



STATE OF OKLAHOMA  
OFFICE OF JUVENILE AFFAIRS  
CENTRAL OKLAHOMA JUVENILE CENTER  
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October 4, 2011

Janice Sharp, Oversight Specialist  
Oklahoma Commission on Children and Youth  
1111 N. Lee Avenue, Suite 500  
Oklahoma City, OK 73103

Dear Ms. Sharp,

The following are responses to the area of concern, recommendation and violations listed in your report dated August 25, 2011, regarding your oversight visit in July 2011.

Area of Concern and Recommendation

**The area of concern and the recommendation noted in your report will be taken into consideration and necessary changes will be made.**

Violations:

1. Two of the twelve resident files reviewed did not contain copies of legal documents verifying authority to accept the juveniles into the facility. **Response: The Records Department shall verify that a court order or court minutes ordering a juvenile into the custody of the Office of Juvenile Affairs has been received by the facility prior to admitting the juvenile into the facility. If after being notified of the pending arrival of a new juvenile, it is discovered that the legal documentation mentioned above is missing, then the Records Department at the facility will request such documentation from the Juvenile Services Unit (JSU). No juvenile will be admitted to the facility until these legal documents are secured. The appropriate legal documents have been procured on the above-mentioned two (2) juveniles that verify the authority to accept the juveniles into the facility.**
2. Two of the twelve resident files reviewed did not document that the residents had received orientation materials when admitted into the facility. **Response: The JJS supervisor issued an email reminding all JJS staff to submit all required documentation to the Records Department. In the future, JJS staff will report to the JJS supervisor that they have turned in the signed statement that they have reviewed the orientation materials with each new juvenile. When that notification is made to the JJS supervisor, he will document such for his records. The "acknowledgment of orientation material" has been completed on the above-mentioned two juveniles that verify that the JJS had read and explained the juvenile handbook. The form has been placed in their respective files in the Records Department.**
3. Two of the twelve resident files did not document that the grievance policies and procedures have been explained to the residents when they were admitted into the facility. **Response: The facility JJS will ensure grievance policies and procedures are explained at the initial intake. This explanation of grievance procedures will be included in the initial orientation when the JJS is reading and explaining the Juvenile Handbook. The juvenile will be expected to sign an "Acknowledgment of Orientation Material" verifying that the juvenile has had the above information explained to them and that they have no further questions regarding the information presented in the Juvenile Handbook. The Social Services Advocate will ensure**

**grievance procedures are read and explained to the juvenile. This will be documented on the grievance notification form to be completed within 30 days of admission to the institution per OJA P-35-09-01. The Social Services Advocate will be required to file the grievance notification form in the Records Department. The two files mentioned in the OCCY report now contain the required signatures on the grievance notification form.**

4. One of the twelve resident files reviewed did not contain an individualized treatment and service plan. **Response: The facility JJS worker will email the JSU worker to request the ITSP for this juvenile. In the future, when a new juvenile arrives at COJC, the assigned JJS worker will email the JSU worker, upon the juvenile's arrival, to request that the ITSP be faxed to the JJS worker. Further, the JJS III and the JJS supervisor will conduct an audit of ten juvenile charts each month to ensure this documentation has been provided.**

5. One of the twelve residents files reviewed did not document that a review was performed monthly of the resident's treatment plan. **Response: The JJS responsible for this treatment plan is currently under corrective action to address several issues, including treatment plans. The JJS III and JJS supervisor monitor the completion of all treatment plans each month. Further, the JJS III and JJS supervisor will conduct an audit of ten juvenile charts each month to ensure this documentation had been provided. The Administrator of Programs (AOP) will incorporate quality assurance measures to assist in monitoring compliance in this area. The AOP will validate that all treatment plan reviews are being conducted in the timeframe allowed.**

6. Four of the resident files reviewed did not document counseling sessions as occurring in accordance with the residents' individualized treatment plans. **Response: The JJS responsible for this documentation is currently under corrective action to address several issues, including contact notes. The JJS III and JJS supervisor monitor the completion of all contact notes each month. Further, the JJS III and JJS supervisor will conduct an audit of ten resident charts each month to ensure this documentation has been provided. The Administrator of Programs (AOP) will incorporate quality assurance measures to assist in monitoring compliance in this area. The AOP will validate that all treatment plan reviews are being conducted in the timeframe allowed.**

7. The grievance log and grievance forms reviewed indicated non-compliance with OJA grievance policy OAC 377:3-1-28, General Grievance Procedure. **Response: The facility Social Services Advocate shall be responsible for the collection and assignment of all facility grievances submitted by juveniles. The Advocate shall maintain a log of all such assignments. The facility Superintendent shall receive a copy of all assignments and will enforce the completion of all grievances within the timeframe allowed. The Advocate shall monitor all outstanding grievances. If the Advocate notices that the deadline for completion of any outstanding grievance is approaching, the Advocate shall provide the Superintendent with said list. The facility Superintendent will enforce the completion of all grievances within the timeframe allowed.**

If additional information is needed, please advise.

Respectfully,

Jesse Gomez

Interim Institutional Superintendent