

I. INTRODUCTION

A. Purpose of This Manual

The Family and Youth Services Bureau is committed to providing the highest quality care to the youth served by its Runaway and Homeless Youth (RHY) programs. To ensure that services are meeting the needs of these vulnerable young people, grantees undergo periodic onsite reviews and evaluations. This manual lays out the review process. It establishes the general governing principles and the uniform Federal requirements for conducting the reviews and reporting the results.

This publication also provides instructional materials that promote consistent practices by all onsite review teams. Consistent practices and criteria are important for making fair and reliable determinations of a grantee's compliance with Federal grant requirements.

It also offers suggestions on how to prepare for and conduct each phase of the review and how to report the results in a way that accurately reflects the findings.

This manual is intended to be used for all RHY programs funded by the Family and Youth Services Bureau, including:

- Basic Centers
- Transitional Living Programs
- Maternity Group Homes
- Street Outreach Programs

It also provides specific guidance regarding four categories of optional services for Basic Centers, namely:

- Street-based Services
- Home-based Services for Youth at Risk of Separation from Their Families
- Drug Abuse Prevention and Treatment
- Testing for Sexually Transmitted Diseases

B. Overview of the Review Process

Purpose of Onsite Reviews

According to Section 386 of the Runaway and Homeless Youth Act, onsite reviews are conducted to ensure:

1. **Compliance with Grant Requirements** - determining whether Federal grants are being used for the purposes for which they are made.
2. **Program Evaluation** - collecting additional information on the status, activities, and accomplishment of grantees for the biennial reports that the Secretary of the Department of Health and Human Services is required to submit to Congress.
3. **Assistance to Grantees** - providing information and assistance to grantees to enable them to improve RHY facilities, projects, and activities.

Review Team Composition

Review teams will consist of:

- A **Runaway and Homeless Youth Specialist**, who coordinates activities before, during, and after the onsite review.
- A **Peer Monitor** appointed by the Family and Youth Services Bureau, who assists the Runaway and Homeless Youth Specialist and participates in the site visit.
- The **Runaway and Homeless Youth Team Leader**, who will be available for consultation either onsite or by phone.

The Runaway and Homeless Youth Specialist is the leader of the onsite team. The Peer Monitor assists by drawing on his or her professional experience to offer insight into the practical issues involved in managing an RHY program. Although only Federal staff can determine whether a grantee is in compliance with the approved grant, a Peer Monitor can provide crucial advice and assistance to enable the Federal officials to draw such a conclusion. At the same time, both the Federal staff and the Peer Monitor can and should provide information and assistance to grantees to enable them to improve RHY facilities, projects, and activities.

Frequency of Reviews

Every grantee receiving a grant award covering 3 or more consecutive fiscal years will be reviewed at least once during the 3-year period.

If, as a result of an onsite review, a grantee is found to be not in substantial compliance with grant requirements, the program may be subject to a follow-up review to determine whether appropriate corrective action has been taken. This type of review is also called a **Validation Review** and is generally done within a year after significant findings to focus on the non-compliance issues listed in the report. This review may or may not be performed with a peer monitor.

Any grantee may be subject to an onsite review if the Family and Youth Services Bureau receives a credible allegation either of conditions that could jeopardize the health, safety, and well-being of residents or of serious financial irregularities.

Many RHY grantees receive more than one grant from the Family and Youth Services Bureau. In that case, a single onsite review will encompass all such grants.

Assessment of Substantial Compliance

Based on the onsite review, the Runaway and Homeless Youth Specialist, in consultation with senior officials of the Family and Youth Services Bureau, will determine whether the grantee is in substantial compliance with the approved grant.

To be in substantial compliance, a grantee does not necessarily have to fulfill each and every condition or requirement described in its approved grant. Overall, however, a grantee must be delivering the services as described. If the review team finds that a grantee is not in substantial compliance with any aspect of its program, the grantee will be required to submit a corrective action plan. For minor shortcomings, the Runaway and Homeless Youth Specialist may make

suggestions to promote more effective or efficient operations and to enhance the future development of the grantee's program. However, these suggestions are not binding on the grantee.

A grantee found to be not in substantial compliance is not providing key services as described in the grant or is not reaching significant numbers or categories of at-risk youth. Organizations can also be considered not in substantial compliance if they are using structures or operational plans that are so flawed that consideration must be given to not renewing grant funding unless these conditions are corrected. In such cases, the grantee may be subject to a follow-up review within a year after the conclusion of the first site visit. If the grantee is still not in substantial compliance at the conclusion of the follow-up review, the situation will be remanded to senior leadership of the Family and Youth Services Bureau for appropriate action.

Criteria

Performance Standards. This protocol is organized along the lines of the *Basic Center Program Performance Standards*, which the Family and Youth Services Bureau established as "minimum standards for its funded basic centers." The performance standards relate to the basic program components enumerated in Section 312 of the Runaway and Homeless Youth Act as reauthorized and as further detailed in Regulations and other guidance from the Bureau governing the implementation of the Act. They address the *methods and processes* by which the needs of runaway and homeless youth and their families are being met, as opposed to the *outcomes* of the services provided.

The protocol is divided into 20 sections. Sixteen sections are based on the performance standards. Four additional sections were added to address the four categories of optional Basic Center services: Street-based Services, Home-based Services for Youth at Risk of Leaving Their Families, Drug Abuse Prevention and Treatment, and Testing for Sexually Transmitted Diseases. The performance standards have also been adapted in this manual for Transitional Living and Maternity Group Home programs.

The Street Outreach Program provides services to youth under circumstances that make a straightforward adaptation of some of the elements of the performance standards impractical. However, the underlying ideas of the standards are germane to street outreach programs, and many of them can be easily applied in the case of services provided to street youth who voluntarily accept them.

Positive Youth Development. Another important framework for evaluating the performance of RHY programs is the extent to which they have adopted the principles of Positive Youth Development. This framework emphasizes:

- **healthy messages** to adolescents about their bodies, behaviors, and interaction
- **safe and structured places** for teens to study, recreate, and socialize
- strong relationships with **adult role models**
- **skill development** in literacy competence, work readiness, and social skills
- opportunities for youth to **serve others** and build self-esteem

RHY programs that adopt these principles provide the youth they serve with more opportunities for positive use of time, positive self-expression, and civic engagement.

Approved Grant. Although the performance standards and the Positive Youth Development principles are useful as a framework for conducting the onsite review process, grantees should ultimately be judged on whether they are in compliance with the approved grant. By awarding the grant, the Family and Youth Services Bureau has endorsed it as being consistent with Federal laws and regulations as well as meeting the performance standards and the Positive Youth Development guidelines.

Evidence

Evidence gathered during the onsite review will determine whether a grantee is in compliance with the approved grant. Because of the complex nature of RHY programs, it isn't possible for the team to review every facet of the grantee's operations within the 2- or 3-day site visit. Furthermore, there is no way to guarantee that what is observed or studied during those days is truly representative of what happens every day. There is no such thing as perfect proof of compliance. However, the following are some types of evidence that, when used in appropriate combinations, can provide a reasonable basis for the review team to draw its conclusions.

Types of Evidence

- **Direct Observation.** For some aspects of the grantee's operations, direct observation of conditions or activities is appropriate, especially if the team members observe unacceptable conditions. On the other hand, site visits are announced in advance, which gives grantees time to get ready for the team's visits. Thus, direct observation, like all forms of evidence, is best used in combination with others. Direct observation can include, for example, touring the facilities, making note of whether the conditions are sanitary, fire extinguishers and smoke detectors are installed, wheelchair access is possible, the number of rooms and beds is as described in the approved grant, gender separation of living quarters is assured and maintained, etc. For street outreach programs, direct observation would include accompanying the grantee's staff during an outreach activity or a visit to an outreach site. Direct observation of youth group meetings, skill-building sessions, and staff meetings might also be useful.
- **Interviews.** An "interview" is any discussion or meeting to systematically collect information needed for the review. It could mean asking for a description of program operations, probing an interviewee's sense of priorities, or discussing areas of possible noncompliance. It could be a meeting whose purpose is simply to request copies of plans or documents. Interviews also provide an opportunity for review team members to enhance their understanding of the grantee's program, to ask for greater detail, or to bring up related subjects.

Interviews with the Executive Director and key program and management staff can help the team to understand many aspects of the grantee's services, organization, staff development, and future plans. Such interviews also provide a basis of comparison between what is described in the approved grant and what is actually happening onsite. If they do not match, this could be a sign that the grantee is not operating in accordance with its approved grant. It is also useful to note whether the results of interviews are consistent among the interviewees. If not, additional digging may be needed to understand why.

Interviews with youth, service providers, and members of the Board of Directors can also be useful in understanding the grantee's services, organization, staff development, and

future plans. Interviewing young people also ties nicely back to the Positive Youth Development framework.

- **Verification of Written Plans and Documents.** Grantees are required to have written plans for certain aspects of their operations. Other key documents need to be verified as well, such as State and local licenses, letters of commitment, organizational charts, and financial documents. A complete list of such documents is included in [section VI](#) of this manual.

In most cases, the review team simply needs to see the relevant documents and note that they are accurate, complete, and in proper form. It is not the purpose of the onsite review for the review team to judge whether the plans are “good” or even “adequate.”

Asking the grantee for documents beyond those included in section VI may not be appropriate because they are not required by law, regulation, or the approved grant. In some cases, however, reviewing existing written procedures may be helpful in understanding how the grantee carries out its operations.

- **Content Review.** Content review takes document verification one step further. In a content review, the review team compares what the written plans say is supposed to happen with what the team is told happens in interviews or what the team observes firsthand. The idea is to “triangulate,” that is, to compare sources with each other to check to see if they are in reasonable agreement.

It is not the purpose of content reviews to pass judgment on the appropriateness or adequacy of plans or actions other than to determine whether they are consistent with the approved grant. The Runaway and Homeless Youth Specialist or the Peer Monitor may believe that some ways of doing things are more effective, efficient, or appropriate than others. However, that should not affect the review. The review must be conducted only on the basis of what actions the grantee is committed to perform in accordance with the approved grant.

- **Performance Data.** Grantees are required to fully implement the Runaway and Homeless Youth Management Information System (RHYMIS). The methods by which data are collected, maintained, reported, and analyzed must be reviewed to ensure that the data are reliable and that the grantee is using them to evaluate and plan its programs.
- **Verification of Case File System.** Grantees are required to maintain case files for each youth and family served. Therefore, the review team must determine the adequacy of the management and oversight of these files to ensure that they are a reliable tool for planning and delivering appropriate care to those who are served and that they are in fact used for this purpose.
- **Random Case Reviews.** In addition to verifying the case file system, team members also need to determine whether services are being planned and delivered appropriately and are described in the case files. This is done through a review of a random sample of case files. Case files can be reviewed to determine, for example, how intake and case planning is documented; the kinds and frequency of individual, family, group, and peer counseling sessions held; what kind of skill-building services are provided; what kind of recreation and leisure activities are available; etc.

The Runaway and Homeless Youth Specialist and the Peer Monitor should randomly choose 10 case records for review. If a grantee has received two or more grants, then 20 files should be selected. (Note that the grantee's personnel should not provide the sample. Instead, a member of the review team should select them. This removes any doubt that the selected records might have been "cherry picked" to illustrate services compatible with the approved grant.)

In rare cases it may be necessary for the review team to request additional case files to review to more completely analyze a potentially serious matter that is not resolved throughout the review of the initial 10 or 20 files.

Files selected for review should include a mixture of both closed and open cases. Closed cases need to be checked to determine whether the grantee is following up on the aftercare services planned for discharged youth.

The random review of case files may be conducted separately in connection with each of the review areas for which case reviews are required or may be done all together after all aspects of the grantee's services have been separately reviewed. The latter approach is recommended because it appears to be the most efficient and commonly used method, but the choice is entirely up to the review team. Either way, the case file review is used as a test of both the case file system itself and the services. For the convenience of the review team, a [checklist](#) is attached to use as a starting point in reviewing the case files.

- **Random Review of Financial Transactions.** Grantees are required to have separate accounts for Federal grant monies. Therefore, the review team should ask to see the grantee's accounting records, including its budget and a listing of all deposits and withdrawals. These documents need to be reviewed to see if monies from Federal grants are clearly distinguished from those from other sources and that funds are spent only for allowed purposes in accordance with the approved grant. To test whether expenditures are legitimate, the team should select a random sample of 5 to 10 line items and then request copies of the supporting documents related to each one. This could include purchase orders, invoices, cancelled checks, etc.

Combining Evidence and Checking the Details

The strongest assurance of compliance is derived from choosing the most compelling forms of evidence, combining them, and examining the details of each to ensure they are compatible with the reality of the grantee's operations. If all forms of evidence lead to a similar conclusion, and if the operational details are consistent, then the review team can have confidence in its conclusions.

It is important to remember that the main purpose of checking the details is to ensure that the grantee's operational practices are consistent with plans and processes described in the approved grant, formal plans, and statements of interviewees. In some cases, the approved grant and formal plans do not specify or define operational details. In these cases, grantees have considerable flexibility in how they operate their programs.

Consider these examples:

- **General Service Delivery.** In an interview, the Executive Director explains what services are provided, how they are delivered, and to whom. The review team asks questions to better understand the Director's priorities and clarify operational details. Using what they have learned, the team asks targeted questions of staff responsible for service delivery, youth, and members of the Board of Directors to see if the details match up. The team then heads to the case files, randomly selecting 5 to determine whether the written documentation reflects what the team learned in interviews and what the team knows of the grant requirements. The team discovers that all the evidence is compatible and concludes that services are being provided as described in the approved grant.
- **Living Conditions.** The review team asks to see State and local licenses, fire inspection certificates, and other pertinent documents. They then take a tour of the facilities to see if they can observe any obvious shortcomings. Finally, they ask staff targeted questions about meals, sleeping quarters, etc. By verifying licenses, directly observing living conditions, and conducting staff interviews, the review team feels confident making a judgment about living conditions.
- **Intake Process.** The team draws sound conclusions about the appropriateness of the intake process by reviewing a copy of the intake plan (such as the plan required for contacting parents or other relatives), asking staff members to explain how they develop individualized case plans, and reviewing a random sample of case files for evidence of parental contact and case planning.
- **Budget and Finance.** The review team verifies whether the grantee is maintaining Federal funds in a separate account and drawing down funds in an appropriate manner for covered services by reviewing accounting records and by sampling financial transactions for accuracy and completeness.

This manual provides suggestions on the kinds of evidence that can be combined to provide a compelling basis for conclusions about compliance with the requirements of the approved grant throughout the onsite review protocol.

Judgment

As noted earlier, there is no perfect proof of compliance or noncompliance. In fact, there may be good reasons the various forms of evidence are not in complete agreement with one another. For example, plans may not have been updated to reflect the grantee's current practices. Or an inexperienced staff member may misunderstand a required process. If discrepancies are uncovered, the review team must make additional inquiries to understand the extent of and possible reasons for the apparent discrepancy. The review team must then make a judgment as to whether the discrepancy is a serious and widespread issue and whether it represents noncompliance.

Given that it is simply not possible to verify every operational process during a 2- to 3-day review, the team must also exercise judgment in determining what areas to scrutinize. Furthermore, while on site, the team may discover potential problems that warrant a more extensive review. The Runaway and Homeless Youth Specialist, along with the Peer Monitor, have discretion to make such decisions on the spot.

C. Preparing for the Review

The onsite reviewers will receive the following information in advance of the site visit:

- Copies of the approved competitive and continuation grant(s)
- Summary information about the grantee's programs, including key grant information, services provided, types of facilities, organizational history, and collaborators
- Other materials at the discretion of the Runaway and Homeless Youth Specialist, such as RHYMIS reports, previous audits, semiannual program and financial status reports, and results of previous onsite reviews
- An Onsite Review Protocol to be used to conduct the review and take notes

Review team members should familiarize themselves with all the materials, and particularly the approved grant(s), before arriving. It would also be helpful if review team members annotated their copies of the approved grant(s) to identify the sections in the grant(s) that correspond to the review topics discussed in the next section of this manual.

The review team should meet, at least by conference call, to go over the approved grants and other appropriate materials before the onsite review begins. One of the purposes of such a meeting is to discuss and clarify key points about what the team will be focusing on during the onsite review. If appropriate, other knowledgeable individuals, such as program staff, may be included in the call.

The Runaway and Homeless Youth Specialist and the Peer Monitor may also arrange a telephone call with the grantee to go over the process of the upcoming onsite review.

D. Conducting the Review

Review Schedule

Most onsite reviews will be completed in 2 ½ business days. Whenever possible the reviews will begin in the early afternoon to accommodate travel considerations and will end in the late morning for those same reasons.

A review may last 3 days if the grantee operates in several different locations or uses other organizations or agencies to carry out required activities (whether as contractors, subgrantees, or on a pro-bono basis).

Review Procedures and Logistics

The review will be conducted in accordance with the procedures in this manual, which contains:

- A suggested schedule (may be adapted to meet team preferences)
- Information already available about the grantee
- A suggested approach for each of the review categories

It is highly recommended that the review team set aside about 10 to 15 minutes after each session to take notes, share ideas, and identify areas for further discussion. Notes can be important reference documents to support a final compliance decision.

Exit Meeting With Grantee

Once the review team has gathered all relevant information at the grantee site(s), team members should meet with the Executive Director and other senior staff and/or members of the Board of Directors to discuss:

- positive aspects of the grantee's operations
- preliminary findings
- preliminary nonbinding suggestions on how to enhance the grantee's operations
- next steps, including, possibly, the need to prepare corrective action plans
- challenges or barriers to effective operations that the grantee wishes to pass along to the review team or to the Family and Youth Services Bureau
- areas in which the grantee could benefit from technical assistance

The exit meeting is meant to be an informal discussion. Formal findings will be drawn up only after discussions and review among review team members and headquarters staff. A final determination of compliance will be provided in a report to the grantee.

E. Results of the Review

Positive Aspects of the Grantee's Program. The review team will identify noteworthy and positive aspects of the grantee's program. These comments do not constitute a determination that program operations are "best practices" to be emulated by others. The point is simply to give positive recognition to the grantee for what it does well.

Findings. The review team will then identify areas where the grantee is not in compliance with the approved grant.

Nonbinding Suggestions. The review team may discuss nonbinding suggestions on ways to improve the grantee's operations. These should be based on the experience of the review team members and on what they have learned during onsite reviews of other grantees. Such nonbinding suggestions must be presented in a manner that makes it clear that these are simply helpful suggestions, and that the grantee has no obligation to implement them.

Corrective Action Plans. Neither the exit meeting nor the formal report of the onsite review will include recommendations. It is the grantee's responsibility to formulate a corrective action plan to address areas of noncompliance. However, the corrective action plan is subject to approval by senior staff at the Family and Youth Services Bureau with advice from the review team.

F. Reporting the Results

Schedule

The final report will be completed within 60 days, including time needed to produce a draft report and for management comments, appropriate revisions, and final approval.

Report Preparation and Approval

The review team's final report, including the positive aspects of the grantee's operation, findings of noncompliance with the terms of one or more of the approved grants, and nonbinding suggestions, will be produced using the template in this manual.

The report should include succinct and compelling rationale for the compliance findings. The narrative should describe the kinds of evidence collected by the review team (e.g., documents reviewed, random case reviews, and interviews with staff, direct observations of conditions or activities), and how the team drew its conclusions.

The report will then be sent to the RHY Team Leader to approve. Once approved, the Runaway and Homeless Youth Specialist will send a copy to the grantee. A copy will also be submitted in electronic format for inclusion in the Family and Youth Services Bureau's Runaway and Homeless Youth electronic management application.

G. Follow-up

As noted earlier, the grantee must provide corrective action plans for any areas of noncompliance identified in the onsite review. Corrective action plans are subject to approval by the RHY Team Leader, with advice from the review team. These plans will also be included with other information about the grantee in the Runaway and Homeless Youth electronic management program. The grantee will report on the progress of the corrective action plan in each scheduled semiannual update to the electronic management program.

Depending on the severity of the noncompliance findings, a grantee may be required to update its profile in the electronic management application quarterly, or even more frequently, if warranted. A grantee with serious noncompliance issues may be subject to additional onsite reviews to determine whether the corrective actions have been taken.

RATIONALE FOR FINDINGS

In the space below, explain why the grantee is or is not in compliance with the approved grant, the RHY Act, and grant announcements. Describe the evidence gathered (e.g., documents reviewed, random case reviews conducted, staff interviewed, conditions or activities observed) and the conclusions reached. Each section must be titled with the list below.

A. SERVICES

- A.1. Outreach and Community Education
- A.2. Individual Intake and Case Planning
- A.3. Safe and Appropriate Shelter
 - a. Temporary Shelter for BCP
 - b. Transitional Living Arrangements for TLP/MGH
 - c. Emergency Shelter for SOP
- A.4. Individual, Family, Group and Peer Counseling
- A.5. Skill-building Services
- A.6. Recreation/Leisure Activities
- A.7. Aftercare Services
- A.8. Case Outcome
- A.9. Street Outreach Program for SOP
- A.10. Individual Client Files

B. PROJECT DEVELOPMENT

- B.1. Coordination and Service Linkages
- B.2. Youth Participation
- B.3. Staff and Staff Development
- B.4. Ongoing Project Planning

C. GRANT ADMINISTRATION

- C.1. Budget and Finance
- C.2. Board of Directors
- C.3. Reports and Data Collection

D. OPTIONAL SERVICES FOR BASIC CENTERS

- D.1. Street-Based Services
- D.2. Home-Based Services
- D.3. Drug Abuse Prevention and Treatment
- D.4. Testing for Sexually Transmitted Diseases