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**Hygiene and Sanitation:** Title 15, Articles 10, 11, and 12.  
**Programs:** Title 15, Article 6.  
**Design and Planning:** Title 24, Part 1, Article 2.  
**Physical Spaces:** Title 24 Part 2, Volume 1.  
**Furnishings and Equipment:** Title 24 Part 2, Volume 1

CCR § (Art. #)	CCR § Title	Recommendations/Comment	Commentor's Name, Title & Organization
1230 (T24)	Physical Spaces	<p>I think a lot of the youth come from rough environments and already have gone through traumatic experiences that mess with their behavior that has influence on getting them in these facilities.</p> <p>The physical spaces we currently have creates another traumatic experience for young people. If we want young people to change, I think another traumatic experience is not helping youth change. The way its designed with the brick walls and isolated cells and isolation is traumatic from my experience and once the door closes and makes a loud "clank" noise is also very traumatic.</p>	Carlos Fernandez, At-Risk Youth Coordinator
1370 (6)	Education Program	<p>Tablets have so much opportunity to be more than just visit calls or phone calls – they can be used within education programming (§ 1370). With access to a tablet youth can have opportunities to connect with universities, colleges or any virtual learning opportunity that exists through the power of a tablet.</p> <p>Education should not be made for the short-term and the regulations must reflect a long-term education strategy, especially when considering secure youth treatment facilities that will be housing youth from DJJ for longer periods. Facilities must invest in youth to attend college; one way to accomplish this is to ensure that schooling aligns with credits for a GED. We've heard from multiple youth that often; they think that they're getting the credits and then they'll get out and none of the credits align with an actual curriculum or they don't hold any weight and that's problematic. The education program regulations should ensure and make strict guidelines that the credits are useful once youth leave.</p> <p>Facilities should offer more than just work packets. Schooling should be interactive, hence the tablets. Youth should be able to leave the room to attend class. Learning should be in a safe environment. Youth should have the ability to partner with local colleges and universities and should be able to use their tablets to access online learning. The regulations should reflect the vocational system to help youth prepare for the workforce and career building - this is something that exists within the Division of Juvenile Justice (DJJ) and should be translated to juvenile halls to secure youth treatment facilities, and it should be reflected within regulations.</p>	Nancy Juarez, Communications & Policy Analyst  Center on Juvenile and Criminal Justice

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CCR § (Art. #)	CCR § Title	Recommendations/Comment	Commentor's Name, Title & Organization
1370 (6)	Education Program	In regard to 1370(b)(3), "Youth shall be informed of post-secondary education and vocational opportunities" - With the move towards youth staying longer and the secure youth housing facilities growing and anticipating more youth that are going to be going into custody and being in line to graduate high school and eventually have opportunities, I would like to see and recommend stronger language that connects them to post-secondary education. The way it's worded right now, it just says that they will be informed of post-secondary education so having a stronger connection of an individual plan to prepare for post-secondary education, if that is something they want.	Luis Venegas, Restorative Justice Programs Manager  Restorative Partners
1371 (6)	Program, Recreation, and Exercise	The current regulation states that "facilities shall provide the opportunity for programs, recreation, and exercise a minimum of three hours a day during the week and five hours a day Saturday, Sunday or other non-school days, of which one hour shall be an outdoor activity, weather permitting." We're hearing that the outdoor spaces at facilities are not being used and so I hope that the regulation will be revised to have a stricter definition of what outdoor spaces mean. For example, in Alameda we're hearing that there's so much outdoor space that isn't being used in programming, so instead youth are brought to a space that has grading on the ceiling so it's not actually 100% outside because there is some sort of barrier still and there is some sort of filtered sunlight coming in. This should not be considered within regulation because it's not truly outside. I hope that stricter leveraging will be used to define what does outside mean. Youth deserve access to air, wind, breeze, unfiltered sunlight, sounds of nature, like we all do and should not be deprived of that, or there shouldn't be a loophole regarding what outdoor outside time is.	Nancy Juarez, Communications & Policy Analyst  Center on Juvenile and Criminal Justice

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1371 (6)	Program, Recreation, and Exercise	<p>We're hearing that programming is shut down nearly every other day due to staffing issues. Youth should not have to bear the weight of staffing issues - they deserve access to consistent and reliable programming that gives them a chance at healing and growth. The regulation currently states that programs may include but are not limited to healing-informed approaches, interventions by credible messengers, gender-specific programming, art, creative writing or self-expression, yet we're hearing that in some counties, the only programming offered is run by probation and that little effort is made to seek out community-based organizations, so we encourage the BSCC to look toward Contra Costa Probation Department as an example. Contra Costa probation department refers young people into gender responsive services. Available programming should be reflective of the youth housing facilities. Programming should be run by facilitators that represent the youth that they're working with and this can only be ensured if counties are collecting data on sexual orientation, gender identity and gender expression (SOGIE). Most systems don't ask youth about these aspects of youth identity, and therefore they can't develop authentic relationships or programming or adequately refer to LGBTQ gender non-conforming transgender youth, to the best services. Justice systems conserve youth fast when they develop positive relationships that are for all aspects of identity and lived experience according to an organization called Series. I recommend the BSCC look at the technical assistance programs that are available out there, for example, Series offers a technical assistance component that prepares departments to support whole youth, basically the full identity of a youth. To receive technical assistance support from Series, there is an option for interested sites to partner with them and to match the budget ask, depending on the size and needs of the county. This is an example of a program that is out there and can be implemented for all 58 counties. The regulation language should review practices that are race non-binary youth so, for example when programs are referred to for "girls and boys", there's not space for a non-binary youth to feel comfortable or affirmed in their identity.</p> <p>Lastly, the regulation currently states that the intent is to minimize the amount of time youth are in the rooms or in their bed area. However, we're often hearing that programming is shut down due to staff shortages, but if the intent is to minimize the amount of time youth are in the rooms or bed area, then there should be stronger language to specifically state that programming cannot be shut down for more than X-amount of time due to staff shortages. I'm not sure what the best practices say, but I would say, should not be shut down more than once a week. Why should a youth have to bear the weight of a administrative issue? Our hope is that probation look towards the plethora of CEOs, community-based organizations that are willing to run programming in their county that are have volunteers that are ready to go when there are staff shortages.</p>	<p>Nancy Juarez, Communications &amp; Policy Analyst</p> <p>Center on Juvenile and Criminal Justice</p>

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CCR § (Art. #)	CCR § Title	Recommendations/Comment	Commentor's Name, Title & Organization
1371 (6)	Program, Recreation, and Exercise	To make note about credible messengers, the regulations do mention credible messengers, but do not carry strong enough language to help counties with implementation. A great example of credible messengers comes from Fresno Barrios Unidos, “the credible messenger collaborative program connects youth in custody at the Fresno County Juvenile Justice Center with community-based mentors from different organizations. Each community-based organization in this program represents a touch point for young people to develop relationships with their mentors who share common history and lived experience, as well as a resource for community connection, care, and reentry support upon their release. Mentors from each organization provide services that are healing-centered, strength-based and cultural-relevant” so there are so many people in the community that are able to offer these resources and can play a better role when it comes to programming, that is culturally competent and relatable to youth, and that youth can see themselves in and representative of youth. I hope that there is stronger language around the kinds of programming that can be offered; and stronger language around the canceling of programming do to staff shortages; and that there is a checklist or some sort of step that probation must do before they determine that programming has to be run by probation solely; that the regulation ensures there is a check and an effort to see if there's a community-based organization or someone in the community that is willing to run programming.	Nancy Juarez, Communications & Policy Analyst  Center on Juvenile and Criminal Justice
1371 (6)	Program, Recreation, and Exercise	Sometimes can be repetitive for some youth who have been through the programs a few times. I think there could be more credible messenger related programs such as working with older people had similar experience.  I think the programs intended to help youth with behavior, like anger management and thinking skills would be a lot more effective if youth could take the programs outside of the facilities.	Carlos Fernandez, At-Risk Youth Coordinator



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1373 (6)	Work Program	<p>The regulations should establish a path for youth to enter growing industries that allow them to earn and learn. Work program should offer on the job training and apprenticeship programs to help youth participate in the workforce. For every system impacted youth to succeed, California and the regulations should pay attention to those furthest from opportunity, so those facing persistent education opportunity gaps, especially youth of color, indigenous youth, low-income youth, [?] youth and youth with disabilities.</p> <p>Work programming should allow youth the opportunity to earn fair wages. I'm sensitive to this topic because I understand child labor, but we if we're being real youth are expected to work. Youth are expected to clean facilities youth are doing that in various counties and at most they're offered a snack if they're lucky and that's problematic. Children are cleaning these facilities and they're not being compensated for it, and maybe a snack is dangled in front of them. With that in mind, the regulation on work programming does not mention that youth can gain fair wages and I recommend that it'd be amended to allow for pay or allowance. Senator Kamlager recently advance a legislative piece to ban involuntary servitude in California and the states Constitution currently prohibits involuntary servitude except to punish crime therefore allowing the system to pay incarcerated people as little as eight cents an hour for jobs, including food service, custodial work and construction. California has a long history of dependence on incarcerated people to fulfill jobs, such as fighting wildfires across the state and they earned very little from \$1.45 to \$3 and 90 cents per day, plus an \$1 per hour in emergencies.</p> <p>The regulation language should reflect and take into account, wages that align with the county's cost of living to support successful reentry. What kind of savings or allowance are youth coming out with? If youth are being expected to clean facilities, they should be valued in doing so. I hope that the regulation and the work program reflect some of this language and, at the very least that the work programs include more language surrounding apprenticeship, about vocational training and that more programming is allowed within the facility to create hands-on learning opportunities. Right now, the regulation reads, "the facility administrator shall develop policies and procedures regarding the fair and consistent assignment of youth to work programs. Work assigned to a youth shall be meaningful, constructive and related to vocational training or increasing a youth's sense of responsibility. Work programs shall not be imposed as a disciplinary measure" - that's about like three to four sentences and I hope that more language be added to make it a more robust program that's fair.</p>	<p>Nancy Juarez, Communications &amp; Policy Analyst</p> <p>Center on Juvenile and Criminal Justice</p>

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1373 (6)	Work Program	<p>I've seen a lot is that there are, theoretically, programs that are available, but what is actually happening in custody, the actual information that I get from incarcerated young people is very different from what's on paper or from what's ordered in court, and I think that there needs to be some kind of accountability in the regulations in terms of probation not being allow to just say that they offer something - there really needs to be more teeth in the regulations to ensure that young people are getting the programs that they are being committed to through courts.</p> <p>In Fresno, there is no programming or very little programming on the detention side. The programs are for young people who've been committed to serve sentences in the juvenile hall, but young people who are in detention sometimes for months or even years also need programming, they also need to be [inaudible], they also need to be resourced and so that's really an unacceptable way of doing things and I think that the regulations need to reflect that.</p>	<p>Briana Zweifler, Youth Law &amp; Policy Attorney</p> <p>Fresno Barrios Unidos</p>
1374 (6)	Visiting	<p>Visiting when I was a kid in juvenile hall were the only bright spot or thing I looked forward to. It is the only time I felt like I could be at all like myself, or vulnerable in any way. Throughout the pandemic, visits have been caught off over and over and it is totally not acceptable. Visits should be way more often and available all-day on some days. Most importantly, I think regulations around public health crises or staffing or any other emergency that could be used to cut off visits needs to not be allowed. Visits are crucial for young people's health and mental health and well-being.</p> <p>Incarceration is a trauma, and we know that contact with family members mitigates trauma, it is absolutely essential that visits are not cut off, that probation does not have the power to cut off visits. Even with the pandemic, we've seen in some places that don't cut off visits, so I know that it's possible. It's been really frustrating as an advocate in the community to not feel like we can do anything when young people are being kept from their families for long periods of time.</p>	<p>Briana Zweifler, Youth Law &amp; Policy Attorney</p> <p>Fresno Barrios Unidos</p>

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1374 (6)	Visiting	<p>The regulation says that “opportunity for visitation shall be a minimum of two hours per week”, and this is just not enough, especially as we consider youth that are going to be transitioning from DJJ to their local county. These youth are going to be serving sentences or periods that are much longer and two hours a week is not enough, that is not enough family connection or community connection. The standards and the regulations must be stronger than this. At the DJJ, there are Saturdays and Sundays that are all-day visitation the facility and the physical space of the facility is shaped to allow for an all-day visitation to occur, and this needs to continue as we consider secure youth treatment facilities. Our minimum two hour a week is not enough, especially with the plethora of research that's out there that talks about the importance of family connection, community connection and just ensuring that youth are connected to their community.</p>	<p>Nancy Juarez, Communications &amp; Policy Analyst</p> <p>Center on Juvenile and Criminal Justice</p>
1375 (6)	Correspondence	<p>Mail is kind of going away in favor of e-mail however the youth are still limited to two postages for free a week. I want to see, very similar to phone calls and visitations, an increase in the minimum, ideally for free to allow youth to write back and forth because corresponding is another way to keep the connection with family, community, and things like that.</p> <p>Allow access to email through tablets similar to some pilot programs in different states and California because emails is the way communication is pretty much done nowadays, as opposed to mailing letters.</p>	<p>Luis Venegas, Restorative Justice Programs Manager</p> <p>Restorative Partners</p>

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CCR § (Art. #)	CCR § Title	Recommendations/Comment	Commentor's Name, Title & Organization
1376 (6)	Telephone Access	<p>Youth should have access to free phone calls and video calls. Cost barriers cause further separation and isolation. During COVID, many counties granted access to free phone calls - an example of this is Alameda County. Over the past two years facilities prove that they have the capacity and structure to grant free phone calls, so I recommend the regulations change to continue to allow communication and support amongst families.</p> <p>Research shows, and recent legislation as well, such as sb 832, that justice system involved the youth are more successful when they remain connected to their families and communities. Justice system involved youth who remain in their communities have lower recidivism rates and are more prepared for their transition back into the community. Therefore, the regulations should stronger language surrounding free and routine phone calls as an attempt to keep youth connected to their communities.</p> <p>There should be language in the regulations to address the fact that oftentimes calls within the county that youth is housed in are free, but if a call is made to another county, they are charged. For example, within San Francisco youth can make calls within that county for free but if youth wants to contact their family in Oakland, they're going to be charged for that. I recommend that the regulations have language surrounding just the removal of these cost barriers, especially if the goal is to keep youth united with their families, with support and to allow them a successful reentry.</p> <p>Tablets have also been made accessible to youth within facilities, and so I hope that access to tablets be reflected in § 1376.</p>	<p>Nancy Juarez, Communications &amp; Policy Analyst</p> <p>Center on Juvenile and Criminal Justice</p>

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CCR § (Art. #)	CCR § Title	Recommendations/Comment	Commentor's Name, Title & Organization
1485 (10)	Issue of Personal Care Items	<p>The regulations need to do more to protect the dignity and hygiene of youth. The personal care items list is really limited, weak, and culturally insensitive. The regulations call for the following products to be provided: toothbrush, toothpaste, soap, comb, shaving implements, deodorant, lotion, shampoo, and post-shower conditioning hair products. This list is extremely limited and does not consider different hair textures nor does it state specific quantity amounts. The personal care item list should include hand sanitizer, a functional mirror, a wide-tooth comb, a hair pic and minimum quantities based on best practices and public comments received. We're hearing from youth that the combs that they're given break easily and do-little service for texture or curly hair.</p> <p>The regulation currently states that each female youth shall be provided with sanitary napkins, panty liners and tampons as requested. I recommend this be changed to each youth, to be held over 24 hours, shall be provided with sanitary napkins, panty liners, and tampons every month. The change that I'm asking for here is that youth don't have to request for these items and that they should automatically be provided upon arrival and that they should be provided a new supply every month without youth having to request this.</p>	<p>Nancy Juarez, Communications &amp; Policy Analyst</p> <p>Center on Juvenile and Criminal Justice</p>
1486 (10)	Personal Hygiene	<p>To protect youth, there must be stronger language to guide each facility in constructing their policies and procedures around personal hygiene. As written now the regulation gives discretion to the county to develop specific written policies and site-specific procedures for showering/bathing and brushing teeth, but we've learned that counties cannot be trusted with this discretion. We've heard that staff have youth lineup with their toothbrush out as they walk by, and staff place a dab of toothpaste on each toothbrush - this is extremely unhygienic and does not consider COVID-19 concerns or CDC best practices. There's nothing in the regulation that could stop something like this from happening, so I highly recommend that the BSCC create better regulation language to prevent something like this happening. I understand each county does things differently for 10 depending on their needs and their capacity, but there can be this much leniency in the regulation to have something like this occur.</p>	<p>Nancy Juarez, Communications &amp; Policy Analyst</p> <p>Center on Juvenile and Criminal Justice</p>

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CCR § (Art. #)	CCR § Title	Recommendations/Comment	Commentor's Name, Title & Organization
N/A	N/A	<p>Youth have the right to make their own [inaudible] free from punitive and controlling systems and the right to input and voice around all services impacting their life. Youth should be free from sexual gender-based physical violence, abuse and exploitation perpetrated by families, [inaudible], our communities [of faith or and state?] and institutions. We have the right to defend ourselves from [inaudible] state, community and institutional violence. Youth should have the access to healing prior to coming into contact with the system, and as the key to preventing systems involvement. We should not be punished for our pain and exploitation and trauma - we need healing, not punishment, when we self-medicate for our trauma and grief.</p> <p>We have the right to active education, knowledge and technology while incarcerated and we re-enter and move through the system that will allow for us to keep up with the world. We anticipate returning to post-system involvement and access to college careers, have access to college counselors, have permanent safe and affordable housing that does not sound like institutions that have harmed us. We deserve homes, where we can rest, be at-ease and are safe, can raise our children and build our families.</p> <p>We have a right to be part of deciding our placement within jail, prison, transitional-housing, foster care or group homes, including transferring to other facilities or placement. Youth should have access to touch, feel and see their children from the [inaudible] while we are in the system that criminalizes and controls women, girls and trans folk of all genders. We have a right to know who [inaudible] for our children when we are unable to do so due to incarceration, homelessness, poverty or other conditions. We have a right to get support and resources to stay connected to and reunite with our children as soon as we are able to.</p> <p>We have the right for our gender and sexuality to be respected and to be free from limited perception of masculinity and femininity, and the gender binary to access hormone therapy and not have it withheld, to express our gender and sexuality while inside systems, on the street and in our homes without fear of homophobic transphobic, or discrimination, harassment or assault.</p>	<p>Lucero Herrera, Program Coordinator for Detention and Reentry</p> <p>Young Women's Freedom Center</p>

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CCR § (Art. #)	CCR § Title	Recommendations/Comment	Commentor's Name, Title & Organization
N/A	N/A	<p>Youth should have their right to self-determination. We must determine what success looks like for ourselves. Youth should have economic opportunity in order to break cycles the poverty, exploitation, incarceration, and abuse.</p> <p>We need employment and other economic opportunity that recognize our value, transferable skills, and dignity; to be the care free from any debts to the justice system and to our confidentiality when we have completed our time.</p> <p>We should have equal pay for our labor while inside to comparable work on the outside. We should be consulted when institutions want to create, revise and eliminate policy, legislation, rules or laws that impact the way we experience system.</p> <p>We are best positioned to identify our alternative to incarceration, criminalization and family separation. To have the insight over the systems and institutions that most impactful us. And also be treated with dignity, regardless of our legal immigration status, past history of arrest or incarceration or classification given by the same institution.</p>	<p>Lucero Herrera, Program Coordinator for Detention and Reentry</p> <p>Young Women's Freedom Center</p>

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CCR § (Art. #)	CCR § Title	Recommendations/Comment	Commentor's Name, Title & Organization
1230 (T24)	Physical Spaces	See Attachment C - CJCJ Proposed Revisions to T15	Nancy Juarez, Communications & Policy Analyst  Center on Juvenile and Criminal Justice
1230.1. 4 (T24-2)	Corridors	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center
1230.2. 6 (T24-2)	Lighting	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center
1302 (1)	Definitions	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center
1302 (1)	Definitions	See Attachment D - PJDC Proposed Revisions to T15	Sue Burrell, Policy Director  Brooke Harris, Executive Director  Pacific Juvenile Defender Center
1303 (1)	Pilot Projects	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center

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CCR § (Art. #)	CCR § Title	Recommendations/Comment	Commentor's Name, Title & Organization
1304 (2)	Alternate Means of Compliance	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center
1310 (2)	Applicability of Standards	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center
1311 (2)	Emergency Suspension of Standards or Requirements	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center
1311 (2)	Emergency Suspension of Standards or Requirements	See Attachment D - PJDC Proposed Revisions to T15	Sue Burrell, Policy Director  Brooke Harris, Executive Director  Pacific Juvenile Defender Center
13-201 (c)(7) (T24)		See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center
13-201 (c)(8) (T24)		See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center

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CCR § (Art. #)	CCR § Title	Recommendations/Comment	Commentor's Name, Title & Organization
1321 (3)	Staffing	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center
1321 (3)	Staffing	See Attachment D - PJDC Proposed Revisions to T15	Sue Burrell, Policy Director  Pacific Juvenile Defender Center
1322 (3)	Youth Supervision Staff Orientation and Training	Officers who provide around the clock care for minors need adequate time to transition in between shifts and complete required paperwork.	Pacific Juvenile Defender Center Latanya Letcher, Detention Services Officer  Los Angeles County Probation Department
1322 (3)	Youth Supervision Staff Orientation and Training	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center
1323 (3)	Fire and Life Safety	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center
1324 (3)	Policy and Procedures Manual	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center

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CCR § (Art. #)	CCR § Title	Recommendations/Comment	Commentor's Name, Title & Organization
1327 (3)	Emergency Procedures	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center
1327 (3)	Emergency Procedures	See Attachment D - PJDC Proposed Revisions to T15	Sue Burrell, Policy Director  Brooke Harris, Executive Director  Pacific Juvenile Defender Center
1328 (3)	Safety Checks	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center
1329 (3)	Suicide Prevention Plan	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center
1340 (4)	Reporting of Legal Actions	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center
1341 (4)	Death and Serious Illness or Injury of a Youth While Detained	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center

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CCR § (Art. #)	CCR § Title	Recommendations/Comment	Commentor's Name, Title & Organization
1350 (5)	Admittance Procedures	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center
1350.2 (5)	"Expediting Release"	See Attachment D - PJDC Proposed Revisions to T15	Sue Burrell, Policy Director  Brooke Harris, Executive Director  Pacific Juvenile Defender Center
1351 (5)	Release Procedures	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center
1352 (5)	Classification	Currently High Risk Offenders are being housed with Low Risk Offenders using the least restrictive housing policy. Classification for High Risk Offenders needs to be revised for the safety and security of Low Risk Offenders because Low Risk Offender youth are recruited to join gangs and commit crimes upon release.	Domy Alatorre
1352.5 (5)	Transgender and Intersex Youth	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center
1353 (5)	Orientation	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center

**BSCC Regulation Inbox**

CCR § (Art. #)	CCR § Title	Recommendations/Comment	Commentor's Name, Title & Organization
1353 (5)	Orientation	See Attachment C - CJCJ Proposed Revisions to T15	Nancy Juarez, Communications and Policy Analyst  Center on Juvenile and Criminal Justice
1354 (5)	Separation	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center
1354.5 (5)	Room Confinement	Minors need a break to decompress in their rooms without it being deemed 'room confinement.' Minors need a break in their rooms after school to nap, write, read and/or rest. Youth are not being secured for a reasonable time to diffuse a situation.	Latanya Letcher, Detention Services Officer  Los Angeles County Probation Department
1354.5 (5)	Room Confinement	See Attachment C - CJCJ Proposed Revisions to T15	Nancy Juarez, Communications & Policy Analyst  Center on Juvenile and Criminal Justice
1355 (5)	Institutional Assessment and Plan	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center

**BSCC Regulation Inbox**

CCR § (Art. #)	CCR § Title	Recommendations/Comment	Commentor's Name, Title & Organization
1355 (5)	Institutional Assessment and Plan	See Attachment D - PJDC Proposed Revisions to T15	Sue Burrell, Policy Director
			Brooke Harris, Executive Director
			Pacific Juvenile Defender Center
1355 (5)	Institutional Assessment and Plan	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney
			Youth Law Center
1356 (5)	Counseling and Casework Services	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney
			Youth Law Center
1356 (5)	Counseling and Casework Services	See Attachment D - PJDC Proposed Revisions to T15	Sue Burrell, Policy Director
			Brooke Harris, Executive Director
			Pacific Juvenile Defender Center
1357 (5)	Use of Force	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney
			Youth Law Center

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**BSCC Regulation Inbox**

CCR § (Art. #)	CCR § Title	Recommendations/Comment	Commentor's Name, Title & Organization
1357 (5)	Use of Force	See Attachment C - CJCJ Proposed Revisions to T15	Nancy Juarez, Communications & Policy Analyst  Center on Juvenile and Criminal Justice
1358 (5)	Use of Physical Restraints	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center
1358 (5)	Use of Physical Restraints	See Attachment C - CJCJ Proposed Revisions to T15	Nancy Juarez, Communications & Policy Analyst  Center on Juvenile and Criminal Justice
1358.5 (5)	Use of Restraint Devices for Movement and Transportation within the Facility	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center
1359 (5)	Safety Room Procedures	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center

**BSCC Regulation Inbox**

CCR § (Art. #)	CCR § Title	Recommendations/Comment	Commentor's Name, Title & Organization
1360 (5)	Searches	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center
1361 (5)	Grievance Procedure	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center
1362 (5)	Reporting of Incidents	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center
1363 (5)	Use of Reasonable Force to Collect DNA Specimens, Samples, Impressions	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center
1370 (6)	Education Program	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center
1371 (6)	Programs, Recreation, and Exercise	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center



**BSCC Regulation Inbox**

CCR § (Art. #)	CCR § Title	Recommendations/Comment	Commentor's Name, Title & Organization
1373 (6)	Work Program	See Attachment C - CJCJ Proposed Revisions to T15	Nancy Juarez, Communications & Policy Analyst  Center on Juvenile and Criminal Justice
1374 (6)	Visiting	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center
1374 (6)	Visiting	See Attachment C - CJCJ Proposed Revisions to T15	Nancy Juarez, Communications & Policy Analyst  Center on Juvenile and Criminal Justice
1376 (6)	Telephone Access	See Attachment D - PJDC Proposed Revisions to T15	Sue Burrell, Policy Director  Brooke Harris, Executive Director  Pacific Juvenile Defender Center
1376 (6)	Telephone Access	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center

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**BSCC Regulation Inbox**

CCR § (Art. #)	CCR § Title	Recommendations/Comment	Commentor's Name, Title & Organization
1376 (6)	Telephone Access	See Attachment C - CJCJ Proposed Revisions to T15	Nancy Juarez, Communications & Policy Analyst  Center on Juvenile and Criminal Justice
1377 (6)	Access to Legal Services	See Attachment D - PJDC Proposed Revisions to T15	Sue Burrell, Policy Director  Brooke Harris, Executive Director  Pacific Juvenile Defender Center
1377 (6)	Access to Legal Services	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center
1390 (7)	Discipline	Revise youth discipline to reduce and eliminate violent attacks on youth and officers. Youth with serious behavioral issues or assaultive behavior on other youth or officers need to face consequences. All units should be able to perform the same function as the "Hope Center" because it alone has not been enough to assist and youth continue to get assaulted because of the current limitations on youth discipline.	Domy Alatorre
1390 (7)	Discipline	There have been numerous violent assaults in Juvenile Halls and Camps this year and the BSCC ignores it and doesn't seem concerned that minors are not being held accountable.	Latanya Letcher, Detention Services Officer  Los Angeles County Probation Department

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**BSCC Regulation Inbox**

<b>CCR § (Art. #)</b>	<b>CCR § Title</b>	<b>Recommendations/Comment</b>	<b>Commentor's Name, Title &amp; Organization</b>
1390 (7)	Discipline	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center
1391 (7)	Discipline Process	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center
1400 (8)	Responsibility for Health Care Services	See Attachment C - CJCJ Proposed Revisions to T15	Nancy Juarez, Communications & Policy Analyst  Center on Juvenile and Criminal Justice
1401 (8)	Patient Treatment Decisions	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center
1402 (8)	Scope of Health Care	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center
1403 (8)	Health Care Monitoring and Audits	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center

**BSCC Regulation Inbox**

CCR § (Art. #)	CCR § Title	Recommendations/Comment	Commentor's Name, Title & Organization
1406 (8)	Health Care Records	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center
1407 (8)	Confidentiality	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center
1408 (8)	Transfer of Health Care Summary and Records	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center
1408.5 (8)	Release of Health Care Summary and Records	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center
1409 (8)	Health Care Procedures Manual	See Attachment B - YLC Proposed Revisions to T15	Erin Palacios, Attorney  Youth Law Center
1410 (8)	Management of Communicable Diseases	See Attachment D - PJDC Proposed Revisions to T15	Sue Burrell, Policy Director  Brooke Harris, Executive Director  Pacific Juvenile Defender Center

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**Juvenile Regulations Revision - Comments received via Smartsheet April 8, 2022 - July 8, 2022**

CCR § (Art. #)	CCR § Title	Recommendations/Comment	Commentor's Name, Title & Organization
1354.5 (5)	Room Confinement	Room confinement: Should be utilized to separate youth for a cooling down period/de-escalation which would provide the youth an opportunity to also meet with a mental health clinician. Also this will provide time for staff to meet with the other youth who witnessed an assault or a fight which is very traumatic for the youth who are not involved. Many times the other youth do not feel safe and at times these types of incidents have led to other youth to make weapons (shanks) in case they are assaulted. It provides the victim (youth) a sense of safety from the aggressor that has assaulted them.	Unknown
1357 (5)	Use of Force	The current regulation language in section 1357 is sufficient as it requires local control of juvenile detention facilities that would be designed as the best practice for the local control. BSCC trying to specifically dictate any tools or methods in the use of force goes too far in trying to establish state-wide impact that may have different outcome based on dynamic of each localities. it is best left to local juvenile detention facilities to adhere to own written policies and procedures as currently required in the section 1357. In this diverse state, that has sprawling urban metro areas as well as sparsely populated rural areas, any attempts by BSCC to impose its one-size-fits-all approach would lead to chaotic and haphazard unsafe environment for justice involved youths as well as many stakeholders involved in rehabilitative efforts for those who truly needs. Each local juvenile detention facilities are under respective local control already where those stakeholders can voice each of their concern more effectively thru respective jurisdictions.	Theodore Cha  Los Angeles County Probation
1357 (5)	Use of Force	Use of Pepper Spray: This is a necessary tool to have in special circumstances - such as the following: a major disturbance involving several youth, race riots, several youth physically assaulting one youth, and physical assaults on staff. Female staff and the height/weight differences of the youth. We have had youth that are well over 6 feet and the staff that are supervising them under 5'5. size and weight differences should be considered to prevent injury. Pepper spray ends the physical assaults quickly without the youth and staff getting hurt. It is needed for safety and security of all. I wish you could ask the kids that are physically assaulted by other kids, how they would feel if/when their aggressor was pepper sprayed to stop the assault.	Unknown