



OFFICE OF THE COMPTROLLER  
CITY OF ST. LOUIS



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DR. KENNETH M. STONE, CPA  
Internal Audit Executive

FILE COPY

November 22, 2013

James Sullivan, Drug Court Commissioner  
22<sup>nd</sup> Circuit Drug Court Division 25  
1114 Market Street, Room 526  
St. Louis, MO 63103

RE: 22<sup>nd</sup> Judicial Circuit Drug Court, Division 25 (Project #2013-P10)

Dear Mr. Sullivan:

Enclosed is the Internal Audit Section's report on the process review of the 22<sup>nd</sup> Judicial Circuit Drug Court for the period July 1, 2011 through June 30, 2012. A description of the scope of the work is included in the report.

Fieldwork was completed on September 3, 2013. Responses to the observations and recommendations noted in this report were received on November 7, 2013, and have been incorporated in the report.

This review was made under authorization contained in Section 2, Article XV of the Charter, City of St. Louis, as revised; and has been conducted in accordance with the *International Standards for the Professional Practice of Internal Auditing*.

If you have any questions, please contact the Internal Audit Section at (314) 657-3490.

Respectfully,

Dr. Kenneth M. Stone, CPA, CGMA  
Internal Audit Executive

Enclosure

cc: Michael Noble, Drug Court Commissioner  
Rochelle Woodiest, Drug Court Commissioner  
M. Keithley Williams, Drug Court Administrator  
Dimitri Gay, Drug Court Coordinator



# CITY OF ST. LOUIS

**22<sup>ND</sup> JUDICIAL CIRCUIT  
DRUG COURT DIVISION 25**

**PROCESS REVIEW**

**JULY 1, 2011 THROUGH JUNE 30, 2012  
PROJECT #2013-P10**

**DATE ISSUED: November 22, 2013**

**Prepared by:  
The Internal Audit Section**



# OFFICE OF THE COMPTROLLER

**HONORABLE DARLENE GREEN, COMPTROLLER**

**CITY OF ST. LOUIS  
22<sup>nd</sup> JUDICIAL CIRCUIT  
DRUG COURT DIVISION 25  
PROCESS REVIEW  
JULY 1, 2011 THROUGH JUNE 30, 2012**

**EXECUTIVE SUMMARY**

**Background**

22<sup>nd</sup> Circuit Drug Division 25 (Drug Court) Court offers substance abuse treatment with supervision and judicial oversight as an alternative approach (to jail) for drug addicted individuals arrested in St. Louis. Court monitored treatment aims to decrease drug addiction and drug related crimes by breaking the cycle of addiction, crime and incarceration. The Drug Court program relies on early assessment and drug testing to identify and treat substance abusing defendants. The program includes regular court appearances before the Commissioner. Treatment includes drug testing, individual or group counseling, regular attendance at self-help meetings, and other education and employment classes. Treatment Liaisons evaluate participants need for treatment, determine proper treatment modes and find community based treatment providers. Drug Court is primarily guided by Court en banc resolutions passed September 2002, and Missouri Revised Statutes, Chapter 478. City of St Louis Ordinances #68411(creation of a drug crimes taskforce) and #66156 (drug court assessments/screenings) also provide guidance.

**Purpose**

The Drug Court was selected for review based on the Internal Audit Section's annual risk assessment. The purpose was to determine if the Drug Court's internal controls effectively and efficiently manage risks in achieving goals and objectives relating to:

- Compliance with laws, regulations, policies and procedures applicable to goals and objectives.
- Safeguarding of assets.
- Reliability and integrity of financial and operational information.
- Economic and efficient use of resources.

**Scope and Methodology**

The scope of the period of review included Drug Court's processing of voluntary participants through screening, eligibility, pre-treatment orientation, treatment and graduation phases of the drug court program, for the period July 1, 2011 through June 30, 2012. The review was confined to evaluating internal controls over the financial and operational activities relating to the objectives noted above. The review procedures included:

- Inquiries of management and staff.
- Observation of relevant processes.
- Reviews for compliance with policies and procedures, as well as applicable laws and regulations related to goals and objectives.
- Limited tests of controls.
- Follow-up on prior observations.
- Other procedures as considered necessary.

## Exit Conference

The Drug Court Declined an Exit conference.

## Conclusion

The Drug Court had internal controls in place and operating to effectively and efficiently manage risks in achieving goals and objectives related to drug court participants, except for the following observations:

- Opportunity to implement a uniform checklist for participants' files.
- Opportunity to comply with bus ticket policy and procedures.

The observations are discussed in more detail in the *Detailed Observations, Recommendations and Management's Responses* section of this report.

  
Dr. Kenneth M. Stone, CPA, CGMA  
Internal Audit Executive

  
Date

**CITY OF ST. LOUIS  
22<sup>nd</sup> JUDICIAL CIRCUIT  
DRUG COURT DIVISION 25  
PROCESS REVIEW  
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## OBSERVATIONS

### Status of Prior Observations

The Internal Audit Section had not performed any prior audits of the Drug Court Program.

There was a Missouri State Auditor's Report of the City of St. Louis Judicial Expenditures, issued January 2010. The report covered several specialty courts (Truancy, Problem Properties, Female Drug Court and Mental Health) and contained no observations.

### Summary of Observations

Several control procedures were noted in the Drug Court Program's financial and operational activities. These included, but were not limited to, the following:

- Policies and Procedures manual.
- Pre-treatment workbook for drug court participants.
- Roundtable meetings to discuss participant admittance to program, progress of and modifications to participant treatment, and dockets for participants court appearances.
- Circuit Clerk's review of disbursement vouchers for expenditures to promote the Drug Court's mission.
- Written job descriptions and performance measures for Drug Court Administrator, Coordinator, and Administrative Assistant.

However, the opportunity exists for management to improve internal controls over the Drug Court Program. The following observations resulted from the review:

- Opportunity to implement a uniform checklist for participants' files.
- Opportunity to comply with bus ticket policy and procedures.

The observations are discussed in more detail in the *Detailed Observations, Recommendations and Management's Responses* section of this report.

## **DETAILED OBSERVATIONS, RECOMMENDATIONS AND MANAGEMENT'S RESPONSES**

### **1. Opportunity to Implement A Uniform Checklist for Participants' Files**

A sample of thirty-eight (38) participants' files was reviewed to determine and verify the existence of documents that were required to be maintained in each participant's file. These documents provide information that proves the participants received proper treatment based on their assessed needs and are required for or beneficial to carry out drug court policy and procedures. It was noted that not all files had the required documentation. Summarized below is listing of the types of missing documents.

#### Screening

- Two (2) client files were missing the Agreement to Screen forms.
- Three (3) client files were missing RANT (Risk and Needs Assessment) forms.
- One (1) client file did not contain an arraignment date.

#### Pre-Treatment

- Twelve (12) client files were missing Case Management forms.
- Fifteen (15) client files were missing a Home Plan.
- Four (4) client files were missing Pre-Treatment completion certificates.

#### Treatment

- Seven (7) client files were missing a Treatment Plan form.

If the required forms are not in the participants' files, there may be lack of compliance with drug court policy and procedures and communications between the drug court staff and other court divisions may be impaired. This could result in proper treatment to meet all the participant's needs to achieve sobriety being delayed or not administered.

The Drug Court Administrator and staff acknowledged certain documents may not have been in the participants' files because the forms were not a requirement. Instead, they were in the file as a courtesy copy to reward participants for completing program Path 1, 2, or 3, and to guide and encourage participants towards progression through the program, or to facilitate the drug court staff in processing participants through the court system. Other forms may not have been in the participants' files due to implementation or approval for use after the participant was admitted to or terminated from the program. Documents relating to parole and probationary status were maintained by the Diversion Managers and the assigned Treatment Counselors kept the attendance sheets for self-help meetings.

Good case management practices often use a documentation checklist to ensure the required documents are organized in a manner that clearly identifies activities and follow-up conducted to meet the participants' needs and measure progress towards treatment goals.

## 1. Continued...

Use of a uniform checklist can also assist with proper monitoring, case coordination and case conferencing.

### **Recommendation**

It is recommended that drug court staff implement a uniform checklist of documentation be included in each participant's file to ensure compliance with policy and procedures and those documents conducive for a continuum of case management.

### ***Management's Response (Received November 7, 2013)***

*The St. Louis Drug Court provides individualized services to program participants based on their risk/need assessments and therapy issues. Therefore, the contents of the treatment court social file maintained by the St. Louis Drug Court for each participant varies on a case-by-case basis dependent on the needs and circumstances of the participant.*

*While some forms are essential and are standard in every file, not all forms promulgated and used by the Court are necessary.*

*The St. Louis Drug Court administration will create a uniform checklist of essential documents to be included in each treatment court social file and begin using this checklist before the end of the year.*

## 2. Opportunity to Improve Bus Ticket Policy And Procedures

During review of eighty (80) "Bus Pass Log" entries and "Book Serial Number" forms, a total of eleven (11) logs were not signed and/or dated by the Diversion Managers.

The Drug Court Bus Ticket Policy and Procedures require the Diversion Managers to sign and date the Bus Pass Log when receiving bus pass booklets. The bus tickets are then provided to participants who are indigent or unemployed so they may attend required treatments court appearances and diversion manager meetings. In addition, there a "Book Serial Number" form, which shows the number of tickets issued, name and signature of participant receiving bus passes. There is also a space for Diversion Manager (or other appropriate Drug Court Staff) who is issuing the bus passes, to sign and date the "Book Serial Number" form.

Drug Court staff and Diversion Managers did not always sign and date the "Book Serial Number" form due to lack of oversight or volume of participants requiring bus passes at the time.

## 2. Continued...

By Diversion Managers and other drug court staff not always signing and dating the bus pass logs, the drug court was not in compliance with its own policy and bus passes may be misappropriated or incorrectly distributed to participants.

### **Recommendation**

It is recommended that Drug Court staff and Diversion Managers comply with the bus ticket policy by signing and dating the bus pass logs when tickets are distributed to participants.

### ***Management's Response (Received November 7, 2013)***

*The Bus Ticket Policy for the St. Louis Drug Courts reads...bus tickets can be obtained from the Diversion Manager and **participants must sign** the bus log upon receipt of the transportation tickets.*

*The participant's is the only signature required by the bus ticket policy. To ensure adherence to the policy, a bus log form, also known as the Book Serial Number form, was created for implementation....*

*When the participants receive bus tickets and place their signatures on the bus log form (the Book Serial Number form), they acknowledge the policy and terms under which transportation is provided.*

*Upon review it was determined that the bus log form (the Book Serial Number form) could be better constructed to administer the bus ticket policy, as written, by providing additional important information, and eliminating the unnecessary material....*

*The St. Louis Drug Court will continue to use the new and improved form and follow the recommendation that requires diversion managers and staff to complete the form.*