

New York City Department of Correction

Young Adult ESH Compliance Audit – November 2018

Pursuant to the six (6) month limited variance granted by the NYC Board of Correction on May 8, 2018 allowing for the continued use of Enhanced Supervision Housing (ESH) for young adults (18 to 21 years old), the related variance conditions require a monthly audit on compliance with the following provisions of the Board's Minimum Standards:

- § 1-05(b) (Lock-in), specifically, the number of out-of-cell hours per person;
- § 1-08(f) (Access to Courts and Legal Services, including Law Library);
- § 1-06 (Recreation); and
- § 1-02(c)(2) (Classification), specifically, the number of programming hours offered to each young adult and the number of hours each young adult participated in programming.

Audit Parameters

The audit is conducted through a manual review of housing area logbooks and programming attendance data on four (4) randomly selected dates from each month. The scope of the audit encompasses only those housing units within ESH in which young adults are housed within the audit period. During this audit period, young adults were housed in six (6) ESH housing areas.

This audit report covers the following four (4) dates in the month of November 2018:

- November 2
- November 9
- November 13
- November 21

In addition, on-site inspections of the ESH unit kiosks and typewriters were conducted on four (4) randomly selected dates:

- November 9
- November 16
- November 23
- November 30

§1-05(b) Lock-in

A manual review of housing area logbooks was performed to determine whether seven (7) or fourteen (14) hours of out-of-cell time was afforded to the young adults based on their housing level. This audit report also provides individualized data related to each young adult's out-of-cell time during the reporting period.

§1-08(f) Access to Courts and Legal Services, including Law Library

A manual review of housing area logbooks was conducted to determine whether Law Library services were afforded. In addition to the logbook review, on-site inspections were conducted to determine if the kiosks and typewriters located within the various young adult ESH housing areas were operational.

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§1-06 – Recreation

A manual review of housing area logbooks was conducted to determine whether one (1) hour of recreation was afforded.

§ 1-02(c)(2) (Classification), Provision of Programming

A manual review of programming attendance data was conducted to determine the number of programming hours offered to each young adult and the number of hours each young adult participated in programming.

Audit Findings

§1-05(b) Lock-in

All young adults in ESH are afforded lock-out based on their housing level: seven (7) hours for Level I and Level II and fourteen (14) hours for Level III. On all four (4) dates, institutional lock-out and lock-in was consistently recorded in the logbook for each of the levels.

Level I

Young adults in Level I are afforded seven (7) hours of out-of-cell time each day. Listed below is individualized data related to each young adult's total out-of-cell time in Level I, based on a manual review of the logbook, on the dates audited. The out-of-cell time is the hours each day that a young adult chooses to be out of his cell during institutional lock-out periods. The data reflects the young adults present in the unit for institutional lock-outs on each audit date.¹

November 2, 2018

There were five (5) young adults in Level I; their out-of-cell times were:

1. 15 minutes; young adult was out to court for a significant portion of the day and as a result his out-of-cell time was affected
2. 8 hours 45 minutes
3. 8 hours 45 minutes
4. 7 hours 35 minutes
5. 8 hours 45 minutes

November 9, 2018

There were seven (7) young adults in Level I; their out-of-cell times on this audit date were:

1. 5 hours 36 minutes
2. 5 hours
3. 6 hours
4. 6 hours
5. 3 hours; young adult refused the remainder of afforded out-of-cell time

¹ On any given day, a young adult may be out to court or transferred in or out of the ESH Unit. These young adults may not be included in the out-of-cell time reporting.

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6. 6 hours

On this audit date, one (1) young adult refused all afforded out-of-cell time.

November 13, 2018

There were six (6) young adults in Level I; their out-of-cell times were:

1. 6 hours 57 minutes
2. 6 hours 45 minutes
3. 2 hours; young adult refused the majority of afforded out-of-cell time
4. 5 hours 45 minutes
5. 6 hours 45 minutes

On this audit date, one (1) young adult was out to court for a significant portion of the day, as a result, his out-of-cell time was not included in the out-of-cell time reporting.

November 21, 2018

There were six (6) young adults in Level I; their out-of-cell times on this audit date were:

1. 8 hours
2. 6 hours 45 minutes; young adult was transferred out of the unit, and as a result his out-of-cell time was affected
3. 8 hours
4. 8 hours
5. 8 hours

On this audit date, one (1) young adult refused all afforded out-of-cell time.

Level II

Young adults in Level II are afforded seven (7) hours of out-of-cell time each day. Listed below is individualized data related to each young adult's total out-of-cell time in Level II, based on a manual review of the logbook, on the audit dates. The out-of-cell time is the hours each day that a young adult chooses to be out of his cell during institutional lock-out periods. The data reflects the young adults present in the unit for institutional lock-outs on each audit date.²

November 2, 2018

There were twenty-five (25) young adults in Level II; their out-of-cell times were:

1. 1 hour 20 minutes; young adult refused the majority of afforded out-of-cell time
2. 6 hours 20 minutes
3. 6 hours 20 minutes
4. 6 hours 20 minutes

² On any given day, a young adult may be out to court or transferred in or out of the ESH Unit. These young adults may not be included in the out-of-cell time reporting.

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5. 7 hours
6. 4 hours 30 minutes
7. 4 hours 30 minutes
8. 4 hours 30 minutes
9. 4 hours 30 minutes
10. 4 hours 30 minutes
11. 7 hours
12. 6 hours 25 minutes
13. 5 hours 25 minutes
14. 5 hours
15. 5 hours 45 minutes
16. 7 hours
17. 4 hours 15 minutes
18. 4 hours 15 minutes
19. 4 hours 15 minutes
20. 4 hours 15 minutes
21. 7 hours
22. 3 hours; young adult refused the majority of afforded out-of-cell time
23. 5 hours 15 minutes

On this audit date, two (2) young adults transferred out of the unit, as a result, their out-of-cell times were not included in the out-of-cell time reporting.

November 9, 2018

There were seventeen (17) young adults in Level II; their out-of-cell times on this audit date were:

1. 7 hours 10 minutes
2. 7 hours 10 minutes
3. 7 hours 10 minutes
4. 7 hours 16 minutes
5. 7 hours 16 minutes
6. 7 hours 16 minutes
7. 7 hours 16 minutes
8. 5 hours 25 minutes
9. 2 hours 30 minutes; young adult refused the majority of afforded out-of-cell time
10. 7 hours 15 minutes
11. 5 hours 15 minutes
12. 4 hours 15 minutes
13. 7 hours
14. 4 hours 15 minutes
15. 7 hours
16. 7 hours
17. 7 hours

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November 13, 2018

There were eighteen (18) young adults in Level II; their out-of-cell times were:

1. 7 hours 10 minutes
2. 7 hours 10 minutes
3. 5 hours 25 minutes
4. 7 hours 15 minutes
5. 7 hours 15 minutes
6. 7 hours 15 minutes
7. 7 hours 15 minutes
8. 7 hours 10 minutes
9. 8 hours
10. 8 hours
11. 2 hours 15 minutes; young adult refused the majority of afforded out-of-cell time
12. 3 hours 15 minutes; young adult refused the majority of afforded out-of-cell time
13. 7 hours
14. 7 hours
15. 7 hours

On this audit date, three (3) young adults were out to court for a significant portion of the day and, as a result, their out-of-cell times were not included in the out-of-cell time reporting.

November 21, 2018

There were eighteen (18) young adults in Level II; their out-of-cell times were:

1. 6 hours 30 minutes
2. 7 hours 20 minutes
3. 7 hours 20 minutes
4. 7 hours 20 minutes
5. 4 hours 25 minutes
6. 3 hours 15 minutes; young adult refused the majority of afforded out-of-cell time
7. 4 hours 15 minutes
8. 7 hours
9. 7 hours
10. 1 hour; young adult was transferred out of the unit, and as a result, his out-of-cell time was affected
11. 7 hours
12. 1 hour; young adult refused the majority of afforded out-of-cell time
13. 8 hours
14. 8 hours

On this audit date, three (3) young adults' out-of-cell times were affected by a housing area lockdown during a portion of the tour. In addition, one (1) young adult was out to court for a significant portion of the day, as a result, his out-of-cell time was not included in the out-of-cell time reporting.

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Level III

Young adults in Level III are afforded fourteen (14) hours of out-of-cell time each day. Listed below is individualized data related to each young adult's total out-of-cell time in Level III, based on a manual review of the logbook, on the audit dates. The out-of-cell time is the hours each day that a young adult chooses to be out of his cell during institutional lock-out periods. The data reflects the young adults present in the unit for institutional lock-outs on each audit date.³

November 2, 2018

There was one (1) young adult in Level III; his out-of-cell time on this audit date was fourteen (14) hours.

November 9, 2018

There were three (3) young adults in Level III; their out-of-cell times on this audit date were:

1. 13 hours 52 minutes
2. 13 hours 52 minutes
3. 13 hours 52 minutes

November 13, 2018

There were three (3) young adults in Level III; their out-of-cell times on this audit date were:

1. 11 hours 30 minutes
2. 13 hours 30 minutes
3. 13 hours 30 minutes

November 21, 2018

There were three (3) young adults in Level III; their out-of-cell times on this audit date were:

1. 12 hours 26 minutes
2. 12 hours 25 minutes
3. 12 hours 10 minutes

³ On any given day, a young adult may be out to court or transferred in or out of the ESH Unit. These young adults may not be included in the out-of-cell time reporting.

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§1-08(f) Access to Courts and Legal Services, including Law Library

Law Library Coordinator

In ESH, there are four (4) Law Library Coordinators assigned to areas in which young adults are housed⁴. A manual review of the housing area logbooks reflected that the Law Library Coordinators were in these areas to provide assistance on all four (4) days audited.⁵ On November 13 and 21, 2018, due to training for a Law Library Coordinator, three (3) housing areas were not provided a morning session of Law Library. In addition, on November 21 due to a housing area lockdown, one (1) housing area was not provided an afternoon session of Law Library.

Except for the issue noted above, the duration of each Law Library Coordinator's time in ESH areas during the dates audited were in compliance with the provisions of Minimum Standards. On average, based on each Law Library Coordinator's schedule, a Law Library Coordinator was available to assist young adults within the housing areas for approximately four (4) hours on the dates audited.

During the reporting period, on the dates audited, Law Library Coordinators provided assistance to one (1) to nine (9) young adults per day. On some of the audit dates, young adults did not request Law Library assistance.

Kiosks and Typewriters

During this audit period, young adults were housed in six (6) housing areas in ESH. Young adults in ESH are provided with access to a minimum of one (1) kiosk and one (1) typewriter. During the audit period, all kiosks and typewriters were available and operable.

§1-06 – Recreation

Institutional recreation was afforded to young adults present in ESH on all four (4) days audited.⁶

§ 1-02(c)(2) (Classification), Provision of Programming⁷

Young adults in ESH are placed in housing units exclusively with other young adults (18 to 21 years old) or in co-mingled units with adults (22 years old and older).⁸ Programming is provided to all young adults. In the young adult exclusive housing area within ESH, tablets are utilized in the provision of programming and offered to young adults regardless of whether it is during the

⁴ To facilitate the provision of Law Library services, within their assigned areas, Law Library Coordinators provide services to all individuals regardless of whether it is during the individual's lock-out period.

⁵ This is evidenced by the Law Library Coordinator signing in and out of the logbook on each of the audit dates.

⁶ On three (3) of the four (4) audit dates, logbook entries recorded that some of the young adults were out to court.

⁷ In July 2018, the Department expanded program offerings in two (2) housing areas to include courses and services by a contracted provider. Further programming expansion to additional ESH housing areas is anticipated in the near future.

⁸ Young adults who are eighteen years old are not housed in ESH co-mingled units with adults (22 years old and older.)

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individual's lock-out period. When young adults collect their tablets, they also have the opportunity to request an additional component of programming during that time. In addition, in the young adult exclusive housing area, on days when support programming staff are present, young adults may request individualized counseling while other programming components are being held. In the co-mingled housing areas, the provision of programming is provided to each tier separately through two programming sessions. The hours of programming afforded may vary by tier within a housing area.

The audit reviewed programming attendance data on each of the four (4) dates to ascertain the number of programming hours offered to each young adult and the number of hours each young adult participated in programming. Program participation hours is based on the number of hours each young adult chooses to participate in programming. The data reflects the young adults present in the housing area during programming on each audit date.⁹

Listed below is the number of programming hours offered based on housing area.

November 2, 2018¹⁰

On this audit date, up to five (5) hours of programming were offered to the young adults housed within the six (6) young adult ESH housing areas, labelled A-F.

- ❖ A: 1 hour and 25 minutes of programming was offered: 50 minutes of programming for participants in the morning session and 35 minutes of programming for participants in the afternoon session.
 1. There were five (5) young adults housed in this area.
 - a. Four (4) young adults participated in the morning session. One young adult refused all afforded programming. One young adult went to school and to the clinic during programming. For the remaining two (2) young adults, their hours of program participation were:
 - i. 10 minutes
 - ii. 15 minutes
 - b. One (1) young adult participated in the afternoon session; his program participation was 10 minutes.
- ❖ B: No programming was scheduled for the morning session. 40 minutes of programming was offered for the afternoon session.
 1. There were eight (8) young adults housed in this area.
 - a. Four (4) young adults were not offered programming that day as no programming was scheduled for the morning
 - b. One (1) young adult participated in the afternoon session; his program participation was 15 minutes.

⁹ On any given day, a young adult may be out to court or transferred in or out of the ESH Unit. These young adults may not be included in the programming reporting. It is important to note that young adults returning from court during programming hours are offered the opportunity to participate in programming upon their return.

¹⁰ On any given day, a young adult may be out to court or transferred in or out of the ESH Unit. These young adults may not be included in the programming reporting. It is important to note that young adults returning from court during programming hours are offered the opportunity to participate in programming upon their return.

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- c. Two (2) young adults were transferred out of the unit on this audit date, and as a result did not participate in programming.
 - d. For one young adult, programming hours could not be determined due to incomplete data.
- ❖ C: 30 minutes of programming were offered for participants in the afternoon session. No programming was scheduled for the morning session.
 - 1. There were three (3) young adults housed in this area. None of the three (3) young adults was offered programming that day as no programming was scheduled for the morning.
- ❖ D: Five (5) hours of programming were offered on one (1) of the two (2) tiers. On the other tier, two (2) hours of self-guided programming was provided through the provision of tablets.
 - 1. There were nine (9) young adults housed in this area.
 - a. Five (5) young adults were housed on the tier where two (2) hours of self-guided programming were offered through the provision of tablets. All five (5) young adults refused the afforded self-guided programming.
 - b. Four (4) young adults were housed on the tier where five (5) hours of programming were offered, inclusive of the self-guided programming with tablets. Their hours of program participation were:
 - i. 2 hours; young adult refused to participate in any additional programming
 - ii. 2 hours; young adult refused to participate in any additional programming
 - iii. 3 hours 20 minutes; young adult refused to participate in any additional programming
 - iv. 3 hours 15 minutes; young adult refused to participate in any additional programming
- ❖ E: There were five (5) young adults housed in this area. No programming was scheduled.
- ❖ F: 1 hour and 30 minutes of programming was offered.
 - 1. There was one (1) young adult housed in this area and was in school during programming.

November 9, 2018¹¹

On this audit date, up to five (5) hours of programming were offered to the young adults housed within the six (6) housing areas, labelled A-F.

¹¹ On any given day, a young adult may be out to court or transferred in or out of the ESH Unit. These young adults may not be included in the programming reporting. It is important to note that young adults returning from court during programming hours are offered the opportunity to participate in programming upon their return.

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- ❖ A: There were three (3) young adults housed in this area. No programming was scheduled.
- ❖ B: 2 hours of programming was offered: 1 hour of programming was offered for participants in the morning session and 1 hour of programming was offered for participants in the afternoon session.
 1. There were five (5) young adults housed in this area.
 - a. One (1) young adult participated in programming during the morning session and three (3) young adults participated in programming during the afternoon session. Their hours of program participation were:
 - i. 5 minutes
 - ii. 1 hour
 - iii. 5 minutes
 - iv. 5 minutes
 - b. One (1) young adult was out to visits during programming.
- ❖ C: 1 hour and 30 minutes of programming was offered. 1 hour 30 minutes of programming was offered for participants in the afternoon session. No programming was scheduled for the morning session.
 1. There were two (2) young adults housed in this area. One (1) young adult refused all afforded programming. One (1) young adult participated in the afternoon session for 1 hour and 30 minutes of programming.
- ❖ D: 5 hours of programming were offered on one (1) of the two (2) tiers. On the other tier, 2 hours of self-guided programming was provided through the provision of tablets.
 1. There were seven (7) young adults housed in this area.
 - a. Three (3) young adults were housed on the tier that was offered 2 hours of self-guided programming through the provision of tablets. All three (3) young adults refused to participate in all afforded programming.
 - b. Four (4) young adults were housed on the tier where 5 hours of programming was offered, inclusive of the self-guided programming with tablets. Their hours of program participation were:
 - i. 1 hour; young adult refused to participate in any additional programming
 - ii. 1 hour 19 minutes; young adult refused to participate in any additional programming
 - iii. 1 hour; young adult refused to participate in any additional programming
 - iv. 1 hour; young adult refused to participate in any additional programming
- ❖ E: There were seven (7) young adults housed in this area. No programming was scheduled.

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- ❖ F: 2 hours and 15 minutes of programming were offered.
 1. There were three (3) young adults housed in this area. Their hours of program participation were:
 - i. 2 hours 15 minutes
 - ii. 2 hours 15 minutes
 - iii. 2 hours 15 minutes

November 13, 2018¹²

On this audit date, up to six (6) hours of programming were offered to the young adults housed within the six (6) housing areas, labelled A-F.

- ❖ A: 4 hours and 20 minutes of programming were offered: 1 hour and 50 minutes of programming for participants in the morning session and 2 hours and 30 minutes of programming for participants in the afternoon session.
 1. There were four (4) young adults housed in this area.
 - a. One (1) young adult participated in the morning session, his hours of program participation was 30 minutes.
 - i. Two (2) young adults participated in the afternoon session. Their hours of participation were:
 1. 5 minutes
 2. 5 minutes
 - ii. One (1) young adult was out to court during programming.
- ❖ B: 4 hours and 10 minutes of programming were offered: 2 hours of programming for participants in the morning session and 2 hours and 10 minutes of programming for participants in the afternoon session.
 1. There were five (5) young adults housed in this area.
 - a. One (1) young adult was afforded programming in the morning session and refused to participate.
 - b. Three (3) young adults participated in the afternoon session. Their hours of participation were:
 - i. 2 hours
 - ii. 2 hours
 - iii. 2 hours
 - c. One (1) young adult was in school during programming.
- ❖ C: 2 hours of programming were offered.
 1. There were two (2) young adults housed in this area. Their hours of programming participation were:
 - i. 20 minutes; young adult refused to participate in any additional programming
 - ii. 15 minutes; young adult refused to participate in any additional programming

¹² On any given day, a young adult may be out to court or transferred in or out of the ESH Unit. These young adults may not be included in the programming reporting. It is important to note that young adults returning from court during programming hours are offered the opportunity to participate in programming upon their return.

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- ❖ D: 6 hours of programming were offered on one (1) of the two (2) tiers. On the other tier, 2 hours of self-guided programming was provided through the provision of tablets.
 1. There were seven (7) young adults housed in this area.
 - a. Three (3) young adults were housed on the tier that were offered two (2) hours of self-guided programming through the provision of tablets.
 - i. Two (2) young adults refused all afforded programming.
 - ii. One (1) young adult was out to court during programming.
 - b. Four (4) young adults were housed on the tier. Three of the four young adults were offered 6 hours of programming, inclusive of the self-guided programming with tablets.
 - i. 1 hour 30 minutes; young adult refused to participate in any additional programming
 - ii. 2 hours; young adult refused to participate in any additional programming
 - iii. 1 hour 30 minutes; young adult refused to participate in any additional programming
 - c. One (1) young adult was out to court during programming.
- ❖ E: 6 hours of programming were offered.
 1. There were six (6) young adults housed in this area. Their hours of program participation were:
 - i. 6 hours
 - ii. 4 hours
 - iii. 6 hours
 - iv. 4 hours
 - v. 6 hours
 2. One (1) young adult was out to court during programming.
- ❖ F: 2 hours and 15 minutes of programming were offered.
 1. There were three (3) young adults housed in this area; their hours of program participation were:
 - i. 2 hours
 - ii. 6 minutes; young adult opted to go to school for the remaining time that programming was offered
 2. One (1) young adult was in school during programming.

November 21, 2018¹³

On this audit date, up to five (5) hours of programming were offered to the young adults housed within the six (6) housing areas, labelled A-F.

- ❖ A: 4 hours of programming were offered: 2 hours of programming for participants in the morning session and 2 hours of programming for participants in the afternoon session.

¹³ On any given day, a young adult may be out to court or transferred in or out of the ESH Unit. These young adults may not be included in the programming reporting. It is important to note that young adults returning from court during programming hours are offered the opportunity to participate in programming upon their return.

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1. One (1) young adult was offered programming in the morning session and his hours of participation were 1 hour and 55 minutes
 2. Three (3) young adults were offered programming in the afternoon session
 - i. Two (2) young adults refused to participate in all offered programming
 - ii. 1 hour 40 minutes
- ❖ B: 2 hour and 30 minutes of programming were offered during the afternoon session. No programming was scheduled for the morning session.
1. There were five (5) young adults housed in this area. One (1) young adult was not offered programming that day, as he was housed on the tier where lockout was afforded during the morning, but no programming was scheduled for the morning. One (1) young adult was out to court during programming. For the remaining three (3) young adults; their hours of program participation were:
 - i. 20 minutes
 - ii. 10 minutes
 - iii. 5 minutes
- ❖ C: 2 hours and 30 minutes of programming were offered.
1. There were two (2) young adults housed in this area. Their hours of program participation were:
 - i. 1 hour; young adult refused to participate in any additional programming
 - ii. 2 hours 30 minutes
- ❖ D: 4 hours of programming were offered in one (1) of the two (2) tiers. In the other tier, 3 hours of self-guided programming was provided through the provision of tablets.
1. There were seven (7) young adults housed in this area.
 - a. There were two (2) young adults housed on the tier that were offered 3 hours of self-guided programming through the provision of tablets. Their hours of program participation were:
 - i. 1 hour; young adult opted to go to a visit for the remaining time that programming was offered
 - ii. 1 hour; young adult refused to participate in any additional programming
 - b. Five (5) young adults were housed on the tier where four (4) hours of programming were offered, inclusive of the self-guided programming with tablets. Their hours of program participation were:
 - i. 3 hours
 - ii. 3 hours
 - iii. 2 hours; young adult refused to participate in any additional programming
 - iv. 1 hour; young adult refused to participate in any additional programming
 - v. 2 hours; young adult refused to participate in any additional programming

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- ❖ E: 5 hours of programming were offered.
 1. There were six (6) young adults housed in this area. One (1) young adult refused all offered programming. One (1) young adult transferred out of the unit on this audit date and as a result did not participate in programming. For the remaining four (4) young adults, their hours of program participation were:
 - i. 2 hours
 - ii. 2 hours
 - iii. 5 hours
 - iv. 2 hours

- ❖ F: 2 hours and 10 minutes of programming were offered.
 1. There were three (3) young adults housed in this area. Two (2) young adults were in school during programming. For the remaining one (1) young adult, his program participation was 1 hour 35 minutes.

Audit Recommendations

The Department began conducting monthly audits of young adult ESH in January 2018. In the time since, through the audit process, issues have been identified and addressed related to the provision of mandated services and programming.

During this audit period, issues were identified in regard to the provision of law library services and programming. The below recommendations for corrective action should be implemented.

Law Library

- Law Library services were not afforded on November 13 and 21, 2018, during the morning session in three housing areas, because the Legal Coordinator was at training. The Director of Law Libraries, in conjunction with the facility administration, should ensure that designated staff are scheduled to provide Law Library services to inmates in the ESH. In the case of staff training, the Director of Law Libraries should assign other staff to provide Law Library coverage.

Programming

- During this reporting period, programming information could not be determined in at least one incident because of incomplete data.
 - To facilitate complete and consistent recording of both programming hours offered and individualized data related to hours of participation, program counselors and external providers are directed to provide more comprehensive individualized outcomes, by:
 - Verifying on a daily basis which young adults are housed in each ESH co-mingled housing area and updating information accordingly;
 - Recording of program start and end times, by participant;
 - Delineating the reason for participants' absences.

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- Designate supervisory staff to review programming attendance documentation and related information to ensure that programming hours and participation are recorded on a daily basis, that deficiencies are corrected in a timely manner, and that young adults' program participation is accurately reflected and any programmatic overlap explained.
 - The Programs Division Leadership will maintain a diligent approach to ensuring the list of young adults in each of the co-mingled housing units is submitted to the ACI staff in a timely and accurate fashion.
- In order to minimize the cancellation of programming, the Counseling staff is in the process of identifying staff members from other facilities to serve as alternate counselors and cover gaps in programming scheduling.
- In some housing areas during this audit period, the programming schedule overlapped with school schedule. Corrective action should be taken to ensure that programming hours do not conflict with the school hours.