

Line #	Recommendation (with regards to column D)	Page Number	Original Text	Suggested Text or Issue	Submitted By	Notes from whoever suggested the edit unless otherwise noted
72	Data & Evaluation Plans: Pg 45 - 46					
73		45	[Regarding "Data & Evaluation Plan"]	Clarification requested	Emily Young	Additional clarification needed re: who is responsible for doing the comprehensive evaluation & who will be determining if and what data collection tools should be used from the beginning of programming. Are feedback surveys & suggestion boxes intended to be used regularly or only during the comprehensive assessment? NOTE: Monica Vaughan also expressed wanting more clarity on on evaluation, reporting, and oversight. It seems a little muddy now with the JJCC/JJDCPC roles and also understanding there are legal oversight and accountability authorities for Probation and other agencies.
74		45	[Regarding "Data & Evaluation Plan"]	ADD: ACPD commits to providing relevant data to the SB 823 Subcommittee as often as it convenes. The Subcommittee will need data in order to evaluate the efficacy of the SB 823 program. The data provided will include specific numbers of cases where 707(b) offenses were alleged and instances when the youth were transferred to adult court. Probation will also provide the Subcommittee with data showing how many youth were ordered to the SPTF. Probation will also provide historical data for the Subcommittee to use for comparison.	Andrea Zambrana	
75		46	Importantly, ACPD's program evaluation processes will be transparent and accessible to the general public. Program evaluations will be regularly submitted to the JJDCPC Programmatic Advisory Subcommittee to help inform their recommendations	Suggested to delete	ACPD	SB 823 does not provide any additional funds to support evaluation. The legislation does not specifically call for local evaluation of any services. OYCR has the statutory requirement to "evaluate the efficacy of local programs being utilized for realigned youth" per section 2020 of the Welfare and Institution Code. We understand the intent. We also have a fully staffed Research and Evaluation Unit in-house to support these basic evaluations. Also note: JJDCPC Programmatic Subcommittee to be replaced by the Youth Advisory Council. NOTE: Monica Vaughan also expressed wanting more clarity on the role of the JJDCPC vs the JJCC
76	Facilities: Immediate, Intermediate, & Long-Term Plans: Pg 47 - 62					
77		47	[Regarding "Facilities"]	ACPD will commit to consulting with a facilities expert when exploring all current and future facilities for the SB 823 population.	Andrea Zambrana	
78		48	[Regarding "Eradication of Inhumane & Re-Traumatizing Practices"]	Extensive edits - see next tab	ACPD	
79	Adopt IJs language in green text in column F	50	ACPD will prioritize reviewing policies that directly impact the youth's daily lives, such as being able to wear their own clothes, allowing families to bring in food during visits, and reviewing and expanding the personal items that are allowed.	As part of the Youth In Custody Practice Model, ACPD has reviewed and updated several policies to align with best practices and positive youth development. ACPD will continue to explore opportunities to allow for more autonomy and independence in the SB 823 program.	ACPD	As part of the Youth In Custody Practice Model, ACPD has reviewed and updated several policies to align with best practices and positive youth development. ACPD will continue to review and explore opportunities to allow for more autonomy and independence in the SB 823 program, prioritizing reviews of policies directly impacting the youths' daily lives.

80		50	During this process, ACPD shall explore making alterations and adjustments to allow for/create the following:	In order to meet the immediate day-to-day needs of young people during this process, ACPD will adapt the current juvenile hall facility to create the most homelike environment possible in the facility. ACPD shall make alterations and adjustments to allow for, create, and implement the following:	Erin Palacios & Vamsey Palagummi	Suggested edit replaces original language	
81	Adopt	51	[Regarding "using" Camp Sweeney as a step-down option]	[ACPD edits to read "preparing" Camp Sweeney to be used]	ACPD		
82	Adopt	51	They are clear in their belief that the current facility is not satisfactory, and they have no intention to "coast" and use the JJC indefinitely.	Suggested to delete	ACPD	This language is written as if this is not "our" plan, but rather a document that one party is giving to another about ACPD. All language of this sort should be removed to be consistent with this being "our" plan – as a Subcommittee. Its misleading to say that we will not use the JJC indefinitely. "We" don't use anything. The Court does.	
83	Adopt	52	It is expected that ACPD will complete a full assessment of the possibility of using Camp Sweeney as a Secure Treatment Facility and as a potential step-down facility during the first year of implementation of this Plan.	ACPD will aim to complete a full assessment of the possibility of preparing Camp Sweeney to be utilized a Secure Treatment Facility and as a potential option for a step-down facility during the first year of implementation of this plan.	ACPD		
84		52	[Regarding "Long-Term Planning for Facilities"]	Extensive edits - see next tab	ACPD		
85	Reject	52	[Regarding "Long-Term Planning for Facilities"]	Request for additional research	Andrea Zambrana	I would like Impact Justice to provide more scholarly support under the section "Long term planning for facilities."	Note from IJ: We have the capacity to respond to limited, very specific requests for additional research. To provide a complete literature review on this section is beyond our scope, capacity, and timeline. Perhaps we can include additional language indicating that long-term planning should include a review of best practices with regards to facilities.
86		52	[Regarding "Long-Term Planning for Facilities"]	Substantial additions suggested	Erin Palacios & Vamsey Palagummi	See suggestions in attached document "VPalagummi & EPalacios Edits & Comments"; beginning on pg. 62	
87		53	[Regarding "Other Options for Step-Down"]	Substantial additions suggested regarding girls & gender expansive youth	Erin Palacios & Vamsey Palagummi	See suggestions in attached document "VPalagummi & EPalacios Edits & Comments"; beginning on pg. 63	
88	Adopt	54	Healing homes can be a viable option at various points in the continuum of the justice process.	Healing homes can be a viable option at various points in the continuum of the justice process, provided they meet Community Care Licensing requirements.	ACPD		

89		54	[Regarding "Safety & Protection"]	Entire section suggest delete	ACPD	These are operational issues that are subject to the meet and confer process, as a result of changes in work conditions and should be removed from the plan entirely. The Board does not have a history of unilaterally directing the implementation of policies that have not gone through the meet and confer process and we would not be favorable of recommending they do that. This plan is specific to the SB 823 population and any plan to move away from OC Spray will not be limited to this population.	NOTE: Andrea Zambrana requested clarification: "Incident data will be provided to the appropriate body." Who is the "appropriate body"? NOTE: Erin Palacios & Vamsey Palagummi added stronger language prohibiting the use of OC spray, prone restraints, and room confinements under any circumstances. See pg. 65 of their attached document "VPalagummi & EPalacios Edits & Comments"
90	Adopt: include in handbook referenced above	54	[Regarding "Discipline & Behavior Management"]	Clarification requested	Andrea Zambrana	The disciplinary process should be as detailed and transparent for the SB 823 unit as it is for those at Camp Sweeney. [See Camp Sweeney's student handbook page 25]	
91	Adopt	55	As long as room confinement, pepper spray, and physical restraints are used, reviews of each instance will be conducted to determine appropriate use and compliance with policy.	As long as room confinement, pepper spray, and physical restraints are used, reviews of each instance will be conducted by the Chief Probation Officer to determine appropriate use and compliance with policy.	Andrea Zambrana		
92	Adopt	57	[Regarding proposed Youth Bill of Rights]	ADD: Freedom of speech/expression; right to money; right to be informed; right to accuracy and fairness around discipline; right to confidentiality, right to file grievances; and right to be seen by the guidance clinic and medical.	Andrea Zambrana	The Bill of Rights outlined in the plan should include all the same rights as outlined in the Camp Sweeney Handbook. These are the ones missing in the current SB 823 draft plan.	
93		59	[Regarding "Incident Data"]	Entire section suggest delete	ACPD	SB 823, Section 1995 states that the subcommittee was created to develop a plan describing the facilities, programs, placements, services, supervision and reentry strategies that are needed to provide appropriate rehabilitation and supervision services for the population described in subdivision (b) of Section 1990. The plan is not intended to be used as a mechanism for oversight and accountability.	Andrea Zambrana requests clarification on what is considered an "incident" to trigger this disclosure?
94	Reject	59	[Regarding "Staff"]	Suggest replacing "credible messengers" with "all relevant stakeholders" in this section up until the "Milieu Providers" section The therapeutic milieu/community relies on structure and predictability to include dedicated staff with clear roles and responsibilities for each community team member. The SB 823 programming unit will be supported by a core group of ACPD staff, ACBH clinicians, and professional Credible Messengers. ACPD will operate a unit management structure with clear lines of supervision and roles and responsibilities to support the milieu. All milieu providers will participate in regular/weekly meetings" to determine the best operational strategies week to week.	ACPD	CM's have been outlined throughout the document. Its clear in several sections that they are to be imbedded. There's no debate about that. Not all stakeholders are infused into Probation culture, including county partners. So to single out the CMs seems like favor towards them when all should be treated equal.	
95		60	[Regarding "Milieu Providers" & the supervision roles & responsibilities]		ACPD	These concerns are resolved and do not need to be included in the plan as a concern to address	Emily Young & Andrea Zambrana also expressed concern about the bifurcated supervision structure outlined previously & the confusing nature of the original language.

96		60	[Regarding "Milieu Providers" & the supervision roles & responsibilities]	Remove language regarding FTEs	Emily Young	In our workgroup we were hesitant to include FTE language because we didn't want the program to be staffed with multiple part time people. Is it possible to clarify that it is desirable that the mental health clinicians and credible messengers be assigned to the unit full time?
97	Reject; should be addressed above	60	[Regarding Credible Messengers]	Clarification requested	Andrea Zambrana	Who will CM be employed by and report to? Is it important that they have independence and autonomy from Probation?
98	Adopt	61	The Credible Messengers will assist youth in developing skills necessary to thrive in community and will complete an independent assessment of youth needs to be considered during the comprehensive case planning process.	The Credible Messengers will assist youth in developing skills necessary to thrive in community.	ACPD	Language in the Assessment section of this plan states that assessments will be done collaboratively with the MDT
99		61	[Regarding "Training of Milieu Providers"]	Clarification requested	Emily Young	It's really important to emphasize the need for ongoing coaching and supervision on the training topics. The full plan places a huge responsibility on the milieu team to implement many different interventions well (restorative justice, mindfulness, conflict resolution, positive youth justice, etc.) and one training – even a great one is not going to be nearly enough to give them the support they need to be successful at this.