

# 2023 Franklin County Juvenile Detention Center Inspection Report

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ILLINOIS DEPARTMENT OF JUVENILE JUSTICE

## Executive Summary

The Illinois Department of Juvenile Justice (the “Department”) conducted an annual inspection of the Franklin County Juvenile Detention Center on September 28, 2023, pursuant to 730 ILCS 5/3-15-2(b). While there were some improvements noted from the 2022 inspection, the Department observed several areas on non-compliance during this review, many of which warrant immediate attention.

The sections and specific requirements of 20 Ill. Adm. Code 2602 County Juvenile Detention Standards (“County Detention Standards”), noted as non-compliant, are listed in the table below and specific observations are noted in the following sections of this report.

Each section of the report also includes policy and practice recommendations to either gain compliance or move towards best practice. Those recommendations are combined in a second table at the end of the report.

## Areas of Non-Compliance

Section	Requirement
2602.110 Food Services	Food must be of sufficient nutritional value with a balance of fruits and vegetables and provide a daily minimum of 2,500-3,000 calories.
2602.120 Sanitation	Walls shall be kept clear of etched or inscribed drawings or writing.
2602.140 Security	After use, tools and equipment shall be accounted for by the staff member on duty and returned to their proper storage space. . . Eating utensils shall be accounted for after each meal and returned to the kitchen. . . Tools and equipment shall be listed and inventoried after each use.
2602.160 Grievances	The designated detention administrator shall respond to all non-emergency youth grievances as follows: 1) Examine all relevant information concerning the issue being grieved, including interviewing witnesses and collecting documentation. 2) Conduct a face-to-face meeting with the youth when the designated detention administrator determines there are serious issues related to safety, security, and well-being that are the subject of the grievance. 3) Document all information sources on the response to youth grievance form (response form).
2602.170 Discipline	All facilities shall have a developmentally appropriate, research informed behavioral management program that supports the development of pro-social skills and provides positive reinforcement for good behavior. The program shall provide opportunities for immediate recognition of pro-social behavior as well as meaningful incentives and rewards for improvement and maintenance of desired behavior. The program shall also include potential sanctions for negative behavior that are developmentally appropriate, research informed, proportionate and fair. . . When the use of force is authorized, only the least force necessary under the circumstances shall be employed. . . Pressure point control and pain compliance techniques are prohibited. . . Room confinement may be

	used only as a temporary response to behavior that threatens the safety of the youth and others. Room confinement shall not be used for a fixed period of time, but only until the youth is calm enough to rejoin programming without being a risk to the safety of others. Supervisory staff shall be notified immediately when room confinement is used. At no time should room confinement exceed 4 hours without administrators and/or mental health staff developing an individualized plan to address the behavior. Youth shall not be deprived of the following basic rights as part of a disciplinary response: Approved phone calls; Education.
2602.210 Visiting	Visits shall be contact visits unless specific concerns preclude contact visits for identified individuals.
2602.220 Detention Programs	Programs designed to address the risk and needs of delinquent youth shall be provided to youth in custody either by staff or community providers. Programs may include drug and alcohol treatment, group or individual counseling, social and life skills training, and family interventions. Facilities shall have in place an evidence-based positive behavior program that targets criminogenic risk and needs of youth in custody.
2602.230 Education	A detention facility shall operate a 12-month long schedule of school instruction and programming with appropriately certified teachers that are licensed by the State Board of Education. There shall be a minimum of five hours of instruction per day.
2602.260 Recreation and Leisure Time	Vigorous physical activities, indoor and out, shall be a part of the daily schedule. Passive indoor activities, in addition to television viewing and radio listening, shall be included. At least one hour of physical recreation and one hour of additional leisure activity shall be scheduled each day.
2602.50 Admissions Procedures	Within 72 hours after the youth's arrival at the facility and periodically throughout a youth's confinement, the agency shall obtain and use information about each youth's personal history and behavior to reduce the risk of sexual abuse by or upon a resident. Assessments shall be conducted using an objective screening instrument. . . An initial orientation shall be conducted by a detention staff member at time of admission. The orientation shall include information regarding programs (i.e., education, arts and crafts, counseling, and all social services) and procedures for making requests or entering complaints to staff members, judiciary or to Department personnel. . . The agency shall also provide at least one way for youth to report abuse or harassment to a public or private entity or office that is not part of the agency and that is able to receive and immediately forward resident reports of sexual abuse and sexual harassment to agency officials, allowing the resident to remain anonymous upon request.

2602.90 Mental Health Services	<p>All facilities shall employ or contract with qualified mental health professionals to address the needs of youth identified in the mental health screening, as well as needs that arise during the period of confinement. Services shall meet or exceed the community level of care. . Youth with significant mental health needs shall be assessed by a qualified mental health professional. A service plan shall be developed for each youth that includes: 1) Counseling or psychotherapy to be provided; 2) Behavioral management strategies and goals; 3) Medication; 4) Protocol for monitoring youth's progress; and 5) Needed adjustments to normal detention programs and procedures. The facility shall provide appropriate services to youth with serious mental illnesses (e.g., bi-polar disorder, psychosis, severe depression) including psychiatric evaluation and care, as well as prescribing and monitoring psychotropic medication. . Youth who are at risk of self-harm shall be encouraged to participate in programming.</p>
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### **Methodology**

- Interviews Conducted
  - Superintendent
  - Assistant Superintendent (PREA Coordinator)
  - 3 Correctional Officers
  - 1 Supervisor
  - 9 youth
  - 2 Educators
  - Mental Health Intern
  - 1 Nurse
  
- Documents Reviewed
  - Youth point cards
  - Sample youth files
  - Staff Training Documentation
  - Sample Incident Reports
  - Menus with Caloric Counts
  - Employee Background Check Documentation
  - Behavior Management Manual
  - Youth Grievances
  - Medical Contract
  - Training Schedule
  - PREA Orientation Materials
  - Youth Handbook

## Overview

The Franklin County Juvenile Detention Center is a 32-bed facility in Benton, Illinois. The facility houses youth from several counties in southern Illinois. The on-site portion of this review took place on September 28, 2023.

At the time of this audit, the facility had 9 residents in custody. Administrators have capped the youth population at 10 youth (with exceptions for youth from Franklin County) to keep the youth population low in an effort to facilitate improvements. Staffing levels at the facility have moderately improved over the past year. At the time of the inspection, the facility employed a Superintendent, Assistant Superintendent (who has also been identified as the PREA Coordinator) and twelve additional staff consisting of Supervisors and Detention Officers. There was an additional new hire scheduled to start the following week and two potential hires awaiting approval from the Administrative Office of Illinois Courts (AOIC).

There have been some improvements to the physical plant over the past year, but many issues remain that require attention. The facility had mold remediation completed over the summer. A contract has also been approved by the county board to make improvements to the facility camera system and locking mechanisms. Both of these improvements are essential, as the facility currently does not have the ability to review video from previous incidents and there are several doors with inoperable locks, including a door leading from the dietary area to the main living area. Administrators report that attempts to get approval to have painting done in the facility were denied. Staff at the facility are being offered overtime to paint rooms and dayrooms, however progress has been slow. At the time of this audit, several youth rooms and dayroom walls were observed full of graffiti and in need of painting.

The facility also needs improvement in overall cleanliness and management of equipment inventories. Several areas were observed to be dirty, including the intake shower, resident rooms, and dayrooms. Dried food was observed on the walls of one living unit. There is inadequate control over equipment inventories as well, including mechanical restraints and dietary equipment. The intake area has a closet that contains youth clothing and mechanical restraints utilized for court transportation. The facility has stopped doing transport for out-of-county youth, but mechanical restraints were observed loose on the floor in the closet. There are hooks on the wall intended for storage of the mechanical restraints. There were some mechanical restraints present on the hooks, but other hooks were empty. This was also observed in the control room. Some were in use, others were empty. Inventory control issues were also observed in the kitchen area, where kitchen utensils were loosely stored in a closet with no control of inventory. Facility administrators acknowledged they do not have a method for checking and maintain an inventory of mechanical restraints and dietary equipment.

## Areas of Non-Compliance and Recommendations

- 2602.120 Sanitation states: "Walls shall be kept clear of etched or inscribed drawings or writing."
  - Implement a regular inspection process to ensure areas are adequately cleaned.
- 2602.140 Security states: "After use, tools and equipment shall be accounted for by the staff member on duty and returned to their proper storage space. . . Eating utensils shall be accounted

for after each meal and returned to the kitchen. . . Tools and equipment shall be listed and inventoried after each use.”

- Recommendations:
  - Implement a regular process to check and log daily inventories of security and dietary equipment.

### **Admission Policy and Procedures**

The Franklin County Juvenile Detention Center offers 24-hour coverage for admissions. Youth property is collected, inventoried, and laundered according to standards. The facility has ended the practice of conducting strip searches on all youth upon admission, instead doing so only when there is an individualized suspicion of hazardous contraband.

The facility has updated its Youth Handbook and other orientation materials over the past year. The updated materials are much more thorough than those observed in 2022. Administrators report that intake staff are supposed to review these items with youth during the admission process. Youth are administered a test during their first day to confirm understanding of facility rules and programming. Administrators report the intent is for staff to assist youth through this process, so they pass that initial test, however the practice does not match this intent. One youth who was admitted for the first time earlier in the week reported he was provided the orientation materials, but no one reviewed it with him. He was placed in his room after his admission, which occurred around noon. After spending the afternoon confined and eating dinner in his room, he was provided the test, which he failed. He was not permitted to enter into programming due to failing the test, instead remaining restricted from programming until the next time he was permitted to take the test the following day. Practice should change to provide orientation to youth directly from staff. The practice of not permitting youth to enter programming if they “fail” a test should also cease. While it is clear this change is the intent of administrators, procedures should be implemented to monitor the process to ensure practice matches intent.

The County Detention Standards were updated in 2021 to include elements from PREA standards. PREA requirements include an assessment to determine risk for victimization within 72 hours of each youth’s admission and periodically throughout a youth’s confinement. The facility has not undergone a formal PREA audit. The Assistant Superintendent has been identified as the PREA Coordinator for the facility but has yet to undergo the required PREA Coordinator Training. The facility has identified a risk for victimization assessment for use on resident intake. Administrators reported it had been implemented. However, a review of resident files showed only one risk assessment had been completed. The risk assessment was missing from the rest of the youth files. Again, the intent may be to implement the assessment, however this area is still non-compliant until practice matches administrative intent.

### **Areas of Non-Compliance and Recommendations**

- 2602.50 Admissions Procedures states: “Within 72 hours after the youth’s arrival at the facility and periodically throughout a youth’s confinement, the agency shall obtain and use information about each youth’s personal history and behavior to reduce the risk of sexual abuse by or upon a resident. Assessments shall be conducted using an objective screening instrument. . . An initial orientation shall be conducted by a detention staff member at time of admission. The

orientation shall include information regarding programs (i.e., education, arts and crafts, counseling, and all social services) and procedures for making requests or entering complaints to staff members, judiciary or to Department personnel. . . The agency shall also provide at least one way for youth to report abuse or harassment to a public or private entity or office that is not part of the agency and that is able to receive and immediately forward resident reports of sexual abuse and sexual harassment to agency officials, allowing the resident to remain anonymous upon request.”

- Recommendations:

- Implement a monitoring and quality assurance process to ensure youth receive the intended orientation upon intake.
- Eliminate any practice of confining youth for failing a post-orientation test.
- Implement the PREA Risk for Victimization Assessment for youth within 72 hours of admission and periodically throughout a youth’s confinement.
- Implement a monitoring and quality assurance process to confirm the Risk for Victimization Assessment is completed for all youth.

### **Personnel, Staffing, Supervision, and Administration**

The facility has made some improvements regarding staffing and administration over the past year. The number of full-time Correctional Officers working at the facility has increased from eight to twelve and an Assistant Superintendent is now in place. The facility was in the process of interviewing applicants for additional supervisory positions as well at the time of the inspection.

Facility staff went through 40 hours of training through AOIC at the end of 2022 and there were ample staff training records available for review. Background checks were completed for new staff and employees who have been employed for more than five years.

The facility policy manual was significantly improved from the 2022 inspection, with several new policies having been developed and signed.

### **Detention Programs, Youth Discipline, and Confinement**

At the beginning of the inspection, facility administrators reported they have made a change to the behavior management program, moving towards a cognitive-behavior program that is run at multiple detention centers throughout the state. The program consists of an incentive-based behavior program in which youth earn daily points that determine weekly levels, associated with various incentives, such as later bedtimes. The program also has a cognitive intervention component in which groups are intended to be conducted by facility staff once per day in the evenings. The facility has a manual that comprehensively outlines the program. The facility superintendent conducted individual training with employees and oriented youth to the program. She has also developed a daily group schedule. In practice, however, the program is yet to be implemented. Both staff and youth reported groups are not being facilitated; all interviewed youth were totally unfamiliar with them. The new incentive program is not in place either, as youth files still showed the old point sheet being used in days leading up to the

audit. The incentive program is also not in place yet, as the rotation of free time the facility utilizes in the evenings interfere with any meaningful use of later bedtime incentives.

In summary, the program that has been selected is a positive step towards programming improvements at the facility. However, as seen in other areas detailed earlier in the report, there remains a disconnect between stated intent and actual practice. An improvement in program oversight will be necessary to ensure intended changes are implemented. These can include a daily reviews of point sheets, direct observations of groups being facilitated, and interviews with youth.

The use of confinement, while less than observed in 2022, is still prevalent at the facility. The primary consequence for youth infractions is confinement and there are still instances in which youth earn 24-hour confinements. The facility continues to utilize an Administrative Hold Status for youth who exhibit more significant behaviors. This status is characterized by a 24-hour confinement, followed by separation from the rest of the youth at the facility for a period of time until cleared by administrators. While on Administrative Hold, youth do not attend school in the classroom, instead having schoolwork delivered to their living unit dayroom. Youth on Administrative Hold are not permitted to attend recreation with other youth and remain on their living units alone in the dayroom. They must split use of the dayroom with other youth on the living unit, resulting in daily stretches of confinement. One youth had just been released from Administrative Hold after spending 26 days on the status during which he only left the living unit to shower (because the shower on his unit was inoperable). The youth did not go to the gym while on Administrative Hold and did not attend school, instead having classwork delivered to him despite having an IEP.

The facility does not have any method for documenting or tracking the use of confinement at the facility, nor the activities of youth when they are on Administrative Hold status. One should be developed and implemented. Youth and staff also reported daily rotations of youth in confinement due to use of different programming groups for youth, driven by youth conflicts. Throughout the day, youth attended recreation in two or three groups, rotating free time and access to the gym. When a youth group is not engaging in free time or gym time, they are confined.

The facility is transitioning towards using “Handle with Care” as the primary de-escalation and physical intervention technique. They are taking steps to have staff certified as instructors and complete training for the rest of facility staff. As noted in prior reports, the facility will call for assistance from the Franklin County Sheriff’s Department if help is needed de-escalating a youth. On at least one occasion over the past year, a taser was used on a youth in the facility. The use of a taser is out of compliance with County Detention Standards and should not be allowed.

The facility has implemented a visiting schedule, with two visiting days per week. These visits remain non-contact, however, despite requirements in County Detention Standards that stipulate visits should be contact visits, unless specific concerns preclude contact visits for identified individuals

#### Areas of Non-Compliance and Recommendations

- 2602.170 Discipline states: “All facilities shall have a developmentally appropriate, research informed behavioral management program that supports the development of pro-social skills



and provides positive reinforcement for good behavior. The program shall provide opportunities for immediate recognition of pro-social behavior as well as meaningful incentives and rewards for improvement and maintenance of desired behavior. The program shall also include potential sanctions for negative behavior that are developmentally appropriate, research informed, proportionate and fair. . . When the use of force is authorized, only the least force necessary under the circumstances shall be employed. . . Pressure point control and pain compliance techniques are prohibited. . . Room confinement may be used only as a temporary response to behavior that threatens the safety of the youth and others. Room confinement shall not be used for a fixed period of time, but only until the youth is calm enough to rejoin programming without being a risk to the safety of others. Supervisory staff shall be notified immediately when room confinement is used. At no time should room confinement exceed 4 hours without administrators and/or mental health staff developing an individualized plan to address the behavior. Youth shall not be deprived of the following basic rights as part of a disciplinary response: Approved phone calls; Education.”

- Recommendations:
  - End the practice of confining youth due to rotating recreational groups.
  - Identify and implement a clear list of incentives associated with each behavior level.
  - Implement a policy that only permits the use of confinement as a temporary response to behavior on only lasts until the youth is calm enough to rejoin programming.
  - Implement a quality assurance process to ensure compliance with confinement policy.
  - Prohibit the use of confinement longer than 4 hours without administrator approval and development of an individualized plan.
  - Enhance the documentation of youth confinement time to include:
    - Written reports that indicate the reason for confinement.
    - The start and end times of the confinement.
    - Attempts to de-escalate the youth and return them to regular programming.
  - End the practice of withholding access to education during confinements.
  - Prohibit the use of tasers as a use of force technique.
- 2602.210 Visiting states: “Visits shall be contact visits unless specific concerns preclude contact visits for identified individuals.”
  - Recommendations:
    - Permit youth to engage in contact visits with families.
- 2602.220 Detention Programs states: “Programs designed to address the risk and needs of delinquent youth shall be provided to youth in custody either by staff or community providers. Programs may include drug and alcohol treatment, group or individual counseling, social and life skills training, and family interventions. Facilities shall have in place an evidence-based positive behavior program that targets criminogenic risk and needs of youth in custody.”
  - Recommendations:
    - Implement a supervision process to ensure the implementation of the cognitive-behavioral program occurs, including daily reviews of youth point sheets, a

clearly articulated level and incentives system, and direct observations of cognitive-behavioral groups.

- 2602.260 Recreation and Leisure Time states: “Vigorous physical activities, indoor and out, shall be a part of the daily schedule. Passive indoor activities, in addition to television viewing and radio listening, shall be included. At least one hour of physical recreation and one hour of additional leisure activity shall be scheduled each day.”
  - Recommendations:
    - Implement a daily schedule that includes, at minimum, one hour of large muscle exercise for each resident in the gym or outdoor recreation space, inclusive of youth on Administrative Hold Status.

### **Medical and Health Care**

Medical Services are provided through a contract with Advanced Correctional Healthcare. The contract provides 12 hours of on-site nursing services per week. A physician is also on-site once per week, usually on Mondays. The facility has a sick call process by which a youth can request to be added to the sick call list, which is maintained in the control room to be given to the nurse upon her arrival. Medication is packaged and organized by day and time for distribution by facility staff.

### **Mental Health Services**

Youth at the facility continue to have minimal access to mental health services, as noted in the 2022 Inspection Report. The Franklin County Juvenile Detention Center does not have any mental health practitioners employed, nor does the county have a contract with any community mental health service providers.

Staff at the facility cited a community agency called the “Stress and Trauma Center” as an agency that has provided services to youth. The Stress and Trauma Center is a subcontractor of Redeploy Illinois through the Second Judicial Circuit. Youth do not receive services from any licensed mental health practitioners; rather services are provided by graduate student interns. Franklin County does not contribute any financial resources towards providing mental health services to youth at the facility, as required by the County Detention Standards. As such, the facility is in violation of a large portion of the mental health section of the standards.

The facility utilizes Screening, Assessments, and Support Services (SASS) when youth are in crisis. At the time of the inspection, one youth was in the crisis watch room, which is a room visible from the control room. The youth there was still without his clothing (other than boxer shorts), only possessing suicide blankets. The youth was not participating in programming or attending school. An empty bag of chips was on the floor and room was dirty. The youth had been placed on a close watch status the day prior. Per facility protocols, the facility had reached out for a SASS assessment. The youth had been assessed the night before and had paperwork from the assessment. Per the youth and shift supervisor on duty, the youth had been removed from suicide watch and was cleared to return to programming the night prior. However, the youth reported he was not able to come out until after showers that evening. The shift supervisor and administrators confirmed that this was the case, stating they chose to

give the youth extra time in a smock to make sure he was stable despite having been cleared by the SASS worker the night prior. There are no objective criteria supporting this, however, and it seems to be an institutional practice that has persisted at the facility for some time. Keeping a youth confined to a room without access to clothing and programming despite being cleared from a crisis watch status is out of compliance with County Detention Standards.

#### Areas of Non-Compliance and Recommendations

- Section 2602.90 Mental Health Services states: “All facilities shall employ or contract with qualified mental health professionals to address the needs of youth identified in the mental health screening, as well as needs that arise during the period of confinement. Services shall meet or exceed the community level of care. . . Youth with significant mental health needs shall be assessed by a qualified mental health professional. A service plan shall be developed for each youth that includes: 1) Counseling or psychotherapy to be provided; 2) Behavioral management strategies and goals; 3) Medication; 4) Protocol for monitoring youth's progress; and 5) Needed adjustments to normal detention programs and procedures. The facility shall provide appropriate services to youth with serious mental illnesses (e.g., bi-polar disorder, psychosis, severe depression) including psychiatric evaluation and care, as well as prescribing and monitoring psychotropic medication. . . Youth who are at risk of self-harm shall be encouraged to participate in programming.”
  - Recommendations:
    - Employ or contract with qualified mental health professionals to provide mental health services to youth at the facility.
      - Provide a mental health assessment for all youth.
      - Develop and implement service plans for all youth with mental health needs.
    - Employ or contract with a psychiatrist to provide psychiatric assessments, services, and medication prescribing and monitoring for youth in need.
    - Follow guidance from mental health professionals when youth are identified as at risk for self-harm.
    - Encourage youth at risk of self-harm to participate in programming.

#### Youth Grievances

The facility has developed a formal youth grievance policy, dated 3/1/2023. The policy itself is reflective of best practice by including mandatory response timelines, ways to promote privacy, and rules against retaliation. The facility has also developed a new grievance form and method for documenting responses. A few resident grievances and responses were reviewed as part of the audit and were indicative of an improved process. There is evidence, however, that the consistency of implementation is still lagging. On the date of the inspection, administrators had a collection of grievances from the week prior. Administrators indicated that they had not responded to them because they were deemed “not serious”. Regardless of an initial assessment of seriousness, all youth grievances should be documented, and a response should be delivered to the youth. The facility still does not have blank grievance forms and grievance boxes available to youth in their living unit dayrooms. These items should be placed there so youth have easier access to them.

### Areas of Non-Compliance and Recommendations

- Section 2602.160 Grievances states: “The designated detention administrator shall respond to all non-emergency youth grievances as follows: 1) Examine all relevant information concerning the issue being grieved, including interviewing witnesses and collecting documentation. 2) Conduct a face-to-face meeting with the youth when the designated detention administrator determines there are serious issues related to safety, security, and well-being that are the subject of the grievance. 3) Document all information sources on the response to youth grievance form (response form).”
  - Recommendations:
    - Place youth grievance boxes in youth living units and common areas.
    - Ensure all youth grievances are logged and receive responses according to policy.

### Food Services

Since the time of the 2022 Inspection, the facility has entered into an agreement with the Franklin County Sheriff’s Department to provide dietary services for youth in the facility. Franklin County JDC staff still cook and serve breakfast for the youth. Lunch and dinner are provided by the Franklin County Jail. This change has freed up facility staff to focus on youth monitoring and engagement and has directly contributed to a decrease in youth confinement at the facility. Youth are also eating meals in groups in the main dining area.

While it is commendable that facility administrators were responsive to the 2022 findings, the quality of food being provided is poor and insufficient. The county jail delivers both lunch and dinner at the same time. Lunch is considered the “hot” meal for the day. The dinner, however, is only a sandwich each day. The day prior to the audit, dinner consisted of a peanut butter and jelly sandwich, a zip lock bag of chips, and a bag of animal crackers. On the day of the inspection, the dinner provided was a bologna and cheese sandwich, a bag of chips, and a fudge brownie. The menu and caloric counts submitted by the facility as part of the audit shows days during the week in which the total caloric count offered is below 2,500 calories. County Detention Standards require youth to be offered a daily minimum of 2,500-3,000 calories each day. The dinner menu should be changed to provide a hot meal and ensure enough calories are offered each day. There were food items stored in the refrigerator that did not have an expiration date listed.

During the inspection, youth were not provided condiments upon request. One youth requested some ketchup with his lunch but was told no because “calories were being counted and they couldn’t provide anything that was not included with the lunch.”

### Areas of Non-Compliance and Recommendations

- Section 2602.110 Food Services states, “Food must be of sufficient nutritional value with a balance of fruits and vegetables and provide a daily minimum of 2,500-3,000 calories.”
  - Recommendations:
    - Adjust the daily menu to provide a hot meal for dinner.

- Ensure all youth receive a daily minimum of 2,500-3,000 calories.
- Provide condiments to youth upon request.

## Education

There has been some progress towards improving youth educational services over the past year. Services are still provided by the Regional Office of Education. There are now two full-time teachers working at the facility (one general education teacher and one special education teacher). There is also a full-time teacher's aid employed. Given that the facility has capped the youth population at 10 youth, the number of teachers present are sufficient to maintain required ratios. There are five hours of school scheduled for each school day, and the facility is consistently using all three classrooms during school time. On the date of the audit, all three classrooms were observed to be in use during the school day, with a total of five youth physically in classrooms. The facility does not operate a 12-month school calendar as required by County Detention Standards, as classes are not offered to youth over the summer.

There is still improvement needed with respect to providing full-time education for youth at the facility. Four of the youth detained at the time of the inspection were not in school. One youth was absent due to being on a close watch status (as noted above, this youth should have been able to attend school as there was nothing contraindicating his attendance notice by his mental health assessment). Another youth was not allowed to attend school in the classrooms per a memo from one of the teachers which stated contraband was recently found in his room. This youth had multiple admissions to the facility, with his most recent admission taking place on 5/28/23. The youth reported he had never attended class in one of the classrooms, which was confirmed by educators who stated the youth had trouble getting along with peers. Instead, classwork was provided to the youth to work in his pod dayroom. At the time of the inspection, the youth's work was on a table in the dayroom, consisting of a reading packet, calculator, and math textbook. The youth was identified by teachers as a special education student. When a copy of the student's IEP was requested, educators stated they did not have a copy.

There are additional policies in place that address youth school attendance that remain out of compliance with County Detention Standards. The revised youth handbook states, "If you are too sick to attend school, you are also too sick to leave your room for the remainder of the day and evening. You will not participate in programs, free time, and dining. You must be cleared by a nurse to resume these activities. You will be allowed to shower if you are able to do so. . . If you refuse school more than two times in a week, you will not be allowed to participate in free-time on the week-end." This practice of confining youth who refuse to attend school for the entirety of the day is in direct violation of County Detention Standards. This practice should end. Instead, youth should be continually engaged and encouraged to attend school and permitted to do so if they agree.

## Areas of Non-Compliance and Recommendations

- 2602.230 Education states: "A detention facility shall operate a 12-month long schedule of school instruction and programming with appropriately certified teachers that are licensed by the State Board of Education. There shall be a minimum of five hours of instruction per day."
  - Recommendations:

- Adjust the annual school schedule to include educational service through the summer to operate a 12-month schedule of instruction.
- Provide 5 hours of education to all youth each day, including youth on Administrative Hold.
- Implement an incentive process to encourage youth attendance in school and end the practice of using extended confinements when youth do not attend.

**Recommendations**

Section	Recommendations
Sanitation	<ul style="list-style-type: none"> <li>• Implement a regular inspection process to ensure areas are adequately cleaned.</li> </ul>
Food Services	<ul style="list-style-type: none"> <li>• Adjust the daily menu to provide a hot meal for dinner.</li> <li>• Ensure all youth receive a daily minimum of 2,500-3,000 calories.</li> <li>• Provide condiments to youth upon request.</li> </ul>
Discipline	<ul style="list-style-type: none"> <li>• End the practice of confining youth due to rotating recreational groups.</li> <li>• Identify and implement a clear list of incentives associated with each behavior level.</li> <li>• Implement a policy that only permits the use of confinement as a temporary response to behavior on only lasts until the youth is calm enough to rejoin programming.</li> <li>• Implement a quality assurance process to ensure compliance with confinement policy.</li> <li>• Prohibit the use of confinement longer than 4 hours without administrator approval and development of an individualized plan.</li> <li>• Enhance the documentation of youth confinement time to include:               <ul style="list-style-type: none"> <li>○ Written reports that indicate the reason for confinement.</li> <li>○ The start and end times of the confinement.</li> <li>○ Attempts to de-escalate the youth and return them to regular programming.</li> </ul> </li> <li>• End the practice of withholding access to education during confinements.</li> <li>• Prohibit the use of tasers as a use of force technique.</li> </ul>
Security	<ul style="list-style-type: none"> <li>• Implement a regular process to check and log daily inventories of security and dietary equipment.</li> </ul>
Visiting	<ul style="list-style-type: none"> <li>• Permit youth to engage in contact visits with families.</li> </ul>

Detention Programs	<ul style="list-style-type: none"> <li>• Implement a supervision process to ensure the implementation of the cognitive-behavioral program occurs, including daily reviews of youth point sheets, a clearly articulated level and incentives system, and direct observations of cognitive-behavioral groups.</li> </ul>
Education	<ul style="list-style-type: none"> <li>• Adjust the annual school schedule to include educational service through the summer to operate a 12-month schedule of instruction.</li> <li>• Provide 5 hours of education to all youth each day, including youth on Administrative Hold.</li> <li>• Implement an incentive process to encourage youth attendance in school and end the practice of using extended confinements when youth do not attend.</li> </ul>
Recreation and Leisure Time	<ul style="list-style-type: none"> <li>• Implement a daily schedule that includes, at minimum, one hour of large muscle exercise for each resident in the gym or outdoor recreation space, inclusive of youth on Administrative Hold Status.</li> </ul>
Admissions Procedures	<ul style="list-style-type: none"> <li>• Implement a monitoring and quality assurance process to ensure youth receive the intended orientation upon intake.</li> <li>• Eliminate any practice of confining youth for failing a post-orientation test.</li> <li>• Implement the PREA Risk for Victimization Assessment for youth within 72 hours of admission and periodically throughout a youth's confinement.</li> <li>• Implement a monitoring and quality assurance process to confirm the Risk for Victimization Assessment is completed for all youth.</li> </ul>
Mental Health Services	<ul style="list-style-type: none"> <li>• Employ or contract with qualified mental health professionals to provide mental health services to youth at the facility. <ul style="list-style-type: none"> <li>○ Provide a mental health assessment for all youth.</li> <li>○ Develop and implement service plans for all youth with mental health needs.</li> </ul> </li> <li>• Employ or contract with a psychiatrist to provide psychiatric assessments, services, and medication prescribing and monitoring for youth in need.</li> <li>• Follow guidance from mental health professionals when youth are identified as at risk for self-harm.</li> <li>• Encourage youth at risk of self-harm to participate in programming.</li> </ul>
Youth Grievances	<ul style="list-style-type: none"> <li>▪ Place youth grievance boxes in youth living units and common areas.</li> <li>▪ Ensure all youth grievances are logged and receive responses according to policy.</li> </ul>