

- addendums to correctly document the incident, required notifications, etc.)
- 3) Note any UC case files to request from the program

Follow up notes:

Review of completed Site Visit Guide (SVG) and attachments

Identify any areas that require follow up (e.g., discrepancy between the site's P&P and ORR P&P, unique challenges posed at this site, items to add to the facility walkthrough, concerns with service delivery, any recent inspections from local/State authorities, any relevant licenses/permits/certifications, etc.):

Follow up notes:

Review Prevention of Sexual Abuse and Harassment materials

Review and confirm the site has the following in place:

- 1) Zero Tolerance Policy
- 2) Staff Reporting Policies and Procedures
- 3) Coordinated Response and Sexual Abuse
- 4) Attorney Client Visitation Rules

Follow up notes:

Site's Staffing Plan and Organizational Chart

Does the staffing plan meet the ORR and SOW minimum requirements for client to staff ratio requirements?

Does the organizational structure promote effective chain of command and communication?

Follow up notes:

UC Orientation and Discharge Packets

Are all ORR required topics covered, in both the orientation and discharge information?

Is the information in line with ORR policies and procedures?

Are language access services used as needed for youth?

Is it child friendly?

Follow up notes:

Behavior Management Plan

Review the Behavior Management Plan. Does the behavior management plan meet the Flores requirements i.e. "Program rules and discipline standards shall be formulated with consideration for the range of ages and maturity in the program and shall be culturally sensitive to the needs of alien minors. Minors shall not be subjected to corporal punishment, humiliation, mental abuse, or punitive interference with the daily functions of living, such as eating or sleeping. Any sanctions employed shall not: (1) adversely affect either a minor's health, or physical or psychological well-being; or (2) deny minors regular meals, sufficient sleep, exercise, medical care, correspondence privileges, or legal assistance"?

Follow up notes:

Background Checks for Staff, Volunteers, and Contractors

Review the entire list to ensure staff, volunteers, and contractors are receiving the ORR required background checks (ORR Guide 4.3.3):

- 1) A FBI fingerprint check of national and state criminal history repositories;
- 2) A Public Records Criminal Background Check
- 3) A child protective services check with the staff's State(s) of U.S. residence for the last five years; and
- 4) Background investigation updates at a minimum of every five years of the staff/contractor/volunteer's start date or last background investigation update.

Check to ensure that the facility is following their supervision plan (as reported in the ICF Site Visit Guide) for any staff whose background checks are still pending. *Monitors should observe, not just ask, that the supervision plan is being followed during both day and night shifts.*

Have you identified any background discrepancies to discuss with the site?

Are there specific files you plan to pull on-site?

Follow up notes:

Educational Services

Does the program have an educational assessment tool to assess individual needs?

Ensure all required classes, per Flores/ORR Guide, are covered (Science, SS, Math, Reading, Writing, and PE)

Ensure UC are receiving 6 hours of structured education daily

Ensure there are different level curriculums to address the various UC educational levels:

Follow up notes:

Map of facility

Helpful for getting oriented to campus and to identify the amount of time needed for the facility walkthrough

Follow up notes:

Emergency Plan

Does the site have a current evacuation plan(s) in place for relevant natural disasters?

Does the site have an emergency response plan in place (e.g., health emergencies, fires, behavioral disruptions, intruders, active shooters, etc.?)

Does the evacuation plan include a list of agencies and individuals to notify in the event of an evacuation, including ORR contacts, DHS, and local law enforcement (UC MAP Section 3.3.4)?

Follow up notes:

Quality assurance procedures and internal monitoring resources

Review the site's quality assurance procedures

How often do they review UC case files, and other site documents for compliance?

Follow up notes:

Internal Procedures

Code of Conduct – should include employee's obligations with respect to interactions and interventions with UC, staff, and external stakeholders. Must include respecting boundaries, zero tolerance for sexual abuse and harassment, not providing legal advice to UC, therapeutic counseling only if properly licensed and authorized, maintaining professional standards, not discriminating against any person, employing strength-based behavior management approaches, cooperating with official investigations, reporting any criminal or inappropriate conduct, and protecting staff and UC from retaliation if they disclose or threaten to disclose the existence of an illegal or unsafe practice. (See Cooperative Agreement p. 16-18 for full description and also ORR Guide 4.3.5.)

Grievances – should include procedures on handling time-sensitive incidents reported as a grievance that involve an immediate threat, include issuing a written decision to a grievance within 5 days of receipt, and that youth may obtain assistance from another youth, care provider staff, family members, or legal

representative to prepare a grievance.

Conflict of Interest – should identify and define conduct that creates a conflict of interest, prohibit employees from having any direct or indirect financial interests in services of the program, require staff to recuse themselves from decision-making if there is a conflict of interest, require staff to disclose conflicts of interest, state that failure to disclose conflicts of interest may result in discipline or termination. (See Cooperative Agreement p. 19 for full description.)

Follow up notes:

Food services/menus and employee food safety certifications

Are meals prepared in accordance with nutritional guidelines as defined by DOA guidelines?

Are meals prepared with sensitivity to cultural dietary practice when possible?

Are the employee food safety certifications current?

Follow up notes:

CPS Reports

Have there been any CPS reports or investigations?

If yes, were any of the allegations substantiated? If so, review reports.

Follow up notes:

Vehicle Inspections

Are inspections required in the State? If so, how often and is the site in compliance?

How often does the site's complete internal vehicle reviews/walkarounds?

Any deficiencies found? If so, when were they corrected?

Follow up notes:

Personnel Training

Review the list of personnel trainings

Are the annual trainings in line with ORR required trainings?

Are trainings offered frequently enough for staff to comply with requirements?

Follow up notes:

Safety, health and sanitation certificates, fire inspections

Are the certificates current?

When was the last fire inspection conducted? Were any violations cited?

Follow up notes:

UC Daily Activity Schedule

Does the daily activity schedule account for adequate recreation and leisure activity, both on the weekend and weekdays?

Does the daily activity schedule account for religious services?

Follow up notes:

Personnel File Checklists

Complete the Personnel File checklist for all selected files

Note any additional personnel file documents to spot-check while on-site

Follow up notes:

UC Case Files Checklists (UC Portal and hard file documentation)

Complete the UC Case File checklist for all selected files

Follow up notes:

Consult with ORR Staff, COR, PSA, Intakes, Medical, FFS, CFS, etc.

Recent emergency SIRs

Potential issues to research

Name of specific personnel and UC to interview and/or files to review

Follow up notes:

Legal Service Provider Interview

Were there any issues/concerns raised by the LSP?

Follow up notes:

GDIT Case Coordinator Interview

Were there any issues/concerns raised by the Case Coordinator(s)?

Follow up notes:

Monitoring Plan based on pre-onsite review

- Any additional stakeholders to meet with or interview?
- Does the agenda need to be adjusted?
- Additional questions for Entrance Meeting/Site Lead/Contract Staff
- Additional items to look for during facility walkthrough (Document: On-Site Monitoring Checklist)
- List of case files to potentially review on-site
- Possible UC to interview
- Additional questions for UC interviews
- Possible staff to interview
- Additional questions for staff interviews
- Questions/additional questions for stakeholders
- List of personnel files to potentially review on-site
- List of documents to potentially review (Document: On-Site Monitoring Checklist)
- Other issues to address

Onsite Monitoring Activities

Entrance Meeting

Introductions and Information about the UC Monitoring Process:

- ✓ Personal introductions
- ✓ Explain the UC Monitors' role (i.e., to conduct a comprehensive reviews of each program, for ICFs this is no less than every three months to ensure compliance with all ORR requirements)

Primary Goals:

- ✓ Evaluate the site for at compliance with governing statutes, ORR policies and procedures, regulations and contract to ensure:
 - UC are provided with a safe and appropriate environment
 - UC are provided with client-focused care to maximize their well-being both while in care and upon release

This visit is not a 'gotcha', but rather we are here to work with the site to strengthen the services for UC.

Secondary Goals:

- ✓ Assist programs to understand their responsibilities
- ✓ Identify areas where technical assistance may be helpful
- ✓ Identify successful and innovative program implementation/administration techniques
- ✓ Answer questions or provide answers promptly upon return to DC office

To accomplish these goals:

- ✓ Tour facilities
- ✓ Review personnel files, UC case files, and other relevant records to ensure administrative compliance
- ✓ Interview UC
- ✓ Interview staff and stakeholders
- ✓ Review all program materials, policies, and procedures

Request the following documents, if needed or not included in the SVG:

- ✓ UC Roster with assigned CM and Clinician
- ✓ Education/Academic Schedule
- ✓ UC Activity Schedule

Facility Walkthrough

General Findings:

✓

UC Case Files to Request

✓

Additional Questions resulted from UC Interviews

Staff to Interview

Additional questions for Youth Care Workers

- Do staff/case managers demonstrate a general understanding of all ORR/UCP P&P?

Additional questions regarding Educational Services

- Do staff/case managers demonstrate a general understanding of all ORR/UCP P&P?

Additional questions for Case Management

- Do staff/case managers demonstrate a general understanding of all ORR/UCP P&P?

Additional questions for Clinician

- Do staff/case managers demonstrate a general understanding of all ORR/UCP P&P?

Additional questions/topics for Lead Clinician

➤

Additional questions/topics for Lead Case Manager:

Additional questions for Program Management:

➤

Issues/Concerns raised by the Site

➤

Interviews with Field Staff, GDIT CC, Stakeholders, etc.

✓

Personnel Files to Review

✓

Additional items to review/research in relation to personnel files

➤ Do the pre-service training requirements meet the POW and ORR/UCP policy? How many hours?

Observe UC Activities

(See the On-Site Monitoring Checklist)

General Findings:

✓

Additional Documents to Request /Items to follow-up on:

(See the On-Site Monitoring Checklist)

General Findings:

✓

Exit Meeting

Site's Strengths

Areas of non-compliance and recommended improvements

Next Steps

Formal Report should be finalized within 30 business days. It will mainly include all the information presented during this meeting. The site will have 30 business days to respond with a comprehensive corrective action plan. This corrective action plan should be sent to your assigned COR, who will follow-up with the site and provide any further technical assistance. Thanks for your hospitality.