

2022 LaSalle County Juvenile Detention Center Inspection Report

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Executive Summary

The Department of Juvenile Justice conducted the annual inspection of the LaSalle County Juvenile Detention Center in Ottawa, IL on June 23, 2022, pursuant to 730 ILCS 5/3-15-2(b). While there were some strengths noted, the center was found to be non-compliant with several requirements of the 20 Ill. Adm. Code 2602 County Juvenile Detention Standards (“County Detention Standards”) noted as non-compliant are listed in the table below, while 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
2602.170 Discipline	At no time should room confinement exceed 4 hours without administrators and/or mental health staff developing an individualized plan to address the behavior. Staff must be trained in acceptable methods of physical intervention.
2602.230 Education	Teacher student ratios are at least 1:12 for general education and 1:8 for students with Individualized Education Programs (IEPs). Qualified special education staff are assigned to youth with special education status and special education testing is available for youth in custody.
2602.20 Administration	In the first year of employment, all staff shall minimally receive an additional 80 hours of training including crisis prevention and intervention.
2602.30 Personnel	All personnel working in the detention center, including contractual staff and volunteers, must complete a background check prior to employment and at least once every five years throughout employment. Before hiring new employees who may have contact with youth, the agency shall make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse.
2602.50 Admissions Procedures	Following admission, a strip search may be administered only when there is an individualized, reasonable suspicion. 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.
2602.80 Medical and Health Care	Youth with emergency complaints shall receive attention as quickly as possible, regardless of the sick call schedule.

2602.90 Mental Health Services

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.

Methodology

- Interviews Conducted
 - Director
 - Assistant Superintendent
 - 1 Supervisor
 - 4 Juvenile Detention Officers
 - Educator
 - Wellpath Nurse
 - Wellpath Mental Health Clinician
 - 4 youth

- Documents Reviewed
 - Policy 16.02 "Complaints"
 - Policy 16.05 "Use of Force by Staff"
 - Policy 16.06 "Use of Restraints"
 - Policy 16.07 "Display of Restraints"
 - Policy 16.09 "Isolation"
 - Policy 16.11 "Motivational Learning Model"
 - Policy 17.02 "Disciplinary Segregation"
 - Resident Handbook
 - Sample Youth File
 - Sample Youth Medical Files
 - Sample Youth Mental Health Documentation

Overview

The LaSalle County Juvenile Detention Center is 16-bed facility. At the time of the audit, the facility had six residents in custody. Two youth were on an intake quarantine status; the remaining four youth were in general population. The facility has three living units, all of which were in operation. One living unit operates as the quarantine unit for new youth with two others acting as general population units.

While there have been some disruptions due to COVID-19, the facility currently offers in-person family visitation.

Admission Policy and Procedures

The LaSalle County Juvenile Detention Center offers 24-hour coverage for admissions. Youth property is collected, inventoried, and laundered according to standards. Youth property documentation was observed in youth files.

The facility conducts strip searches of all youth upon intake. County Detention Standards only permit strip searches of youth upon admission only when there is an individualized, reasonable suspicion of weapons, contraband, or body pests.

Facility staff complete a medical screening form for all youth intakes. Youth who are flagged as needing more immediate follow-up are referred to nursing staff.

The updates to County Detention Standards over the past year included the addition of Prison Rape Elimination Act (PREA) requirements. These 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 implemented this practice and has not undergone an official PREA audit.

Areas of Non-Compliance and Recommendations

- 2602.50 Admissions Procedures states: "Following admission, a strip search may be administered only when there is an individualized, reasonable suspicion."
 - Recommendation:
 - Eliminate the use of strip searches as a standard process during intake.
- 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."
 - Recommendation:
 - Implement the PREA Risk for Victimization Assessment for youth within 72 hours of admission and periodically throughout a youth's confinement.

Personnel, Staffing, and Supervision

The facility has two administrators, five supervisory staff, 12 Juvenile Detention Officers (JDOs), and one teacher currently employed. And there are three additional JDO vacancies. At the time of the inspection, there were two administrators, one supervisor, four JDOs, and a teacher present. While the number of employees at the facility is low, it is sufficient to manage the average number of youths at the facility.

The facility relies on the Relias Training required by the Administrative Office of Illinois Courts for most of the annual training offered to employees. The facility has struggled to maintain some trainings that require in-person facilitation, such as CPR and use of force. The facility utilizes Crisis Prevention Institute (CPI) as its approach to de-escalation and use of force, however they have not had a contract with a certified instructor for the last few years. As a result, current staff have not had any refresher training in

several years and there are new employees that have not had any use of force training or certification. at all. This is a significant concern and presents a risk for harm to youth and/or staff as well as a high-level of potential liability for the county.

Areas of Non-Compliance and Recommendations

- 2602.20 Administration states: “In the first year of employment, all staff shall minimally receive an additional 80 hours of training including crisis prevention and intervention.”
- Section 2602.170 Discipline states: “Staff must be trained in acceptable methods of physical intervention.”
 - Recommendations:
 - Contract with someone to provide CPI training.
 - Identify and enroll at least two existing employees in the CPI train-the-trainer course to build the capacity to conduct training internally.
 - Complete CPI training for all new and existing employees.

Detention Programs, Youth Discipline, and Confinement

The facility utilizes a traditional point card and level system to manage youth behavior. Levels are determined daily and associated with later bedtimes, additional snacks, and access to things like a video game system. Staff complete points collaboratively at the end of every shift and share points with youth to give them opportunities to ask questions.

The facility has a well-established daily schedule that is adhered to consistently. Staff and youth reports matched the schedule provided for the audit. Every youth interviewed affirmed the constancy of the daily schedule. The facility makes frequent use of the outside area. Youth shared they can go outside for recreation daily, weather permitting, and frequently go outside during school time with the teacher for lessons and reading time. The frequent use of the outdoor area is a strength for the facility.

The facility addresses negative youth behavior through a set of sanctions called “Special Programs.” Youth are placed on one of four special programs (called Special Programs A-D). A youth is placed on Special Program A for minor infractions and are assigned interventions such as community service or cleaning assignments. More significant negative behaviors earn further special programs, which are associated with more severe consequences.

At the time of the audit, one youth was on Special Program D, and another was on Special Program C. Both youths indicated they had started their special programs with 24 hours of confinement. Furthermore, these youth are confined in their rooms during mealtimes and free time throughout the day in shorter increments. This was affirmed by staff interviews. County Detention Standards stipulate that “at no time should room confinement exceed 4 hours without administrators and/or mental health staff developing an individualized plan to address the behavior.” The practice of the 24-hour confinement and residual confinements during mealtimes and free time are out of compliance with these standards.

Areas of Non-Compliance and Recommendations

- 2602.170 Discipline states: “At no time should room confinement exceed 4 hours without administrators and/or mental health staff developing an individualized plan to address the behavior.”
 - Recommendations:
 - Eliminate the use of 24-hour confinement with the Special Program C and D consequences.
 - Eliminate the use of confinements during mealtimes and free time for youth on special program status.
 - Implement individualized behavior plans for youth who exhibit significant negative behaviors.

Medical, Health Care, and Mental Health Services

Medical and Mental Health Services are offered by Wellpath via a shared contract with the LaSalle County Jail. Nurses are stationed in the adult portion of the facility and present 16 hours per day with a 24-hour on call. A physician is available once per week and on call as needed. Medication is administered by nursing staff. Youth are brought to the Nurse’s office to receive medication. Doors leading to the adult side of the facility are secured during these timeframes to ensure sight and sound separation. Youth medication is monitored and prescribed by the physician.

The facility communicates that a youth needs to be seen for medical or mental health services via a paper “Medical/Mental Health Visit Request Form.” The facility indicates the reason for the request and the Nurse or Mental Health Practitioner (MHP) is supposed to document the date of visit and follow-up notes. Youth indicated that access to both medical and mental health services is slow, and sometimes non-existent. One youth stated he submitted a sick call request and was not seen for almost a month. Another indicated he has never seen an MHP. Interviews with nursing staff and the MHP, along with a review of sick call documentation in medical files corroborated this claim. In one case, a youth file indicated a youth had submitted a sick call request on 2/24/22 but was not seen until 3/4/22 (a full 10 days later). There were several additional request forms observed that had visit notes, but no date indicated or lacked a visit date and notes entirely. Nursing staff indicated they had just moved to a new electronic records system in the past week which may contributed to the lack of documentation.

The same lack of follow-up was present regarding mental health services. The MHP had a collection of request forms in her office loosely on a desk without any apparent method for organization. There was one request from 6/2/22 that had no documented follow-up present. During the interview, the MHP acknowledged that she had not visited with any youth from the juvenile detention center since 6/6/22 (a full 17 days prior to the interview). County Detention Standards require that youth with significant mental health needs be assessed by qualified mental health professionals and a service plan developed. This clearly is not taking place for youth at the LaSalle County Juvenile Detention Center. It is apparent that the volume of mental health services available to youth is insufficient. Furthermore, the response times for both medical and mental health services are insufficient.

Areas of Non-Compliance and Recommendations

- Section 2602.80 Medical and Health Care states: “Youth with emergency complaints shall receive attention as quickly as possible, regardless of the sick call schedule.”
 - Recommendation:
 - Ensure youth who complete sick call requests are assessed the same day.
- Section 2602.90 Mental Health Services states: “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.”
 - Recommendations:
 - Implement a consistent schedule for contracted MHPs to be on-site at the juvenile detention center.
 - Provide a mental health evaluation for all youth.
 - Develop and implement individualized service plans for youth assessed as needing services.

Youth Grievances

The facility does not have a formal grievance process. Facility administration reports they have not received any youth grievances over the past year. Youth and staff reported if a grievance were needed, a resident could write the grievance on a piece of notebook paper and submit it to a supervisor. There were no specific grievance forms available to youth, nor private grievance boxes for youth to place grievances in a private manner.

Recommendations:

- Make grievance forms available to youth without having to obtain one from a staff member.
- Place youth grievance boxes in youth living units and common areas.

Education

The facility employs one fulltime licensed educator. The educator is a former volunteer at the facility who was hired in her educational capacity in August 2021. Prior to her hire, the facility was without a licensed educator for several months. While the facility was without a primary educator, there was no consistent, licensed substitute educator available to provide services to youth. Instead, school was managed by security staff at the facility. Youth did speak highly of the educator, saying she is very engaging and takes them outside for lessons whenever she can. It is clear the educator is taking ownership of educational services at the facility, but more assistance is needed. The current educator only has a K-9 endorsement, so she is providing services to youth outside of her endorsement.

Youth at the facility are officially enrolled in the Ottawa High School, however administrators and the on-site educator report very little collaboration with the high school. The Ottawa High School did not provide services to youth while the facility was without an educator. There are no clear services provided to youth with IEPs. One youth at the facility had an IEP at the time of the inspection, and

administrators reported they average 1-2 youth with IEPs at a time. The full-time educator is not a licensed special education teacher but reports she does her best to provide services in a manner consistent with IEPs. The facility does not participate in or lead any IEP meetings.

The facility began use of the Edgenuity Courseware in May of 2022. Edgenuity provides both credit recovery and personalized learning for youth. Incorporation of this program is good for the youth at the facility, but incorporation of this system alone is insufficient to solely address the findings of noncompliance in this area.

Areas of Non-Compliance and Recommendations

- 2602.230 Education states: “Teacher student ratios are at least 1:12 for general education and 1:8 for students with Individualized Education Programs (IEPs). Qualified special education staff are assigned to youth with special education status and special education testing is available for youth in custody.”
 - Recommendations:
 - Hire a special education teacher to ensure services can be provided for youth with IEPs.
 - Identify a process to have a substitute teacher in the event of a teacher absence.
 - Hire an additional teacher with an endorsement fitting the youth population of the facility.

Prison Rape Elimination Act (PREA) and Additional Observations

The most recent revision to County Detention Standards in 2021 includes a series of expectations related to the Prison Rape Elimination Act (PREA). The LaSalle County Juvenile Detention Center conducts required background checks for new employees as required by standard. However, the facility administration does not contact former institutional employers to inquire about investigations nor does the facility administration complete follow-up background checks for existing employees every five years as is required by County Detention Standards.

Several facility policies were reviewed during the inspection. The policy manual is significantly outdated and should be completely revised. Many of the policies reviewed had revision dates from 2001. The most recent policy shared by the facility was last revised in 2010. Regular, annual reviews of policies are critical to maintaining compliance with new and revised standards and governing the day-to-day performance of employees.

Areas of Non-Compliance and Recommendations

- Section 2602.30 Personnel states: “All personnel working in the detention center, including contractual staff and volunteers, must complete a background check prior to employment and at least once every five years throughout employment.” Before hiring new employees, who may have contact with youth, the agency shall make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse.”

- Recommendations:
 - Conduct background checks on all existing employees who have been employees for five years or more.
 - Contact former institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse and document the results.
 - Conduct a thorough revision of the existing policy manual and institute an annual review and revision process for all policies.

Recommendations

Section	Recommendations
Discipline	<ul style="list-style-type: none"> • Eliminate the use of 24-hour confinement with the Special Program D consequence. • Eliminate the use of confinements during mealtimes and free time for youth on special program status. • Implement individualized behavior plans for youth who exhibit significant negative behaviors. • Contract with someone to provide CPI training. • Identify and enroll at least two existing employees in the CPI train-the-trainer course to build the capacity to conduct training internally.
Education	<ul style="list-style-type: none"> • Complete CPI training for all new and existing employees. • Hire a special education teacher to ensure services can be provided for youth with IEPs. • Identify a process to have a substitute teacher in the event of a teacher absence. • Hire an additional teacher with an endorsement fitting the youth population of the facility.
Youth Grievances	<ul style="list-style-type: none"> • Make grievance forms available to youth without having to obtain one from a staff member. • Place youth grievance boxes in youth living units and common areas.
Personnel	<ul style="list-style-type: none"> • Conduct background checks on all existing employees who have been employees for five years or more. • Reach out to former institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse and document the results.
Admissions Procedures	<ul style="list-style-type: none"> • Eliminate the use of strip searches as a standard process during intake. • Implement the PREA Risk for Victimization Assessment for youth within 72 hours of admission and periodically throughout a youth’s confinement.

Medical and Health Care	<ul style="list-style-type: none"> • Ensure youth who complete sick call requests are assessed the same day.
Mental Health Services	<ul style="list-style-type: none"> • Implement a consistent schedule for contracted MHPs to be on-site at the juvenile detention center. • Provide a mental health evaluation for all youth. • Develop and implement individualized service plans for youth assessed as needing services.
Additional Areas	<ul style="list-style-type: none"> • Conduct a thorough revision of the existing policy manual and institute an annual review and revision process for all policies.