.

OBJECTIVES AND CONCLUSIONS

1. *Are intake and probation cases properly tracked, monitored, and processed in accordance with applicable laws, regulations, and policies?*

Generally, yes. Cases are generally being processed in accordance with Juvenile Court policies and objectives. A random sample of 60 probation cases out of 314 cases was reviewed. All 60 cases were monitored and tracked by Juvenile Court staff. All applicable cases had a Static Risk Report conducted, and all applicable cases had the required detention center hearing conducted.

A random sample of 60 informal adjustment cases out of 1,887 cases was reviewed. Documentation was not retained in 22 of the 60 cases (36 percent). Of the 38 cases where documentation was retained, 14 cases required additional staffing decisions. Of the 14, 2 cases (14 percent) did not have additional documentation regarding staffing decisions. Certain duties within the Intake Unit were also performed by only one individual. **(See Observation F.)**

The ability to conduct analysis across the entire Juvenile Court system is challenging. The current system set up does not maximize the identification and utilization of critical fields. Information such as arrest dates, intake dates, Static Risk Scores etc. are typically retained as scanned image files. **(See Observation E.)** Additionally, reconciliations between MNPD arrest records to Juvenile Information Management Systems are not conducted. **(See Observation H.)**

2. *Are staffing levels, billing, and reporting requirements at the Davidson County Juvenile Detention Center being conducted in accordance with applicable contractual requirements, laws, regulations, and policies?*

Generally, no. Daily Census Reports reviewed were complete and accurate. The Daily Census Report created by the detention center vendor is submitted to the Juvenile Court and provides the Juvenile Court with an attendance breakdown and other relevant information for the Juvenile Detention Center. A random sample of 60 juveniles from the population of juveniles housed in the juvenile detention for fiscal year 2023 was reviewed. All 60 juveniles sampled from the Daily Census reports agreed to vendor billings and Juvenile Court's case records. All 24 vendor invoices for fiscal year 2023 were reviewed. Each billing was accurate and complete. The Juvenile Court had a process in place to monitor billings to ensure accuracy.

Compliance with required juvenile detention center staffing ratios could not be determined. A random sample of 60 shifts were selected for review. Documentation verifying staffing level ratios were met could only be obtained for 2 out of the 60 shifts (3 percent). **(See Observation C.)**

Incident Reports were not consistently being sent to the Juvenile Court or in a timely manner. A sample of 60 Incident Reports retained at the juvenile detention center revealed that 7 reports (12 percent) were not submitted to the Juvenile Court. Another 17 reports (28 percent) were not submitted to the Juvenile Court timely. Additionally, key reports required by the vendor's contract were not being submitted to appropriate parties. **(See Observation B.)**

The Juvenile Court has a designated staff to monitor juvenile detention center activities to help ensure compliance with contractual requirements and policies. The monitoring program is active but informal. **(See Observation D.)**

3. *Are educational services at the Detention Center being conducted in accordance with applicable contractual requirements, laws, and regulations?*

Unable to Determine/Scope Limitation: The delivery, monitoring, and adequacy of educational services provided at the juvenile detention center could not be determined. Documentation

pertaining to educational plans, benchmark assessments, invoicing, benchmark progress reports, and module progression could not be provided. (See **Observations A.**)

4. *Have general and application controls been developed over key software application systems?*

Generally, no. Processes were in place to ensure terminated employees have access privileges removed. However, access to the database is excessive. User roles are modified individually instead of by job role. Formal role evaluations are not being conducted. (See **Observation G.**)

AUDIT OBSERVATIONS

Internal control helps entities achieve important objectives and sustain and improve performance. The Committee of Sponsoring Organizations of the Treadway Commission (*COSO*), *Internal Control – Integrated Framework*, enables organizations to effectively and efficiently develop systems of internal control that adapt to changing business and operating environment, mitigate risks to acceptable levels, and support sound decision making and governance of the organization. The audit observations listed are offered to assist management in fulfilling their internal control responsibilities.

Observation A – Educational Services Contract Monitoring

Monitoring of education services at the Juvenile Detention Center by the Metropolitan Nashville Public Schools does not appear to be present. Consequently, the delivery and adequacy of educational services provided could not be determined.

Metropolitan Nashville Public Schools contracted with Ombudsman Educational Services to ensure eligible juveniles are continuing their education while detained. Metropolitan Nashville Public Schools has dedicated staff who are charged with monitoring the educational services provided at the juvenile detention center. Additionally, the contract with Ombudsman details documentation required to be submitted to Metropolitan Nashville Public Schools. The documentation is designed to monitor the delivery and effectiveness of educational services provided. Documentation includes:

- Monthly Invoices that, *“shall include, but not be limited to, a description of the type(s) of service(s) provided during the month, date, time, names of Contractor’s personnel performing the service and duration of service, agendas, sign-in sheets, and attendance rosters.”*
- Quarterly and end of year reports evaluating the programs effectiveness: *“These reports will include, attendance levels, stabilization rates, academic growth, credit attainment, and graduation rates.”*
- Metropolitan Nashville Public Schools Student Service department will evaluate the contractor’s performance based on, *“completeness and quality of services provided”* and *“academic performance (improvement) of the students assigned”* during the term of the contract.

Metropolitan Nashville Public Schools could not provide documentation related to these contractual requirements. Lack of documentation also precluded the ability to obtain a population of students receiving educational services. Alternatively, billing records from Rite of Passage were used to generate a population of 447 juveniles. A random sample of 28 juveniles required to receive educational services were selected for review.

- None of the 28 juveniles selected received the ESSA Initial Assessment as required by the Federal Every Student Succeed Act and Tennessee Department of Education Rule 0520-01-12-04.
- None of the 28 juveniles sampled completed a ESSA Benchmarking Assessment as required by the Federal Every Student Succeed Act and Tennessee Department of Education Rule 0520-01-12-04.
- None of the 25 juveniles released could be verified as having an exit meeting detailing the juvenile’s progress such as completed coursework, testing, report cards, etc.

The Federal Every Student Succeeds Act and the State Board of Education, Chapter 0520-01-12 requires incarcerated juveniles complete an initial educational assessment and subsequently complete benchmark assessments every four weeks. The assessments help determine the academic level of an individual when first incarcerated and monitor progress. Not conducting the assessments enhances the

risk that juvenile’s educational development will be diminished while in the juvenile detention center. Exit conferences provide a critical tool to assist transitioning a juvenile from the detention center back into the normal, routine course work. The transition between being incarcerated and being released is a critical component on whether a child will have the tools to succeed. Not performing meaningful exit conferences enhances the risk of an unsuccessful transition.

Per Metropolitan Nashville Public Schools staff a systematic 90-day monitoring process occurs. Staff also supervise exit conferences whereby the student and staff from the student’s school meet to discuss the student’s educational instruction while in the detention center. However, supporting documentation verifying these activities occurred could not be obtained.

Accordingly, the delivery and effectiveness of educational services during the scope period could not be determined. Having a systematic, robust monitoring program is critical in ascertaining the delivery and adequacy of educational services provided at the juvenile detention center.

Criteria:

- COSO, Control Activities—Principal 10— the organization selects and develops control activities that contribute to the mitigation of risks to the achievement of objectives to acceptable levels.
- Contract #2-00145-01 between MNPS and Ombudsman Educational Services

Assessed Risk Rating:

High

Recommendations for management of Metropolitan Nashville Public Schools:

1. Develop and document a detailed contract monitoring plan to provide assurance that educational services provided at the juvenile detention center are adequately provided in accordance with Metropolitan Nashville Public Schools and State of Tennessee standards.
2. Maintain documentation of key steps within the contract monitoring process to evidence compliance with applicable policies and laws.

Observation B – Juvenile Detention Center Reporting to Juvenile Court

The Davidson County Juvenile Detention Center’s operating vendor, Rite of Passage, was not submitting contractually required reports to the Juvenile Court in a timely manner. The purpose of the reporting requirements is to assist the Juvenile Court in adequately monitoring significant activities and processes within the juvenile detention center. The reporting also helps monitor the safety and well-being of juveniles and staff within the facility.

Incident Reports relate to significant events involving juveniles and staff. The juvenile detention center is required to submit all incident reports to the Juvenile Court within specified time frames as shown in Exhibit E.

Exhibit E: Incident Reporting Times

Type of Incident	Reporting Time Frame
Use of Force	Within 24 hours
Suicidal Ideations	Within 24 hours
Restrictive Housing of Inmates	Within 24 hours
Substantial Risk to Life or Property	Within 24 hours
Investigations	Within 72 hours

Source: Contract 6516822 between the Juvenile Court and Rite of Passage

A random sample of 60 Incident Reports retained at the juvenile detention center were reviewed. A total of 7 reports out of the 60 reports (12 percent) were not submitted to the Juvenile Court. An additional 17 reports out of the 60 reports (28 percent) were not submitted within the time frame required by the contract. Submitting all incident reports in a timely manner provides assurance that Juvenile Court can identify, assess, and address high risk situations and events.

Two annual reports required by the contract must be prepared and submitted to the Juvenile Court by the vendor. The Safety and Emergency Plans Report was completed, but it was not submitted by the required July 1st date. The Annual Audit of Facility Operations, Policies, Procedures, and Post Orders Report was partially completed. The facility's operations were audited. However, the policies, procedures, and post orders were not audited. The Juvenile Court Contract Monitor has corresponded with and met with Rite of Passage including in December of 2022 to inform them their current policies did not conform to American Correctional Association, the Standards and Department of Children Services Minimum Standards for Juvenile Detention Centers, and the executed contract between ROP and the Metropolitan Government of Nashville. The issue had not been resolved as of the end of the audit scope period.

Metropolitan Nashville Council's Ordinance BL2017-542 §1 mandates all contractors for correctional facility management services submit quarterly reports to the Metropolitan Nashville Council. The vendor was unaware of the requirement, and the report was never submitted.

Criteria:

- COSO, Control Activities—Principal 9— the organization identifies and assesses changes that could significantly impact the system of internal control.
- COSO, Control Activities—Principal 10— the organization selects and develops control activities that contribute to the mitigation of risks to the achievement of objectives to acceptable levels.
- COSO, Control Activities—Principal 13— the organization obtains or generates and uses relevant, quality information to support the functioning of internal control.
- Metropolitan Council, Ord. BL2017-542 §1
- Contract 6516822 between the Juvenile Court and Rite of Passage

Assessed Risk Rating:

High

Recommendation for management of the Davidson County Juvenile Court to:

Create a process within the monitoring program to ensure all incident reports and other reporting requirements are being generated and submitted by the Detention Center in a timely manner.

Observation C – Detention Center Staffing Levels

Staffing levels at the juvenile detention center for fiscal year 2023 could not be determined. The contract between Rite of Passage and the Juvenile Court requires the Juvenile Detention Center be staffed at the following ratios:

- 1 eligible staff member to 8 juveniles from 6:00AM to 10:00PM
- 1 eligible staff member to 16 juveniles from 10:00PM to 6:00AM

A random sample of 30 days was selected to determine if required staffing levels were met. Payroll records, job titles, scheduling information, and applicable employee documentation establishing eligibility to supervise detained youth were requested for each sample day. The vendor was unable to

provide sufficient information to verify staffing levels. Thus, it was not possible to determine if proper staffing levels were maintained throughout fiscal year 2023. Maintaining required staffing levels is important to ensure the safety of juveniles and staff.

Criteria:

- COSO, Control Activities—Principal 10— the organization selects and develops control activities that contribute to the mitigation of risks to the achievement of objectives to acceptable levels.
- Tennessee Department of Children’s Services, Legal Division, Chapter 0250-04-08, Minimum Standards for Juvenile Detention Centers and Temporary Holding Resources
- Contract 6516822 between the Juvenile Court and Rite of Passage

Assessed Risk Rating:

High

Recommendation for management of the Davidson County Juvenile Court to:

Create a process within the monitoring program to ensure a systematic methodology is developed that ensures staffing ratios meet contractual requirements.

Observation D – Detention Center Contract Monitoring

The juvenile detention center’s contract monitoring program could be enhanced. The Juvenile Court has a dedicated staff who actively monitors the contract. However, the process was informal without clear guidelines and reporting structures. A more systematic process including more detailed policies and procedures, monitoring schedules, and remedies in cases of non-compliance is needed.

Generating and implementing a methodical monitoring program with clear procedures and reporting structures provides assurance that the juvenile detention center is being operated in accordance with the intent of the Juvenile Court. Additionally, a more developed monitoring program helps reduce the ethical, legal, and administrative risk of operating a juvenile detention center.

Criteria:

- COSO, Control Activities—Principal 10— the organization selects and develops control activities that contribute to the mitigation of risks to the achievement of objectives to acceptable levels.
- Contract 6516822 between the Juvenile Court and Rite of Passage

Assessed Risk Rating:

High

Recommendation for management of the Davidson County Juvenile Court to:

Create a defined contract monitoring program that includes, at minimum, procedures, schedules, reporting structures, and remedies for non-compliance.

Observation E – Leveraging of Technology

Leveraging of technology could improve the monitoring and effectiveness of obtaining the Juvenile Court’s operational and financial objectives. The Juvenile Court primarily utilizes the Juvenile Information Management Systems (JIMS) software application for monitoring and tracking cases. The system is effective in the individual management of specific cases. However, the process is highly segregated by individual cases.

JIMS maintains information on juveniles organized primarily by name and petition. For example, to determine an arrest date for a corresponding individual, the user needs to navigate to the appropriate name. The user then narrows down the petition results by petition date and opens the corresponding scanned PDF documents. The documents are typically scanned in as one file. However, sometimes multiple files need to be opened to locate the correct information. The user needs to scroll through the uploaded documents until the arrest report containing the arrest date is located. The system is cumbersome to navigate and impedes efficient access to and utilization of the court's data.

The ability to conduct systems-wide analysis across the various operational areas of the Juvenile Court ecosystem is restrictively challenging. The current system set up does not maximize ability to identify and utilize critical fields. Information such as arrest dates, intake dates, Static Risk Scores, etc. are typically retained as scanned image files.

Utilizing technology properly reduces the risk that cases are improperly processed and handled. Additionally, the ability to capture and analyze the efficiency and effectiveness of various programs is greatly enhanced by utilizing technology.

Criteria:

- COSO, Control Activities—Principle 10—The organization selects and develops control activities that contribute to the mitigation of risks to the achievement of objectives to acceptable levels.
- COSO, Control Activities—Principle 11—The organization selects and develops general control activities over technology to support the achievement of objectives.

Assessed Risk Rating:

Medium

Recommendation for management of the Davidson County Juvenile Court:

Perform a cost-benefit analysis related to the implementation of a court management system that allows for enhanced monitoring and analyzes.

Observation F – Case Management Assessment Tools

The Juvenile Court's implementation of Static Risk Prescreener Assessments and Juvenile Detention Risk Assessments could be strengthened. Juvenile Detention Risk Assessments were not always completed properly. Supporting documentation for Static Risk Prescreener Assessments were not being retained consistently. Management review and approval of Static Report Prescreeners could be enhanced.

The Juvenile Court implemented many of the recommendations of the Robert F. Kennedy Juvenile Probation Review process prior to the audit period. The process is designed to improve juvenile justice systems and redesign them in such a way that involves youth outcomes. A significant recommendation was implementing the Juvenile Detention Risk Assessment and Static Risk Prescreener Assessment. The Juvenile Detention Risk Assessment is utilized by the juvenile detention center vendor to determine if an arrested juvenile should remain in custody or be released. A similar process is followed by the Juvenile Court's Intake Team utilizing the Static Risk Prescreener to determine the youth's risk level which will determine whether the child's case will go through formal or informal case processing. Juveniles categorized as low risk are automatically sent to the Diversion Program. Juveniles categorized as medium or high risk go through additional screening processes to determine how the specific case is to be handled.

A sample of 60 cases out of 1,887 cases where a Static Risk Prescreener should have been completed revealed documentation was not retained in 22 cases out of the 60 cases (36 percent). Of the 38 cases

where documentation was retained, 2 cases did not have additional documentation regarding subsequent staffing decisions.

A sample of 60 cases out of 314 cases where a Juvenile Detention Risk Assessment should have been completed was reviewed. A Juvenile Detention Risk Assessment was not completed for 4 cases of the 60 cases (7 percent). A further review of 108 additional Juvenile Detention Risk Assessments revealed 9 assessments (8 percent) were filled out incorrectly. Additionally, the assessments were not being consistently reviewed by the court.

Static Risk Prescreener Assessments are completed by one person and are not reviewed for accuracy. Properly completing and reviewing Juvenile Detention Risk Assessments and Static Risk Prescreener Assessments and retaining adequate supporting documentation reduces the risk of Juvenile Court youth outcome objectives not being met.

Criteria:

- COSO, Control Activities—Principle 10—The organization selects and develops control activities that contribute to the mitigation of risks to the achievement of objectives to acceptable levels.

Assessed Risk Rating:

Medium

Recommendations for management of the Davidson County Juvenile Court:

1. Ensure Juvenile Detention Risk Assessments and Static Risk Prescreeners are properly completed, reviewed, and approved by both the juvenile detention center staff and Juvenile Court staff.
2. Ensure underlying documentation for Static Risk Prescreener Assessments are consistently retained.

Observation G – Software Application Controls

General application controls over JIMS need improvement. Access to JIMS is controlled by roles. Each role has access to perform specific functions such as to create, update, and delete information and records. Access rights to the database were excessive. JIMS attempts to mitigate these rights by limiting application menus granted to each individual user. However, users could bypass the application to the database and modify critical information without detection. Managerial review of exception reports and regular security audits were not utilized.

Individual user roles were modified based on business needs. However, manual modifications were made to individual user roles irrespective of job role. The changes increase the risk of incorrect role assignment.

A list of individual job roles and functions were compiled from information provided by the Justice Information Systems department. A review of the information revealed at least one user had permissions consistent with prior job duties that had not been appropriate for approximately five years. In addition, eight individuals had application administrator roles. Formal role evaluations were not being conducted to ensure access was limited to the functions necessary. A list of 16 terminated employees was compared to the JIMS active users. All 16 terminated employees properly had access revoked upon leaving.

Excessive access not related to job functions enhances the risk of inappropriate activity. Access not routinely reviewed against the needs of specific job duties increases the risk of inappropriate activity

such as theft or fraud occurring without detection. Managerial review of critical function exception reports and regular security audits reduce the risk of inappropriate activity.

Criteria:

- COSO, Control Activities—Principle 10—The organization selects and develops control activities that contribute to the mitigation of risks to the achievement of objectives to acceptable levels.
- COSO, Control Activities—Principle 11—The organization selects and develops general control activities over technology to support the achievement of objectives.

Assessed Risk Rating:

Medium

Recommendations for management of the Davidson County Juvenile Court:

1. Work with Justice Information Systems to maintain an active listing of all employees, the respective access privileges within JIMS, and the specific job responsibilities.
2. Work with Justice Information Systems to routinely reconcile access privileges to the job responsibilities to ensure minimum access necessary is granted.

Observation H – Reconciling System Data

Reconciliations between the Metropolitan Nashville Police Department’s Automated Records Management System and the Juvenile Court case management systems were not being conducted. Cases within the Juvenile Court are initiated through a Metropolitan Nashville Police Department arrest report or complaint. Performing periodic reconciliations would help ensure all cases that should be addressed by the Juvenile Court are being captured and recorded within the Juvenile Court systems.

Criteria:

- COSO, Control Activities—Principal 10—the organization selects and develops control activities that contribute to the mitigation of risks to the achievement of objectives to acceptable levels.

Assessed Risk Rating

Medium

Recommendation for management of the Davidson County Juvenile Court:

Work with the Metropolitan Nashville Police Department to establish a process to routinely and periodically reconcile juvenile cases from the Metropolitan Nashville Police Department’s Automated Records Management System to the Juvenile Court systems.

GOVERNMENT AUDITING STANDARDS COMPLIANCE

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

METHODOLOGY

To accomplish our audit objectives, we performed the following steps:

- Interviewed key personnel within various departments.
- Reviewed and analyzed documentation for compliance with the Tennessee Code Annotated, Metropolitan Nashville Code of Laws, and other applicable laws, regulations, and policies.
- Evaluated internal controls currently in place.
- Reviewed sample selections to determine the effectiveness of internal controls.
- Reviewed financial related transaction files using analytic audit software.
- Considered risk of fraud, waste, and abuse.
- Considered information technology risks.

AUDIT TEAM

Justine Cunningham, Auditor I

Jeremy Waldorf, Auditor I

Bill Walker, CPA, CIA, CFE, CCFO, Audit Manager

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APPENDIX A – MANAGEMENT RESPONSE AND ACTION PLAN

FREDDIE O'CONNELL
MAYOR



SHEILA D.J. CALLOWAY, JUDGE

JUVENILE COURT OF DAVIDSON COUNTY
100 WOODLAND STREET
P.O. BOX 196306
NASHVILLE, TENNESSEE 37219-6306

Lauren Riley, Metropolitan Auditor
Office of Internal Audit
150 2nd Avenue
Nashville, TN 37219

Dear Lauren Riley,

I am writing to acknowledge receipt of the recent county audit findings conducted and finalized in January 2024 regarding the operations of the Davidson County Juvenile Court. I have carefully reviewed the comprehensive report, and I appreciate the diligence and thoroughness demonstrated by your team in conducting the audit.

The findings and recommendations outlined in the report provide valuable insights into the functioning of our juvenile court system, and I am committed to taking prompt and effective action to address the identified areas of concern. It is of utmost importance to me that we uphold the highest standards of accountability, transparency, and efficiency in the administration of juvenile justice within our jurisdiction.

I would like to assure you that the recommendations presented in the audit report will be given the attention they deserve. We will work internally and with Metro partners to develop a detailed plan of action rectify any deficiencies identified in the audit findings.

Once again, I appreciate the professionalism and dedication exhibited by your team throughout the audit process. Together, we will work towards strengthening the integrity and effectiveness of our court operations.

Thank you for your attention to this matter, and I look forward to the continued collaboration between the Davidson County Juvenile Court and the Metropolitan Nashville Office of Internal Audit.

Sincerely,

Sheila D. J Calloway
Juvenile Court Judge

APPENDIX A – MANAGEMENT RESPONSE AND ACTION PLAN

We believe that operational management is in a unique position to best understand their operations and may be able to identify more innovative and effective approaches, and we encourage them to do so when providing their response to our recommendations.

Risk	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
<i>Recommendations for management of the Metropolitan Nashville Public Schools:</i>			
H	A.1 Develop a more detailed contract monitoring plan to provide assurance that educational services provided at the Detention Center are adequately being provided in accordance with The Metropolitan Nashville Public Schools and State of Tennessee standards.	Agree Metropolitan Nashville Public Schools agrees with the recommendation and will develop and implement a detailed contract monitoring plan in accordance with Metropolitan Nashville Public Schools and State of Tennessee Standards. Senior management will review the plan and regularly monitor for compliance.	02/29/2024
H	A2. Maintain documentation of key steps within the contract monitoring process to evidence compliance with applicable policies and laws.	Agree Metropolitan Nashville Public Schools agrees with the recommendation and will maintain documentation of key steps within the contract monitoring process to evidence compliance with applicable policies and laws. The documentation process will be included in the contract monitoring plan. The information will be maintained for review by auditors. Senior management will review the documentation regularly to monitor for compliance.	02/29/2024
<i>Recommendations for management of the Davidson County Juvenile Court:</i>			
H	B.1 Create a process within the monitoring program to ensure all incident reports and other reporting requirements are being generated and submitted by the Detention Center in a timely manner.	Agree: The Davidson County Juvenile Court will do the following to support this recommendation: First, the Juvenile Court will clearly communicate expectations and timelines to the Detention Center contract agency. In collaboration with their staff, we will develop a standardized template for incident reports and reporting requirements. We will clearly outline	02/20/2024 04/15/2024

APPENDIX A – MANAGEMENT RESPONSE AND ACTION PLAN

Risk	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
		<p>the required information and format to eliminate inconsistencies. The template form will include accountability measures for personnel responsible for generating and submitting reports.</p> <p>Additionally, the Juvenile Court will conduct regular internal audit- style reviews of program operations to ensure compliance with reporting timelines, identify and address any recurring issues promptly, and resolve un-corrected action with the Juvenile Court Judge.</p> <p>Lastly, we will create a feedback mechanism for Detention Center staff to report challenges or provide suggestions regarding the reporting process. We will use this feedback to continuously improve the process. The Court will also ensure that periodic refresher training sessions occur to reinforce the importance of timely reporting.</p>	<p>At least annually</p> <p>Ongoing</p>
H	<p>C.1 Create a process within the monitoring program to ensure a systematic methodology is developed that ensures staffing ratios meet contractual requirements.</p>	<p>Agree</p> <p>The Davidson County Juvenile Court will work with the detention contractor to develop a comprehensive staffing matrix that clearly outlines required staffing levels based on contractual obligations and operational needs. We will ensure the matrix considers peak times, emergency situations, and any unique factors affecting staffing.</p> <p>Further, we will implement a real-time monitoring system within the existing program to track and analyze current staffing ratios and establish automated alerts for deviations from contractual requirements to enable proactive corrective actions.</p>	<p>Matrix development by 03/15/2024</p> <p>Implementation ongoing, at least monthly verification checks</p>

APPENDIX A – MANAGEMENT RESPONSE AND ACTION PLAN

Risk	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
		<p>In order to maintain compliance, juvenile court will conduct regular audits of staffing records to verify compliance with contractual ratios. The contract monitor will identify and address any discrepancies or trends that may indicate systemic issues.</p> <p>The Court will require the detention contactor to develop a training program for managers and supervisors to ensure they understand and can effectively implement the staffing matrix. They will provide ongoing education to keep personnel updated on any changes in contractual requirements and ensure that a feedback loop exists for employees to report concerns or suggestions regarding staffing ratios.</p> <p>For further transparency, we will develop a performance metrics reporting system, a mechanism to provide regular updates on staffing ratios and compliance to relevant stakeholders. These will be used to demonstrate transparency and accountability.</p>	<p>At least annually</p> <p>Develop and be prepared to implement by 04/01/2024</p> <p>At least annually</p>
		H	<p>D.1 Create a defined contract monitoring program that includes, at minimum, procedures, schedules, reporting structures, and remedies for non-compliance.</p>

APPENDIX A – MANAGEMENT RESPONSE AND ACTION PLAN

Risk	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
	<p>reviewed, and approved by both Detention Center and Juvenile Court Staff.</p>	<p>1) Engage key stakeholders, including Detention Center staff, Juvenile Court personnel, legal experts, and relevant administrative representatives to facilitate open communication to understand perspectives, concerns, and expectations regarding the completion, review, and approval of risk assessments.</p>	<p>03/01/2024</p>
		<p>2) Develop standardized protocols for completing, reviewing, and approving juvenile detention risk assessments and static risk prescreeners.</p>	<p>04/15/2024</p>
		<p>3) Clearly outline the required information, steps, and criteria for approval.</p>	<p>04/15/2024</p>
		<p>4) Conduct regular quality assurance audits of completed risk assessments and prescreeners. Identify any inconsistencies, errors, or areas for improvement and implement corrective measures.</p>	<p>Starting from the time of implementation ongoing.</p>
		<p>5) Conduct training sessions for both Detention Center and Juvenile Court staff on the importance of accurate risk assessments and pre-screeners. We will also ensure that personnel are aware of their roles, responsibilities, and the collaborative nature of the process.</p>	<p>At least quarterly and with every new hire, beginning on the completion date.</p>
<p>M</p>	<p>F.2 Ensure underlying documentation for Static Risk Prescreener Assessments are consistently retained.</p>	<p>Agree The Davidson County Juvenile Court will do the following: First, we must determine the court’s capacity for retaining documentation. Once the capacity of the court is established, we will create a policy for the documentation retention of all</p>	<p>04/15/2024</p>

APPENDIX A – MANAGEMENT RESPONSE AND ACTION PLAN

Risk	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
		assessments. We will host training for all staff on the new policy and implement accountability measures.	
M	<p>G.1 Work with Justice Information Systems to maintain an active listing of all employees, the respective access privileges within JIMS, and the specific job responsibilities.</p>	<p>Agree The Davidson County Juvenile Court will do the following:</p> <p>Engage with JIS staff to facilitate discussions to understand current challenges, expectations, and the importance of maintaining accurate listings of employee access privileges and job responsibilities.</p> <p>Conduct a comprehensive data validation process to ensure the accuracy of the existing listings within JIMS.</p> <p>Identify and rectify any discrepancies in employee details, access privileges, and job responsibilities.</p> <p>Collaborate with the IT department to implement automated systems for maintaining an active listing of employees within JIMS.</p> <p>Ensure that any changes in job roles or access privileges trigger automatic updates to the system.</p>	06/30/2024
M	<p>G.2 Work with Justice Information Systems to routinely reconcile access privileges to the job responsibilities to ensure minimum access necessary is granted.</p>	<p>Agree The Davidson County Juvenile Court will do the following, same as above:</p> <p>Engage with JIS staff to facilitate discussions to understand current challenges, expectations, and the importance of maintaining accurate listings of employee access privileges and job responsibilities.</p> <p>Conduct a comprehensive data review of current access privileges.</p>	06/30/2024

APPENDIX A – MANAGEMENT RESPONSE AND ACTION PLAN

Risk	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
		<p>Identify and rectify any discrepancies in employee details, access privileges, and job responsibilities.</p> <p>Collaborate with the IT department to implement automated systems for maintaining an active listing of employees within JIMS.</p> <p>Ensure that any changes in job roles or access privileges trigger automatic updates to the system.</p>	

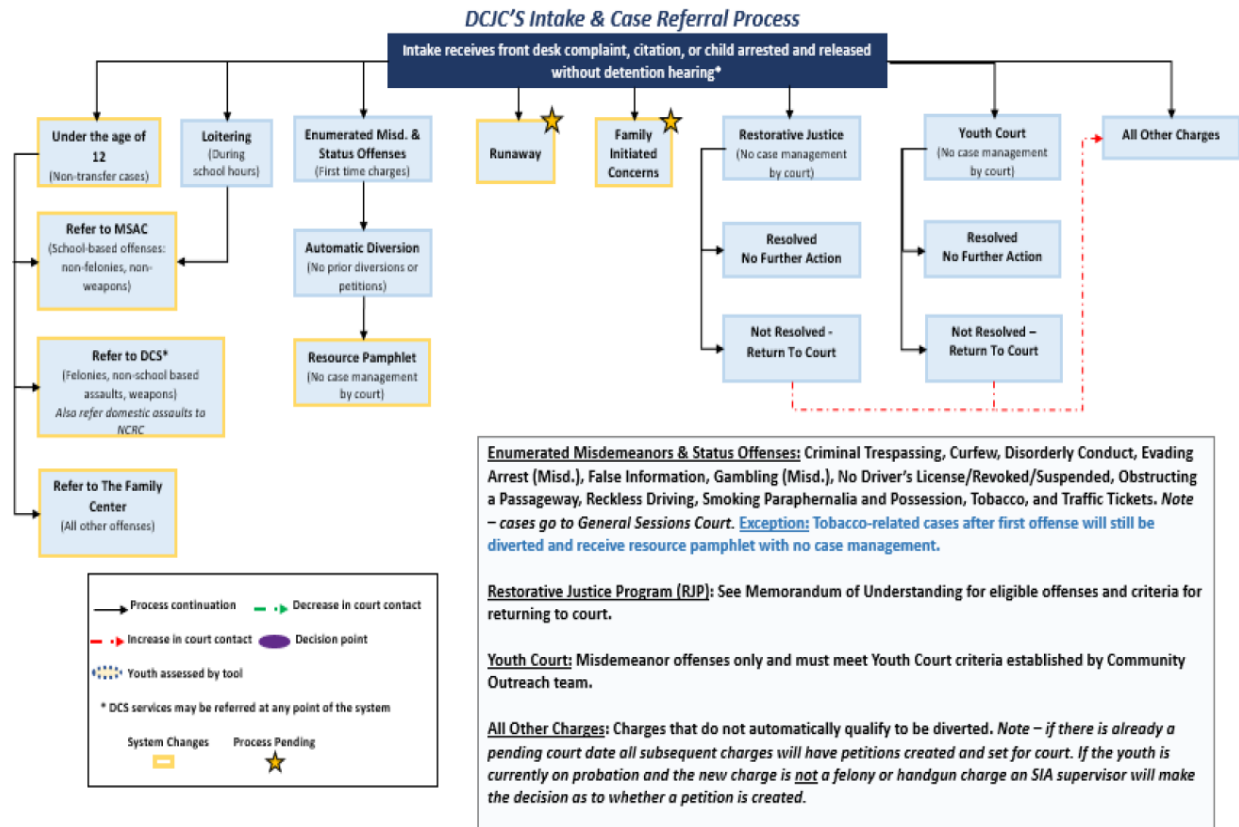
APPENDIX A – MANAGEMENT RESPONSE AND ACTION PLAN

Observations identified during the course of the audit are assigned a risk rating, as outlined in the table below. The risk rating is based on the financial, operational, compliance or reputational impact the issue identified has on the Metropolitan Nashville Government. Items deemed “Low Risk” will be considered “Emerging Issues” in the final report and do not require a management response and corrective action plan.

Rating	Financial	Internal Controls	Compliance	Public
HIGH	Large financial impact >\$25,000 Remiss in responsibilities of being a custodian of the public trust	Missing, or inadequate key internal controls	Noncompliance with applicable Federal, state, and local laws, or Metro Nashville Government policies	High probability for negative public trust perception
MEDIUM	Moderate financial impact \$25,000 to \$10,000	Partial controls Not adequate to identify noncompliance or misappropriation timely	Inconsistent compliance with Federal, state, and local laws, or Metro Nashville Government policies	The potential for negative public trust perception
LOW/ Emerging Issues	Low financial impact <\$10,000	Internal controls in place but not consistently efficient or effective Implementing / enhancing controls could prevent future problems	Generally complies with Federal, state, and local laws, or Metro Nashville Government policies, but some minor discrepancies exist	Low probability for negative public trust perception
Efficiency Opportunity	An efficiency opportunity is where controls are functioning as intended; however, a modification would make the process more efficient			

APPENDIX B – OVERVIEW OF JUVENILE CASE MANAGEMENT PROCESS

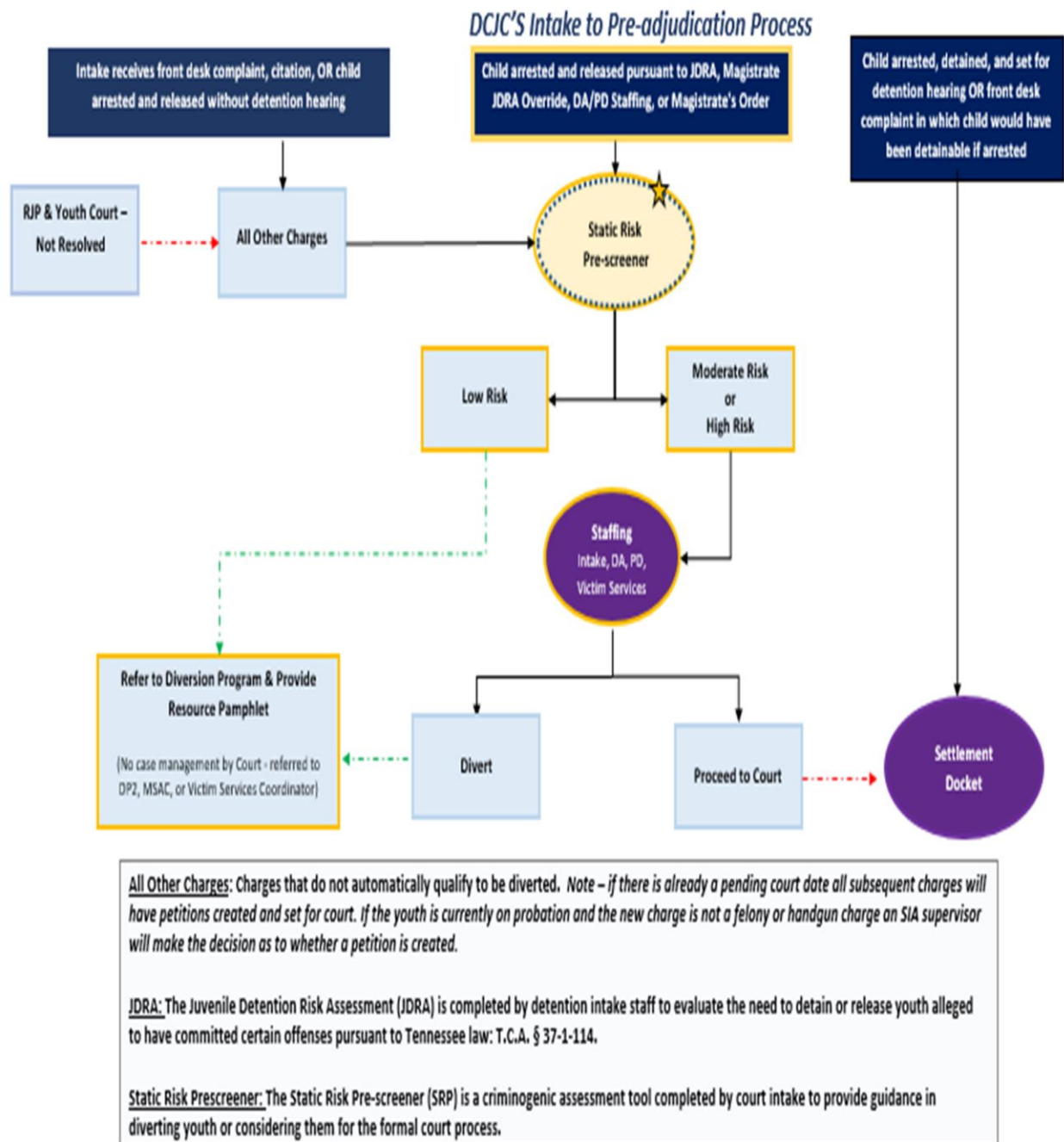
Table 1: Intake and Case Referral Process



Source: Juvenile Court

APPENDIX B – OVERVIEW OF JUVENILE CASE MANAGEMENT PROCESS

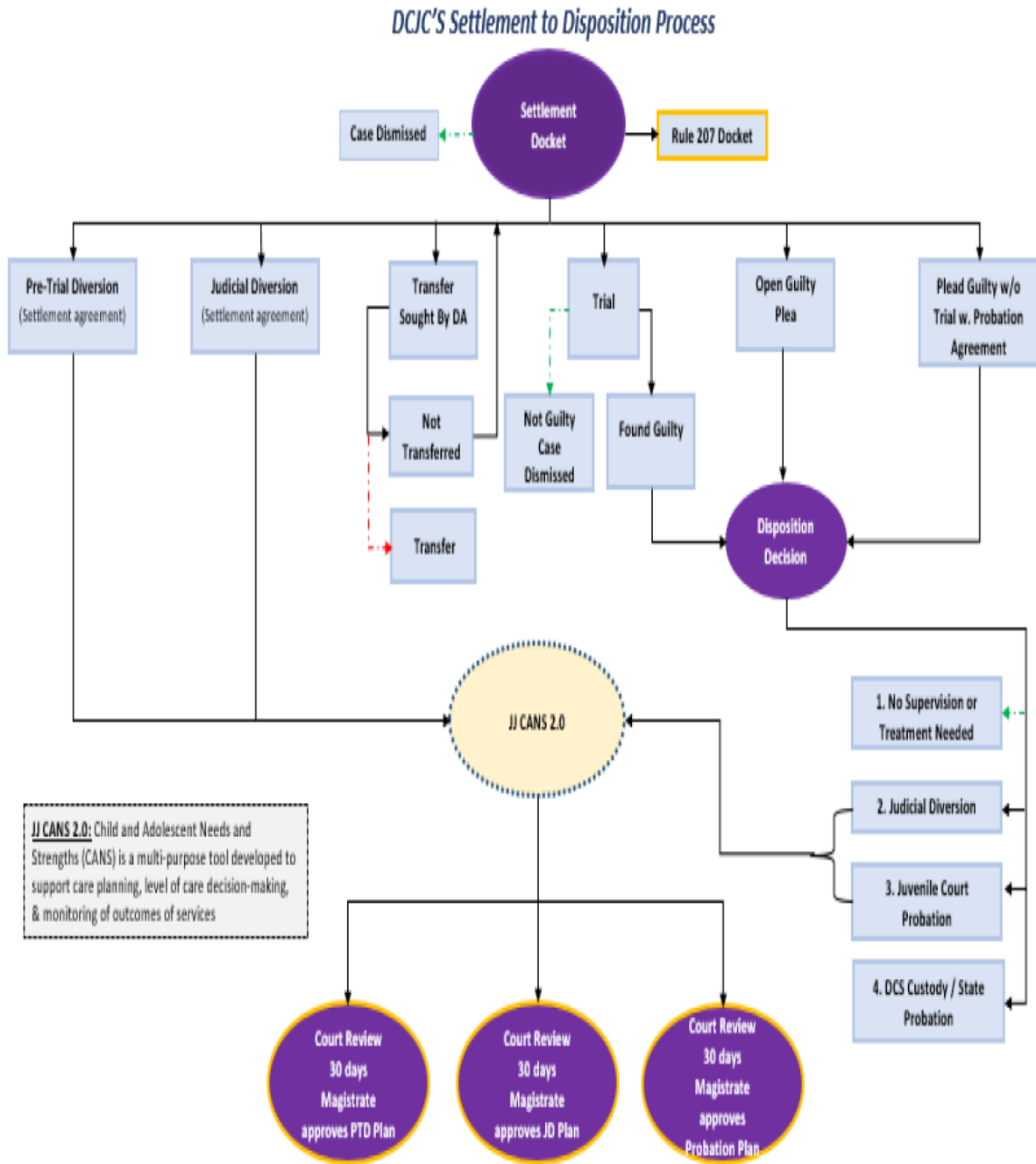
Table 2: Intake to Pre-Adjudication Process



Source: Juvenile Court

APPENDIX B – OVERVIEW OF JUVENILE CASE MANAGEMENT PROCESS

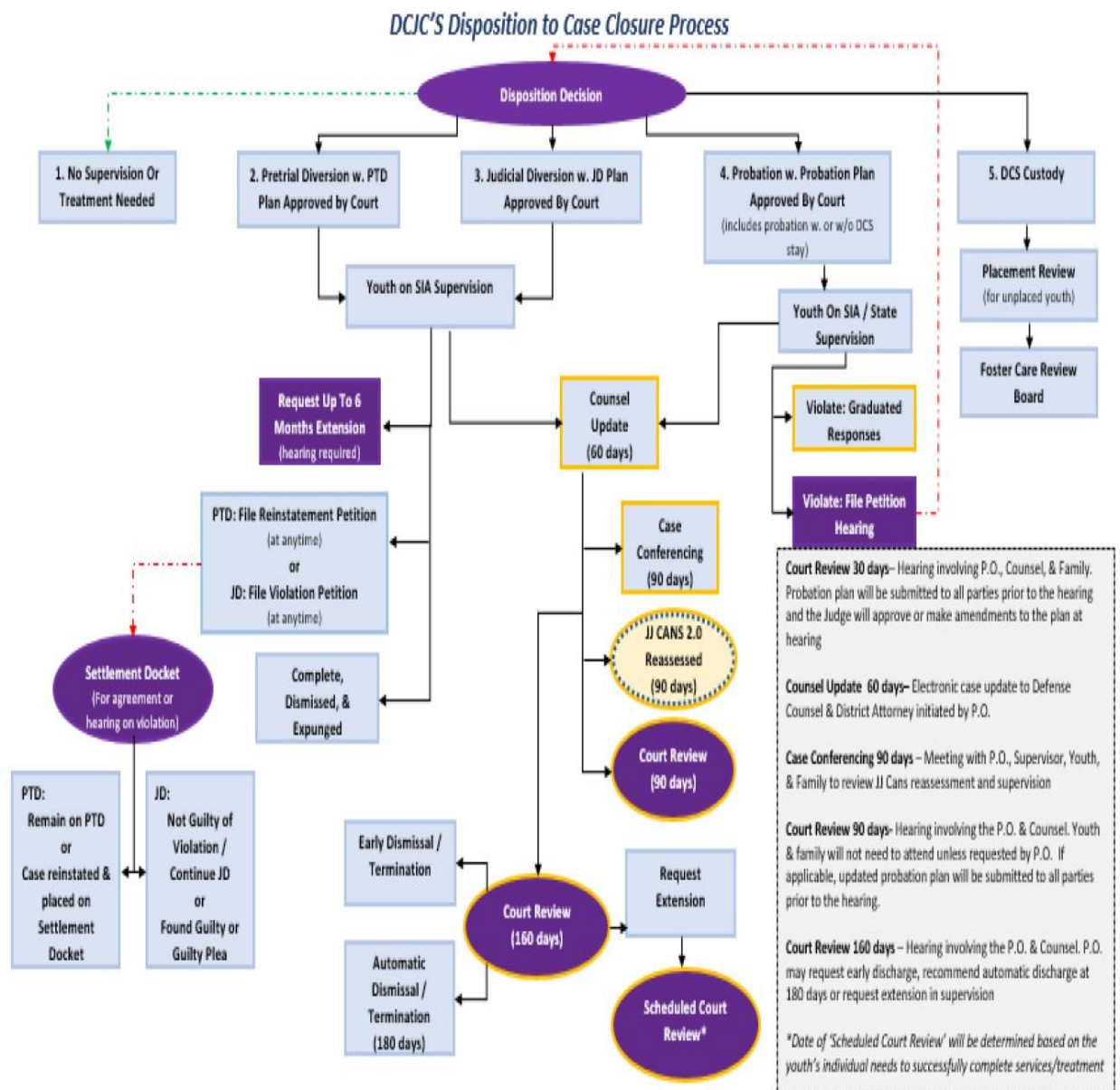
Table 3: Settlement to Disposition Process



Source: Juvenile Court

APPENDIX B – OVERVIEW OF JUVENILE CASE MANAGEMENT PROCESS

Table 4: Disposition to Case Closure Process



Source: Juvenile Court