



Fresno County Probation Department

Kirk Haynes, Chief Probation Officer



June 7, 2018

Ms. Tifanei Ressler-Moyer,

We thank you for providing a copy of your draft report, and we appreciate the opportunity to respond before its publication and release to the public. Below is our response to certain sections of the report.

Before responding to certain portions of the draft report, we note that the draft report does not acknowledge the County's juvenile justice campus is a new, state-of-the-art facility that provides a school campus-like atmosphere.

Disability Rights California Inspection Report

Summary of Findings and Recommendations (Page 4 of 23)

Recommendations to Adequately Care for Youth with Disabilities:

1. The County should end its reliance on the use of pepper spray and use alternative methods to address youth behavior, especially for youth with disabilities who are distinctly vulnerable to the harms of chemical restraint.

JJC RESPONSE: The Department is within BSCC Title 15 regulations in its use of pepper spray. In addition, all officers are trained in the use of pepper spray prior to it being issued and working in the unit with youth. Our staff are mandated to complete 24 hours of training which include the following courses, "Interacting Effectively with the Mentally Ill," "Autism and Probation," "Conscious Communication," and "Customer Service: Strategies for Improving Community Relationships." As well, staff are required to attend a yearly "Use of Force" training, which reviews the Department's use of force policy.

2. The County should modify its behavior management programs so that they alert staff to, and provide for mechanisms that accommodate the needs of, students with disabilities.

JJC RESPONSE: Our behavior management system is based on the "Pillars of Character." Pillars of character include: respect, responsibility, trustworthiness, caring, fairness, and citizenship.

OFFICE OF THE CHIEF PROBATION OFFICER

3333 E. American Ave. / Building 701 / Suite B / Fresno, California 93725

Phone (559) 600-1294 / FAX (559) 455-2488

Equal Employment Opportunity • Affirmative Action • Disabled Employer

Youth do not lose points but rather fail to earn points in these specific areas. In our programming pods, (i.e., Substance Abuse Treatment and New Horizons Program), it is not just that it takes them longer to promote, but there are specific therapeutic individual treatment goals that need to be met. Clinicians and staff do treat those youth on a case-by-case basis based on their diagnosis rather than implement group sanctions. We have further implemented an incentive-based program with a youth store, which enables them to spend their earned points; youth have the ability to request a point review in order to earn points when they have failed to earn them. These options are presented to youth when they arrive in the pod during their orientation. In addition, we are currently working on an incentive-based matrix to encourage positive behavior and reduce the number of youth on youth incidents.

3. The County should implement an inter-system database – shared between Fresno County Superintendent of Schools (FCSS) and Probation – that identifies and monitors the needs of youth with disabilities.

JJC RESPONSE: JJC Administration and FCSS are in discussions to establish a process for the dissemination of this information.

4. The County should evaluate the efficacy of its mental health assessment tools to analyze whether its tools adequately identify youth needs or whether they contribute to race and disability disparities within the youth population at JJC.

JJC RESPONSE: The Probation Department does not conduct mental health needs assessments at intake using the Child and Adolescent Needs and Strengths (CANS) assessment tool as stated on page 14 under letter C. In addition, DRC incorrectly identified the JJC's mental health care system as three separate mental health providers. The JJC's mental health providers are Corizon, the county contracted medical and mental health provider, Mental Health Systems, which provides mental health services to our Substance Abuse Treatment unit (SAU) as well as to the 365 days New Horizons Treatment unit (NHP), and Sierra Educational Research Institute (SERI), which provides supplemental services and group treatment to our general commitment pods. These groups treatment ranges from substance abuse education to anger management. Focus Forward provides mentorship services, evidence based nurturing parenting to our youth and their parents, as well as, provide social workers for our PREP Leadership Academy youth and their families.

In regards to the Positive Achievement Change Tool (PACT) and its efficacy, the Probation Department is developing a quality evaluation unit, which in part will conduct ongoing fidelity checks of the tools utilized within the Department.

OFFICE OF THE CHIEF PROBATION OFFICER

3333 E. American Ave. / Building 701 / Suite B / Fresno, California 93725

Phone (559) 600-1294 / FAX (559) 455-2412

Equal Employment Opportunity • Affirmative Action • Disabled Employer

5. The County's new health services contract should require that mental health, medical and substance abuse services be sufficiently coordinated to meet co-occurring needs of youth with complex mental health concerns.

JJC RESPONSE: The existing contract provides for continuity of care and includes that there be coordination with the Department of Behavioral Health Children's Crisis Assessment Intervention Resolution Center (CCAIR) for more intensive observation and adjunctive crisis care, if deemed necessary. The new County provider, California Forensic Medical Group (CFMG), will continue to provide these services.

JJC Administration meets with our contracted medical and mental health provider, as well as our substance abuse treatment provider, at least once per month to discuss expectations of services. Representatives from all community-based organizations that provide services within the JJC are scheduled to attend to the monthly JJC management team meetings, as well as attend a quarterly service provider meeting to discuss services and new evidence based approaches to better assist our youth in their rehabilitation efforts. Treatment team staffings' are held regularly for youth who are in need of additional services or where traditional services may not meet the youth's needs. Supervising Juvenile Correctional Officers, Deputy Probation Officers, Senior Juvenile Correctional Officers, clinicians, school personnel, and Corizon medical and mental health providers participate in the staffing where an individualized plan of action is developed to assist the youth in their treatment.

6. As the County further develops its reentry services and scales up its pilot reentry program, it should include targeted and integrated services for foster youth and young girls.

JJC RESPONSE: All youth who are committed to the JJC for 45 days or more receive transition services. Our weekly reentry transition meetings have been in effect for over four years and we have successfully transitioned many youth and continue to see all of our partnering community based organizations, Focus Forward, Boys and Girls Club, SERI, MHS, Fresno Barrios Unidos, and Youth for Christ, sit around the table to ensure a smooth successful transition back into the community. PREP, an extension of our transition piece has since expanded its population to include females as well as foster youth.

Other Recommendations to Provide a Safe and Healthy Setting for youth:

1. The County should end the practice of disciplining youth by limiting telephone access and provide all youth with reasonable access to the telephone.

JJC RESPONSE: Per Fresno County JJC Policy #406.2 and as per Title 15 section 1376, youth have access to telephone and in addition, youth have unlimited access to written correspondence.

OFFICE OF THE CHIEF PROBATION OFFICER

3333 E. American Ave. / Building 701 / Suite B / Fresno, California 93725

Phone (559) 600-1294 / FAX (559) 455-2412

Equal Employment Opportunity • Affirmative Action • Disabled Employer

2. The County should modify its policy on hygiene products so that it is sensitive to the ethnic, gender, and cultural diversity of its youth in custody.

JJC RESPONSE: The JJC provides Luster's Pink Oil Moisturizer Hair Lotion for our female youth and Blue Magic hair grease to all youth. JJC administration will continue to research for the availability of culturally appropriate products.

3. The County should review its food service contract and determine whether their vendor is providing adequate portions and nutrition. The County should also allow extra portions be served to hungry youth and provide for snacks in between meals.

JJC RESPONSE: Trinity Food Services, the County's food service vendor, is meeting Title 15 standards. The food services contract was awarded to Trinity Food Services through the County RFP process. FCSS is currently providing youth with snacks during the school day. Further, JJC Administration is considering options to augment snacks for the youth.

OFFICE OF THE CHIEF PROBATION OFFICER

3333 E. American Ave. / Building 701 / Suite B / Fresno, California 93725

Phone (559) 600-1294 / FAX (559) 455-2412

Equal Employment Opportunity • Affirmative Action • Disabled Employer