

Heidi W. Abbott, Chair
Karen Cooper-Collins, Secretary
Tyren Frazier
David R. Hines
Helivi L. Holland
Mary E. Langer
Robyn Diehl McDougle
Dana G. Schrad
Jennifer Woolard



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COMMONWEALTH of VIRGINIA

Board of Juvenile Justice

DRAFT MEETING MINUTES

June 10, 2015

Main Street Centre
600 East Main Street, 12th Floor, Conference Room South
Richmond, Virginia 23219

Board Members Present: Heidi Abbott, Tyren Frazier, Helivi Holland, Robyn McDougle, Dana Schrad, Kenneth "Ken" Stolle

Board Members Absent: Karen Cooper-Collins, David Hines, Tamara Neo

Department of Juvenile Justice (Department) Staff Present: Kenneth "Ken" Bailey, Andrew "Andy" K. Block, Jr., Valerie Boykin, Lisa Floyd, Daryl Francis, Wendy Hoffman, Jack Ledden, Margaret O'Shea (Attorney General's Office), Barbara Peterson-Wilson, Deron Phipps, Beth Stinnett, Ralph Thomas, Angela Valentine, Janet Van Cuyk

Guests Present: DaQuan Beaver (JustChildren Program), Michael Cassidy (Commonwealth Institute), Barry Green (former Department Director), Christopher Pena (JustChildren Program), Jeree Thomas (JustChildren Program), Brette Throckmorton (JustChildren Program)

CALL TO ORDER

Chairperson Heidi Abbott called the meeting to order at 9:45 a.m.

INTRODUCTIONS

Chairperson Abbott welcomed all that were present and asked for introductions.

APPROVAL of April 24, 2015, MINUTES

The minutes of the April 24, 2015, Board meeting were provided for approval. On MOTION duly made by Tyren Frazier and seconded by Robyn McDougle to approve the minutes as presented. Motion carried.

PUBLIC COMMENT PERIOD

There was no public comment.

DIRECTOR'S CERTIFICATION ACTIONS

Ken Bailey, Certification Unit Manager, Department

Included in the Board's packet are the individual reports and the summary of the Director's certification actions completed on April 27, 2015. Mr. Bailey discussed two areas of interest:

- The 19th District Court Service Unit was certified for three years with a monitoring report in six months on their significant number of issues regarding social history documentation.
- Prince William Juvenile Detention Center (Center) was certified for one year with quarterly monitoring visits. After the Certification Unit's status visit, the Center still had two non-compliance issues dealing with log books and room checks. The Certification Unit will perform a follow up visit and report back to Director Block on the results.

Chairperson Abbott asked about the issues with the log books.

Mr. Bailey responded that the Center's staff were not signing the log books and not putting proper entries in the log books. In addition, staff was not conducting the required 30 minute room checks or conducting the room checks but not recording them in the log books.

Board Member Stolle asked if the staff noted the times in the log books or were staff just putting entries in the log books to fill them out.

Mr. Bailey said the Center's staff are omitting issues from the log books and not identifying who made the entry.

Director Block noted that, at some point, a larger discussion with the Board needs to take place on the regulations for room checks.

Chairperson Abbott asked if there is a process for random inspections or are monitoring and status visits by the Certification Unit scheduled with the facilities.

Mr. Bailey was unsure if the Certification Analyst was planning a random or an announced visit back to the Center, but stressed the Certification Unit can go to a facility any time without notification.

Mr. Bailey wanted to clarify that the Center, just prior to the audit, hired a new Administrator. The new Administrator has a long history with the Department, and Mr. Bailey is confident this administrative change will make a difference in improving the Center's operations.

Board Member Stolle stressed that log books are extremely important. When an incident happens at the jail, log books are frozen immediately and reviewed to see what took place. The log book qualifies as a state document and, if falsified, is considered a felony in Virginia.

Mr. Bailey wanted the members to know that, over the years, the Certification Unit has successfully eliminated the use of whiteout in log books.

Virginia Juvenile Community Crime Control Act (VJCCCA) Plan Approvals

Beth Stinnett, Statewide Program Manager, Department

Ms. Stinnett distributed details of the VJCCCA plans and their budget (attached). The Board reviewed the information with no questions.

On MOTION duly made by Helivi Holland and seconded by Robyn McDougle to approve the VJCCCA Plans for FY2016 for Frederick, Clarke combined plan; Henrico County; Rockingham, Harrisonburg combined plan; Warren County; and Manassas combined plan. Motion carried.

Length of Stay (LOS) Update

Andy Block, Director, Department

Janet Van Cuyk, Legislative and Research Manager, Department

At the April 24th Board meeting, the Department provided a presentation on the proposed revisions to the LOS guidelines. The Board decided to table the vote on the guidelines and requested the Department solicit feedback from specific groups. Those groups included law enforcement, victim rights organizations, Commonwealth's Attorneys, and juvenile court judges. Since that meeting, there has been an expansive outreach effort from the Department to our community partners.

The Department reached out to the Virginia Association of Commonwealth's Attorneys (VACA). The VACA indicated their preference for the Board to extend the public comment period to give them an opportunity to personally hear from Director Block on the issue. Chairperson Abbott granted the request for a longer public comment period. In addition, the Sheriffs' and Police Chiefs' associations were interested in the VACA's feedback as well before they reached a decision on support for the proposed guidelines.

After the Board meeting today, Director Block will provide a second presentation on the proposed guidelines to the VACA. Ms. Van Cuyk and Policy and Planning Director Deron Phipps presented to this group shortly after the April Board meeting. The VACA requested additional information, specifically relating to how the proposed LOS guidelines fit into the greater transformation effort of the Department.

The Department's Regulatory & Policy Coordinator Barbara Peterson-Wilson reviewed the public comments received on the proposed revisions to the LOS guidelines (attached).

Board Member Stolle asked for a copy of the email that Chesterfield County Chief of Police, Colonel Thierry Dupuis, sent to his staff soliciting comment on the proposed LOS guidelines. Board Member Stolle would like to see the questions Chief Dupuis asked and the information he provided in his email to his staff requesting feedback.

In other outreach efforts, Director Block presented at the statewide conference for juvenile court judges and the Department's Judicial Liaison Committee on the proposed LOS guidelines. Both groups were very positive in their comments, and the Judicial Liaison Committee noted support for the proposal.

The fiscal impact analysis was provided to the Board (attached) and reviewed.

The analysis showed no additional burdens to local government which was a concern from the last meeting for some Board members. In fact, the Department will be in a better position to reinvest the savings back into the community for earlier and alternative interventions. An example would be the increased utilization of the Community Placement Program (CPP) which is a partnership between the Department and local juvenile detention centers where the Department pre-pays for empty beds in the local juvenile detention centers. There is no negative fiscal impact with the proposed revisions, only positive.

Deron Phipps stated that the Department's intent is to capture the savings gained from a decline in its overall population and reinvest that money in local services. However, past experiences have not been successful. The Department's savings from closing facilities in Hanover and Culpeper was appropriated by the General Assembly, and the Department was not allowed to reinvest that money. This time around, the Department has met with Senate Finance and House Appropriations staff and both are supportive of the Department's initiative to reinvest into community programs though the final decision lies with the General Assembly.

Board Member Stolle asked, as the commitments decrease, will the Department close additional facilities.

Mr. Phipps stated that the Department is currently under staffed at both facilities (Bon Air and Beaumont Juvenile Correctional Centers). As the population comes down, units within the facility will close. This will reap additional savings and allow those employees affected by the closed units to transfer to vacant positions. We believe this will help the Department become fully employed and reduce our footprint to an appropriate size.

Mr. Phipps followed by saying that the Department is working closely with the Virginia Juvenile Detention Association. In the late 1990s and early 2000s, juvenile detention centers essentially doubled their space and currently have a 50% occupancy rates based on constructed capacity. This will be a win-win situation for the Department's CPP to utilize empty beds in order to keep kids closer to home. This will improve the juvenile's success rate and save the state money.

Board Member McDougle cautioned the Department to stop using the word "savings" and start using "reinvestment" when talking about the fiscal impact.

Board Member Holland had an opportunity to speak with representatives from VACA and the juvenile judges. Both were concerned about not being included in the process, so they were happy for the Department to reach out to them for their input.

Board Member Holland went on to discuss her concerns with returning the child back to the home. Specifically making sure resources are available for them and there are ways in place to address the child's behavior since the child has lived in an institutional setting while in custody. It could be a difficult and challenging transition.

Board Member Holland noted that she made the motion at the last Board meeting to table the vote regarding the proposed revisions to the LOS guidelines for today's meeting as noted in the meeting minutes. On a MOTION duly made by Helivi Holland and seconded by Robyn McDougle to move the vote on the proposed revisions to the LOS guidelines from today's meeting to the next scheduled Board meeting. Motion Carried.

Chairperson Abbott asked if the reinvestment of services into the localities would include mental health services.

Director Block noted that currently most of the reinvesting is in the CPP with either step-down programs or juveniles who serve a short LOS. The Department is looking to expand other interventions such as wrap around case management or multisystemic therapy by using 294 funding. Section 294 (§16.1-294 of the *Code of Virginia*) funding is used to provide treatment services to juveniles released from juvenile correctional centers (JCC) and placed on parole supervision

Director Block also indicated the Department is trying to improve and strengthen family engagement while the juvenile is in our custody and not start the process 30 or 60 days before their release. It is a big issue and the Department does not want to place the juvenile back in the same situation they experienced before they left the home.

Board Member McDougle requested a document outlining how LOS fits into the bigger picture showing the programs on the front end happening in the facility and the back end programs. This will help put LOS into context and show the public the Department is just not letting juveniles free and here is a document reflecting the work the Department is doing or contemplating doing.

Ms. Van Cuyk responded by agreeing with the request to complete a one page document outlining the Department's transformation work and LOS.

Board Member Schrad noted that in her discussions, particularly with police chiefs but also with Commonwealth's Attorneys and others in the criminal justice system, there are two key concerns. One is continuum of supervision, of care, and of programs. Having a continuum – providing sufficient supervision or care to the juvenile as they transition back to the community is a key point. The other concern is making sure there is no disparity of impact on our juveniles. For example, Northern Virginia has plenty of services in place for transitioning juveniles compared to Southwest Virginia who lack in programs. We need to make sure all kids statewide have the same opportunities no matter where they live within the system.

Board Member Frazier indicated that he supported the creation of the one page document which would help show the services and work being done to keep juveniles from transitioning into secure facilities.

Board Member Holland wanted to be clear that she is talking about the first 30 days and beyond at home for the child. Board Member Holland went on to discuss a case of a child who returned, from the Department's custody, to school and was not able to handle that adjustment. The Department of Social Services has an initiative called the Family Stabilization Program, which is a program that helps stabilize the family before the child returns home. We can learn from this program.

Chairperson Abbott indicated a personal concern of hers are the 18 or older juveniles that are released who have not graduated high school and are not going home; essentially they are unaccompanied youth that are now included in the homeless population.

Board Member Stolle noted that the fiscal impact analysis was great work and cautioned the Department about identifying the savings but not having an expenditure plan associated with the savings. This will be a target for the General Assembly. The Department needs a solid plan for the reinvestment money before going before the General Assembly.

DIRECTOR'S COMMENTS

Andy Block, Director, Department.

Director Block noted that he had emailed a message to the Board on current activities at the Department and went on to briefly review the topics of that email.

Budget Reduction Plan: During the last session of the General Assembly, all state agencies were required to have a plan to meet a savings target for FY2015 and FY2016. This year the Department was originally supposed to have a budget reduction of \$7.5 million, but, fortunately, it was reduced to \$2.7 million. To achieve those savings, the Department abolished a number of positions in Central Office. Overall the agency laid-off 17 employees with most of those employees placed in vacancies within the Department.

The Reception and Diagnostic Center (RDC): In May, the Department formally announced the relocation of intake services and the closing of the RDC building. The Department will complete the relocation and redesign of its intake and assessment function and the necessary steps for closure by the end of July. Most of the RDC staff will be relocated to Bon Air Juvenile Correctional Center and some to Beaumont Juvenile Correctional Center. All security staff was kept and will help plug in the holes at both facilities. Detention administrators and juvenile judges have been notified.

Salary Raises for Juvenile Correctional Officers: The last session of the General Assembly found money to increase salaries for all state employees and found extra money for hard to fill positions, which includes not only correctional officers but also line staff and medical professionals. The salary increase becomes effective August 10, 2015.

Juvenile Correctional Center Standard Operating Procedure Review: The Department's Certification Unit Team, along with Operations Division, Training, and Policy and Planning Division personnel developed a new process to review the standard operating procedures in our facilities. The team is reviewing procedure compliance and using this opportunity to learn if there are disconnects between practices and procedures. Beaumont has completed their review and Bon Air will be completed the end of June. The Department should be ready to report out on this initiative at the next meeting.

Quilting Show: The Department has developed positive social activities to engage residents and provide them an opportunity to think differently about themselves. One of those activities involved the quilting program at Beaumont Juvenile Correctional Center which held a quilt show at the Bridge PAI Gallery in Charlottesville on May 21, 2015. It was a beautiful display of quilts made by residents of

instructor Roy Mitchell's quilting class entitled "We Are Somebody." It was well-attended. Three of Mr. Mitchell's students (who are current Beaumont residents) also were on hand to share with gallery visitors what they have learned in Mr. Mitchell's classroom.

Board Member Schrad asked what the Department does with the quilts.

Director Block noted that the quilts are donated to various charitable organizations or used as gifts for family members. There are legal questions the Department is working through regarding the residents keeping the money made from the sale of the quilts.

Director Block recognized Deputy Director of Operations Ralph Thomas who is retiring from the Department this summer. Director Block thanked Mr. Thomas for his amazing work for the Department and for kids in the juvenile justice system.

Director Block also recognized Board Members Ken Stolle and Tamara Neo whose terms expire at the end of June. Director Block presented a plaque to Board Member Stolle for his dedicated service.

BOARD COMMENTS

The Board Members thanked Mr. Thomas, Board Members Stolle and Neo for their support and service.

NEXT MEETING

The next meeting is scheduled for September 9, 2015, but could be changed due to conflicts. A meeting date will be announced soon.

ADJOURNMENT

Chairperson Abbott adjourned the meeting at 12:25 p.m.

FY 2015-2016 VJCCA Plan Detail

| Locality | Program Type | Year 1 Youth | Year 1 Budget | Year 2 Youth | Year 2 Budget |
|-----------------------|------------------------------------|--------------|---------------|--------------|---------------|
| Accomac, Northampton | Outreach Detention/Electronic | 65 | \$31,666 | 65 | \$31,666 |
| Accomac, Northampton | Substance Abuse Assessment | 95 | \$9,000 | 95 | \$9,000 |
| Accomac, Northampton | Surveillance/Intensive Supervision | 35 | \$13,000 | 35 | \$13,000 |
| Alexandria | Shelter Care and Less Secure | 65 | \$220,601 | 60 | \$220,601 |
| Alexandria | Alternative Day Services and Day | 40 | \$32,400 | 40 | \$32,400 |
| Alexandria | Shoplifting Programs | 25 | \$6,000 | 25 | \$6,000 |
| Alexandria | Case Management | 20 | \$21,600 | 20 | \$21,600 |
| Amelia | Community Service | 15 | \$6,321 | 15 | \$6,321 |
| Amelia | Pro-Social Skills | 7 | \$6,321 | 7 | \$6,321 |
| Amherst | Shelter Care and Less Secure | 20 | \$53,580 | 20 | \$53,580 |
| Amherst | Outreach Detention/Electronic | 30 | \$11,675 | 30 | \$11,675 |
| Arlington | Alternative Day Services and Day | 23 | \$334,422 | 23 | \$334,422 |
| Arlington | Group Homes | 24 | \$942,893 | 24 | \$942,893 |
| Bath | Coordinator/Administrative | 0 | \$50 | 0 | \$50 |
| Bath | Supervision Plan Services | 2 | \$6,535 | 2 | \$6,535 |
| Bedford County | Shelter Care and Less Secure | 15 | \$30,000 | 15 | \$30,000 |
| Bedford County | Shelter Care and Less Secure | 15 | \$30,000 | 15 | \$30,000 |
| Bedford County | Outreach Detention/Electronic | 25 | \$24,941 | 25 | \$24,941 |
| Bland | Supervision Plan Services | 3 | \$6,585 | 3 | \$6,585 |
| Campbell | Community Service | 48 | \$11,578 | 48 | \$11,578 |
| Campbell | Coordinator/Administrative | 0 | \$5,653 | 0 | \$5,653 |
| Campbell | Shelter Care and Less Secure | 36 | \$68,500 | 36 | \$68,500 |
| Campbell | Outreach Detention/Electronic | 15 | \$23,322 | 15 | \$23,322 |
| Campbell | Parenting Skills | 4 | \$4,000 | 4 | \$4,000 |
| Caroline | Outreach Detention/Electronic | 45 | \$10,392 | 45 | \$10,392 |
| Caroline | Substance Abuse Treatment | 10 | \$5,926 | 10 | \$5,926 |
| Caroline | Supervision Plan Services | 10 | \$7,011 | 10 | \$7,011 |
| Charlotte, Appomattox | Pro-Social Skills | 14 | \$3,500 | 14 | \$3,500 |
| Charlotte, Appomattox | Substance Abuse Education | 12 | \$2,100 | 12 | \$2,100 |
| Charlotte, Appomattox | Outreach Detention/Electronic | 20 | \$21,600 | 20 | \$21,600 |
| Charlotte, Appomattox | Supervision Plan Services | 6 | \$13,774 | 6 | \$13,774 |
| Charlotte, Appomattox | Life Skills | 14 | \$22,500 | 14 | \$22,500 |
| Charlottesville | Group Homes | 10 | \$160,669 | 10 | \$160,669 |
| Charlottesville | Community Service | 25 | \$35,000 | 25 | \$35,000 |
| Charlottesville | Community Service | 6 | \$20,000 | 6 | \$20,000 |
| Charlottesville | Pro-Social Skills | 20 | \$5,000 | 20 | \$5,000 |
| Charlottesville | Individual, Group, Family | 25 | \$75,000 | 25 | \$75,000 |
| Charlottesville | Outreach Detention/Electronic | 15 | \$30,000 | 15 | \$30,000 |
| Charlottesville | Employment/Vocational | 40 | \$66,000 | 40 | \$66,000 |
| Charlottesville | Case Management | 45 | \$52,035 | 45 | \$52,035 |
| Charlottesville | Outreach Detention/Electronic | 23 | \$9,000 | 23 | \$9,000 |
| Chesterfield | Case Management | 66 | \$63,200 | 66 | \$63,200 |
| Chesterfield | Case Management | 83 | \$46,700 | 83 | \$46,700 |
| Chesterfield | Community Service | 100 | \$12,000 | 100 | \$12,000 |
| Chesterfield | Supervision Plan Services | 10 | \$20,500 | 10 | \$20,500 |
| Chesterfield | Alternative Day Services and Day | 77 | \$213,780 | 77 | \$213,780 |
| Chesterfield | Alternative Day Services and Day | 34 | \$91,620 | 34 | \$91,620 |
| Chesterfield | Outreach Detention/Electronic | 140 | \$241,900 | 140 | \$241,900 |
| Chesterfield | Community Service | 175 | \$129,500 | 175 | \$129,500 |
| Chesterfield | Sex Offender Treatment | 12 | \$30,960 | 12 | \$30,960 |
| Chesterfield | Coordinator/Administrative | 0 | \$20,591 | 0 | \$20,591 |
| Colonial Heights | Community Service | 35 | \$6,190 | 35 | \$6,190 |
| Colonial Heights | Parenting Skills | 0 | \$0 | 0 | \$0 |
| Colonial Heights | Office on Youth | 0 | \$37,500 | 0 | \$37,500 |

FY 2015-2016 VJCCA Plan Detail

| Locality | Program Type | Year 1 Youth | Year 1 Budget | Year 2 Youth | Year 2 Budget |
|-------------------------|------------------------------------|--------------|---------------|--------------|---------------|
| Colonial Heights | Shoplifting Programs | 240 | \$8,510 | 240 | \$8,510 |
| Colonial Heights | Supervision Plan Services | 4 | \$3,500 | 4 | \$3,500 |
| Colonial Heights | Case Management | 10 | \$10,000 | 10 | \$10,000 |
| Colonial Heights | Coordinator/Administrative | 0 | \$3,380 | 0 | \$3,380 |
| Craig | Supervision Plan Services | 6 | \$6,535 | 6 | \$6,535 |
| Craig | Coordinator/Administrative | 0 | \$50 | 0 | \$50 |
| Culpeper | Pro-Social Skills | 24 | \$7,200 | 24 | \$7,200 |
| Culpeper | Pro-Social Skills | 30 | \$4,500 | 30 | \$4,500 |
| Culpeper | Coordinator/Administrative | 0 | \$2,646 | 0 | \$2,646 |
| Culpeper | Life Skills | 35 | \$3,575 | 35 | \$3,575 |
| Culpeper | Supervision Plan Services | 10 | \$35,000 | 10 | \$35,000 |
| Danville | Life Skills | 8 | \$6,386 | 8 | \$6,386 |
| Danville | Outreach Detention/Electronic | 40 | \$58,642 | 40 | \$58,642 |
| Danville | Outreach Detention/Electronic | 60 | \$48,295 | 60 | \$48,295 |
| Dinwiddie | Pro-Social Skills | 20 | \$22,322 | 20 | \$22,322 |
| Dinwiddie | Pro-Social Skills | 10 | \$7,532 | 10 | \$7,532 |
| Emporia, Brunswick | Community Service | 100 | \$47,365 | 100 | \$47,365 |
| Emporia, Brunswick | Outreach Detention/Electronic | 35 | \$62,150 | 35 | \$62,150 |
| Fairfax County/City | Shelter Care and Less Secure | 290 | \$1,295,229 | 290 | \$1,295,229 |
| Fairfax County/City | Group Homes | 45 | \$1,347,706 | 45 | \$1,347,706 |
| Fairfax County/City | Group Homes | 25 | \$1,183,627 | 25 | \$1,183,627 |
| Fairfax County/City | Outreach Detention/Electronic | 350 | \$1,268,861 | 350 | \$1,268,861 |
| Fairfax County/City | Group Homes | 18 | \$1,003,718 | 18 | \$1,003,718 |
| Falls Church | Group Homes | 25 | \$900,071 | 25 | \$900,071 |
| Fauquier | Coordinator/Administrative | 0 | \$1,830 | 0 | \$1,830 |
| Fauquier | Home-Based, In-Home Services | 20 | \$18,392 | 20 | \$18,392 |
| Fauquier | Pro-Social Skills | 8 | \$7,000 | 8 | \$7,000 |
| Fauquier | Outreach Detention/Electronic | 2 | \$1,000 | 2 | \$1,000 |
| Fauquier | Sex Offender Treatment | 15 | \$10,400 | 15 | \$10,400 |
| Fauquier | Surveillance/Intensive Supervision | 3 | \$1,100 | 3 | \$1,100 |
| Fluvanna | Supervision Plan Services | 10 | \$6,585 | 10 | \$6,585 |
| Floyd | Supervision Plan Services | 10 | \$6,585 | 10 | \$6,585 |
| Franklin County | Outreach Detention/Electronic | 25 | \$31,456 | 25 | \$31,456 |
| Frederick, Clarke | Surveillance/Intensive Supervision | 45 | \$43,800 | 45 | \$43,800 |
| Frederick, Clarke | Case Management | 150 | \$55,800 | 150 | \$55,800 |
| Frederick, Clarke | Supervision Plan Services | 10 | \$4,508 | 10 | \$4,508 |
| Frederick, Clarke | Substance Abuse Treatment | 30 | \$11,250 | 30 | \$11,250 |
| Frederick, Clarke | Substance Abuse Education | 25 | \$2,000 | 25 | \$2,000 |
| Frederick, Clarke | Substance Abuse Assessment | 80 | \$7,000 | 80 | \$7,000 |
| Frederick, Clarke | Pro-Social Skills | 35 | \$4,000 | 35 | \$4,000 |
| Fredericksburg | Case Management | 5 | \$20,000 | 5 | \$20,000 |
| Fredericksburg | Shelter Care and Less Secure | 5 | \$35,000 | 5 | \$35,000 |
| Fredericksburg | Outreach Detention/Electronic | 20 | \$5,250 | 20 | \$5,250 |
| Fredericksburg | Supervision Plan Services | 10 | \$19,890 | 10 | \$19,890 |
| Fredericksburg | Restitution/Restorative Justice | 40 | \$2,500 | 40 | \$2,500 |
| Fredericksburg | Substance Abuse Education | 40 | \$2,500 | 40 | \$2,500 |
| Fredericksburg | Community Service | 40 | \$3,000 | 40 | \$3,000 |
| Giles | Outreach Detention/Electronic | 6 | \$7,473 | 6 | \$7,473 |
| Giles | Supervision Plan Services | 2 | \$2,155 | 2 | \$2,155 |
| Goochland | Community Service | 40 | \$6,585 | 40 | \$6,585 |
| Gravson, Carroll, Galax | Pro-Social Skills | 48 | \$1,200 | 48 | \$1,200 |
| Gravson, Carroll, Galax | Community Service | 135 | \$36,000 | 135 | \$36,000 |
| Gravson, Carroll, Galax | Outreach Detention/Electronic | 12 | \$3,817 | 12 | \$3,817 |
| Gravson, Carroll, Galax | Shoplifting Programs | 13 | \$200 | 13 | \$200 |

FY 2015-2016 VJCCA Plan Detail

| Locality | Program Type | Year 1 Youth | Year 1 Budget | Year 2 Youth | Year 2 Budget |
|-------------------------|------------------------------------|--------------|---------------|--------------|---------------|
| Gravson, Carroll, Galax | Substance Abuse Education | 34 | \$600 | 34 | \$600 |
| Greene | Supervision Plan Services | 7 | \$7,596 | 7 | \$7,596 |
| Halifax | Outreach Detention/Electronic | 44 | \$40,800 | 44 | \$40,800 |
| Halifax | Outreach Detention/Electronic | 31 | \$37,100 | 31 | \$37,100 |
| Halifax | Substance Abuse Education | 10 | \$4,000 | 10 | \$4,000 |
| Halifax | Supervision Plan Services | 18 | \$12,522 | 18 | \$12,522 |
| Hampton | Pro-Social Skills | 94 | \$40,000 | 94 | \$40,000 |
| Hampton | Home-Based, In-Home Services | 9 | \$32,760 | 9 | \$32,760 |
| Hampton | Outreach Detention/Electronic | 160 | \$144,000 | 160 | \$144,000 |
| Hampton | Outreach Detention/Electronic | 81 | \$67,000 | 81 | \$67,000 |
| Hampton | Substance Abuse Assessment | 90 | \$13,500 | 90 | \$13,500 |
| Hampton | Substance Abuse Treatment | 91 | \$54,600 | 91 | \$54,600 |
| Hampton | Supervision Plan Services | 6 | \$4,567 | 6 | \$4,567 |
| Hampton | Surveillance/Intensive Supervision | 42 | \$70,000 | 42 | \$70,000 |
| Hanover | Surveillance/Intensive Supervision | 40 | \$9,427 | 40 | \$9,427 |
| Hanover | Community Service | 150 | \$33,874 | 150 | \$33,874 |
| Hanover | Outreach Detention/Electronic | 50 | \$34,930 | 50 | \$34,930 |
| Hanover | Case Management | 40 | \$3,258 | 40 | \$3,258 |
| Hanover | Case Management | 50 | \$20,310 | 50 | \$20,310 |
| Henrico | Pro-Social Skills | 200 | \$43,200 | 190 | \$33,390 |
| Henrico | Pro-Social Skills | 52 | \$4,440 | 46 | \$4,440 |
| Henrico | Community Service | 90 | \$21,160 | 74 | \$21,158 |
| Henrico | Coordinator/Administrative | 0 | \$148,564 | 0 | \$148,651 |
| Henrico | Home-Based, In-Home Services | 71 | \$250,364 | 70 | \$274,057 |
| Henrico | Mental Health Assessments | 115 | \$5,760 | 80 | \$5,060 |
| Henrico | Outreach Detention/Electronic | 320 | \$283,118 | 320 | \$287,856 |
| Henrico | Outreach Detention/Electronic | 130 | \$29,000 | 130 | \$29,000 |
| Henrico | Parenting Skills | 42 | \$7,435 | 30 | \$7,435 |
| Henrico | Shoplifting Programs | 240 | \$29,440 | 190 | \$26,192 |
| Henrico | Shoplifting Programs | 58 | \$30,132 | 54 | \$18,628 |
| Henrico | Substance Abuse Assessment | 38 | \$1,920 | 40 | \$2,620 |
| Henrico | Substance Abuse Assessment | 50 | \$425 | 50 | \$425 |
| Henrico | Case Management | 100 | \$61,301 | 105 | \$65,524 |
| Highland | Coordinator/Administrative | 0 | \$346 | 0 | \$346 |
| Highland | Surveillance/Intensive Supervision | 13 | \$6,239 | 13 | \$6,239 |
| Hopewell | Outreach Detention/Electronic | 31 | \$64,377 | 31 | \$64,377 |
| Hopewell | Supervision Plan Services | 4 | \$9,000 | 4 | \$9,000 |
| Hopewell | Home-Based, In-Home Services | 2 | \$7,500 | 2 | \$7,500 |
| Hopewell | Pro-Social Skills | 40 | \$13,550 | 40 | \$13,550 |
| Hopewell | Community Service | 65 | \$17,907 | 65 | \$17,907 |
| Hopewell | Case Management | 12 | \$21,974 | 12 | \$21,974 |
| Hopewell | Coordinator/Administrative | 0 | \$7,405 | 0 | \$7,405 |
| Hopewell | Substance Abuse Assessment | 19 | \$2,960 | 19 | \$2,960 |
| Hopewell | Substance Abuse Education | 15 | \$3,425 | 15 | \$3,425 |
| King George | Outreach Detention/Electronic | 30 | \$8,000 | 30 | \$8,000 |
| King George | Community Service | 25 | \$4,298 | 25 | \$4,298 |
| King George | Substance Abuse Education | 20 | \$4,000 | 20 | \$4,000 |
| King William, Charles | Community Service | 120 | \$59,800 | 120 | \$59,800 |
| King William, Charles | Law Related Education | 50 | \$18,056 | 50 | \$18,056 |
| King William, Charles | Surveillance/Intensive Supervision | 25 | \$21,000 | 25 | \$21,000 |
| King William, Charles | Outreach Detention/Electronic | 20 | \$19,245 | 20 | \$19,245 |
| King William, Charles | Group Homes | 0 | \$0 | 0 | \$0 |
| King William, Charles | Supervision Plan Services | 5 | \$5,000 | 5 | \$5,000 |
| King William, Charles | Substance Abuse Assessment | 15 | \$7,163 | 15 | \$7,163 |

FY 2015-2016 VJCCA Plan Detail

| Locality | Program Type | Year 1 Youth | Year 1 Budget | Year 2 Youth | Year 2 Budget |
|------------------------|------------------------------------|--------------|---------------|--------------|---------------|
| King William, Charles | Parenting Skills | 12 | \$8,000 | 12 | \$8,000 |
| Lexington, Buena Vista | Office on Youth | 0 | \$16,003 | 0 | \$16,003 |
| Lexington, Buena Vista | Coordinator/Administrative | 0 | \$3,602 | 0 | \$3,602 |
| Lexington, Buena Vista | Supervision Plan Services | 5 | \$2,260 | 5 | \$2,260 |
| Lexington, Buena Vista | Surveillance/Intensive Supervision | 20 | \$58,160 | 20 | \$58,160 |
| Loudoun | Shelter Care and Less Secure | 130 | \$800,000 | 130 | \$800,000 |
| Louisa | Supervision Plan Services | 8 | \$10,933 | 8 | \$10,933 |
| Lynchburg | Shelter Care and Less Secure | 46 | \$197,543 | 46 | \$197,543 |
| Lynchburg | Shelter Care and Less Secure | 46 | \$197,543 | 46 | \$197,543 |
| Madison | Supervision Plan Services | 10 | \$8,079 | 10 | \$8,079 |
| Manassas/Manassas | Surveillance/Intensive Supervision | 25 | \$83,177 | 12 | \$83,177 |
| Martinsville, Henry | Group Homes | 27 | \$200,427 | | \$28,900 |
| Martinsville, Henry | Outreach Detention/Electronic | 36 | \$28,900 | 25 | \$62,400 |
| Martinsville, Henry | Outreach Detention/Electronic | 25 | \$62,400 | 30 | \$49,752 |
| Mecklenburg | Life Skills | 15 | \$19,998 | 15 | \$19,998 |
| Mecklenburg | Supervision Plan Services | 8 | \$5,000 | 8 | \$5,000 |
| Mecklenburg | Outreach Detention/Electronic | 5 | \$7,711 | 5 | \$7,711 |
| Montgomery | Community Service | 150 | \$42,649 | 150 | \$42,649 |
| Montgomery | Outreach Detention/Electronic | 5 | \$4,123 | 5 | \$4,123 |
| Montgomery | Surveillance/Intensive Supervision | 2 | \$2,800 | 2 | \$2,800 |
| Nelson | Shelter Care and Less Secure | 4 | \$7,000 | 4 | \$7,000 |
| Nelson | Outreach Detention/Electronic | 8 | \$3,566 | 8 | \$3,566 |
| Newport News | Outreach Detention/Electronic | 350 | \$421,043 | 350 | \$437,151 |
| Newport News | Outreach Detention/Electronic | 300 | \$301,043 | 300 | \$301,043 |
| Norfolk | Outreach Detention/Electronic | 240 | \$411,841 | 240 | \$411,841 |
| Norfolk | Outreach Detention/Electronic | 385 | \$60,800 | 385 | \$60,800 |
| Norfolk | Group Homes | 35 | \$296,500 | 35 | \$296,500 |
| Norfolk | Group Homes | 5 | \$3,000 | 5 | \$3,000 |
| Norfolk | Group Homes | 5 | \$1,500 | 5 | \$1,500 |
| Norfolk | Shelter Care and Less Secure | 100 | \$20,000 | 100 | \$20,000 |
| Norfolk | Surveillance/Intensive Supervision | 200 | \$228,450 | 200 | \$228,450 |
| Norfolk | Alternative Day Services and Day | 61 | \$59,400 | 61 | \$59,400 |
| Norfolk | Law Related Education | 200 | \$22,000 | 200 | \$22,000 |
| Norfolk | Pro-Social Skills | 75 | \$30,000 | 75 | \$30,000 |
| Norfolk | Pro-Social Skills | 60 | \$43,000 | 60 | \$43,000 |
| Norfolk | Pro-Social Skills | 33 | \$20,000 | 33 | \$20,000 |
| Norfolk | Employment/Vocational | 0 | \$0 | 0 | \$0 |
| Norfolk | Substance Abuse Assessment | 18 | \$5,000 | 18 | \$5,000 |
| Norfolk | Substance Abuse Treatment | 0 | \$0 | 0 | \$0 |
| Norfolk | Parenting Skills | 25 | \$11,987 | 25 | \$11,987 |
| Norfolk | Pro-Social Skills | 4 | \$2,100 | 4 | \$2,100 |
| Norfolk | Alternative Day Services and Day | 0 | \$0 | 0 | \$0 |
| Norfolk | Supervision Plan Services | 0 | \$0 | 0 | \$0 |
| Norfolk | Restitution/Restorative Justice | 0 | \$0 | 0 | \$0 |
| Norfolk | Coordinator/Administrative | 0 | \$63,990 | 0 | \$63,990 |
| Nottoway | Community Service | 30 | \$10,676 | 30 | \$10,676 |
| Nottoway | Pro-Social Skills | 15 | \$9,340 | 15 | \$9,340 |
| Orange | Office on Youth | 0 | \$3,705 | 0 | \$3,705 |
| Orange | Coordinator/Administrative | 0 | \$1,000 | 0 | \$1,000 |
| Orange | Community Service | 35 | \$300 | 35 | \$300 |
| Orange | Pro-Social Skills | 12 | \$4,900 | 12 | \$4,900 |
| Orange | Substance Abuse Assessment | 20 | \$2,000 | 20 | \$2,000 |
| Orange | Substance Abuse Treatment | 10 | \$4,800 | 10 | \$4,800 |

FY 2015-2016 VJCCA Plan Detail

| Locality | Program Type | Year 1 Youth | Year 1 Budget | Year 2 Youth | Year 2 Budget |
|----------------|------------------------------------|--------------|---------------|--------------|---------------|
| Orange | Supervision Plan Services | 10 | \$7,204 | 10 | \$7,204 |
| Page | Employment/Vocational | 4 | \$5,120 | 4 | \$5,120 |
| Page | Pro-Social Skills | 8 | \$11,520 | 8 | \$11,520 |
| Page | Substance Abuse Assessment | 30 | \$2,100 | 30 | \$2,100 |
| Page | Substance Abuse Treatment | 25 | \$9,000 | 25 | \$9,000 |
| Page | Supervision Plan Services | 8 | \$2,336 | 8 | \$2,336 |
| Petersburg | Community Service | 80 | \$32,762 | 80 | \$32,762 |
| Petersburg | Coordinator/Administrative | 0 | \$8,032 | 0 | \$8,032 |
| Petersburg | Case Management | 30 | \$55,814 | 30 | \$55,814 |
| Petersburg | Surveillance/Intensive Supervision | 20 | \$55,813 | 20 | \$55,813 |
| Petersburg | Law Related Education | 45 | \$8,229 | 45 | \$8,229 |
| Pittsylvania | Pro-Social Skills | 36 | \$5,782 | 36 | \$5,782 |
| Pittsylvania | Pro-Social Skills | 10 | \$6,000 | 10 | \$6,000 |
| Pittsylvania | Outreach Detention/Electronic | 25 | \$36,539 | 25 | \$36,539 |
| Pittsylvania | Outreach Detention/Electronic Moni | 18 | \$23,200 | 18 | \$23,200 |
| Powhatan | Community Service | 20 | \$6,321 | 20 | \$6,321 |
| Powhatan | Pro-Social Skills | 13 | \$4,203 | 13 | \$4,203 |
| Prince George | Community Service | 70 | \$50,577 | 70 | \$50,577 |
| Prince George | Individual, Group, Family | 6 | \$2,000 | 6 | \$2,000 |
| Prince George | Outreach Detention/Electronic | 10 | \$22,170 | 10 | \$22,170 |
| Prince William | Shelter Care and Less Secure | 159 | \$498,699 | 159 | \$498,699 |
| Prince William | Outreach Detention/Electronic | 196 | \$1,022,460 | 196 | \$1,022,460 |
| Pulaski | Outreach Detention/Electronic | 14 | \$7,939 | 14 | \$7,939 |
| Pulaski | Community Service | 99 | \$13,382 | 99 | \$13,382 |
| Radford | Community Service | 25 | \$7,650 | 25 | \$7,650 |
| Radford | Supervision Plan Services | 2 | \$2,549 | 2 | \$2,549 |
| Rappahannock | Home-Based, In-Home Services | 5 | \$5,889 | 5 | \$5,889 |
| Rappahannock | Surveillance/Intensive Supervision | 1 | \$500 | 1 | \$500 |
| Rappahannock | Pro-Social Skills | 2 | \$500 | 2 | \$500 |
| Rappahannock | Surveillance/Intensive Supervision | 1 | \$300 | 1 | \$300 |
| Rappahannock | Sex Offender Treatment | 4 | \$2,000 | 4 | \$2,000 |
| Rappahannock | Coordinator/Administrative | 0 | \$484 | 0 | \$484 |
| Richmond City | Sex Offender Treatment | 6 | \$14,180 | 6 | \$14,180 |
| Richmond City | Community Service | 130 | \$103,809 | 130 | \$103,809 |
| Richmond City | Outreach Detention/Electronic | 235 | \$429,431 | 235 | \$429,431 |
| Richmond City | Outreach Detention/Electronic | 80 | \$173,098 | 80 | \$173,098 |
| Richmond City | Coordinator/Administrative | 0 | \$20,000 | 0 | \$20,000 |
| Richmond City | Substance Abuse Assessment | 156 | \$3,900 | 156 | \$3,900 |
| Richmond City | Outreach Detention/Electronic | 40 | \$12,080 | 40 | \$12,080 |
| Richmond City | Alternative Day Services and Day T | 64 | \$118,500 | 64 | \$118,500 |
| Richmond City | Supervision Plan Services | 0 | \$0 | 0 | \$0 |
| Richmond City | Mental Health Assessments | 36 | \$25,000 | 36 | \$25,000 |
| Richmond City | Home-Based, In-Home Services | 50 | \$198,906 | 50 | \$198,906 |
| Rockingham | Case Management | 70 | \$46,459 | 70 | \$48,317 |
| Rockingham | Substance Abuse Assessment | 30 | \$4,590 | 0 | \$0 |
| Rockingham | Substance Abuse Treatment | 10 | \$8,400 | 0 | \$0 |
| Rockingham | Mental Health Assessments | 10 | \$6,500 | 0 | \$0 |
| Rockingham | Coordinator/Administrative | 0 | \$4,341 | 0 | \$4,515 |
| Rockingham | Pro-Social Skills | 20 | \$3,200 | 30 | \$3,200 |
| Rockingham | Pro-Social Skills | 40 | \$3,000 | 50 | \$4,675 |
| Rockingham | Supervision Plan Services | 10 | \$9,591 | 20 | \$19,724 |
| Rockingham | Pro-Social Skills | 15 | \$750 | 32 | \$6,400 |
| Roanoke City | Pro-Social Skills | 45 | \$25,237 | 45 | \$25,237 |
| Roanoke City | Community Service | 130 | \$48,294 | 130 | \$48,294 |

FY 2015-2016 VJCCA Plan Detail

| Locality | Program Type | Year 1 Youth | Year 1 Budget | Year 2 Youth | Year 2 Budget |
|-----------------------|------------------------------------|--------------|---------------|--------------|---------------|
| Roanoke City | Mental Health Assessments | 45 | \$29,000 | 45 | \$29,000 |
| Roanoke City | Individual, Group, Family | 30 | \$21,000 | 30 | \$21,000 |
| Roanoke City | Parenting Skills | 30 | \$4,000 | 30 | \$4,000 |
| Roanoke City | Coordinator/Administrative | 0 | \$33,430 | 0 | \$33,430 |
| Roanoke City | Shelter Care and Less Secure | 9 | \$86,122 | 9 | \$86,122 |
| Roanoke City | Supervision Plan Services | 9 | \$4,001 | 9 | \$4,001 |
| Roanoke City | Outreach Detention/Electronic | 160 | \$143,040 | 160 | \$143,040 |
| Roanoke City | Outreach Detention/Electronic | 33 | \$56,161 | 33 | \$56,161 |
| Roanoke City | Substance Abuse Education | 150 | \$55,206 | 150 | \$55,206 |
| Roanoke City | Pro-Social Skills | 75 | \$23,860 | 75 | \$23,860 |
| Roanoke City | Restitution/Restorative Justice | 20 | \$4,000 | 20 | \$4,000 |
| Roanoke City | Restitution/Restorative Justice | 20 | \$1,934 | 20 | \$1,934 |
| Roanoke City | Surveillance/Intensive Supervision | 200 | \$133,309 | 200 | \$133,309 |
| Roanoke County, Salem | Outreach Detention/Electronic | 160 | \$186,305 | 160 | \$186,305 |
| Roanoke County, Salem | Substance Abuse Assessment | 175 | \$24,625 | 175 | \$24,625 |
| Roanoke County, Salem | Community Service | 155 | \$27,500 | 155 | \$27,500 |
| Roanoke County, Salem | Restitution/Restorative Justice | 30 | \$15,020 | 30 | \$15,020 |
| Roanoke County, Salem | Coordinator/Administrative | 0 | \$13,445 | 0 | \$13,445 |
| Shenandoah | Supervision Plan Services | 10 | \$12,704 | 10 | \$12,704 |
| Shenandoah | Substance Abuse Assessment | 25 | \$4,500 | 25 | \$4,500 |
| Shenandoah | Pro-Social Skills | 5 | \$7,000 | 5 | \$7,000 |
| Shenandoah | Sex Offender Assessment | 4 | \$7,000 | 4 | \$7,000 |
| Spotsylvania | Restitution/Restorative Justice | 10 | \$1,000 | 10 | \$1,000 |
| Spotsylvania | Case Management | 15 | \$20,000 | 15 | \$20,000 |
| Spotsylvania | Community Service | 120 | \$37,431 | 120 | \$37,431 |
| Spotsylvania | Substance Abuse Treatment | 22 | \$14,000 | 22 | \$14,000 |
| Spotsylvania | Shelter Care and Less Secure | 10 | \$45,000 | 10 | \$45,000 |
| Spotsylvania | Substance Abuse Education | 30 | \$6,365 | 30 | \$6,365 |
| Spotsylvania | Supervision Plan Services | 3 | \$500 | 3 | \$500 |
| Stafford | Community Service | 90 | \$8,500 | 90 | \$8,500 |
| Stafford | Shelter Care and Less Secure | 8 | \$45,750 | 8 | \$45,750 |
| Stafford | Case Management | 8 | \$20,000 | 8 | \$20,000 |
| Stafford | Substance Abuse Education | 15 | \$2,500 | 15 | \$2,500 |
| Stafford | Surveillance/Intensive Supervision | 120 | \$63,025 | 120 | \$63,025 |
| Stafford | Supervision Plan Services | 10 | \$6,585 | 10 | \$5,000 |
| Surry | Office on Youth | 150 | \$6,860 | 150 | \$6,860 |
| Surry | Supervision Plan Services | 10 | \$6,000 | 10 | \$6,000 |
| Tidewater Youth | Shelter Care and Less Secure | 200 | \$567,929 | 200 | \$567,929 |
| Tidewater Youth | Shelter Care and Less Secure | 68 | \$191,825 | 68 | \$191,825 |
| Tidewater Youth | Shelter Care and Less Secure | 157 | \$444,395 | 157 | \$444,395 |
| Tidewater Youth | Life Skills | 9 | \$11,400 | 9 | \$11,400 |
| Tidewater Youth | Outreach Detention/Electronic | 304 | \$410,189 | 304 | \$410,189 |
| Tidewater Youth | Outreach Detention/Electronic | 235 | \$63,633 | 235 | \$63,633 |
| Tidewater Youth | Substance Abuse Treatment | 122 | \$252,513 | 122 | \$252,513 |
| Tidewater Youth | Pro-Social Skills | 14 | \$17,500 | 14 | \$17,500 |
| Tidewater Youth | Restitution/Restorative Justice | 340 | \$145,854 | 340 | \$145,854 |
| Tidewater Youth | Individual, Group, Family | 20 | \$38,486 | 20 | \$38,486 |
| Tidewater Youth | Community Service | 143 | \$28,462 | 143 | \$28,462 |
| Tidewater Youth | Substance Abuse Assessment | 36 | \$8,294 | 36 | \$8,294 |
| Tidewater Youth | Sex Offender Assessment | 10 | \$5,625 | 10 | \$5,625 |
| Tidewater Youth | Sex Offender Treatment | 18 | \$34,870 | 18 | \$34,870 |
| Tidewater Youth | Home-Based, In-Home Services | 29 | \$47,669 | 29 | \$47,669 |
| Tidewater Youth | Individual, Group, Family | 9 | \$15,000 | 9 | \$15,000 |
| Tidewater Youth | Parenting Skills | 48 | \$63,154 | 48 | \$63,154 |

FY 2015-2016 VJCCA Plan Detail

| Locality | Program Type | Year 1 Youth | Year 1 Budget | Year 2 Youth | Year 2 Budget |
|-------------------------|------------------------------------|--------------|---------------|--------------|---------------|
| Tidewater Youth | Pro-Social Skills | 0 | \$0 | 0 | \$0 |
| Warren | Surveillance/Intensive Supervision | 25 | \$36,630 | 15 | \$36,630 |
| Washington, Bristol | Community Service | 300 | \$80,689 | 300 | \$80,689 |
| Washington, Bristol | Outreach Detention/Electronic | 150 | \$360,767 | 150 | \$360,767 |
| Wavnesboro, Augusta | Office on Youth | 0 | \$10,910 | 0 | \$10,910 |
| Wavnesboro, Augusta | Shoplifting Programs and larceny | 25 | \$1,500 | 25 | \$1,500 |
| Wavnesboro, Augusta | Outreach Detention/Electronic | 18 | \$6,200 | 18 | \$6,200 |
| Wavnesboro, Augusta | Surveillance/Intensive Supervision | 70 | \$10,800 | 70 | \$10,800 |
| Wavnesboro, Augusta | Employment/Vocational | 28 | \$20,000 | 28 | \$20,000 |
| Wavnesboro, Augusta | Surveillance/Intensive Supervision | 10 | \$4,500 | 10 | \$4,500 |
| Wavnesboro, Augusta | Mental Health Assessments | 7 | \$3,000 | 7 | \$3,000 |
| Wavnesboro, Augusta | Community Service | 75 | \$24,000 | 75 | \$24,000 |
| Wavnesboro, Augusta | Individual, Group, Family | 15 | \$2,800 | 15 | \$2,800 |
| Wavnesboro, Augusta | Case Management | 175 | \$11,575 | 175 | \$11,575 |
| Wavnesboro, Augusta | Parenting Skills | 15 | \$3,200 | 15 | \$3,200 |
| Wavnesboro, Augusta | Life Skills | 20 | \$350 | 20 | \$350 |
| Wavnesboro, Augusta | Coordinator/Administrative | 0 | \$6,550 | 0 | \$6,550 |
| Wavnesboro, Augusta | Alternative Day Services and Day | 35 | \$12,000 | 35 | \$12,000 |
| Westmoreland, Essex | Substance Abuse Education | 15 | \$5,000 | 15 | \$5,000 |
| Westmoreland, Essex | Community Service | 80 | \$83,051 | 80 | \$83,051 |
| Westmoreland, Essex | Outreach Detention/Electronic | 35 | \$52,000 | 35 | \$52,000 |
| Westmoreland, Essex | Supervision Plan Services | 10 | \$14,215 | 10 | \$14,215 |
| Westmoreland, Essex | Life Skills | 19 | \$34,187 | 19 | \$34,187 |
| Westmoreland, Essex | Parenting Skills | 10 | \$10,000 | 10 | \$10,000 |
| Westmoreland, Essex | Life Skills | 25 | \$5,000 | 25 | \$5,000 |
| Wythe | Community Service | 95 | \$15,857 | 95 | \$50,507 |
| Wythe | Outreach Detention/Electronic | 13 | \$5,139 | 18 | \$8,196 |
| Wythe | Pro-Social Skills | 50 | \$12,160 | 3 | \$4,453 |
| York, Gloucester, James | Group Homes | 10 | \$245,685 | 10 | \$245,685 |
| York, Gloucester, James | Shelter Care and Less Secure | 15 | \$123,355 | 15 | \$123,355 |
| York, Gloucester, James | Surveillance/Intensive Supervision | 30 | \$53,440 | 30 | \$53,440 |
| York, Gloucester, James | Outreach Detention/Electronic | 28 | \$53,230 | 28 | \$53,230 |
| York, Gloucester, James | Community Service | 175 | \$88,274 | 175 | \$88,274 |
| York, Gloucester, James | Law Related Education | 175 | \$42,023 | 175 | \$42,023 |
| York, Gloucester, James | Law Related Education | 0 | \$0 | 0 | \$0 |
| York, Gloucester, James | Substance Abuse Assessment | 75 | \$23,059 | 75 | \$23,059 |
| York, Gloucester, James | Substance Abuse Education | 40 | \$23,236 | 40 | \$23,236 |
| York, Gloucester, James | Supervision Plan Services | 5 | \$2,000 | 5 | \$2,000 |
| York, Gloucester, James | Substance Abuse Assessment | 15 | \$2,650 | 15 | \$2,650 |

Summary of FY 2015 - FY 2016 VJCCCA Programs

Number of Youth Projected / Projected Budgets

| Program Type | 2015 Youth | 2015 Budget | 2016 Youth | 2016 Budget |
|--------------------------------------|-------------------|---------------------|-------------------|---------------------|
| Case Management | 879 | \$530,026 | 884 | \$536,107 |
| Community Service | 3171 | \$1,160,762 | 3155 | \$1,195,410 |
| Coordinator/Administrative | 0 | \$345,389 | 0 | \$345,650 |
| Employment/Vocational | 72 | \$91,120 | 72 | \$91,120 |
| Group Homes | 229 | \$6,285,796 | 202 | \$6,114,269 |
| Home-Based, In-Home Services | 186 | \$561,480 | 185 | \$585,173 |
| Individual, Group, Family Counseling | 105 | \$154,286 | 105 | \$154,286 |
| Law Related Education | 470 | \$90,308 | 470 | \$90,308 |
| Life Skills | 145 | \$103,396 | 145 | \$103,396 |
| Mental Health Assessments | 213 | \$69,260 | 168 | \$62,060 |
| Office on Youth | 150 | \$74,978 | 150 | \$74,978 |
| Outreach Detention/Electronic Monito | 4933 | \$6,984,018 | 4932 | \$7,028,773 |
| Parenting Skills | 186 | \$111,776 | 174 | \$111,776 |
| Pro-Social Skills | 1134 | \$399,817 | 1108 | \$389,625 |
| Restitution/Restorative Justice | 460 | \$170,308 | 460 | \$170,308 |
| Sex Offender Assessment | 14 | \$12,625 | 14 | \$12,625 |
| Sex Offender Treatment | 55 | \$92,410 | 55 | \$92,410 |
| Shoplifting Programs | 576 | \$74,282 | 522 | \$59,530 |
| Substance Abuse Assessment | 967 | \$122,686 | 939 | \$118,796 |
| Substance Abuse Education | 406 | \$110,932 | 406 | \$110,932 |
| Substance Abuse Treatment | 320 | \$360,489 | 310 | \$352,089 |
| Supervision Plan Services | 251 | \$271,805 | 261 | \$280,353 |
| Surveillance/Intensive Supervision | 927 | \$895,470 | 904 | \$895,470 |
| Shelter Care and Less Secure Detent | 1398 | \$4,958,070 | 1393 | \$4,958,070 |
| Alternative Day Services and Day Tre | 334 | \$862,122 | 334 | \$862,122 |
| Shoplifting Programs and larceny red | 25 | \$1,500 | 25 | \$1,500 |
| Grand Total | 17606 | \$24,895,110 | 17373 | \$24,797,136 |

**Summary of FY 2015 - FY 2016 VJCCCA Programs
Number of Programs by Type**

| Program Type | 2015 Programs | 2016 Programs |
|--|----------------------|----------------------|
| Case Management | 16 | 16 |
| Community Service | 35 | 35 |
| Coordinator/Administrative | 20 | 20 |
| Employment/Vocational | 4 | 4 |
| Group Homes | 12 | 11 |
| Home-Based, In-Home Services | 7 | 7 |
| Individual, Group, Family Counseling | 6 | 6 |
| Law Related Education | 5 | 5 |
| Life Skills | 8 | 8 |
| Mental Health Assessments | 5 | 5 |
| Office on Youth | 5 | 5 |
| Outreach Detention/Electronic Monitoring | 55 | 55 |
| Parenting Skills | 9 | 9 |
| Pro-Social Skills | 34 | 34 |
| Restitution/Restorative Justice | 7 | 7 |
| Sex Offender Assessment | 2 | 2 |
| Sex Offender Treatment | 5 | 5 |
| Shoplifting Programs | 5 | 5 |
| Substance Abuse Assessment | 17 | 17 |
| Substance Abuse Education | 12 | 12 |
| Substance Abuse Treatment | 9 | 9 |
| Supervision Plan Services | 35 | 35 |
| Surveillance/Intensive Supervision | 20 | 20 |
| Shelter Care and Less Secure Detention | 20 | 20 |
| Grand Total | 353 | 352 |

FY2015-FY2016 Funding Distribution

| Locality | FY2015 MOE | FY2015 State | FY2016 MOE | FY 2016 State | FIPS |
|-----------------|----------------|---------------|----------------|---------------|------|
| Accomack | \$0.00 | \$ 23,933.00 | \$0.00 | \$ 23,933.00 | 001 |
| Albemarle | \$52,231.00 | \$ 71,218.00 | \$52,231.00 | \$ 71,218.00 | 003 |
| Alleghany | \$3,617.00 | \$ 18,476.00 | \$3,617.00 | \$ 18,476.00 | 005 |
| Amelia | \$2,729.00 | \$ 9,913.00 | \$2,729.00 | \$ 9,913.00 | 007 |
| Amherst | \$28,233.00 | \$ 37,022.00 | \$28,233.00 | \$ 37,022.00 | 009 |
| Appomattox | \$332.00 | \$ 9,071.00 | \$332.00 | \$ 9,071.00 | 011 |
| Arlington | \$475,383.00 | \$ 270,059.00 | \$475,383.00 | \$ 270,059.00 | 013 |
| Augusta | \$0.00 | \$ 26,808.00 | \$0.00 | \$ 26,808.00 | 015 |
| Bath | \$0.00 | \$ 6,585.00 | \$0.00 | \$ 6,585.00 | 017 |
| Bedford County | \$14,190.00 | \$ 64,166.00 | \$14,190.00 | \$ 64,166.00 | 019 |
| Bland | \$0.00 | \$ 6,585.00 | \$0.00 | \$ 6,585.00 | 021 |
| Botetourt | \$3,300.00 | \$ 13,138.00 | \$3,300.00 | \$ 13,138.00 | 023 |
| Brunswick | \$635.00 | \$ 11,703.00 | \$635.00 | \$ 11,703.00 | 025 |
| Buchanan | \$809.00 | \$ 67,453.00 | \$809.00 | \$ 67,453.00 | 027 |
| Buckingham | \$287.00 | \$ 8,798.00 | \$287.00 | \$ 8,798.00 | 029 |
| Campbell | \$60,029.00 | \$ 53,024.00 | \$60,029.00 | \$ 53,024.00 | 031 |
| Caroline | \$8,460.00 | \$ 14,869.00 | \$8,460.00 | \$ 14,869.00 | 033 |
| Carroll | \$2,940.00 | \$ 18,929.00 | \$2,940.00 | \$ 18,929.00 | 035 |
| Charles City | \$9,400.00 | \$ 6,585.00 | \$9,400.00 | \$ 6,585.00 | 036 |
| Charlotte | \$268.00 | \$ 12,976.00 | \$268.00 | \$ 12,976.00 | 037 |
| Chesterfield | \$202,459.00 | \$ 668,292.00 | \$202,459.00 | \$ 668,292.00 | 041 |
| Clarke | \$0.00 | \$ 8,990.00 | \$0.00 | \$ 8,990.00 | 043 |
| Craig | \$0.00 | \$ 6,585.00 | \$0.00 | \$ 6,585.00 | 045 |
| Culpeper | \$1,119.00 | \$ 51,802.00 | \$1,119.00 | \$ 51,802.00 | 047 |
| Cumberland | \$0.00 | \$ 6,585.00 | \$0.00 | \$ 6,585.00 | 049 |
| Dickenson | \$2,739.00 | \$ 10,437.00 | \$2,739.00 | \$ 10,437.00 | 051 |
| Dinwiddie | \$9,014.00 | \$ 19,549.00 | \$9,014.00 | \$ 19,549.00 | 053 |
| Essex | \$4,885.00 | \$ 22,825.00 | \$4,885.00 | \$ 22,825.00 | 057 |
| Fairfax County | \$1,431,099.00 | \$ 600,996.00 | \$1,431,099.00 | \$ 600,996.00 | 059 |
| Fauquier | \$2,886.00 | \$ 36,836.00 | \$2,886.00 | \$ 36,836.00 | 061 |
| Floyd | \$0.00 | \$ 6,585.00 | \$0.00 | \$ 6,585.00 | 063 |
| Fluvanna | \$0.00 | \$ 6,585.00 | \$0.00 | \$ 6,585.00 | 065 |
| Franklin County | \$10,124.00 | \$ 21,332.00 | \$10,124.00 | \$ 21,332.00 | 067 |
| Frederick | \$0.00 | \$ 53,031.00 | \$0.00 | \$ 53,031.00 | 069 |
| Giles | \$385.00 | \$ 9,243.00 | \$385.00 | \$ 9,243.00 | 071 |
| Gloucester | \$57,125.00 | \$ 44,727.00 | \$57,125.00 | \$ 44,727.00 | 073 |
| Goochland | \$0.00 | \$ 6,585.00 | \$0.00 | \$ 6,585.00 | 075 |
| Grayson | \$0.00 | \$ 6,585.00 | \$0.00 | \$ 6,585.00 | 077 |
| Greene | \$0.00 | \$ 7,596.00 | \$0.00 | \$ 7,596.00 | 079 |
| Greensville | \$8,668.00 | \$ 6,585.00 | \$8,668.00 | \$ 6,585.00 | 081 |
| Halifax | \$10,476.00 | \$ 63,762.00 | \$10,476.00 | \$ 63,762.00 | 083 |
| Hanover | \$20,556.00 | \$ 81,243.00 | \$20,556.00 | \$ 81,243.00 | 085 |
| Henrico | \$209,620.00 | \$ 390,110.00 | \$209,620.00 | \$ 390,110.00 | 087 |
| Henry | \$34,009.00 | \$ 131,661.00 | \$34,009.00 | \$ 131,661.00 | 089 |
| Highland | \$0.00 | \$ 6,585.00 | \$0.00 | \$ 6,585.00 | 091 |
| Isle of Wight | \$10,716.00 | \$ 23,984.00 | \$10,716.00 | \$ 23,984.00 | 093 |
| James City | \$144,572.00 | \$ 91,512.00 | \$144,572.00 | \$ 91,512.00 | 095 |
| King & Queen | \$2,535.00 | \$ 9,336.00 | \$2,535.00 | \$ 9,336.00 | 097 |
| King George | \$1,040.00 | \$ 15,258.00 | \$1,040.00 | \$ 15,258.00 | 099 |
| King William | \$10,300.00 | \$ 6,951.00 | \$10,300.00 | \$ 6,951.00 | 101 |
| Lancaster | \$7,908.00 | \$ 20,530.00 | \$7,908.00 | \$ 20,530.00 | 103 |
| Lee | \$3,333.00 | \$ 27,260.00 | \$3,333.00 | \$ 27,260.00 | 105 |
| Loudoun | \$330,708.00 | \$ 145,706.00 | \$330,708.00 | \$ 145,706.00 | 107 |
| Louisa | \$1,028.00 | \$ 9,905.00 | \$1,028.00 | \$ 9,905.00 | 109 |

FY2015-FY2016 Funding Distribution

| Locality | FY2015 MOE | FY2015 State | FY2016 MOE | FY 2016 State | FIPS |
|------------------|--------------|---------------|--------------|---------------|------|
| Lunenburg | \$1,047.00 | \$ 13,270.00 | \$1,047.00 | \$ 13,270.00 | 111 |
| Madison | \$1,494.00 | \$ 6,585.00 | \$1,494.00 | \$ 6,585.00 | 113 |
| Mathews | \$10,651.00 | \$ 22,790.00 | \$10,651.00 | \$ 22,790.00 | 115 |
| Mecklenburg | \$1,349.00 | \$ 31,360.00 | \$1,349.00 | \$ 31,360.00 | 117 |
| Middlesex | \$3,241.00 | \$ 6,585.00 | \$3,241.00 | \$ 6,585.00 | 119 |
| Montgomery | \$179.00 | \$ 49,393.00 | \$179.00 | \$ 49,393.00 | 121 |
| Nelson | \$202.00 | \$ 10,364.00 | \$202.00 | \$ 10,364.00 | 125 |
| New Kent | \$14,391.00 | \$ 10,557.00 | \$14,391.00 | \$ 10,557.00 | 127 |
| Northampton | \$0.00 | \$ 12,336.00 | \$0.00 | \$ 12,336.00 | 131 |
| Northumberland | \$6,626.00 | \$ 29,083.00 | \$6,626.00 | \$ 29,083.00 | 133 |
| Nottoway | \$617.00 | \$ 19,399.00 | \$617.00 | \$ 19,399.00 | 135 |
| Orange | \$2,181.00 | \$ 21,728.00 | \$2,181.00 | \$ 21,728.00 | 137 |
| Page | \$0.00 | \$ 30,076.00 | \$0.00 | \$ 30,076.00 | 139 |
| Patrick | \$5,984.00 | \$ 25,241.00 | \$5,984.00 | \$ 25,241.00 | 141 |
| Pittsylvania | \$29,756.00 | \$ 41,765.00 | \$29,756.00 | \$ 41,765.00 | 143 |
| Powhatan | \$2,056.00 | \$ 8,468.00 | \$2,056.00 | \$ 8,468.00 | 145 |
| Prince Edward | \$0.00 | \$ 10,840.00 | \$0.00 | \$ 10,840.00 | 147 |
| Prince George | \$21,972.00 | \$ 52,775.00 | \$21,972.00 | \$ 52,775.00 | 149 |
| Prince William | \$509,171.00 | \$ 394,413.00 | \$509,171.00 | \$ 394,413.00 | 153 |
| Pulaski | \$0.00 | \$ 21,321.00 | \$0.00 | \$ 21,321.00 | 155 |
| Rappahannock | \$0.00 | \$ 9,673.00 | \$0.00 | \$ 9,673.00 | 157 |
| Richmond Cour | \$11,698.00 | \$ 10,751.00 | \$11,698.00 | \$ 10,751.00 | 159 |
| Roanoke Count | \$24,644.00 | \$ 179,982.00 | \$24,644.00 | \$ 179,982.00 | 161 |
| Rockbridge | \$0.00 | \$ 14,600.00 | \$0.00 | \$ 14,600.00 | 163 |
| Rockingham | \$0.00 | \$ 44,867.00 | \$0.00 | \$ 44,867.00 | 165 |
| Russell | \$411.00 | \$ 28,355.00 | \$411.00 | \$ 28,355.00 | 167 |
| Scott | \$35.00 | \$ 23,096.00 | \$35.00 | \$ 23,096.00 | 169 |
| Shenandoah | \$0.00 | \$ 31,204.00 | \$0.00 | \$ 31,204.00 | 171 |
| Smyth | \$4,392.00 | \$ 29,786.00 | \$4,392.00 | \$ 29,786.00 | 173 |
| Southampton | \$6,340.00 | \$ 10,485.00 | \$6,340.00 | \$ 10,485.00 | 175 |
| Spotsylvania | \$39,655.00 | \$ 84,641.00 | \$39,655.00 | \$ 84,641.00 | 177 |
| Stafford | \$37,265.00 | \$ 107,510.00 | \$37,265.00 | \$ 107,510.00 | 179 |
| Surry | \$6,275.00 | \$ 6,585.00 | \$6,275.00 | \$ 6,585.00 | 181 |
| Sussex | \$3,321.00 | \$ 6,585.00 | \$3,321.00 | \$ 6,585.00 | 183 |
| Tazewell | \$923.00 | \$ 46,689.00 | \$923.00 | \$ 46,689.00 | 185 |
| Warren | \$0.00 | \$ 36,630.00 | \$0.00 | \$ 36,630.00 | 187 |
| Washington | \$11,856.00 | \$ 34,727.00 | \$11,856.00 | \$ 34,727.00 | 191 |
| Westmoreland | \$30,339.00 | \$ 58,808.00 | \$30,339.00 | \$ 58,808.00 | 193 |
| Wise | \$6,815.00 | \$ 54,899.00 | \$6,815.00 | \$ 54,899.00 | 195 |
| Wythe | \$0.00 | \$ 33,156.00 | \$0.00 | \$ 33,156.00 | 197 |
| York | \$44,146.00 | \$ 54,684.00 | \$44,146.00 | \$ 54,684.00 | 199 |
| Alexandria | \$95,575.00 | \$ 185,026.00 | \$95,575.00 | \$ 185,026.00 | 510 |
| Bedford City | \$0.00 | \$ 6,585.00 | \$0.00 | \$ 6,585.00 | 515 |
| Bristol | \$9,828.00 | \$ 28,057.00 | \$9,828.00 | \$ 28,057.00 | 520 |
| Buena Vista | \$0.00 | \$ 11,657.00 | \$0.00 | \$ 11,657.00 | 530 |
| Charlottesville | \$108,415.00 | \$ 220,840.00 | \$108,415.00 | \$ 220,840.00 | 540 |
| Chesapeake | \$83,014.00 | \$ 246,857.00 | \$83,014.00 | \$ 246,857.00 | 550 |
| Colonial Heights | \$0.00 | \$ 69,080.00 | \$0.00 | \$ 69,080.00 | 570 |
| Covington | \$1,054.00 | \$ 7,575.00 | \$1,054.00 | \$ 7,575.00 | 580 |
| Danville | \$26,324.00 | \$ 86,999.00 | \$26,324.00 | \$ 86,999.00 | 590 |
| Emporia | \$8,917.00 | \$ 63,101.00 | \$8,917.00 | \$ 63,101.00 | 595 |
| Fairfax City | \$0.00 | \$ 12,378.00 | \$0.00 | \$ 12,378.00 | 600 |
| Falls Church | \$2,815.00 | \$ 120,679.00 | \$2,815.00 | \$ 120,679.00 | 610 |
| Franklin City | \$6,195.00 | \$ 15,521.00 | \$6,195.00 | \$ 15,521.00 | 620 |

FY2015-FY2016 Funding Distribution

| Locality | FY2015 MOE | FY2015 State | FY2016 MOE | FY 2016 State | FIPS |
|----------------|----------------|---------------|----------------|---------------|------|
| Fredericksburg | \$33,165.00 | \$ 54,975.00 | \$33,165.00 | \$ 54,975.00 | 630 |
| Galax | \$0.00 | \$ 13,363.00 | \$0.00 | \$ 13,363.00 | 640 |
| Hampton | \$110,724.00 | \$ 315,703.00 | \$110,724.00 | \$ 315,703.00 | 650 |
| Harrisonburg | \$0.00 | \$ 41,964.00 | \$0.00 | \$ 41,964.00 | 660 |
| Hopewell | \$42,913.00 | \$ 105,185.00 | \$42,913.00 | \$ 105,185.00 | 670 |
| Lexington | \$0.00 | \$ 6,608.00 | \$0.00 | \$ 6,608.00 | 678 |
| Lynchburg | \$147,370.00 | \$ 247,716.00 | \$147,370.00 | \$ 247,716.00 | 680 |
| Manassas | \$2,510.00 | \$ 59,873.00 | \$2,510.00 | \$ 59,873.00 | 683 |
| Manassas Park | \$0.00 | \$ 20,794.00 | \$0.00 | \$ 20,794.00 | 685 |
| Martinsville | \$22,756.00 | \$ 72,076.00 | \$22,756.00 | \$ 72,076.00 | 690 |
| Newport News | \$226,485.00 | \$ 339,437.00 | \$226,485.00 | \$ 339,437.00 | 700 |
| Norfolk | \$1,059,098.00 | \$ 639,899.00 | \$1,059,098.00 | \$ 639,899.00 | 710 |
| Norton | \$10.00 | \$ 12,062.00 | \$10.00 | \$ 12,062.00 | 720 |
| Petersburg | \$64,836.00 | \$ 84,000.00 | \$64,836.00 | \$ 84,000.00 | 730 |
| Poquoson | \$22,659.00 | \$ 10,295.00 | \$22,659.00 | \$ 10,295.00 | 735 |
| Portsmouth | \$45,877.00 | \$ 184,000.00 | \$45,877.00 | \$ 184,000.00 | 740 |
| Radford | \$0.00 | \$ 10,199.00 | \$0.00 | \$ 10,199.00 | 750 |
| Richmond City | \$459,084.00 | \$ 347,683.00 | \$459,084.00 | \$ 347,683.00 | 760 |
| Roanoke City | \$274,384.00 | \$ 394,210.00 | \$274,384.00 | \$ 394,210.00 | 770 |
| Salem | \$9,418.00 | \$ 52,851.00 | \$9,418.00 | \$ 52,851.00 | 775 |
| Staunton | \$0.00 | \$ 35,093.00 | \$0.00 | \$ 35,093.00 | 790 |
| Suffolk | \$57,855.00 | \$ 124,169.00 | \$57,855.00 | \$ 124,169.00 | 800 |
| Virginia Beach | \$662,505.00 | \$ 869,280.00 | \$662,505.00 | \$ 869,280.00 | 810 |
| Waynesboro | \$0.00 | \$ 55,484.00 | \$0.00 | \$ 55,484.00 | 820 |
| Williamsburg | \$31,908.00 | \$ 39,383.00 | \$31,908.00 | \$ 39,383.00 | 830 |
| Winchester | \$0.00 | \$ 66,337.00 | \$0.00 | \$ 66,337.00 | 840 |
| | \$7,634,873.00 | \$10,379,921 | \$7,634,873.00 | \$10,379,921 | |

Department of Juvenile Justice
Proposed Revisions to the Length of Stay Guidelines
Fiscal Impact Statement

GENERAL DISCUSSION

Purpose/Objective. The Board of Juvenile Justice (Board) is considering modifications to its “Guidelines for Determining the Length of Stay of Juveniles Indeterminately Committed to the Department of Juvenile Justice (Length of Stay Guidelines)” as amended by the Board on July 1, 2008.

Background-Statutory Authority and Mandated Solicitation of Public Comments. Except for juveniles committed as “serious juvenile offenders” under §16.1-285.1 of the *Code of Virginia*, commitments to the DJJ “shall be for an indeterminate period having regard to the welfare of the juvenile and interests of the public” (*Code of Virginia* § 16.1-285). Section 66-10 of the *Code of Virginia* gives the Board the authority to establish the LOS Guidelines for juveniles indeterminately committed to DJJ and the section requires the Board to make the guidelines available for public comment.

Purpose and Intent of the Proposed Revisions. The modifications are intended to update the Length of Stay Guidelines that were amended in 2008. DJJ is granted broad discretion to determine when a juvenile should be released, and the Board is directed to provide “guidelines” that the DJJ consults in making decisions concerning a resident’s length of stay and release. Broadly speaking, the role of the Board’s guidelines is to express the factors that should be weighed in deciding when to release an indeterminately committed juvenile. DJJ is responsible for applying these guidelines generally and for making exceptions with regard to the welfare of the juvenile and the interests of the public.

Impact of Current LOS Guidelines. The LOS Guidelines have not changed substantively since 1998¹ and, since then, have not served to improve outcomes for committed juveniles. Under the current guidelines, juveniles remain in direct care for an average of 18.2 months.² The average annual cost of confinement is \$137,000 per juvenile. Thus, it costs approximately \$207,000 for each juvenile commitment. Since 1998, the recidivism rate has not improved (the one-year post-release rearrest rate ranged from 46% to 53% and the three-year rearrest rate ranged from 75% to 78%).

Scope of Current Guidelines. The LOS Guidelines *only* apply to juveniles given an indeterminate commitment to DJJ. This population *does not* include juveniles committed as a serious offender (determinate commitment) or determinately sentenced to DJJ by a circuit court after being tried as an adult. For FYs 2012-2014: 18.3% of admissions were determinately committed.

Supporting Data. Data shows that reducing a juvenile’s length of stay will also reduce the juvenile’s likelihood to recidivate. When looking at a two-year release cohort of Virginia data, controlling for offense and YASI risk and protective factors, the following probabilities were identified (run independently):

¹ The LOS Guidelines were reviewed, with minor revisions in 2008. Notwithstanding those changes, the core structure of the LOS calculation has remained unchanged since 1998.

² 15.6 months for indeterminate commitments, and 29.8 months for determinate commitments.

- a 2% increase of rearrest within one year for every additional month of LOS;
- a 33% increase of rearrest within one year for every additional year of LOS;
- a 33% increase of rearrest within one year if the LOS were longer than 15 months; and
- a 44% higher rate of rearrest within one year for juveniles with LOSs longer than 15 months compared to juveniles with LOSs of 10 months or less.

In Virginia, juveniles with misdemeanor and non-person felonies have an increase in rearrest by 14.8% and 4.0%, respectively, when their LOS is over 12 months. In Virginia, juveniles with person felonies have a 5.2% lower rearrest rate when their LOS is over 12 months. Note: Juveniles with person felonies have much lower overall rearrests than those committed on other offenses.

Proposed Changes. The proposed revisions use data to balance public safety, personal accountability, and competency development for juveniles to become law-abiding citizens upon return to the community. The proposed revisions weigh the risk for rearrest, based on factors and offense severity to estimate the projected LOS (the current guidelines are based solely on offense severity). The proposed revisions incorporate seven primary LOS ranges, from 2-4 months to 9-15 months (the current guidelines have four primary categories, 3-6 months to 18-36 months, with the possibility of enhancement for chronicity). Under both, a juvenile may stay until the statutory release date (36 months or 21st birthday) based on behavior, adjustment, and progress in treatment.

FISCAL IMPACT

Does the Proposal Have a Fiscal Impact? Check all the following that apply to this proposal. If "no," go to Item 10.

No Fiscal Impact
 Expenditure Increase
 Expenditure Reduction
 Revenue Increase
 Revenue Reduction

Provide Detailed Breakout of the Fiscal Impact.

Fiscal Impact Estimates are: (Choose one: preliminary or final.) Preliminary.

Is a Budget Amendment Needed?

No. The Department has the authority to reinvest savings achieved through population reduction management.

Potential Cost Savings. Thirty-eight percent of the Department's General Fund Budget is used to confine less than 10% of the youth the Department serves, of whom 75% are rearrested within 3 years of release from a juvenile correctional center. The Department believes that the proposed length of stay guidelines will generate a cost savings by reducing the Department's average daily population.

Describe methodology for calculating the fiscal impact. The Department wants to safely lower the secure custody population by implementing new Length of Stay (LOS) Guidelines in FY2015. The Department is closing the Reception and Diagnostic Center (RDC) in FY2016.

Expediting and Streamlining the RDC Intake Process Will Produce Savings. The Department anticipates a net savings for local secure detention facilities as the number of days a

youth waits to be transferred to the Department will be shortened due to an expedited intake process at the time of commitment. Assembling the commitment packet currently takes about 20 days. During the assembly of the commitment package, the youth remains in a locally operated detention facility. By closing RDC and streamlining the intake process, the Department hopes to shave 1 to 4 days of a youth's stay in detention.

Once the commitment package is complete, the youth can be transported to the Department. On average, a youth waits 9 days to be transferred. The primary source of the delay in transferring youth to RDC is the capacity of RDC. Because the new intake process will be much quicker than the current RDC process, these delays will be much less frequent. The Department believes there is the potential to reduce the delay in the transfer or placement of the youth by 3 to 6 days on average. By reducing JCC utilization, the LOS policy will enable the Department to shift resources to increase the per diem. Lower-risk youth will be prioritized for placement in a Community Placement Program (CPP) or other JCC alternative, preferably one closer to the youth's home.

For youth placed in CPPs or other JCC alternatives, diagnostic assessments will be completed in those placements – youth will be housed at their regular contracted rate (much higher than \$50 per diem) and their health insurance will remain covered by the Department. Youth who will still be placed in a JCC will spend up to 14 days in a Central Admissions & Placements (CAP) unit within each juvenile correctional center, rather than the typical 30 days in RDC. Because of the shorter stays, and because lower-risk youth will not touch them at all, the effective capacity of these units will be greater than the current RDC, and therefore waits for an open bed should become brief and rare.

Lowering the JCC Population will Produce Savings. Under the current LOS Guidelines, the JCC population is expected to continue its downward trend. By July 1, 2017, the forecast for the JCC population under the current guidelines is 402. However, if the proposed revisions to the LOS Guidelines are approved and implemented on October 1, 2015, then the projected JCC population on July 1, 2017 will be 311. The forecast under the current LOS Guidelines plateaus around 400. The forecast under the proposed LOS Guidelines plateaus around 300. The difference in the population under the proposed LOS Guidelines will generate substantial savings.

No Fiscal Impact on Localities as a Result of Ongoing Decrease in JCC Population.

Localities will not feel any fiscal impact as a result of the declining State direct care population. Between FY 2005 and FY 2014, the JCC capacity fell by 455 beds (42%) and JCC average daily population (ADP) fell by 464 residents (44%). As a result, the Department closed 4 JCCs. In the last two budgets, the Department sustained significant cuts to its budget (\$26 million and 482 positions). Localities did not experience any budget reductions or staff reductions as a result of the current declining JCC population. Likewise, probation and parole ADP numbers, which services are the responsibility of the Department for the 32 state operated court services units, continue to decline as well, and localities have not experienced increases in any expenditures due to that declining caseload.

LOS Modifications will Allow for Reinvestment in Local Facilities and Programs. The Department wants to reinvest the savings generated by the declining JCC population in alternative placements, services, and assessments and create a statewide continuum of secure and

non-secure locally operated placements and services. As with the declining JCC population, the Detention ADP has decreased by 294 juveniles since FY 2005 (29%). Current capacity in locally operated secure detention facilities is under 50%. The Department wants to expand the CPP program by investing the savings generated by the declining JCC population by purchasing empty detention beds. The Department wants to create a similar partnership with localities for the purchase and use of empty group home beds.

Lowering the LOS Should Improve Recidivism Rates. Given that the data shows a strong correlation between the youth's LOS and recidivism, the cost-benefit analysis needs to take into account, not just its negative net impact on public safety costs, but also its impact on the safety and development of youth committed to the Department's care and its impact on Virginia taxpayers. In terms of youth well-being, the Department's data indicates that lower-risk youth tend to fare poorly in our JCCs and that youth with similar risk profiles who receive other interventions recidivate at lower rates than those who are placed in JCCs (especially those held in JCCs for longer periods of time). The Department therefore concludes that the impact on youth well-being of extended exposure to the JCCs must also be counted as a net cost of the current LOS policy. In terms of cost-effectiveness for taxpayers, placement in a JCC is among the most expensive interventions the Department can provide, and therefore it would only be a cost-effective way of preventing crime if it led to much lower recidivism. Because long stays in JCCs actually lead to higher recidivism, the Department concludes that the current LOS policy is not a cost-effective crime control strategy.

OTHER IMPACTS

Another State Implemented Similar Length of Stay Strategy that Resulted in Actual Savings. In Indiana, the Division of Youth Services calculated the impact of lengths of stay in their secure facilities on youth's recidivism rates when they returned to the community. The data showed that youth with a low risk of reoffending who were confined for longer periods of time were recidivating at a higher rate. In response, the agency worked with the courts to reduce the time these low-risk youth spent in a facility. In the three-year period that followed these reforms, the percentage of youth who were reincarcerated fell from 39 percent to 30.5 percent. In addition, the shortened lengths of stay have had a significant fiscal impact, accounting for approximately \$12 to \$15 million in savings annually. These efforts have also substantially lowered the overall correctional facilities' population, and the state estimates a 3-year cost avoidance of \$167 million because the number of youth returning to these facilities would have been even higher if the state had not reduced its recidivism rate.³

*Note that Indiana's recidivism rates in this statement cannot be compared to Virginia's rates due to differences in methodology.

CONCLUSION

³ National Reentry Resource Center (July 2014). *Measuring and Using Juvenile Recidivism Data to Inform Policy, Practice, and Resource Allocation*. Retrieved from <http://csgjusticecenter.org/wp-content/uploads/2014/07/Measuring-and-Using-Juvenile-Recidivism-Data-to-Inform-Policy-Practice-and-Resource-Allocation.pdf>

1. The Department anticipates a net savings for local secure detention facilities as the number of days a youth waits to be transferred to the Department will be shortened due to an expedited intake process at the time of commitment. In fact, modification to the LOS policy will likely result in greater state investment in local detention centers through the Community Placement Program.
2. The forecast under the current LOS Guidelines plateaus around 400. The forecast under the proposed LOS Guidelines plateaus around 300. The difference in the population under the proposed LOS Guidelines will generate substantial savings that can be reinvested locally.
3. Localities should not feel any fiscal impact as a result of the declining State direct care population. Localities have not experienced any budget reductions or staff reductions as a result of the current declining JCC population.
4. Modifications to the LOS policy will not add to local costs for probation and parole as those services are provided currently, and will continue to be provided, by the Department (with the exception of two localities).
5. The LOS modifications will not add to local service costs because those costs are already being assumed for young people on parole and are assumed primarily by the Department through its deployment of "294" funds and other existing education and Medicaid funding.
6. Probation and parole ADP numbers, which services are the responsibility of the Department for the 32 state operated court service units, continue to decline as well and localities have not experienced increases in any expenditures due to that declining caseload.
7. Given that the data shows a strong correlation between the youth's LOS and recidivism, the Department anticipates a net savings due to the potential decline in recidivism as experienced by Indiana.
8. The Department wants to reinvest the savings generated by the declining JCC population in alternative placements, services, and assessments. The Department wants to create a statewide continuum of secure and non-secure locally operated placements and services. The Department wants to expand the CPP program by investing the savings generated by the declining JCC population by purchasing empty detention beds. The Department wants to create a similar partnership with localities for the purchase and use of empty group home beds.



COMMONWEALTH OF VIRGINIA

Andrew K. Block, Jr.
Director

Department of Juvenile Justice

MEMORANDUM

TO: State Board of Juvenile Justice

FROM: The Department of Juvenile Justice

DATE: June 10, 2015

SUBJECT: Public Comments for the Proposed Length of Stay (LOS) Guidelines

I. Statutory Authority and Mandated Solicitation of Public Comments

Section 66-10 of the *Code of Virginia* gives the State Board of Juvenile Justice (Board) the authority to establish the LOS Guidelines for juveniles indeterminately committed to the Department of Juvenile Justice (DJJ), and the section requires the Board to make the guidelines available for public comment.

II. Public Comment

- A. As requested by the Board during its April meeting, the Department expanded its solicitation of public comments concerning the proposed revisions to the "Guidelines for Determining the Length of Stay of Juveniles Indeterminately Committed to the Department of Juvenile Justice (Length of Stay Guidelines)" as amended by the Board on July 1, 2008. The public comment period for the Length of Stay Guidelines, which closed on April 19, 2015, was reopened on May 1, 2015 and extended to June 26, 2015 in order to ensure ample time to comment.
- B. Per instructions of the Board, the Department specifically requested comment from victim's rights groups. The Department solicited comments from the Virginia Poverty Law Center, the Virginia Sexual and Domestic Violence Action Alliance, and the Virginia Anti-Violence Project.
- C. The Director presented an overview of the proposed revisions to the Length of Stay Guidelines to the Judicial Conference on April 30, 2015. The Director briefed the Department's Judicial Liaison Committee on the proposed revisions on May 1, 2015.
- D. On April 6, 2015, Department staff briefed the Virginia Commonwealth's Attorneys' Association's Executive Council (VACA) concerning the modifications to the Length of Stay

Guidelines. The Director will be meeting with VACA on June 10, 2015, to provide a more comprehensive presentation on the Department's overall transformation plan. In addition, Court Service Unit Directors were instructed to brief each of their jurisdictions' Commonwealth's Attorneys concerning the proposed revisions to the Length of Stay Guidelines.

- E. The Department is soliciting comments from the Virginia Association of Chiefs of Police and Virginia Sheriff's Association.
- F. The Department is currently preparing a fiscal analysis of any potential impact the revisions to the Length of Stay Guidelines may have upon localities.
- G. Below, please find a summary of the public comments submitted thus far along with copies of the comments that have been provided for your review below.

| Name | Support | | | Summary of Comments |
|---|---------|----|-------------|--|
| | Yes | No | No Position | |
| Colonel Thierry G. Dupuis, Chief of Police Chesterfield County Police Department June 8, 2015 | x | | | <p>The Chesterfield County Chief of Police supports "change that would help our youth to live a better life, and become better members of our community."</p> <p>In addition to providing the comment above the Chief of Police solicited comments from his staff. Please note: Names were not submitted with the comments. Below is a summary of the comments:</p> <ul style="list-style-type: none"> - Favor a shorter LOS for the smaller group that fall in the indeterminate commitments group. A better investment is reallocation of funds from the LOS to treatment or services that youth may respond to in a positive manner. - Unit and division commanders support efforts that focus on increasing preventive programs and treatment options for non-serious offenders as opposed to commitment. The proposed changes seem reasonable and worth considering. - Concerns are raised regarding the overall premise on which the proposed revisions are based. The premise is that the "effect" is a high recidivism rate, and the "cause" is long term incarceration, or length of stay. This is incongruent with numerous |

| | | | | |
|--|---|--|--|--|
| | | | | <p>studies that directly relate recidivism rates to quality of life issues. Statistics imply that regardless of LOS the recidivism rate will be about 75%. The data does not support the proposed solution. A better solution would be to focus on the quality of life and environmental issues for these juveniles (1) before they become justice involved, and (2) after release from a facility if they have become justice involved.</p> <ul style="list-style-type: none"> - While it may not appear “tough on crime” from a political standpoint, I believe that end results are what is most important and if the incarceration practices are not working, I support making some changes like these to see if there is a positive result. Follow up research of the numbers should be conducted several years out, however, to see if these changes actually impacted the recidivist rate in a positive way. There are many variables that play into whether a juvenile commits more crime or not. |
| <p>Jana D. Carter, Director of Juvenile Services Chesterfield County</p> <p>June 2, 2015</p> | x | | | <p>Chesterfield County’s Director of Juvenile Services supports the proposed changes and believes the proposed guidelines are grounded in best practices and have been vetted through the appropriate stakeholders.</p> |
| <p>Mr. Kevin G. Bohm</p> <p>May 26, 2015</p> | x | | | <p>Mr. Bohm believes the current LOS guidelines can keep kids locked up long after any rehabilitation value is over and is counter-productive to positive reentry to the community. He states, “The proposed changes are a needed improvement.”</p> |
| <p>Eileen Grey, Virginia CURE</p> <p>May 26, 2015</p> | x | | | <p>Virginia CURE supports the draft LOS Guidelines. The draft revised LOS Guidelines provide a positive update to Virginia’s juvenile justice policy with regard to management and rehabilitation of adolescents committed to DJJ. The draft LOS Guidelines provide for a more equitable treatment of adolescents within the Commonwealth of Virginia as well as nationally. It is appropriate and timely for Virginia to adopt these best practices. In the life of an adolescent, an extra year or even half a year in incarceration</p> |

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| | | | | produces extremely limited returns. The use of validated risk assessment tools should reduce the longest lengths of stay and/or add the opportunity for the DJJ Director to review the cases of adolescents with longer calculated lengths of stay. After an adolescent in the care of DJJ with an indeterminate sentence has successfully completed a period of incarceration including completion of rehabilitation and/or therapeutic programs, the primary goal should be to rapidly transition the youth back to family and community |
| Mr. John F. Bohm May 26, 2015 | x | | | Mr. Bohm states, The revised LOS Guidelines (now in draft) update Virginia's juvenile justice policies in a positive manner with specific regard to management and rehabilitation of adolescents. Longer stays mandated by Virginia's current LOS Guidelines also can result in counter-productive actions and longer confinement in secure facilities which simply add cost; costs that are in turn shouldered by citizens of the Commonwealth. Use of a validated risk assessment will help to reduce extended periods of incarceration. After an adolescent with an indeterminate sentence has successfully completed a period of incarceration, the primary goal should be to rapidly transition young people back to family and community. |
| Richard J. Bonnie, Professor University of Virginia School of Law May 7, 2015 | x | | | Mr. Bonnie supports the adoption of the proposed LOS guidelines because they are in line with the developmental approach to juvenile justice. Mr. Bonnie believes the ten guiding principles listed in his letter are relevant and the Board should consider them while revising the LOS guidelines. Many of Virginia's current practices are not compatible with the listed guiding principles. |
| Frank LaRuffa, Deputy Commonwealth's Attorney Chesterfield County May 6, 2015 | | | x | Deputy Commonwealth's Attorney for Chesterfield County states merely warehousing children without meaningful services being provided to correct behavior is merely delaying their continued criminal behavior. Research shows that after nine months of incarceration any progress made starts to erode. From a public safety standpoint there are cases where removal from society is necessary, but for the majority of cases, reintegrating into society a corrected child |

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| | | | <p>outweighs a few extra months of warehousing.</p> <p>Mr. LaRuffa hopes that any movement toward revamping the guidelines for determining length of stay will include best practice implementation of services that will correct behavior and reintegration will be based on the length of time it will take to provide those corrective services.</p> |
| <p>C. Phillips Ferguson, Suffolk Commonwealth's Attorney City of Suffolk</p> <p>May 5, 2015</p> | | <p>x</p> | <p>The Suffolk Commonwealth's Attorney opposes the proposed LOS guidelines and states the following: Under the 2015 proposed LOS guidelines, there is little to no ability for the juvenile offender to meaningfully successfully complete any of Aggression Management, Substance Abuse, or Sex Offender Treatment programs within the proposed low end of 2-4 months for Risk Level A (low or moderate on the YASI) juveniles, 3-6 months for Risk Level B (high on the YASI) juveniles, 5-8 months for Risk Level C (high on the YASI and dynamic risk score of less than very high) juveniles, and 6-9 for Risk Level D (high on the YASI and dynamic risk score of very high) juveniles.</p> <p>Decreasing the LOS is not a solution to the environmental problems that contributed to the juvenile's criminal behavior which includes everything from socio-economic factors, educational issues, community issues, and parenting skill sets. All of these factors—at least while the juvenile offender is at DJJ—are addressed. The juvenile offender is not truant, is receiving an education, and has a structured environment providing basic sustenance. Finally, the proposed 2015 LOS guidelines would make a sixty-day review meaningless given that an indeterminate stay at DJJ could, effectively, be less than a sixty-day review. This would seemingly cause an absurdity under the proposed LOS guidelines.</p> <p>If, as proposed under the 2015 LOS guidelines, the LOS is changed to about ¼ of the current LOS standards, then it takes <u>away</u> the ability of DJJ to meaningfully impact and rehabilitate the</p> |

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| | | | | juvenile offender. The current LOS guidelines that have been in effect for approximately twenty (20) years should stay in effect. |
| Colleen Miller, Executive Director disAbility Law Center of Virginia April 19, 2015 | x | | | The disAbility Law Center of Virginia strongly supports the proposed changes to the LOS guidelines because Virginia's average LOS is above the national average, it does not curb recidivism, nor does it improve outcomes for youth. Longer lengths of stay are ineffective, costly, and the majority of indeterminately committed youth have not committed a violent felony. Additionally, longer lengths of stay in juvenile correctional centers negatively impact family engagement for youth who are far from home. |
| Kate Duvall, Jeree Thomas JustChildren Legal Aid Justice Center April 18, 2015 | x | | | JustChildren strongly supports the proposed revisions because the current LOS guidelines are out of step with the rest of the nation and they do not reduce recidivism. The proposed guidelines will reduce the amount of time that youth are away from their families, which will assist in their re-entry. |
| Sarah Bryer, Director National Juvenile Justice Network April 17, 2015 | x | | | The National Juvenile Justice Network strongly supports the proposed changes because Virginia's average LOS is out of step with the rest of the nation, it does not curb recidivism, nor does it improve outcomes for youth. Longer lengths of stay are ineffective, costly, and the majority of indeterminately committed youth have not committed a violent felony. |
| John R. Morgan, Ph.D. Independent Public Policy Research April 17, 2015 | x | | | Independent Public Policy Research strongly endorses the proposed revisions stating, "several revisions are strongly supported by juvenile justice and youth development research and by emerging best practice standards." Independent Public Policy Research supports reducing the maximum late release term from 36 to 15 months, use of validated risk assessment instruments to assign early and late release dates, and more frequent case reviews. |
| Amy L. Woolard, Senior Policy Attorney Voices for Virginia's Children | x | | | Voices for Virginia's Children strongly supports the proposed revisions stating, "Family engagement and strong ties to community are critical components of ensuring juvenile |

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| April 17, 2015 | | | | offenders become law-abiding community members and preventing recidivism.” The revisions support this approach. Additionally, Voices for Virginia’s Children recommends that a family- and community-focused approach is more appropriate for a significant percentage of juvenile offenders requiring mental health care. |
| Claire Guthrie Gastanaga American Civil Liberties Union of Virginia April 17, 2015 | x | | | The American Civil Liberties Union of Virginia strongly supports the proposed changes to the LOS guidelines because Virginia’s average LOS is above the national average, it does not curb recidivism, nor does it improve outcomes for youth. Longer lengths of stay are ineffective, costly, and the majority of indeterminately committed youth have not committed a violent felony. Additionally, longer lengths of stay in juvenile correctional centers negatively impact family engagement for youth who are far from home. |
| Ms. Joeann Wright April 16, 2015 | | | x | Ms. Wright shares her experience as a grandparent to a committed juvenile. She would like the juvenile centers to be “more understanding of the need of families, especially since the youth in the system are at their most emotional and critical stage of their lives.” Ms. Wright does not state a position of support or opposition to the LOS Guidelines. |
| Mike Morton, President Court Service Unit Director’s Association April 15, 2015 | x | | | The Court Service Unit Director’s Association supports the proposed LOS guidelines. The Association would welcome an opportunity to discuss with Director Block the impact of the changes on the court service unit operations. |
| Ms. Karen Sale April 9, 2015 | x | | | Ms. Sale supports the assessments and recommendations of the professionals in the field. She would like the Board to consider putting juveniles to “good, hard, back-breaking work.” |

Peterson-Wilson, Barbara (DJJ)

From: Van Cuyk, Janet P. (DJJ)
Sent: Monday, June 08, 2015 10:43 AM
To: Peterson-Wilson, Barbara (DJJ)
Subject: FW: DJJ proposed revisions to "Length of Stay"

From: Nankervis, James P. (DJJ)
Sent: Monday, June 08, 2015 10:10 AM
To: Van Cuyk, Janet P. (DJJ)
Subject: FW: DJJ proposed revisions to "Length of Stay"

Not sure if this helps. It appears to kind of agree....

James P. Nankervis, Director
12th District Court Service Unit
Chesterfield/ Colonial Heights
(804)751-4127 office
(804)748-7915 fax

From: Dupuis, Thierry [<mailto:DupuisT@chesterfield.gov>]
Sent: Monday, June 08, 2015 9:54 AM
To: 'townhall@virginia.gov'
Cc: Nankervis, James P. (DJJ)
Subject: DJJ proposed revisions to "Length of Stay"

I have requested comments from my staff on this matter, and I have attached the comments received below.

I support change that would help our youth to live a better life, and become better members of our community.

Colonel Thierry G. Dupuis, MBA
Chief of Police
Chesterfield County Police Department
P.O. Box 148
Chesterfield, Virginia 23832
Office 804-748-1266 : Fax 804-748-6265
dupuist@chesterfield.gov

Comments:

I would be in favor of a shorter length of stay regarding the smaller group of those that fall in the indeterminate commitments group. The better investment in my opinion is the reallocation of funds from the length of stay to treatment or services that the youth may respond to in a positive manner. Based on a review of the attached information and discussing the proposed changes with my unit and division commanders, I/we support efforts that focus on increasing preventative programs and treatment options for non-serious youth offenders as opposed to commitment to DJJ. With that said, the proposed changes seem reasonable based on the information provided and will not impact serious offender's commitment according Director Nankervis. I believe the proposed changes are worth considering and could potentially have a positive impact on certain youth offender recidivism

rates as well as reduce commitment costs. Based on the above, I would be in favor of supporting the changes.

Makes a lot of sense to me. Jim's personal comments carry a lot of impact for me as well.

I have concerns regarding the overall premise on which these proposed revisions are based. In my opinion, they are positing a theory based on a pseudo-correlation that simply does not exist. In other words, their premise is that the "effect" is a high recidivism rate, and the "cause" is long term incarceration, or length of stay. This is incongruent with numerous studies that directly relate recidivism rates to quality of life issues. (This article summarizes the general results of those studies nicely <http://www.prainc.com/quality-of-life-and-recidivism-risk/>).

"The youth who return to us from the juvenile correctional centers often return as better criminals," implying that longer LOS results in effectually a training program for enhanced prowess and skill in criminal activity upon release. Training, whether positive or negative in nature, can only be effective if the individual being trained is receptive to that training. Proximity to the availability of training, or in this case, more skilled criminals, would not impact an individual who did not wish to continue to engage in criminality in the first place.

Finally, the document compares Virginia LOS data (average 9.1 months) with six other comparable states (average 8.4 months), "Currently, Virginia's length of stays for committed youth is about twice the national average." However, no data regarding the recidivism rates of these other six states is provided. The national average for recidivism (according to the Bureau for Justice Statistics) has increased from 67.5% in 1994 to 75% in 2005, and Virginia rates are reported at 75% to 78%. Therefore, the statistics imply that regardless of the LOS, the recidivism rate will be about 75%.

In my opinion, the data does not support the proposed solution. A better solution would be to focus on the quality of life and environmental issues for these juveniles (1) before they become justice involved, and (2) after release from a facility if they have become justice involved. Before justice involvement would include giving at risk children viable alternatives to immersion in a negative environment. These may include after school programs, youth groups, life skill programs, and so forth. Essentially, this would involve expanding their access to positive role models at a young age (beginning in elementary school) so that their models for behavior are not criminals. When a juvenile does become justice involved, the approach toward their rehabilitation should be a holistic one, in that the youth's family should be heavily involved in the process which may include mandatory counseling or parenting classes. Teaching children life skills in a detention facility setting and then sending them home to the very environment that promulgated their justice involvement in the first place is counterintuitive. The rehabilitation process should include putting them in the best position for success after release by engaging the entire family and maybe even community as partners in the child's success.

Personally, I am more agreeable to alternative sentencing programs and lower guidelines for certain types of offenses (not violent) when the arrested is a juvenile than an adult. I feel that some juveniles do still possess the ability to be rehabilitated and made into a productive member of the community, whereas, adults have the behavior more ingrained and are less likely to change. I agree with the report in that the longer they are committed to DJJ, the better criminal they are when they come out – many of us have witnessed this first hand over the years. The recidivist rate is also hard to argue with. While it may not appear "tough on crime" from a political standpoint, I believe that end results are what is most important and if the incarceration practices are not working, I support making some changes like these to see if there is a positive result. Follow up research of the numbers should be

conducted several years out however, to see if these changes actually impacted the recidivist rate in a positive way. There are many variables that play into whether a juvenile commits more crime or not.

Peterson-Wilson, Barbara (DJJ)

From: Kevin Bohm [kbsale350@gmail.com]
Sent: Tuesday, May 26, 2015 3:56 PM
To: Peterson-Wilson, Barbara (DJJ)
Subject: LOS Policy Changes

Hi Barbara,

I am writing to you concerning the proposed Length of Stay Guidelines. These are a needed improvement. That the current LOS guidelines can keep kids locked up long after any rehabilitation value is over and is counter-productive to positive reentry to the community.

Please adopt the proposed Length of Stay Guidelines.

Thank you.

--
Kevin G. Bohm

8 W Oak Street
Alexandria, VA 22301
May 26, 2015

Board of Juvenile Justice
Virginia Department of Juvenile Justice
Richmond, Virginia
Via email to Barbara Peterson-Wilson

Dear Honorable Board Members:

Subject: Support for Draft Length of Stay Guidelines

On behalf of Virginia CURE and myself, I would like to thank the Board and staff of the Virginia Department of Juvenile Justice (DJJ) for producing and reviewing the important new draft Length of Stay (LOS) guidelines. Virginia CURE is a 25+ year non-profit all-volunteer organization that supports prisoners, offenders and their families through advocacy. I am on the Virginia CURE Board, was a member of the Juvenile committee of Governor McDonnell's Virginia Prisoner and Juvenile Offender Re-Entry Council and also served on Virginia's Advisory Council on Juvenile Justice for eight years (ending June 2013).

The draft revised LOS Guidelines provide a positive update to Virginia's juvenile justice policy with regard to management and rehabilitation of adolescents committed to DJJ. Research shows that the longer an adolescent is in institutional care, the harder it is for him or her to make a successful transition to life in the community. The longer stays mandated by the current LOS Guidelines can result in counter-productive, longer confinement in secure facilities which also costs the public more money. The draft LOS Guidelines will include the use of validated risk assessment tools like the YASI and should reduce the longest lengths of stay and/or add the opportunity for the DJJ Director to review the cases of adolescents with longer calculated lengths of stay. After an adolescent in the care of DJJ with an indeterminate sentence has successfully completed a period of incarceration including completion of rehabilitation and/or therapeutic programs, the primary goal should be to rapidly transition the youth back to family and community.

The draft LOS Guidelines provide for a more equitable treatment of adolescents within the Commonwealth of Virginia as well as nationally. Juvenile justice policies in many other states have been revised to incorporate best practices from research. It is appropriate and timely for Virginia to adopt these best practices. In the life of an adolescent, an extra year or even half a year in incarceration produces extremely limited returns.

Thank you for considering my comments and I urge the Board to adopt the draft LOS Guidelines.

Sincerely,

Eileen Grey

Peterson-Wilson, Barbara (DJJ)

From: Carter, Jana [CarterJ@chesterfield.gov]
Sent: Tuesday, June 02, 2015 3:32 PM
To: Peterson-Wilson, Barbara (DJJ)
Subject: Proposed changes to length-of-commitment determination

Good afternoon.

I am writing in support of the proposed changes to DJJ's policy for determining length-of-stay for committed juveniles. I believe the proposed guidelines are grounded in best practices and have been vetted through the appropriate stakeholders.

Please let me know if you have questions about my comments.

Thank you.

Jana D. Carter

Jana D. Carter
Director of Juvenile Services
Chesterfield County
P. O. Box 40
9700 Krause Road
Chesterfield, VA 23832

carterj@chesterfield.gov

Phone 804-796-7100

Fax 804-748-1099

Peterson-Wilson, Barbara (DJJ)

From: Eileen Grey [egrey1@verizon.net]
Sent: Tuesday, May 26, 2015 4:51 PM
To: Peterson-Wilson, Barbara (DJJ)
Subject: Comments for DJJ Board re Length of Stay Guidelines
Attachments: VA DJJ Board - LOS Guidelines comments 5 26 15.doc

Dear Ms. Peterson-Wilson -
Please accept these comments in support of the proposed Length of Stay Guidelines being considered by the DJJ Board at their next meeting.
My comments are in letter format attached, and copied into this email message below.
Thank you.
Eileen Grey

+++++

Dear Honorable Board Members:

Subject: Support for Draft Length of Stay Guidelines

On behalf of Virginia CURE and myself, I would like to thank the Board and staff of the Virginia Department of Juvenile Justice (DJJ) for producing and reviewing the important new draft Length of Stay (LOS) guidelines. Virginia CURE is a 25+ year non-profit all-volunteer organization that supports prisoners, offenders and their families through advocacy. I am on the Virginia CURE Board, was a member of the Juvenile committee of Governor McDonnell's Virginia Prisoner and Juvenile Offender Re-Entry Council and also served on Virginia's Advisory Council on Juvenile Justice for eight years (ending June 2013).

The draft revised LOS Guidelines provide a positive update to Virginia's juvenile justice policy with regard to management and rehabilitation of adolescents committed to DJJ. Research shows that the longer an adolescent is in institutional care, the harder it is for him or her to make a successful transition to life in the community. The longer stays mandated by the current LOS Guidelines can result in counter-productive, longer confinement in secure facilities which also costs the public more money. The draft LOS Guidelines will include the use of validated risk assessment tools like the YASI and should reduce the longest lengths of stay and/or add the opportunity for the DJJ Director to review the cases of adolescents with longer calculated lengths of stay. After an adolescent in the care of DJJ with an indeterminate sentence has successfully completed a period of incarceration including completion of rehabilitation and/or therapeutic programs, the primary goal should be to rapidly transition the youth back to family and community.

The draft LOS Guidelines provide for a more equitable treatment of adolescents within the Commonwealth of Virginia as well as nationally. Juvenile justice policies in many other states have been revised to incorporate best practices from research. It is appropriate and timely for Virginia to adopt these best practices. In the life of an adolescent, an extra year or even half a year in incarceration produces extremely limited returns.

Thank you for considering my comments and I urge the Board to adopt the draft LOS Guidelines.

Sincerely,
Eileen Grey

Peterson-Wilson, Barbara (DJJ)

From: John Bohm [JBohm@nahro.org]
Sent: Tuesday, May 26, 2015 5:55 PM
To: Peterson-Wilson, Barbara (DJJ)
Subject: Draft LOS Guidelines

8 W Oak Street
Alexandria, VA 22301

Subject: Support for Draft Length of Stay Guidelines

I would like to thank the Board and staff of the Virginia Department of Juvenile Justice (DJJ) for producing and reviewing new Length of Stay (LOS) guidelines. The revised LOS Guidelines (now in draft) update Virginia's juvenile justice policies in a positive manner with specific regard to management and rehabilitation of adolescents.

Research shows that the longer an adolescent is in institutional care, the harder it is for him or her to successfully transition/return to life in the community. Longer stays mandated by Virginia's current LOS Guidelines also can result in counter-productive actions and longer confinement in secure facilities which simply add cost; costs that are in turn shouldered by citizens of the Commonwealth.

I am pleased to know that the draft LOS Guidelines will include the use of validated risk assessment tools like the YASI that should otherwise help to reduce extended periods of incarceration by juvenile offenders. After an adolescent with an indeterminate sentence has successfully completed a period of incarceration; the primary goal in my opinion should be to rapidly transition (young people in particular) back to family and community.

Finally, the draft guidelines in my opinion provide for a more equitable treatment of adolescents. Juvenile justice policies in many other states have been revised to incorporate best practices. It is time for Virginia to also adopt these best practices.

Thank you for considering my comments. I urge the Board to adopt the draft LOS Guidelines.

Sincerely,

John F. Bohm



UNIVERSITY OF VIRGINIA SCHOOL OF LAW

Richard J. Bonnie
Harrison Foundation Professor of Medicine and Law
Professor of Public Policy
Professor of Psychiatry and Neurobehavioral Sciences
Director of Institute of Law, Psychiatry and Public Policy

RECEIVED

MAY 12 2015

Director's Office

May 7, 2015

Heidi W. Abbott, Chair
Virginia Board of Juvenile Justice
600 East Main Street
Richmond, Virginia 23219

Re: Proposed Length of Stay Guidelines

Dear Chairwoman Abbott and Members of the Board of Juvenile Justice:

I am writing to encourage the adoption of the Department of Juvenile Justice's (DJJ) proposed length of stay (LOS) guidelines because they are in line with a developmental approach to juvenile justice.

From 2011-2013, I co-chaired a committee for the National Research Council of the National Academies charged with "assessing juvenile justice reform." The committee reviewed the history of juvenile justice policymaking and carefully examined a growing scientific literature on adolescent development and on the effects of interventions aiming to reduce adolescent offending. Our research confirmed that a developmental approach to juvenile justice is the most effective way to support our youth as they mature and to protect our communities. The committee's report, *Reforming Juvenile Justice: A Developmental Approach*, was released in 2013. It stated that:

If designed and implemented in a developmentally informed way, procedures for holding adolescents accountable for their offending, and the services provided to them, can promote positive legal socialization, reinforce a prosocial identity, and reduce reoffending. However, if the goals, design, and operation of the juvenile justice system are not informed by this growing body of knowledge, the outcome is likely to be negative interactions between youth and justice system officials, increased disrespect for the law and legal authority, and the reinforcement of a deviant identity and social disaffection.

Id. at R8.

The NRC committee also formulated guiding principles for juvenile justice systems focusing on the three key aims of juvenile justice -- promoting accountability, preventing reoffending, and assuring fairness. Based on our research, these guiding principles provide the

Heidi W. Abbott, Chair
May 7, 2015
Page 2

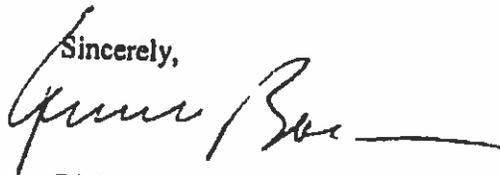
foundation on which a successful juvenile justice system can be built. The following guiding principles are particularly relevant as you consider revising the LOS guidelines:

- Use the justice system to communicate the message that society expects youths to take responsibility for their actions and the foreseeable consequences of their actions.
- Facilitate constructive involvement of family members in the proceedings to assist youths to accept responsibility and carry out the obligations set by the court.
- Use confinement sparingly and only when needed to respond to and prevent serious reoffending.
- Use structured risk and need assessment instruments to identify low-risk youths who can be handled less formally in community-based settings, to match youths with specialized treatment, and to target more intensive and expensive interventions toward high-risk youths.
- Use clearly specified interventions rooted in knowledge about adolescent development and tailored to the particular adolescent's needs and social environment.
- Eliminate interventions that rigorous evaluation research has shown to be ineffective or harmful.
- Keep accurate data on the type and intensity of interventions provided and the results achieved.
- Intensify efforts to reduce racial and ethnic disparities, as well as other patterns of unequal treatment, in the administration of juvenile justice.
- Ensure that youths perceive that they have been treated fairly and with dignity.
- Establish and implement evidence-based measures for fairness based on both legal criteria and perceptions of youths, families, and other participants.

Many of Virginia's current practices are not compatible with these guiding principles. Not only do the proposed revisions to the LOS guidelines bring Virginia more in line with the rest of the country, but they also ground Virginia's juvenile justice system in a strong body of scientific evidence and in best practices. I urge you to move Virginia's juvenile justice system in the right direction by adopting the proposed revisions.

Thank you for the opportunity to comment on the proposed LOS guidelines. Please do not hesitate to contact me with any questions you may have.

Sincerely,



Richard J. Bonnie

Peterson-Wilson, Barbara (DJJ)

From: LaRuffa, Frank [LaRuffaF@chesterfield.gov]
Sent: Wednesday, May 06, 2015 10:37 AM
To: Peterson-Wilson, Barbara (DJJ)
Subject: DJJ length of stay comment

I am a Deputy Commonwealth's Attorney in Chesterfield. My assignment is in juvenile and domestic relations court. I have been practicing law in the Commonwealth for nearly 24 years. I worked as a public defender in Richmond City for 9 years and for the remainder of my career I have been a commonwealth attorney. About 1/3 of the 24 years has been spent assigned to juvenile and domestic relations courts.

With that background I offer the following observations...merely warehousing children without meaningful services being provided to correct behavior is merely delaying their continued criminal behavior. Further, I am advised that research shows that after nine months of incarceration any progress made starts to erode. From a public safety standpoint there are cases where removal from society is necessary, but for the majority of cases, reintegrating into society a corrected child in my mind outweighs a few extra months of warehousing.

I hope any movement toward revamping the guidelines for determining length of stay will include best practice implementation of services that will correct behavior and reintegration will be based on the length of time it will take to provide those corrective services.

Thank you,

Frank LaRuffa
Deputy Commonwealth's Attorney
Chesterfield County



OFFICE OF THE COMMONWEALTH'S ATTORNEY

City of Suffolk

Godwin Courts Building

150 North Main Street

Suffolk, Virginia 23434-4552



COMMONWEALTH'S ATTORNEY
C. PHILIP FERGUSON

DEPUTY COMMONWEALTH'S ATTORNEYS
MATTHEW A. GLASSMAN
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JAMES L. WISER

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VAUGHN T. BREIDENBACH
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DEREK A. COLVIN
HEATHER EMMERT
JEFFERSON JAMES
MICHAEL P. MULLIN
NARENDRA R. PLEAS
MIRIAM H. TRAVIS
T. MARIE WALLS
SUSAN H. WATSON

Please visit our website:
www.suffolk.va.us/cw/atty/

MAIN NUMBER (757) 514-4365
VICTIM/WITNESS (757) 514-4366
FAX (757) 514-4400

CHIEF ADMINISTRATIVE MANAGER
KAREN H. WILLIAMS

CHIEF INVESTIGATOR
NEIL M. IRDINE

COMMUNITY OUTREACH COORDINATOR
JOAN R. TURNER

VICTIM WITNESS DIRECTOR
DIANE BRYANT

ASSISTANT VICTIM/WITNESS DIRECTORS
SONYA L. ABBOTT
SHARON M. SMITH

May 5, 2015

Department of Juvenile Justice
Attn.: Andrew Block, Director
600 East Main Street
20th Floor
Richmond, Virginia 23219
(or whomever it is intended to go to)

Re: Comments Regarding the Proposed 2015 Length of Stay (LOS) Guidelines at the Department of Juvenile Justice.

Dear Director Block:

This letter is in response to the proposed 2015 changes concerning the Length of Stay (LOS) Guidelines at the Department of Juvenile Justice (DJJ). The guidelines currently utilized by the DJJ have been in effect since 1998 with little change warranted. This is because, in part, that the guidelines are predicated on several factors. First and foremost, the rehabilitative nature of the juvenile courts on juvenile delinquents. Second, commitment also serves to have specific deterrence effect on the juvenile offender and therefore, is reinforcing consequences for negative behavior. Third, there is there is general deterrence effect by reinforcing community standards and serving to reinforce within the community what is to be tolerated in juvenile behavior and the consequence for inappropriate and criminal behavior to other juveniles by sending a message about appropriate juvenile conduct. Finally, even with juveniles there is incapacitation for the sake of protecting the community.

When a juvenile is committed to DJJ whether for an indeterminate period or for a sixty (60) day review, the juvenile is seen at the Reception and Diagnostic Center (RDC) for a

psychological evaluation and a routine evaluation. This process ensures that the juvenile receives the full benefit of his or her commitment to DJJ and receives *all* services that will be beneficial to the juvenile and assist the juvenile in transition back into the community as a productive and law abiding citizen within the community. This includes psychological treatment, education, job training, and rehabilitative programs and classes.

As part of the process at the RDC and understanding that the main function at DJJ is rehabilitation, there are several programs which serve a meaningful and beneficial function in rehabilitating juveniles. Based under the current LOS guidelines, a juvenile may be referred to receive Aggression Management, Substance Abuse, or Sex Offender Treatment. These programs can be mandatory, recommended, or not applicable. For a juvenile receiving mandatory aggression management treatment, the LOS is generally within the range of 18-36 months. This is because the beneficial nature of the program can only be met in the juvenile successfully completes the program. Each program has a current LOS that according to DJJ protocol is designed to be a "balanced approach" though "[a] variety of services and programs that builds skills and competencies (e.g. substance abuse treatment, support for academic and vocational education, anger management classes) to enable the juvenile to become a law-abiding member of the community upon release from DJJ's supervision." See *An Integrated Juvenile Justice Approach at the Department of Juvenile Justice's Website*.

Without successful completion of the substance abuse, anger management, or sex offender treatment programs in addition to the educational components, there is little chance of rehabilitating the juvenile offender. Under the 2015 proposed LOS guidelines, there is little to no ability for the juvenile offender to meaningfully successfully complete any of these programs within the proposed low end of 2-4 months for Risk Level A (low or moderate on the YASI) juveniles, 3-6 months for Risk Level B (high on the YASI) juveniles, 5-8 months for Risk Level C (high on the YASI and dynamic risk score of less than very high) juveniles, and 6-9 for Risk Level D (high on the YASI and dynamic risk score of very high) juveniles.

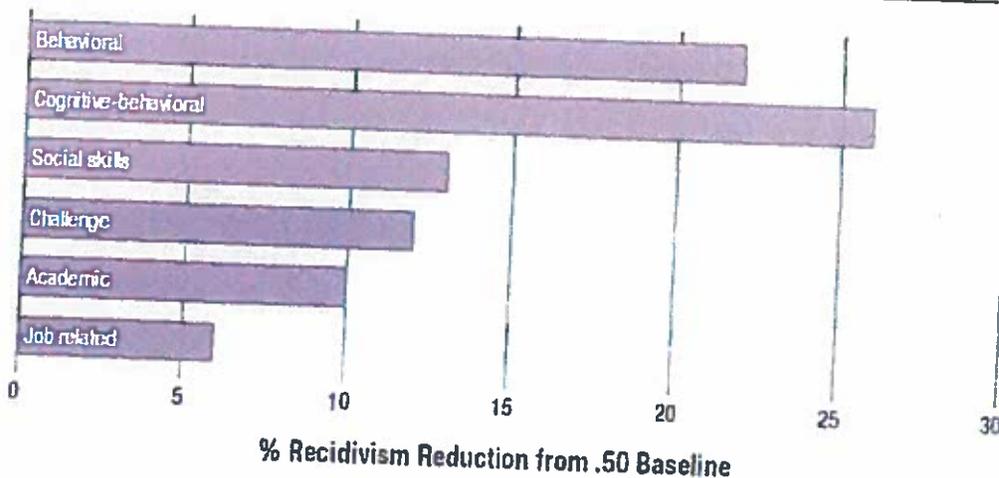
Given that the Youth Assessment and Screening Instrument (YASI) is the diagnostic instrument used by DJJ to assess the juvenile offenders risk and protective factors, the YASI is instrumental in determining the appropriate length of stay. When you factor in the YASI along with the understanding that the one-year recidivism rate is 46.3 to 48.1% for juveniles released from DJJ, this clearly shows that these juvenile offenders need even more skills from DJJ before returning to the community. When you factor

in the three-year recidivism rates of 74.7 to 78.4% after release from DJJ, this indicates that the environment for which the juvenile returns—their home environment as well as parole supervision by the Court Service Units—is not beneficial or productive to most juveniles returning to their community. Under the specific deterrence and the incapacitation prong, then at least for the period that the juvenile offender is at DJJ, the community is safe which fulfills one of DJJ’s missions which are to “[c]ontrol of a juvenile’s liberty through secure confinement and/or community supervision to ensure public safety.” See *An Integrated Juvenile Justice Approach at the Department of Juvenile Justice’s Website*.

Therefore, decreasing the LOS is not a solution to the environmental problems that contributed to the juvenile’s criminal behavior which includes everything from socio-economic factors, educational issues, community issues, and parenting skill sets. All of these factors—at least while the juvenile offender is at DJJ—are addressed. The juvenile offender is not truant, is receiving an education, and has a structured environment providing basic sustenance. Finally, the proposed 2015 LOS guidelines would make a sixty-day review meaningless given that an indeterminate stay at DJJ could, effectively, be less than a sixty-day review. This would seemingly cause an absurdity under the proposed LOS guidelines.

Despite the emphasis in the 2015 proposed LOS guidelines showing that shorter commitments are warranted, some studies have found that juvenile commitments that utilize meaningful programs can have a beneficial effect. Recidivism rates are reduced if programs are successful at addressing juvenile offender issues. The chart below denotes a current avenue of thinking that is based on program skill sets for juvenile offenders:

Figure 3. Mean recidivism effects for the generic program types within the skill-building category



See Lipsey, M.W., Howell, J.C., et al, *Improving the Effectiveness of Juvenile Justice Programs: A New Perspective of Evidence Based Practice*.

In addition, in an older study of six groups of juvenile delinquents followed for periods of up to five years, Schaffstein found that short term lengths of stay (one year or less) were associated with higher levels of recidivism than longer lengths of stay. Schaffstein, F. (1967). *Success, Failure and the Prediction of Recidivism of Juvenile Delinquents*. *Zeitschrift für die Gesamte Strafrechtswissenschaft* 17: 209-249 (1967).

One final and more current study showed:

The positive impact of longer lengths of stay for high-risk offenders may be due to the fact that facilities at this level have a design length of stay ranging from 9 to 12 months. Longer months served at this level may positively impact outcomes if youth continue in the program longer than the design length of stay. However, as Lipsey points out, these effects are likely due more to duration of *treatment* rather than mere incarceration effects. In fact, in examining differences in program types and corresponding treatment approaches, special needs programs, intensive halfway houses for males, serious habitual offender programs (SHOP), and sex offender programs exhibit significant length of stay effects on recidivism in multivariate analyses. These effects are not all in the same direction, however. While longer lengths of stay result in decreased odds of readjudication/conviction for youths released from special needs, SHOP, and sex offender programs, longer lengths of stay in intensive halfway houses for males actually increase the odds a youth will recidivate.

Winokur, K.P., Cass, E., Blankenship, J., *Juvenile Recidivism and Length of Stay*, Justice Research Center. Therefore, treatment and completing of the DJJ programs is critical for successful reintegration into the community.

If, as proposed under the 2015 LOS guidelines, the LOS is changes to about ¼ of the current LOS standards, then it takes away the ability of DJJ to meaningfully impact and rehabilitate the juvenile offender. The fact that the DJJ director always has the ability override the current length of stay of any juvenile offender, the current LOS guidelines that have been in effect for approximately twenty (20) years should stay in effect.

To return juveniles to the same environment where their criminal activities led to commitment without fulfilling the Commonwealth's responsibility of providing rehabilitative services does a disservice to the juvenile, the community, and the juvenile justice system. If you have any questions or concerns that I can address, then please feel free to contact me at (757) 514-4369. As always, best wishes.

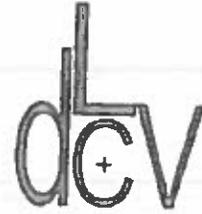
Sincerely,

C. Phillips Ferguson
Suffolk Commonwealth's Attorney
CPF/tmw

disABILITY LAW CENTER

OF VIRGINIA

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April 19, 2015

Heidi W. Abbott, Chair
Virginia Board of Juvenile Justice
600 East Main Street
Richmond, Virginia 23219

Re: New Length of Stay Guidelines

Dear Chair Abbott and Members of the Board:

The disAbility Law Center of Virginia (dLCV) is the federally authorized Protection and Advocacy organization for the Commonwealth of Virginia, and is mandated to protect and advance the civil rights of individuals with disabilities, including children and adolescents with disabilities in educational and residential facilities. A disproportionate number of youth served by DJJ have mental, emotional, or developmental disabilities.

dLCV strongly supports the proposed changes to the Department of Juvenile Justice's (DJJ) length of stay (LOS) guidelines. These proposed changes recognize that the current guidelines have not been effective in promoting effective rehabilitation or reducing recidivism. There are stories of youth being held beyond their late length of stay because they were denied access to treatment, their programming was impacted by staff shortages, or they received inadequate re-entry planning support.

We encourage the board to vote in favor of the proposed changes for the following reasons:

- **Longer lengths of stay do not improve outcomes for youth.**
- **Virginia's current LOS guidelines do not curb recidivism.**
- **Virginia's average LOS is above the national average.**
- **A majority of indeterminately committed youth have not committed violent felonies against the public.**
- **Longer lengths of stay are not cost effective for Virginia.**
- **Longer lengths of stay in juvenile correctional centers negatively impact family engagement for youth who are far from home.**

The vision of the Department of Juvenile Justice is to "provid[e] effective interventions that improve the lives of youth, strengthening both families and communities within the Commonwealth." The proposed changes to the LOS guidelines will help align DJJ's policies with its vision by making sure youth are not

separated from their communities and families for a period of time that is more harmful than rehabilitative.

Sincerely,

//signed//
Colleen Miller
Executive Director

LEGAL AID JUSTICE CENTER

Kate Duvall
Attorney, JustChildren

April 18, 2015

Heidi W. Abbott, Chair
Virginia Board of Juvenile Justice
600 East Main Street
Richmond, Virginia 23219

Re: Proposed Length of Stay Guidelines

Dear Chair Abbott and Members of the Board of Juvenile Justice:

JustChildren strongly supports the proposed length of stay (LOS) guidelines, and encourages the Board to vote in favor of their adoption. The current LOS guidelines are out of step with national practices and do not reduce recidivism. In contrast, the proposed guidelines are informed by a validated risk/needs assessment; more cost-effective than the current guidelines; and most importantly the proposed guidelines will not keep youth away from their families and communities beyond the point of rehabilitation.

JustChildren regularly represents young people committed to the Department of Juvenile Justice (DJJ). We have worked with many youth who sat idle in DJJ facilities after completing therapy and education because they had not reached their assigned early release date under the current guidelines. Some of these youth sat for months or even a year waiting to return home, despite their positive behavior record in DJJ.

Public safety is and should be a priority for DJJ; but unfortunately, the current LOS guidelines do not reduce recidivism. The current LOS guidelines are outdated and do not reflect recent research and best practices regarding the rehabilitation of youth offenders. In fact, Virginia's average length of stay for youth is three times the national average.¹ DJJ's own analysis shows the problems inherent with incarcerating young people for too long. When looking at a two-year release cohort, controlling for offense and YASI risk and protective factors, the following probabilities were identified (run independently):

- A 2% increase of rearrest within one year for every additional month of LOS.
- A 33% increase of rearrest within one year for every additional year of LOS.
- A 33% increase of rearrest within one year if the LOS were longer than 15 months.
- A 44% higher rate of rearrest within one year for juveniles with LOSs longer than 15 months compared to juveniles with LOSs of 10 months or less.

Comparatively, the proposed guidelines are based on a validated and individualized risk and need assessment instrument. Using a validated assessment will ensure that youth are given a length of stay that closely aligns with their individualized treatment and rehabilitation needs.

¹ Mendel, Richard, *No Place for Kids: The Case for Reducing Juvenile Incarceration*, The Annic E. Casey Foundation, 15 (2011).

DJJ currently spends \$150,994 to incarcerate one youth for one year in a juvenile correctional center, approximately \$413.68 per day.² The proposed guidelines are more cost-effective than the current guidelines because the length of incarceration is shorter and more aligned with the rehabilitation needs of each youth. If the guidelines are adopted, the cost savings for DJJ could be used to strengthen the network of evidence-based services and supports for youth in the community.

Finally, one of the most common concerns we hear from clients and their families about their time in DJJ is the negative impact that the distance from home and length of time away from their families has on their ability to successfully re-enter their communities. The Vera Institute studied the impact of family visitation on the behavior and school performance of incarcerated youth in Ohio's Department for Youth Services (DYS). Their study concluded that "[y]outh who were never visited had statistically significant higher behavioral incident rates compared to youth who were visited infrequently or youth who received regular visits."³ They also found that "distance was a significant barrier to visitation; youth who were placed far from home were less likely to receive an in-person visit while incarcerated."⁴ Keeping youth connected to their families is critical both in DJJ and in their communities. The proposed guidelines will reduce the amount of time that youth are away from their families, which will assist in their re-entry.

For the reasons outlined above, JustChildren strongly encourages the Board of Juvenile Justice to adopt the proposed LOS guidelines.

Sincerely,

Kate Duvall

Jeree Thomas

² Block, Andrew, Department of Juvenile Justice Overview Presentation, Slide 7, January 6, 2015.

³ Villalobos Agudelo, Sandra, *The Impact of Family Visitation on incarcerated Youth's Behavior and School Performance Findings from the Families as Partners Project*, Vera Institute of Justice, 3 (April 2013)

⁴ *Id* at 4.

NATIONAL JUVENILE JUSTICE NETWORK

April 17, 2015

Heidi W. Abbott, Chair
Virginia Board of Juvenile Justice
600 East Main Street
Richmond, Virginia 23219

Re: New Length of Stay Guidelines

Dear Chair Abbott and Members of the Board of Juvenile Justice:

The National Juvenile Justice Network strongly support[s] the proposed changes to Virginia Department of Juvenile Justice's (DJJ) length of stay (LOS) guidelines. As a national network of state-based juvenile justice coalitions and organizations working to secure fair, equitable and developmentally appropriate justice system for youth, we have seen far too many youth held in juvenile correctional centers beyond the point of rehabilitation. In Virginia, there are stories of youth being held beyond their late length of stay because they were denied access to treatment, their programming was impacted by staff shortages, or they received inadequate re-entry planning support. Such stories highlight the need for redressing Virginia's current length of stay guidelines, bringing them in line with national best practice.

We encourage the board to redress the need for new length of stay guidelines and vote in favor of the proposed changes for the following reasons:

- **Virginia's average LOS is out of step with the rest of the nation.** In 2009, the Council of Juvenile Correctional Administrators reported that the majority of states had average lengths of stay ranging from 6 to 12 months.¹ Virginia's average length of stay for all juveniles is 18.7 months and the average length of stay for indeterminately committed juveniles is 16.1 months.²
- **Virginia's current LOS guidelines do not curb recidivism.** According to the Department of Juvenile Justice 2014 Data Resource Guide, 78.4 percent of youth released from juvenile correctional centers in 2009 were re-arrested within 36 months and 73.5 percent were re-convicted.³ According to DJJ's own analysis, "controlling for offense and risk and protective factors, the probability of re-arrest increased by 32.7% for every additional year" that a youth remained in custody.⁴

¹ *No Place for Kids*, 15 (2011)

² Virginia Department of Juvenile Justice, *Data Resource Guide*, 40 (2014)

³ Virginia Department of Juvenile Justice, *Data Resource Guide*, 54 (2014)

⁴ Virginia Department of Juvenile Justice, *Draft Guidelines for Determining the Length of Stay (LOS) of Juveniles Indeterminately committed to the Department of Juvenile Justice (DJJ)*, 7 (2015).

- **Furthermore, research shows that longer lengths of stay do not improve outcomes for youth.** A 2009 study using longitudinal data of serious juvenile offenders in two cities found there was no benefit or decrease in recidivism among youth with longer lengths of stay between 3 and 13 months.⁵ In fact, the study found that among youth with low-level offenses, incarceration increased their level of self-reported offending. In Florida, research on youth in correctional centers found that there was “no consistent relationship between length of confinement and recidivism.”⁶ A study of youth in California linked longer periods of incarceration as juveniles to heightened criminality as adults.⁷
- **A majority of indeterminately committed youth have not committed violent felonies against the public.** In FY 2014, a majority of indeterminately committed youth were committed to DJJ for non-person felony offenses and misdemeanor offenses. In FY 2014, 42.5 percent of the youth indeterminately committed to a JCC had non-person felony offenses.⁸ 14.3 percent of youth had misdemeanor offenses.⁹ This is particularly alarming when considered in light of the above 2009 study, which would suggest Virginia’s current LOS requirements increase rather than decrease a youth’s risk of reoffending.
- **Not only are longer lengths of stay ineffective, longer lengths of stay are not cost effective for Virginia.** The Department of Juvenile Justice currently spends \$150,994 to incarcerate one youth for one year in a juvenile correctional center, approximately \$413.68 per day.¹⁰ According to a 2014 report by Youth Advocate Programs, using the American Correctional Associations’ average cost of youth incarceration, nationally Americans spend \$240.99 a day incarcerating one youth compared to \$75 a day for community-based wrap around services.¹¹ Not only are community-based services more cost effective, they have the added benefit of keeping kids connected to their communities and their support systems.

<http://www.djj.virginia.gov/pdf/Admin/2015%20Proposed%20Guidelines%20for%20Determining%20Length%20of%20Stay.pdf>

⁵ Loughran, T., Mulvey, E. P., Schubert, C. A., Fagan, J., Losoya, S. H., & Piquero, A. R. (2009). *Estimating a dose-response relationship between length of stay and future recidivism in serious juvenile offenders*. *Criminology*, 47, 699-740. See also Brian Lovins, K., *Putting Wayward Kids Behind Bars: The Impact of Length of Stay in a Custodial Setting on Recidivism*, (PhD dissertation, University of Cincinnati, 2013).

⁶ Winokur, Kristin Parsons, Alisa Smith, Stephanie R. Bontrager, & Julia L. Blankenship, *Juvenile Recidivism and Length of Stay*, *Journal of Criminal Justice*, Vol. 36, No. 2, 2008.

⁷ Ezell, Michael E., *Examining the Overall and Offense-Specific Criminal Career Lengths of a Sample of Serious Offenders*, *Crime & Delinquency*, Vol. 53, No. 1, 2007. See also, Mendel, Richard, *No Place for Kids: The Case for Reducing Juvenile Incarceration*, The Annie E. Casey Foundation, 15 (2011)

⁸ Block, Andrew, *Department of Juvenile Justice Overview Presentation*, Slide 8, January 6, 2015.

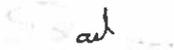
⁹ *Id.* at 8.

¹⁰ *Id.* at 7.

¹¹ Fazal, S. (2014). *Safely Home: Reducing youth incarceration and achieving positive youth outcomes for high and complex need youth through effective community-based programs*, Washington, DC. Youth Advocate Programs Policy & Advocacy Center.

The vision of the Department of Juvenile Justice is to "provid[e] effective interventions that improve the lives of youth, strengthening both families and communities within the Commonwealth." The proposed changes to the LOS guidelines will help align DJJ's policies with its vision by making sure youth are not separated from their communities and families for a period of time that is more harmful than rehabilitative.

Sincerely,



Sarah Bryer
Director, National Juvenile Justice Network

John R. Morgan, Ph.D.
Independent Public Policy Research
5711 North Chase Road
Midlothian, Virginia 23112

April 17, 2015
Heidi W. Abbott, Chair
Virginia Board of Juvenile Justice
600 East Main Street
Richmond, Virginia 23219

Re: New Length of Stay Guidelines

Madame Chair and Members of the Board:

I strongly endorse the proposed Revised Guidelines for Length of Stay. As a career-long advocate for best practices in juvenile justice, I can attest that the revised guidelines are a significant and highly positive step in a much-needed initiative to install best practice reforms in Virginia's juvenile justice system. Current length of stay guidelines fall far short of the more enlightened and effective best practices being used in many other states.

Along with steps to reduce Virginia's long-standing overreliance on institutional placements through the use of more effective community-based alternatives, reforms on the institutional side of the system can enhance rehabilitative impact, reduce recidivism, and promote better long-term outcomes for troubled youths and greater public safety in Virginia communities. Several revisions in particular are strongly supported by juvenile justice and youth development research and by emerging best practice standards.

- Reducing the maximum late release term from 36 to 15 months. Research has shown no added effectiveness from longer lengths of stay; on the contrary, evidence suggests that longer stays may produce more rather than less criminal behavior due to increased exposure to criminogenic influences and increased risk of violence and harm during incarceration.
- Use of validated risk assessment instruments to assign early and late release dates. Such instruments permit data-based, objective decision making that better matches confinement duration to offender needs and to the probability of re-offending.
- More frequent case reviews. Periodic reviews can ensure that confinement is not arbitrarily extended beyond desirable duration due to administrative or procedural missteps.

These proposed guidelines represent commendable progress in the effort to reform juvenile corrections. Please vote to adopt the revised guidelines so that Virginia can join other states in repudiating a "lock 'em up and throw away the key" stance in favor of more rational, effective and just approaches. Thank you for the opportunity to comment on this positive initiative.

Respectfully submitted,

John R. Morgan, Ph.D.



For Virginia's
Children

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April 17, 2015

Heidi W. Abbott, Chair
Virginia Board of Juvenile Justice
600 East Main Street
Richmond, VA 23219

Re: Proposed DJJ Length of Stay Guidelines

Dear Chairperson Abbott and Members of the Board of Juvenile Justice:

Voices for Virginia's Children strongly supports the proposed revisions to the Department of Juvenile Justice's length of stay guidelines, and encourages the DJJ Board to take swift action to adopt them. Far too many of Virginia youth are confined in correctional institutions—far from their communities and families—with results that run counter to a core component of the Department's mission to employ best practices and data-driven strategies.

In our work with the child welfare and foster care systems, both research and practice demonstrate that children have better outcomes when they are living in family settings, connected to their communities, and offered appropriate services and trauma-informed care. Similar strategies are also more appropriate for juvenile offenders. Family engagement and strong ties to community are critical components of ensuring juvenile offenders become law-abiding community members and preventing recidivism. The proposed revisions to the length of stay guidelines would properly support this approach.

Voices for Virginia's Children also coordinates the Campaign for Children's Mental Health, through which we advocate for evidence-based best practices in providing access to quality children's mental health services. It is our recommendation that a family- and community-focused approach to treatment is also more appropriate for the significant percentage of juvenile offenders who need such mental health care.

The proposed guidelines will bring Virginia more in-line with best practices, while improving outcomes, reducing recidivism, and avoiding unnecessary expense to the Commonwealth. We urge the Board to vote in favor of this proposal.

Sincerely,

Amy L. Woolard
Senior Policy Attorney, Voices for Virginia's Children



April 17, 2015

Heidi W. Abbott, Chair
Virginia Board of Juvenile Justice
600 East Main Street
Richmond, Virginia 23219

Re: New Length of Stay Guidelines

Dear Chair Abbott and Members of the Board of Juvenile Justice:

The American Civil Liberties Union of Virginia and its more than 10,000 members and supporters across Virginia strongly support the proposed changes to the Department of Juvenile Justice's (DJJ) length of stay (LOS) guidelines. Too many youth have been held in our juvenile correctional centers (JCC) beyond the point of rehabilitation. There are stories of youth being held beyond their late length of stay because they were denied access to treatment, their programming was impacted by staff shortages, or they received inadequate re-entry planning support.

We encourage the board to vote in favor of the proposed changes for the following reasons:

- **Research shows that longer lengths of stay do not improve outcomes for youth.** A 2009 study using longitudinal data of serious juvenile offenders in two cities found there was no benefit or decrease in recidivism among youth with longer lengths of stay between 3 and 13 months.¹ In fact, the study found that among youth with low-level offenses, incarceration increased their level of self-reported offending. In Florida, research on youth in correctional centers found that there was "no consistent relationship between length of confinement and recidivism."² A study of youth in California linked longer periods of incarceration as juveniles to heightened criminality as adults.³
- **Virginia's current LOS guidelines do not curb recidivism.** According to the Department of Juvenile Justice 2014 Data Resource Guide, 78.4 percent of youth released from juvenile correctional centers in 2009 were re-arrested within 36

¹ Loughran, T., Mulvey, E. P., Schubert, C. A., Fagan, J., Losoya, S. H., & Piquero, A. R. (2009). *Estimating a dose-response relationship between length of stay and future recidivism in serious juvenile offenders*. *Criminology*, 47, 699-740. See also Brian Lovins, K., *Putting Wayward Kids Behind Bars: The Impact of Length of Stay in a Custodial Setting on Recidivism*, (PhD dissertation, University of Cincinnati, 2013).

² Winokur, Kristin Parsons, Alisa Smith, Stephanie R. Bontrager, & Julia L. Blankenship. *Juvenile Recidivism and Length of Stay*. *Journal of Criminal Justice*, Vol. 36, No. 2, 2008.

³ Ezell, Michael E., *Examining the Overall and Offense-Specific Criminal Career Lengths of a Sample of Serious Offenders*. *Crime & Delinquency*, Vol. 53, No. 1, 2007. See also, Mendel, Richard, *No Place for Kids: The Case for Reducing Juvenile Incarceration*, The Annie E. Casey Foundation, 15 (2011).

months and 73.5 percent were re-convicted.⁴ According to DJJ's own analysis, "controlling for offense and risk and protective factors, the probability of re-arrest increased by 32.7% for every additional year" that a youth remained in custody.⁵

- **Virginia's average LOS is above the national average.** In 2009, the Council of Juvenile Correctional Administrators reported that the majority of states had average lengths of stay ranging from 6 to 12 months.⁶ Virginia's average length of stay for all juveniles is 18.7 months and the average length of stay for indeterminately committed juveniles is 16.1 months.⁷
- **A majority of indeterminately committed youth have not committed violent felonies against the public.** In FY 2014, a majority of indeterminately committed youth were committed to DJJ for non-person felony offenses and misdemeanor offenses. In FY 2014, 42.5 percent of the youth indeterminately committed to a JCC had non-person felony offenses and 14.3 percent of youth had misdemeanor offenses.⁸
- **Longer lengths of stay are not cost effective for Virginia.** The Department of Juvenile Justice currently spends \$150,994 to incarcerate one youth for one year in a juvenile correctional center.⁹ According to a 2014 report by Youth Advocate Programs, using the American Correctional Associations' average cost of youth incarceration, nationally Americans spend \$240.99 a day incarcerating one youth compared to \$75 a day for community-based wraparound services.¹⁰ Not only are community-based services more cost effective, they have the added benefit of keeping kids connected to their communities and their support systems.
- **Longer lengths of stay in juvenile correctional centers negatively impact family engagement for youth who are far from home.** The Vera Institute studied the impact of family visitation on the behavior and school performance of incarcerated youth in Ohio's Department for Youth Services (DYS). Their study concluded that "[y]outh who were never visited had statistically significant higher

⁴ Virginia Department of Juvenile Justice, *Data Resource Guide*, 54 (2014).

⁵ Virginia Department of Juvenile Justice, *Draft Guidelines for Determining the Length of Stay (LOS) of Juveniles Indeterminately Committed to the Department of Juvenile Justice (DJJ)*, 7 (2015).

<http://www.djj.virginia.gov/pdf/Admin/2015%20Proposed%20Guidelines%20for%20Determining%20Length%20of%20Stay.pdf>

⁶ *No Place for Kids*, 15 (2011).

⁷ Virginia Department of Juvenile Justice, *Data Resource Guide*, 40 (2014).

⁸ *Id.* at 8.

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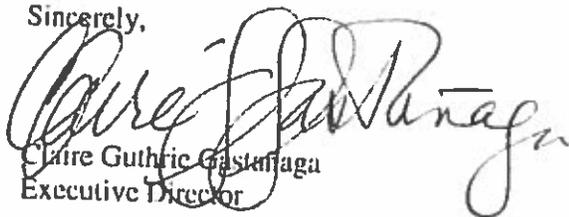
¹⁰ Fazal, S. (2014). *Safely Home: Reducing youth incarceration and achieving positive youth outcomes for high and complex need youth through effective community-based programs*. Washington, DC: Youth Advocate Programs Policy & Advocacy Center.

behavioral incident rates compared to youth who were visited infrequently or youth who received regular visits.¹¹ They also found that "distance was a significant barrier to visitation; youth who were placed far from home were less likely to receive an in-person visit while incarcerated."¹²

The vision of the Department of Juvenile Justice is to "provid[e] effective interventions that improve the lives of youth, strengthening both families and communities within the Commonwealth." The proposed changes to the LOS guidelines will help align DJJ's policies with its vision by making sure youth are not separated from their communities and families for a period of time that is more harmful than rehabilitative.

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Sincerely,



Claire Guthrie Gastaffaga
Executive Director

¹¹ Villalobos Agudelo, Sandra. *The Impact of Family Visitation on incarcerated Youth's Behavior and School Performance: Findings from the Families as Partners Project*, Vera Institute of Justice, 3 (April 2013).

¹² *Id.* at 4.

Peterson-Wilson, Barbara (DJJ)

From: Jeree Thomas [jereo@justice4all.org]
Sent: Thursday, April 16, 2015 10:23 AM
To: Peterson-Wilson, Barbara (DJJ)
Cc: jwright196@cox.net
Subject: Re: Proposed Length of Stay Guidelines- Public Comment

Dear Mrs. Peterson-Wilson,

Below is public comment from Mrs. Joeann Wright (cc'd here) regarding the length of stay guidelines and the impact of extended incarceration on families.

Best Regards,
Jeree Thomas

Greetings:

I am writing on behalf of the young people in the juvenile justice system. I speak from experience gained by trial and error in dealing with the juvenile justice system. I entered the system operating under the misconception that the family, and the justice system, including the courts, the Commonwealth attorneys, as well as the defenders were part of a team working to act in the best interests of the child. I was wrong.

Many of the youth are being raised by grandparents like myself or extended family members who do not understand the system and the brief overview that you get when you are two minutes away from facing the judge doesn't really cover it. When you get the copy of the psychological report and it says the child (who has no prior offenses) can get the treatment they need locally you prepare for continued visits and providing support at the local facility. Unfortunately, the report is ignored and your grandchild is turned over to the juvenile system and one day you go to visit him and discover he left that morning for the Reception and Diagnostic Center (RDC). Then you get the information about where they are and when you can see them. You are also informed that you can come to Richmond on a weekday to participate in the review that will tell you how long your child will be gone. You worry because your child is special needs. No, he doesn't look broken. Most youth with mental illness never do. He was diagnosed with ADHD, with impulsive tendencies, and has difficulty being still and controlling impulsive blurting out, especially in frightening or frustrating situations, and so it begins.

Being so far from home is so difficult. There is a hardship in preparing for a six hour round trip drive for the hour and a half visit, especially if you are elderly grandparents and great-grand parents. You have to adjust when you take your medication and you have to stop to eat at certain times if you are diabetic. You never know what will happen when you get there because although there are rules, not everyone interprets them the same way. I saw a grandmother who was healing from foot surgery crying because she came so far to see her grandson and was told she could not because her shoes (orthopedic) were wrong. I offered to go to my car for an asthmatic mother who had driven all the way there to realize she didn't have her inhaler (some staff wouldn't allow you to take it in when you go to visit so you had to leave it in the car). She had to be sent to the infirmary and the ambulance came to attend to her, but she wanted to go home and not stay in a strange city and hospital with no one there with her.

It's hard on the youth when you drive away and they don't know when they will see you again. Since my grandson has been incarcerated, I have been diagnosed with cancer in my kidney and had to have it surgically removed, we have had our oldest son (the youth's uncle) die, our 14 year old great-granddaughter became ill with a virus and died, our oldest family uncle (92 years young) has died.

In March of 2014, a young man committed suicide. All they told the press was there was an ongoing investigation, but the young man was depressed because his grandmother who was his primary visitor had cancer and the visits were getting more difficult. The juvenile centers should be more understanding of the need of families, especially since the youth in the system are at their most emotional and critical stage of their lives. They are like the elephants that get separated from their families and so seek family connection in their environment for the necessary nurturing that they need to go from adolescence to young adult. How can one become an empathetic and compassionate adult if one never receives empathy or compassion?

There are so many local agencies, closer to the youth's homes that can provide the services they need to correct their behavior and guide them to more positive choices for their lives. It isn't necessary for them to be sent so far from home. The separation goes against everything you are trying to achieve. You want them to be a productive and conscientious citizen, but that is not what is taught. Inside all human beings is the desire to be part of an accepted group, be it family or otherwise. It is difficult to incorporate the ideals needed to be positively accepted and function in today's society without incorporating family values and you need real family to do that.

Joeann Wright
4249 Schooner Trail
Chesapeake, VA 23321
757-535-4230

The information contained in this electronic message is legally privileged and confidential under applicable law, and is intended only for the use of the individual or entity named above. If you are not the intended recipient of this message, you are hereby notified that any use, distribution, copying or disclosure of this communication is strictly prohibited. If you have received this communication in error, please notify the Legal Aid Justice Center at (804) 862-2205 and purge the communication immediately without making any copy or distribution.

Disclosure Required by Internal Revenue Service Circular 230: This communication is not a tax opinion. To the extent it contains tax advice, it is not intended or written by the practitioner to be used, and it cannot be used by the taxpayer, for the purpose of avoiding tax penalties that may be imposed on the taxpayer by the Internal Revenue Service.

On Apr 15, 2015, at 5:39 PM, Morton, Michael G. (DJJ) <Michael.Morton@dji.virginia.gov> wrote:

Director Block;

The Court Service Unit Director's Association (CSUDA) supports the 2015 Proposed Length of Stay Guidelines. We would welcome an opportunity to discuss with you the impacts of these changes on court service unit operations at one of our next association meetings.

Thank you for recognizing and seeking the support of the CSUDA.

**Mike Morton
CSUDA President**

Peterson-Wilson, Barbara (DJJ)

From: Karen Sale [karensale@icloud.com]
Sent: Thursday, April 09, 2015 10:16 PM
To: Peterson-Wilson, Barbara (DJJ)
Subject: Request for Public Comments: Guidelines for Determining the Length of Stay...

Thank you for inviting me to comment. If everything else in the program remains the same, I am confident the assessment and recommendations of the professionals in the field are accurate and will prove beneficial to their goals. However, if the Board would like to change the course of these boys and girls lives, consider putting them to work - good, hard, back-breaking work. Not an abusive environment, just a working hard environment. We all feel better about ourselves when we accomplish something with good, hard work. We become stronger inside and out. When this happens, they will not ever want to go back to feeling worthless and thinking they don't matter. They will have enough confidence in themselves, they won't need a gang to feel whole. If you have ever worked hard and accomplished something, you know what I'm talking about. Hard work will sweat the sad, defecated poison out of anyone.

Thank you again. Good-luck

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