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Page Number	Original Text	Suggested Text or Issue	Submitted By	Notes
3	[Regarding "Subcommittee Composition & Membership" Table]	Update needed	Impact Justice	Will be edited to match most recent letter submitted to and approved by the Board of Supervisors
4	This SB 823 Realignment Plan, if approved by the Board of Supervisors, shall be submitted to the Office of Youth and Community Restoration (OYCR) no later than January 1, 2022, and will remain in effect through April 30, 2022. The SB 823 Subcommittee will convene to review, revise, and update this document prior to the next required submission to the OYCR, which is on or before May 1, 2022.	This SB 823 Realignment Plan, if approved by the Board of Supervisors, shall be submitted to the Office of Youth and Community Restoration (OYCR) no later than January 1, 2022, and will remain in effect through April 30, 2023. The SB 823 Subcommittee will convene to review, revise, and update this document prior to the next required submission to the OYCR, which is on or before May 1, 2023.	ACPD	
4	It is the intent of this Subcommittee to remain regularly engaged in the SB 823 planning and to receive regular reports on implementation, convening monthly through April 2022 and at least quarterly thereafter.	It is the intent of this Subcommittee to remain regularly engaged in the SB 823 planning and to receive regular reports on implementation, convening quarterly following the submission of this Plan.	Impact Justice	Making this suggestion based on the majority of opinions expressed in disucssion on 9/23
6	Youth of color were disproportionately committed to DJJ were mostly Black (57%), Hispanic (38%), and Asian (5%).	Youth of color were disproportionately committed to DJJ making up 100% of the populations: Black (57%), Hispanic (38%), and Asian (5%).	ACPD	Clarifying that all Alameda County youth committed to DJJ were youth of color
6	[Regarding "Defining the Target Population"] The section that follows provides an overview of the 21 youth currently committed to DJJ, with the earliest registered in 2014. Since the passage of Proposition 57, in 2016, there have been three youth transfers from Alameda County to the adult system.	The section that follows provides an overview of the 21 youth currently committed to DJJ, with the earliest registered in 2014. This population most nearly resembles the population of youth likely to be committed to the SYTF. The section also contains an overview of the (#) of youth with a sustained 707(b) offense who received a disposition other than a commitment to DJJ. Since the passage of Proposition 57, in 2016, there have been three youth transfers from Alameda County to the adult system. Together, these three groups makeup the target realignment population.	Erin Palacios & Vamsey Palagummi	Note from IJ: This edit to the definition of the target population has significant ramifications throughout the Plan.
8	D. Certifying that formal recommendations from Probation to the Court, for adult transfers, are approved at the Chief Probation Officer level. This ensures several layers of review and discussion before a recommendation for transfer proceeds. A detailed, updated report from the Multi-Disciplinary Team (MDT) and the youth's counsel will be considered and submitted as part of the overall recommendation.	D. Certifying that formal recommendations from Probation to the Court, for adult transfers, are approved at the Chief Probation Officer level. This ensures several layers of review and discussion before a recommendation for transfer proceeds. [DELETE FOLLOWING:] A detailed, updated report from the Multi-Disciplinary Team (MDT) and the youth's counsel will be considered and submitted as part of the overall recommendation.	ACPD	In transfer cases, the Probation Officers draft their reports in collaboration with their supervisors and make their recommendations to the court based on the facts. A Child and Family (CFT) team meeting is held with the youth and stakeholders of the youth's choosing – similar to a MDT. There is a set criteria that must be met in order to make the recommendation to transfer. Additionally, the Chief also has to sign off. Given that, an MDT is not necessary and we would like this sentenced removed. The final decision is up to the Court and the youth's attorney has the opportunity to debate the contrary with the Court.

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8	E. Tracking data of youth transfers to adult criminal court and reporting to justice partners to monitor and review at least bi-annually and at all SB 823 Subcommittee meetings. This will ensure a level of oversight and input, contributing toward the goals of transparency and fairness.	E. Tracking data of youth transfers to adult criminal court and reporting to justice partners, including the youth's defense team , to monitor and review at least bi-annually and at all SB 823 Subcommittee meetings. This will ensure a level of oversight and input, contributing toward the goals of transparency and fairness.	Andrea Zambrana		
9	[Regarding youth transfers to adult criminal court]	Data to be captured will include: demographic data (including age at time of offense, date of birth, self-identified racial/ethnic identity, and SOGIE) ; most serious charge; and reason for transfer, if applicable. This information will be gathered and tracked for all 707b offenses so that rates of transfer can be easily calculated and monitored.	Impact Justice; per discussion on 9/23	SOGIE = sexual orientation, gender identity, & gender expression	
10	Suggested addition; would be last paragraph under "Focus on Relationships"	ADD: While a great deal of attention is paid to the staff of the milieu, the youth themselves are also a vital part of the social environment. Thus, opportunities for peer support and empowerment, as well as agency and self-direction will be actively sought out and encouraged. Given that youth will likely remain in this Program for several years, such relationships and sources of peer support will likely be important components of success.	Impact Justice, per suggestion by Andrea Zambrana	Request: Dr. Khumalo outlined on 7/15, that a successful SB 823 program must include several attributes and I would like Probation to commit to the following in more specific ways throughout the plan: Peer support and empowerment/self-direction. The latter is mentioned on page 13 with respect to culturally responsive programming, which suggests this might be the only area where this will happen. Page 11 seems like a good place to include this.	
11	Suggested addition; would be the opening statement under "Credible Messengers"	and have been transformed can serve as positive role models for others. Serving as mentors in community programs, Credible Messengers are trusted by justice-involved people looking to get their lives back on track. With their life experience, Credible Messengers can contribute through a meaningful mentoring relationship with a young person.	Impact Justice per suggestions for clarification from several Subcommittee members	This would add a definition of Credible Messengers as the opening sentences the first time the term is used. Taken from Clinton Lacey's website.	
11	The institution will support that process by "making room" for Credible Messengers to contribute to such a culture and milieu.	The institution will support that process by "making room" for Credible Messengers in the ways outlined above to contribute to such a culture and milieu.	Impact Justice, per a request for clarification from Andrea Zambrana		
12	For instance, youth will participate in activities that promote their socio-political consciousness, such as designing and participating in social justice projects that can have an impact in their communities.	For instance, youth will be afforded the opportunity to participate in activities that promote their socio-political consciousness, such as designing and participating in social justice projects that can have an impact in their communities.	ACPD		
12	N/A	ADD new section right before Culturally Responsive Programming defining the MDT	Impact Justice, per requests to clarify the MDT membership	Andrea Zambrana also requests that youth be able to "elect to have members of their defense team attend the MDT meetings"	NOTE: IJ is unaware of any best practices that include members of the defense team in MDTs. It is rare that members of the defense team are involved at the level expected by members of the MDT.

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12	To improve youth's successful participation in program activities, ACPD will take on a culturally responsive approach across two main program components: structure and staffing.	To improve youth's successful participation in program activities, ACPD will take on a culturally responsive approach across three main program components: structure, staffing, and program design.	Erin Palacios & Vamsey Palagummi		
12	Relatedly, ACPD will ensure youth are offered programs that provide the history of their respective cultures, races, and/or ethnicities.	Relatedly, ACPD will ensure youth are offered programs that provide the history of their respective cultures, races, and/or ethnicities, and employ relevant indigenous/ancestral practices and frameworks that support youth development.	Erin Palacios & Vamsey Palagummi		
14	The primary interventions selected for this unit will have a manual or written protocol, facilitators who have been trained in the interventions, and a mechanism to ensure fidelity to the interventions.	Clarification requested	Andrea Zambrana	The plan says "primary interventions" will have a manual. What is this manual?	NOTE: IJ is unsure what additional clarification is needed?
14	Suggested addition would be last paragraph before "Credible Messengers"	One of the central benefits of juvenile justice realignment is that youth will remain close to their homes and communities. Using the most expansive definition of family, ACPD will engage and support youth in establishing the most connected relationships possible. It will further support youth's relationships through deep partnerships with contracted, community-based providers and volunteers at all phases of a youth's contact with the system. For youth with 707(b) adjudications who are not committed to the SYTF ACPD will contract with and engage community providers and volunteers to serve youth in other settings or in the community, ensure access to the mentorship program described above, and provide robust family engagement and support. At every phase, and in every setting, these services will be delivered with goal of maintaining the youth in the least restrictive appropriate environment as intended by SB 823.	Erin Palacios & Vamsey Palagummi		
14	[Suggested addition would go after:] One model that has been developed for youth in the justice system is the "RJ Ready" curriculum developed by Rashida George at the Institute for Restorative Future.	and sanctions policies, allowing for the community (youth, milieu team, and family members) to instill meaningful and authentic ways to repair any harms committed by youth or staff during the Program. This will allow for a move away from stock rewards and sanctions and toward highly individualized approaches more likely to help youth internalize the core competency being developed within the process.	Erin Palacios & Vamsey Palagummi		
14	[Regarding language for "sexual minority" and "LGBQ/GNCT"]	lesbian, gay, bisexual, queer, trans, and gender expansive youth	Erin Palacios & Vamsey Palagummi	Note from IJ: We suggest using this terminology throughout for consistency.	
14	[Regarding "Gender Responsive Approach"]	Significant suggested additions	Erin Palacios & Vamsey Palagummi	See suggestions in attached document "VPalagummi & EPalacios Edits & Comments"; beginning on pg. 18	

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16	[Regarding Mental Health Services] ACPD will also engage an expert consultant (or group of consultants) to develop, implement, and monitor the fidelity of this program and the essential training elements.	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.	
16	[Regarding "Mental Health Services"]	Clarification requested	Andrea Zambrana	Under the Mental Health section there are individuals identified by role as being a part of a team. Is this the MDT team? If not, where in the plan is the composition of the MDT team explicitly identified? There seem to be a lot of different teams that are meeting and the membership is different. It would be helpful to have a section that outlines the different teams, who will/can attend those and the purpose of those teams.	IJ Note: See also comments on page 12 (also regarding the composition & role of the MDT)
19	Therefore, the SB 823 deputy probation officer will review the YLS and collateral documentation for all newly placed youth to ensure that the information entered is comprehensive and consistent with the current understanding of youth need.	Therefore, the SB 823 deputy probation officer will review the YLS and collateral documentation, including reports submitted by the youth's defense team, for all newly placed youth to ensure that the information entered is comprehensive and consistent with the current understanding of youth need.	Impact Justice, per a request for clarification from Andrea Zambrana		
20	ACBH proposes to provide a biopsychosocial assessment and to use that information to determine need for services and develop an appropriate mental health treatment plan.	ACBH proposes to provide a biopsychosocial assessment, which may include the CANS, and to use that information to determine need for services and develop an appropriate mental health treatment plan.	Impact Justice, per discussion 9/30		
20	[Regarding the list of domains listed as part of the biopsychosocial assessment]	ADD: An assessment of youth and family strengths	Emily Young	Because this is a core feature of the CANS that would be worth formalizing if the CANS is not used.	
21	ACPD has indicated that it will hire a recreational therapist to provide services. As a part of this service, ACPD will ensure that the therapist participates in the assessment process...	The SB 823 program will employ a recreational therapist to provide services. The therapist will participate in the assessment process...	ACPD		
21	[Suggested addition would be last paragraph before "Specialized Treatment"]	ACPD will work with credible messengers, the Court, Public Defender, District Attorney and others to discuss and develop practices for progress review hearings that aim to avoid the demoralization, frustration, and anger youth reported experiencing at parole hearings.	Erin Palacios & Vamsey Palagummi		
23	The main diagnoses provided by Guidance Clinic clinicians for youth committed to DJJ have been PTSD, depression, and anxiety.	The main diagnoses provided by Guidance Clinic clinicians for youth committed to DJJ in Alameda County have been PTSD, depression, and anxiety.	ACPD		
25	Once the youth's family has been clearly defined and identified, ACPD will provide access through both formal and informal means and will work to remove all physical and economic barriers to ensure that these relationships are preserved.	Once the youth's family has been clearly defined and identified in consultation with the MDT, ACPD will provide access through both formal and informal means and will work to remove all physical and economic barriers to ensure that these relationships are preserved.	Impact Justice; per discussion on 9/23	This clarifies how ACPD will operationalize the "broadest definition of the family"	

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25	Suggested addition; would be the last paragraph on page 25 before "Family Therapy"	Youth will be provided opportunities for family engagement on a daily basis, with emphasis and preference placed on in-person opportunities, but also utilizing virtual and telephone contact as well. Exceptions to daily family engagement opportunities will be documented and monitored to help identify barriers.	Impact Justice; per discussion on 9/24	Added to the bottom of the first paragraph	
25	Most families won't want therapy; instead they will often seek opportunities to build effective relationships.	Some families will not desire therapy; instead they will seek opportunities to build effective relationships.	ACPD		
25	ACPD will partner with an expert consultant(s) to assist in developing, implementing, and ensuring the core program's fidelity over the course of the first two years of implementation, at a minimum.	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.	
25	[Suggested addition would be last paragraph before "Specialized Treatment"]	In addition to the engage strategies described in this section, ACPD will also provide robust and diligent family finding services to help connect youth to familial resources. This will help youth in the SYTF locate and develop connections, and will assist the remaining target population to locate and develop both relationships and placement resources.	Erin Palacios & Vamsey Palagummi		
26	... we have identified 20 core competencies necessary to support "thriving."	... we have identified 20 core competencies necessary to allow youth to thrive .	Al Mance		
26	Additionally, thriving will be the key outcome that the youth's individual success plan and programming ultimately seek to achieve. This will be informed by the various mental health, risk/needs, and social emotional assessments; collateral information from the youth's success team (i.e., the individual youth and their family, Credible Messenger, clinician, JIO, educational partner, and relevant CBO partners).	Additionally, thriving will be the key outcome that the youth's individual success plan and programming ultimately seek to achieve. This will be informed by the various mental health, risk/needs, and social emotional assessments; collateral information from the youth's success team (i.e., the individual youth, their family, their MDT, and other relevant CBO partners).	Impact Justice, per requests to clarify "success team" (the term is only used here) vs the MDT	Andrea Zambrana asked regarding the success team: is this different from the MDT? If so, can we identify who will be a part of the success team? Can a youth request members of the defense team to be a part of the success team?	
28	[Under "Support Others"] ACPD is committed to partnering with the JJDPC to develop a program in which youth are paid for their work...	ACPD is committed to exploring a program in which youth are paid for their work...	ACPD		
28	[Suggested addition would be added to the end of the definition of "Support Others"]	In partnership with ACPD, the JJDPC will immediately create a youth income plan, outlining the process in which youth can earn income during and after their incarceration. While the details of the plan are still in progress, youth shall be given the opportunity to earn no less than \$500 per month (this amount is aligned with cutting-edge research, stating that merely \$500 per month can support agency and a reduction of stress and anxiety).	Erin Palacios & Vamsey Palagummi		
29	[Regarding Programmatic Advisory Subcommittee]	Extensive edits - see next tab	ACPD		

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31	... to provide services in the community during "inside/outside" and reentry phases.	... to provide services in the community during "inside/outside" (youth being in-custody while also being allowed to go into the community for programs, jobs, school, and services) and reentry phases.	ACPD		
31	[Regarding footnote 48]	Suggested to delete	Impact Justice, per request for clarification from Andrea Zambrana	From IJ: The footnote was linking to a PDF shared with the Subcommittee for internal reference. It should not have been included here as a footnote.	
32	ACPD will also pursue the identification of other innovative programs within the community. For example, ACPD will partner with a Credible Messenger or a community provider to have an emotional or therapeutically trained animal, such as a dog...	ACPD will also pursue the identification of other innovative programs within the community, including but not limited to emotional or therapeutically trained animals, such as a dog...	ACPD		
33	ACPD, in recognition of the importance of sleep and the delay in sleep onset and wakefulness, will develop programming and daily schedules to meet the sleep hygiene needs of youth. This will be routinely reassessed and include increased flexibility on weekends. ACPD will also consider and implement options to accommodate the needs of young people	ACPD, in recognition of the importance of sleep and the delay in sleep onset and wakefulness, will develop programming and daily schedules to meet the sleep hygiene needs of youth, consistent with Title 15 requirements and in alignment with all existing MOUs. This will be routinely reassessed and include increased flexibility on weekends. ACPD will also consider [DELETE: and implement] options to accommodate the needs of young people	ACPD		
33	The established daily schedule, or a sampling of weekly schedules, and any accommodations or modifications made to meet these needs will be reported to the subcommittee prior to the approval of the Annual Realignment Plan.	Clarification requested	Andrea Zambrana	Not sure what this is saying	
34	[Regarding "Sample Core Programming Schedule"]	Revision requested	Monica Vaughan	The sample does not include any time for education/school; Al Mance also expressed concern about this.	
35	If ACPD acknowledges that racism entrenched in the laws, policies, and practices of our society have contributed to these youth attending substandard schools and living in severely under-resourced, often violent communities, then it will commit to contributing to repair these injustices...	ACPD acknowledges that racism entrenched in the laws, policies, and practices of our society have contributed to youth attending substandard schools and living in severely under-resourced, often violent communities, and commits to contributing to repair these injustices...	ACPD		
35	See above	ACPD acknowledges that racism entrenched in the laws, policies, and practices of our society have contributed to many of these youth not receiving the same educational opportunities and resources that they need, and living in severely under-resourced, often violent communities, and commits to contributing to repair these injustices...	Impact Justice, per Education workgroup meeting 9/28	Rephrasing: "... society have contributed to these youth attending substandard schools..." to something that does not assume the previous schools were substandard, but recognizes many of the youth will have had negative experiences in school was also requested by Monica Vaughan. Andrea Zambrana also requested clarification	

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35	Suggested addition after: Every student should have an Individualized Learning, and Transition Plan (ILTP). Assessments for IEPs should be conducted as needed.	ADD: It is recognized that a disproportionate number of students in custody have IEPs, and special attention will be given to special education needs. The needs of English Language Learners will also be addressed in culturally appropriate ways.	Impact Justice, per Education workgroup meeting 9/28	Erin Palacios & Vamsey Palagummi expressed concern about providing specialized services such as Speech & Language Pathologists & Occupational Therapists. [IJ: Can we clarify that these needs are assessed and included in any IEPs?]	
35	Suggested addition to IEP section	with disabilities, as well as youth who are re-engaging with school after periods of absence and frequent transition. Recognizing that it may have been some time since a youth has been in the same school for more than a few months, ACOE will implement assessment and evaluation protocols that will a) identify present academic levels b) monitor present levels such that supports can be scaled up, or so that students can engage in more challenging work and c) meet current special education needs and identify any previously unmet special education needs. In addition to students with disabilities, special attention should be paid to the needs of English Language Learners.	Al Mance		
35	Assessments for IEPs should be conducted as needed.	Clarification requested	Andrea Zambrana	Who determines this? I assume this only relates to situations where the minor transfers in from another jurisdiction or wasn't held in our local Hall pending disposition.	
35	Suggested addition to IEP section	As it relates to students with disabilities, ACOE and ACPD will comply with its legal obligations under the IDEA and the State Education Code. This shall include implementing the existing IEPs of SB 823 students well as conducting initial special education assessments for SB 823 students with suspected disabilities. Cal. Ed. Code Section 56301(a).	Al Mance		
36	San Mateo's Project Change program, since such a program could be adapted and/or improved for local use... Ideally these services would be provided by ROC at Laney Community College. This organization would be supported by ACOE and Probation.	Suggested to delete	ACPD	Specific programs should not be identified prior to the procurement process	
37	Access to facilities that enable hands-on learning (e.g. auto repair shops, commercial kitchens, computer labs, etc.) will also be provided.	Access to facilities that enable hands-on learning (e.g. auto repair shops, commercial kitchens, computer labs, etc.) will also be provided when feasible .	ACPD		
38	ACPD will therefore explore opportunities for SB 823 youth to obtain their driver's license or CA ID while they are in custody.	ACPD will therefore make it a priority to support opportunities for SB 823 youth to obtain their driver's license or CA ID while they are in custody.	Impact Justice, per request from Andrea Zambrana & Al Mance	Andrea Zambrana: I would like Probation to make it a priority to help SB 823 youth obtain a DL or ID and other vital documents; Al Mance: The current language is "will explore" and that's too vague	Note from IJ: "other vital documents" are also discussed in the Reentry section (see pg. 42)

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40	One of the current challenges facing reentry is that the exact date of reentry is often unknown until the Court sets the final baseline term of confinement or step down date within the secure track. These decisions will generally take place at progress review hearings.	Suggested to delete	ACPD	The baseline term is established at time of commitment so this would not necessarily be a challenge to re-entry. The existing process for pre-adjudicated youth is not the same for SB 823. We will know the release dates in advance and be able to coordinate accordingly.	
40	[Regarding "Phased Approach"]	Significant suggested additions	Trevor Arceneaux	Please see attached document "T Arceneaux Suggested Edits ReentryPhases"	
41	Issue: Language specifying that the Reentry Case Manager comes from a CBO outside of probation.	ACPD intends to utilize a Reentry Service Coordinator, who will collaborate with the assigned Deputy Probation Officer. The Reentry Service Coordinator will be an ACPD employee. NOTE: Relevant language would be changed throughout	ACPD		
41	[Regarding "Reentry Case Management" specifically the JCRU example of coordination] ACPD and the Public Defender's office already have an existing collaboration with many of these practices in place, however further coordination with the Court and the Case Manager would be a significant benefit to the youth.	Clarification requested	Andrea Zambrana	What does SF's JCRU do, and what is their relationship with the MDT and the reentry probation officer? I would ask that the plan explicitly state here that a youth's defense counsel may also attend. It currently only mentions the PD's.	Note from IJ: We are not sure what additional clarification is needed. We're not sure what the difference is between the Public Defender's office and the youth's defense counsel?
42	[Under "Addressing Basic Needs..."] ACPD will prioritize under-resourced areas of the County, particularly South County.	ACPD will prioritize services based on the needs of the population and where they reside throughout the County.	ACPD		
42	Involving youth with justice involvement in paid work, service, or other employment related activity as soon as possible is key to success.	Involving youth in paid work, service, or other employment related activity as soon as possible is key to success. especially for youth with justice involvement.	Impact Justice, per request for clarification from Andrea Zambrana		
43	ACOE will ensure that all needed transcripts and other student records are provided and given to the school or program, including any prior transcripts from other districts.	ACOE will ensure that all needed transcripts and other student records are provided and given to the school or program, including a fully consolidated transcript reflecting all enrollments and credits from other districts.	Monica Vaughan	This was also discussed in our last Education workgroup meeting	
45	[Regarding "Options for Step Down" - entire section]	Suggested to delete entire section	ACPD	This section is duplicative as it is addressed in th Core Programming Secion of this plan	IJ response: We will look to make sure we reorganize all the literature and background is put into the appropriate place in the document
45	[Regarding "Options for Step-Down"]	ADD: Youth committed to the SB 823 Program will be given a handbook about SB 823 programming, similar what youth are given at Camp Sweeney. This handbook will outline the phases and how they can work toward "stepping down."	Impact Justice, per request from Andrea Zambrana		
45	ACPD will strive to ensure step-down programs are individualized and involve a number of options that are geographically spaced throughout the County.	individualized and involve a number of options including options that are geographically varied where necessary to the successfully re-entry of the youth.	Al Mance		

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45	[Regarding "Options for Step-Down"]	Clarification requested	Andrea Zambrana	Under the first paragraph under section "Options for Step-Down", 2nd sentence, it reads that step down is less determined by benchmarks and more by the services the youth needs. What does this mean?	Note from IJ: We're not sure what further clarification is needed. Youth should be considered for step-down based on their needs and where they can receive the most appropriate individualized services. Not waiting for benchmarks like "after XYZ amount of time" or "once XYZ modules are completed".
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?	expressed wanting more clarity on on evaluation, reporting, and oversight. It seems a little muddy now with the JJCC/JJDPC roles and also understanding there are legal oversight and accountability authorities for Probation and other agencies.
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		
46	Importantly, ACPD's program evaluation processes will be transparent and accessible to the general public. Program evaluations will be regularly submitted to the JJDPC 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: JJDPC Programmatic Subcommittee to be replaced by the Youth Advisory Council.	NOTE: Monica Vaughan also expressed wanting more clarity on the role of the JJDPC vs the JJCC
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		
48	[Regarding "Eradication of Inhuman & Re-Traumatizing Practices"]	Extensive edits - see next tab	ACPD		

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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		
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	
51	[Regarding "using" Camp Sweeney as a step-down option]	[ACPD edits to read "preparing" Camp Sweeney to be used]	ACPD		
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.	
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 for a step-down facility during the first year of implementation of this plan.	ACPD		
52	[Regarding "Long-Term Planning for Facilities"]	Extensive edits - see next tab	ACPD		
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.
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	
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	
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		

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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"
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]	
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		
56	[Regarding "Conflict Management"]	Clarification requested	Al Mance	is it realistic to only use the credible messengers for dispute resolution? I think the JIOs should be trained to serve this function as well.	
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.	
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?
59	[Regarding "Staff"]	Suggest replacing "credible messengers" with "all relevant stakeholders" in this section up until the "Milieu Providers" section	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.	

Main List

60	[Regarding "Milieu Providers" & the supervision roles & responsibilities]	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	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.
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?	
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?	
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	
61	[Regarding "Training of Milieu Providers"]	Clarification requested	Emily Young	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.	

Programmatic Advisory Subcommittee

Current Language	Proposed language from ACPD	Notes
Programmatic Advisory Subcommittee of the JJDPC	Programmatic Advisory Subcommittee of the Youth Advisory Council	An existing contract with FLY can be leveraged and utilized to seek youth input into justice system programs, services, policies and processes.
<p>In consultation with the Chief of Probation, the JJDPC shall immediately develop a programmatic advisory subcommittee to review programming and advise ACPD regarding a) requests for proposals to provide services to the target population or in connection with the Realignment Plan; b) proposals to provide services; c) proposed extensions, increases, or other substantive or durational amendments to contracts for services; and d) programming utilized (or proposed for use) by ACPD staff. The JJDPC Programmatic Advisory Subcommittee shall include a minimum of three community members as defined by Welfare and Institutions Code Section 1995(b), and at least one of those members must be a youth member who is 24 years of age or younger. The JJDPC Chair and the Chief of Probation shall develop a process for the Programmatic Advisory Subcommittee to receive, review, and advise the ACPD with respect to the items listed and any additional programmatic service items for which ACPD seeks advice or comment.</p>	<p>The Youth Advisory Council (YAC) will be used to review programming and provide recommendation to ACPD regarding programs and services to the target population or in connection with the SB 823 Plan.</p>	<p>NOTE: Monica Vaughan also expressed concern with the PAS reporting to the JJDPC: The paragraph includes a citation from W&I Code 1995(b), but that piece of code is related to the Multiagency Juvenile Justice Coordinating Council, not the JJDPC. It is unclear why the JJDPC would be the ones to review proposals and advise on contracts.</p>
<p>The Programmatic Advisory Subcommittee will review proposals and options for the items listed in the preceding paragraph and will advise ACPD and provide community perspective on the applicants or proposed options. The Programmatic Advisory Subcommittee will use the Core Competencies to make their assessments and recommendations. The Programmatic Advisory Subcommittee will gather information from the community and directly impacted young people and families in order to develop its recommendations.</p>	<p>The YAC will use the Core Competencies to make their assessments and recommendations. The YAC will gather information from the community and directly impacted young people and families in order to develop its recommendations.</p>	<p>Note: Andrea Zambrana requested that: The plan should state that as part of the Advisory SubCommittee of the JJDPC that Probation will provide them with data</p>

Eradication of Inhumane & Re-Traumatizing Practices

Current Language	Proposed language from ACPD	Notes	
Eradication of Inhumane and Re-Traumatizing Practices	Suggested to delete		
<p>Restoration cannot exist alongside harm or fear of harm. This milieu shall serve as a nurturing social environment and thus cannot include the tools of degradation and control that create physically and psychologically unsafe environments and have proven to contribute to increased mental health symptomatology and trauma. ACPD shall commit to eliminate these practices in this milieu. Camp Sweeney ACPD has already eliminated the use of pepper spray and has included that in the policy. ACPD shall utilize the same policy to eliminate the use of pepper spray on the SB 823 program. Isolation and room confinement is non-existent at Camp Sweeney, and all available alternatives to these practices shall be explored for the SB 823 program. Several programs throughout the country may serve as models for the elimination of such practices.</p>	Suggested to delete	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.	Andrea Zambrana requests the addition of the following language: "ACPD will commit to not using pepper spray and room confinement in the SB 823 unit or any of the other facilities where SB 823 youth attend/participate."
<p>Clothing, and personal items of comfort will not be used as rewards or sanctions. All youth will have access to "civilian" clothes, and ACPD will coordinate with the JJDC and youth council to develop a plan to work toward allowing youth to wear their own clothes. There may be a dress code related to security and community standards, but there will not be a set uniform. Youth who enter the program without sufficient clothing will be provided an initial wardrobe that they work to select with staff. While budget limits may provide a necessary constraint, the intent is to allow youth as much personal expression and freedom as possible. Minimum clothing requirements set by the BSCC will be reviewed by the JJDC and youth council during the first year of implementation to ensure that ACPD policies meet or exceed these regulations. The intent is to promote both agency and personal dignity among youth.</p>	<p>Clothing, and personal items of comfort will not be used as rewards or sanctions. ACPD, in partnership with youth and relevant stakeholders, will explore the possibilities with regard to clothing, including youth potentially having access to "civilian" clothes. The intent is to allow youth as much personal expression and freedom as possible, and to promote both agency and personal dignity among youth.</p>	The JJDC can review the BSCC clothing requirements independent of being included in this plan.	
<p>Given that SB 823 realigned youth will most likely be incarcerated for longer periods of time than other youth at the JJC, personal items are especially important in order to promote a homelike environment. Allowable personal items—both in the individual rooms and within the unit—will be examined with the goal of expanding the policy as broadly as possible. Culturally relevant personal items such as toiletries and hygiene products will be provided to all youth, regardless of Phase or level of privilege. These items will not be restricted by sanction in any way. In addition to toiletries, youth will also be allowed a photo album in which to keep photos beyond those immediately displayed. A small bookcase or other storage option will be provided in each individual room to store books and other personal items. Art supplies and writing supplies will be made available. A cabinet, closet, or locker that youth can lock will be provided for each youth somewhere in the unit. Staff may have keys or access codes, but youth will utilize locks to promote a sense of independence and agency.</p>	No suggested edits to this paragraph		
<p>Food is not only a matter of proper nutrition, quantity, and quality but represents an important connection to human self-worth and dignity. Food is central to cultural expressions and offers a sense of familiarity, comfort, and home. Meal planning and preparation provide important opportunities to connect with other traditions and people. Families will be allowed to bring "outside" food to all family engagement activities and times (whether brought from a restaurant or vendor or prepared at home).</p>	<p>Food is not only a matter of proper nutrition, quantity, and quality but represents an important connection to human self-worth and dignity. Food is central to cultural expressions and offers a sense of familiarity, comfort, and home. Meal planning and preparation provide important opportunities to connect with other traditions and people. ACPD will review current policies to explore whether families will be allowed to bring "outside" food to family engagement activities (whether brought from a restaurant or vendor or prepared at home).</p>		

Eradication of Inhumane & Re-Traumatizing Practices

<p>Finally, sleep is particularly important (and is easily disrupted) for adolescents and young adults, as noted earlier. The ability to feel safe and relaxed while sleeping is essential for healing and rest both physically and emotionally. While some lighting is necessary for safety of both youth and staff, proper darkness is needed for proper sleep. Thus, sleeping masks will be provided for all youth. Similarly, access to lighting for evening reading and other activities will be provided.</p>	<p>Finally, sleep is particularly important (and is easily disrupted) for adolescents and young adults, as noted earlier. The ability to feel safe and relaxed while sleeping is essential for healing and rest both physically and emotionally. While some lighting is necessary for safety of both youth and staff, proper darkness is needed for proper sleep. Thus, sleeping masks will be provided for all youth upon request. Similarly, access to lighting for evening reading and other activities will be provided upon request.</p>		
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Long-Term Planning for Facilities

Current Language	Proposed language from ACPD	Notes
Long-Term Planning for Facilities	Long-Term Planning for Facilities	
<p>Alameda County is committed to reimagining the possibilities for children in the county and to developing a new approach to responding to young people (even those who have committed the most serious offenses). This includes the commitment to move away from the current juvenile hall and ultimately close or repurpose that facility, and to instead establish a complete continuum of services and housing options to meet the needs of young people. A full array of juvenile justice housing models to accommodate security, treatment, developmental, and emotional needs.</p>	<p>Alameda County is committed to reimagining the possibilities for children and young adults in the county and to developing a new approach to responding to young people (even those who have committed the most serious offenses). This includes the commitment to engage relevant county stakeholders to assess the feasibility of moving away from the current juvenile hall with the potential to close or repurpose that facility, and to instead establish a complete continuum of services and housing options to meet the needs of young people. The County will explore a full array of juvenile justice housing models to accommodate security, treatment, developmental, and emotional needs.</p>	<p>Bolded green text added by Impact Justice</p>
<p>This Subcommittee has determined that even our most secure environments should be small, homelike, and designed to allow for normative development, emotional healing, and connectedness. The prison-like facilities that so many believed we required have been proven unnecessary and harmful. The scores of youth offenders that were predicted to fill them did not emerge. Instead, our community, like most around the country, has witnessed unprecedented declines in juvenile crime and perhaps the generation with the lowest rates of criminal activity ever recorded. This does not guarantee that crime rates will decrease forever as that is highly dependent on a host of societal factors. However, the fact that the population is vastly smaller than predicted does offer a moment of great opportunity, and this Subcommittee has determined to capitalize on that opportunity to build a better approach for youth in Alameda County.</p>	<p>No edits suggested to this paragraph</p>	
<p>There is no way to fully develop and implement this new approach in the time provided—nor should a plan to develop a new model that takes the County well into the future be created without a community-based planning process. There is no way to meet the many lofty goals of juvenile justice realignment without also addressing other aspects of the system and our overall response to children. None of our services and responses can work or be developed in a vacuum.</p>	<p>There is no way to fully develop and implement this new approach in the time provided—nor should a plan to develop a new model that takes the County well into the future be created without a collaborative process that includes impacted youth and families, the general community, advocates, victims, community and faith-based organizations, county, and justice partners. There is no way to meet the many lofty goals of juvenile justice realignment without also addressing other aspects of the system and our overall response to children and young adults. None of our services and responses can work or be developed in a vacuum.</p>	
<p>While the development of such a process is beyond the scope of this Subcommittee, it is our intent to remain involved as the SB 823 realigned youth are particularly vulnerable to harsh system responses and the impacts of long-term confinement. The County should include a broad range of stakeholders, including significant and meaningful participation of system-impacted youth and their families. The planning process should be transparent and equitable, and the resulting plan should be fiscally efficient and grounded in equity.</p>	<p>Suggest delete paragraph</p>	<p>While the content of this paragraph is meaningful, this statement was written as a third-party statement. This is “the county’s” plan to be submitted to the state that should focus on the tenants of outlining the programs and services for this population. We do not need language outlining the intent of the committee.</p>