

## Summary of Major Concerns Outlined by Erin Palacios & Vamsey Palagummi.

Summary starting at Promoting Healthy Adolescent Development. The previous two sections (“Defining the Target Population” & “Retaining the Population”) will need to be reviewed by ACPD, as they took the lead in writing those two sections.

Note: Language added by Erin & Vamsey is in red.

1. Inclusion of **all 707(b) offenders** in this plan
  - In multiple areas throughout the plan, there are references to expand language to include all 707(b) offenders
    - Example Pg. 15: **All programs, settings, and services for 707(b) adjudicated youth who are not committed to the SYTF will also be based on the core concepts and values of restorative justice. This includes family engagement and maintenance efforts, recommending appropriate conditions of probation, incident responses, supervision and reporting requirements, staff training, and individual case planning and assessment.**
2. Addition of multiple Headers throughout the document
  - a. Note from IJ: To provide background research on all of these topics is beyond our scope, capacity, and timeline.
3. Promoting Healthy Adolescent Development (Page 12).

Erin adding language and comments to this section – see below:

- Pg. 12: Youth are more susceptible to engaging in risky behaviors due to the development of the brain’s prefrontal cortex, which is responsible for complex reasoning and functioning, and will not fully mature until their mid-twenties.<sup>1</sup> Youth are more likely to be impulsive, fail to evaluate the impacts of their decisions, and assess long-term consequences. **With that said, youth also have significant neuroplasticity – the brain’s ability to rewrite, rewire, relearn, and strengthen important connections - and through practice, repetition, and praise, youth are best positioned to create and reinforce new neural pathways to learn new skills, habits, and ways of thinking.** Transfers to adult court can potentially entrench youth in a life of criminal behavior that they otherwise would have matured away from. Youth afforded the opportunity to remain in the juvenile system will, on the other hand, have access to age-appropriate education and rehabilitative services that are designed for them, and designed to harness their neuroplasticity.

One approach that takes this perspective into account is known as positive youth justice, which is built upon the idea that youth can be developed within a caring community of adults who

**Commented [EP1]:** We shouldn't leave it with just keeping youth in the JJ system. In part because the target population that we are dealing with isn't just youth in the SYTF and transferred, it is broader as described.

This should also include how ensuring use of the least restrictive environment and establishing the most connected relationships is a major part of promoting health AD.

<sup>1</sup> Cohen, A. O., & Casey, B. J. (2014). Rewiring juvenile justice: the intersection of developmental neuroscience and legal policy. *Trends in Cognitive Sciences*, 18(2), 63-65.

work to help them learn and practice key skills. The goal of this approach is to recognize that many of the youth's behaviors and challenges are developmentally typical (rather than pathological and/or abnormal) responses to unaddressed needs. ACPD recognizes that many of the youth from the target population may not have had the support and experiences necessary to build the core skills to manage emotion and make effective decisions. **ACPD also recognizes that negative or harmful decisions are often a direct response to the many traumas youth have experienced, which act as coping or survival strategies.** When programming and services prioritize skill development for all youth, their mental, physical, psychological, and emotional wellness benefit.

4. Multiple questions/comments and suggestion to expand language for Culturally Responsive Programming (page 17)
  - Pg. 16: Stating that ACPD will take on a culturally responsive approach across three main program components rather than two.
    - New sentence will read: ACPD will take on a culturally responsive approach across three main program components: structure, staffing, **and program design**
  - Pg. 17: Erin wants a paragraph regarding culturally responsive service delivery to the remaining target population. How will this be accomplished in the diverse array of settings that youth may be in for disposition? Brought to programming at the camp for youth committed there? How will culturally responsive programming be used to better support youth residing with their families, and to better provide services to family members? The last question may also relate to youth in the SYTF.
  - Pg. 18: Erin wants to revise language to state that **All youth** not Most in DJJ are BIPOC
5. Mental Health Services (bottom of Page 21):
  - Erin requests a paragraph describing how same attention to and development of comprehensive community healing will be brought to services for the remaining target population.
6. Request to add language that specifically focuses on girls and gender expansive youth population and explicitly spells out the County's intention to consult with The Young Women's Freedom Center. Examples of language added is highlighted in red below and please see document for more details (page 19 - 20)
  - Pg. 19: **Although there is no exhaustive list of gender responsive program elements, recent reviews, research, and government-led study groups examining effective gender-responsive programming suggest that the most promising elements in programming for girls include the following: Relational (e.g. attention to healthy romantic and non-romantic relationships) Restorative (e.g. scaffold skills for navigating the justice system with attention to trauma histories) Socio-culturally anchored (e.g. attention to the intersectional identities of girls) Individualized (e.g. tailored to meet a variety of needs) Multi-level (e.g. girls' individual, peer, family, community, and multiple systems of involvement are targeted.) Community-based (e.g. provided flexibly in youth's natural communities). Strengths-based (e.g. orientation on positive**

development, resisting deficit-orientation and promoting skills and assets in the child.) In a national survey conducted with parole and probation staff, the overwhelming majority (97%) agreed that girls have unique needs and most of them (94%) thought there should be gender-responsive programming<sup>2</sup>. For this reason, ACPD will work to implement the key elements of gender responsive programming described in the development of SB 823 programs for girls and gender expansive youth.

- Pg. 20. Given that it is anticipated that young women will rarely be referred to the SB 823 program, ACPD will engage in discussions with other Bay Area counties to co-develop a program for young women. Prior to housing Alameda County girls in any out-of-county facility, Alameda County shall ensure that the facility provides a therapeutic model that is in line with the County's own program, and that the facility adheres to the same minimum standards of care, treatment, and honoring of children's rights as the County's own program. With that said, ACPD will work closely with the Young Women's Freedom Center to create a plan to better support gender-responsive and culturally affirming programming to our young women, transgender and intersex youth, and LGBTQ youth.

7. Request for clarity and additional language about assessments (page 22 - 26)

- Pg. 22. The paragraph reads: An analysis of the Youth Level of Service Case Management Inventory (YLS-CMI 2) domains in the current DJJ population (see Table 1) suggest that DJJ youth committed to the SB 823 program are likely to demonstrate challenges in problem solving, judgement, decision making, and behavior and emotion management (especially related to anger and aggression). These specific needs may be defined as "criminogenic" in the juvenile justice vernacular or as originating from an underlying mental health concern, but neither label changes the recommendations related to appropriate services and supports. Services and supports must be rooted in a clear conceptualization of the potential drivers of symptomatology. Understanding the drivers provides insight regarding the methods of intervention. **Erin stated: This only covers DJJ committed youth and therefore only forecasts youth in SYTF commitments. It also needs to provide an overview/ assessment of the MH needs of the remainder of the target population. A review of different/ additional assessments will be important – including the CANS or other case planning and service delivery assessment**
- Pg. 23: The paragraph reads: ACPD and other service providers will develop a unified assessment and case planning process in which the Individual Rehabilitation Plan completed is informed by both formal and informal assessments and take into account the CANS. It is understood that each Department/service provider will also develop their individual plans to detail and document their specific services, but these plans will reflect a shared vision and the role each will play in assisting the youth along the journey to successful return to their community of choice. **Erin stated: This works for the youth in the SYTF, but language needs to be added for youth with 707b offenses who are not committed to the SYTF. Case planning and assessment for these youth- receiving services in placement and in the community- should include the practices and protocols required for ACPD and other agencies for coordinated service delivery. This includes the ICPM, CFT, and CANS.**

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<sup>2</sup> Parrish, D. E., Thompson, R., Negi, N., & Alquicira, L. (2020). A National Survey of Probation Staff of the Needs, Services and Barriers of Female Youth in Juvenile Justice Settings. *Women & Criminal Justice*, 1-18.

8. Comments and language added to Mental Health Assessment Section (Pages. 25 – 26):
  - Pg. 25: Erin stated: *Need a description of the assessment and services to youth who are not committed to the SYTF. ICPM model work and inclusion of intensive community-based service options (Pathways to Wellbeing etc) and specialty mental health services.*
  
9. Comments on Section about Youth with Significant Mental Health Needs (Pages 27 – 28)
  - (Pg. 27) Erin stated: There doesn't seem to be anything in here about youth with developmental needs (autism and spectrum disorders for example). How will youth receive BHT services when required?
  - (Pg. 28) Erin added language: *Since significant mental health needs doesn't necessarily mean significant risk, there should be language describing how these services will also be provided in alternative settings or in the community. Just to make it very clear that no youth will have to be committed to receive a service – but will be able to receive the service if committed.*
  
10. Added language to Family Engagement section and posed questions (29 – 30)
  - Pg. 30: Erin had questions about (a) Services in this category for the remaining target population and (b) How and what type of reunification services are being delivered to help address the needs of families.
  
11. Added language stating that the County will commit to providing UBI of \$500 for youth. See additional language below in red (Pages 33-34):
  - Pg. 33- 34: **Support Others:** It is critical to give youth the opportunity to support others within their immediate environment, larger community, and families. ACPD is committed to partnering with the JJDPC to develop a program in which youth are paid for their work and contributions to maintaining the Facility. They will be given opportunities to financially contribute to their families or loved ones. This will help foster their sense of pride, empathy, and dignity. Being able to meaningfully contribute financially will also help mitigate any feelings of guilt for being locked up, particularly towards their families and loved ones. *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).*
  
12. Adding language to expound the purpose of Programmatic Advisory Subcommittee of the JJDPC (page 34).
  - *The purpose of ACJJDP's Programmatic Advisory Subcommittee is to provide ACPD with critical information and perspectives from the Community to help inform current and potential programming. The Programmatic Advisory Subcommittee will work closely with community-based organizations, systems-impacted youth (current and former) and their families, and relevant justice stakeholder groups (i.e. AC Youth Council), to gather critical information, expertise, and*

diverse perspectives, and make recommendations to support the Programming goals outlined in this document; thereby further expanding ACPD's reach into the Community.

### 13. Revised Language for Currently Available Programming (Page 37)

Language added back from previous draft: Within the framework of the milieu, Alameda County Probation is determined to provide services to encourage the continued growth and enrichment of youth committed to the SYTF. Currently available programming will be reviewed to determine whether and which core competencies each support. Each will be assessed to ensure that they fit within the new programming framework prior to being continued, or prior to receiving any new contract, contract extension, or other contract amendment that extends its substance or duration. All new program development shall be centered around development of the core competencies, and be submitted to the programmatic advisory subcommittee of the JJDC described herein.

In addition to reviewing all programming within the context of the core competencies ACPD will also ensure development of a program array that provides for and supports all of the core competencies described. ACPD will specifically provide the following programming which supports the core competencies but which is often overlooked or missing:

LIST: (see comment to side for list)

### 14. Partnerships with Community-Based Org (Page 38)

- Erin wants to expand and have a paragraph devoted to detailing the income plan referenced on this page.

### 15. Erin made comments and revised and added language for High School & Higher Education section. Examples are listed below. (Page 41 – 44)

- Pg. 41: Erin added language about using dual enrollment in community college as a credit recovery strategy
- Pg. 41: Erin is concerned that there doesn't seem to be any discussion of access to specialized providers and services such as speech and language pathologist, occupational therapist. Erin asked if the committee add this?
- Pgs. 41-42 – Erin added the language highlighted in red:
  - Every student should have an Individualized Learning, and Transition Plan (ILTP). Assessments for IEPs should be conducted as needed. **Students with existing IEP and 504 plans will have their plans implemented and an IEP meeting scheduled as soon as possible, and in accordance with state and federal timing guidelines. Students with in-progress evaluations will have their evaluations completed as soon as possible, and in accordance with state and federal timeline guidelines. ACOE will work with sending school districts to expedite the completion of in-progress evaluations while minimizing the burden of duplicative assessments on the student and family.**
- Pgs. 43-44 – Erin added language about partnerships with community colleges and highlighting Laney and ROC – see below:

**Commented [EP2]:** This is the bullet point list that followed the language. I tried to check if the items were in here somewhere, but I could only find some. It is very possible that I am overlooking others. Can we please make sure that each of them made it into the document?

Workforce Development  
Initial jobs -PAID- at the facility  
Connection into community in subsequent phase as soon as possible  
Daily Skills and Daily Planning  
Connected to jobs  
Social responsibility -- daily basic items (tied to dispute resolution and community discussions) -- quieter music when it's late -- basic awareness of others in immediate environment  
Community responsibility for specific items (who ordered the toilet paper?)  
Meal planning & preparation  
Life Skills  
Financial Literacy --  
Credit Checking and Assistance with Clearing Issues;  
Identity theft/security  
Social Responsibility -- identifying and addressing issues, activism, participation in political movement in micro to macro space

Civic Engagement -- ensure access to voting  
Social Emotional Learning Development  
Work, education, spiritual development, mental health (not just clinical; including trauma-informed & more general "healing")  
Different tracks/cohorts = flexibility needed to accommodate a range of ages, needs, developmental stages, etc. Peer mentoring; possible to have older, more advanced youth given sense of responsibility

Credible Messengers -- ensuring that they are brought in and fully integrated -- critical part of the model -- refer to description provided by CL -- how are they integrated responsibilities  
Community Providers -- leveraging existing providers assess to make sure that each provider brought it fits within the guiding principles and is addressing core competencies  
prioritize community providers and services that provide a link to and continued services in the community  
how are they integrated responsibilities

**Commented [DS3R2]:** I believe each of these items on the list are addressed in this Plan

**Commented [EP4]:** There doesn't seem to be any discussion of access to Student access to specialized providers and services such as Speech and Language Pathologists, Occupational Therapists. Can we add this in an appropriate place. The length of stay for young people in this facility makes it critical that access to these services has been accounted for and described.

- For both youth still in the secure setting and those in an inside/outside setting, ACPD will develop partnerships with community colleges. These institutions will offer transition support, enrollment services, academic advising, financial aid, etc. ACPD will also pursue partnerships with existing campus-based groups<sup>3</sup> that are supporting formerly incarcerated students and will prioritize relationships with groups that are able to bring in programming and supports into the facility. Post-high school education be formally managed by an educational third party. Ideally, these services would be provided by Laney College's program serving youth with juvenile justice system experience Restoring Our Communities (ROC). This organization would be supported by ACOE and Probation. Exploration and planning for this partnership is already underway. ROC currently provides postsecondary services to students at the Alameda County Juvenile Hall through an established MOU with the Alameda County Office of Education. The intent is to expand this contract to include Alameda County Probation, and to expand the scope of services to serve all youth interested in and eligible for college programming, including DJJ Realignment youth. This expanded MOU between Laney College, Alameda County Probation, and Alameda County Office of Education creates the opportunity for establishing comprehensive college programming inside (the juvenile hall and SYTF) and outside (on the college campus) for both students who have not yet completed their high school diplomas and for those who have.

The MOU process will allow for the key stakeholders: Laney College, ACOE, and Alameda Probation, to create the additional logistics needed to expand their already existing college program model.

The goal of the program partnership with ROC is to provide postsecondary pathways that a) prepare youth for a variety of career and technical pathways; b) allow students to build and maintain positive connections to the community; and c) serve as a framework for community re-integration. Alameda's program model is considered a best practice and provides services that meet several key recommendations for model programs, including:

- It provides postsecondary programming for juvenile justice students with a multidisciplinary, multi stakeholder team for as required for success. Every stakeholder has an essential role to play. The key stakeholders include: Identified local community college (Laney College); Probation; County Office of Education; additional can include public defender's office, a community based organization, social services
- The community college is the lead organization and includes a liaison/program lead to organize the college services and serve as a conduit between the juvenile hall, multi stakeholders, the students, and the college.
- The college course offerings include UC/CSU transferable courses and potentially Career and Technical education courses for credit.

**Commented [EP5]:** Is there a discussion somewhere about how youth engaged in higher ed in the SYTF will access college-based disability services?

**Commented [EP6]:** Added some additional language describing the program and the best practice being used/ developed by the county. Both because it is a credit to the county that should be acknowledged, and because describing it in the plan could serve as a resource for other counties still trying to figure out how to build higher education into their facilities and programs.

<sup>3</sup> Examples of such groups include: Underground Scholars, ROC, Project Rebound, RISE (Chabot Community College)

- Dual Enrollment programing can be included in the college course offerings to enable students without a diploma the opportunity to receive both high school and college courses concurrently.
- Students can receive wrap around support services to ensure success: tutoring, support with enrollment, access to and guidance for financial aid, academic advising through college counselors.
- Transition plans are developed for re-entry support to the college campus upon release; as an alternative placement; as an option for early release; or as an option for furlough to come to campus to engage in college preparation or take college courses.

- Pgs. 44 – 45 – Erin added the section and language below:

**Other Academic Supports and Normative Academic Experiences,**

An important aspect of any educational program is the opportunity to engage in developmentally appropriate activities that develop a sense of community, leadership and social skills, artistic expression, cultural identity, and self. ACOE and probation will work with community partners, students, and families to regularly assess the availability, quality, and accessibility of these activities.

Hence, ACOE and Probation will work with community partners, students, and families to identify academic supports and extracurricular activities that are responsive to students' interests and will support continued academic and community engagement. Examples of such activities include, but are not limited to, sports and recreation, visual and performing arts, creative writing, tutoring and mentoring, and student government.

ACOE and Probation will also work with community partners, students, and families to ensure that families and supportive adults have opportunities to engage with and support their students in their educational progress. Examples of such activities include, but are not limited to, graduation ceremonies, open houses, college nights, and performance opportunities for extracurriculars.

In planning for the above extracurriculars and community events, ACOE and Probation will consider both in-person and virtual opportunities for youth and family engagement, depending on the availability, quality, and accessibility of programming and how that interacts with youth and family circumstances, for instance, providing virtual opportunities for family members to attend events if there are family members who live in another state or country and cannot participate otherwise, or allowing a youth in a creative writing program to submit an entry to a poetry slam that is being held online.

**Commented [EP7]:** A way to link this section to other portions of the plan might be

- 1) to involve the recreational therapist in developing this plan and helping to provide/ coordinate access
- 2) tie extracurricular activities to promotion of adolescent development. Participation in these activities during adolescence is one of the things that has been shown to help ameliorate the effects of past trauma during this critical (plastic) period.

16. Immediate Plans for Facilities (Pages 58-59):

- Erin made multiple comments and included language that explicitly states that ACPD will adapt current juvenile hall to create a more homelike environment, purchase of necessary equipment and explore/establish access to vocational training facilities.

- Example Pg. 58 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:

17. Long Term planning for Facilities (Pages 60 – 61)

- Language revised and included to indicate a commitment for taking immediate steps to begin planning and reimagining process to ensure the design, creation and implementation of services and facilities needed for the target population.
- Language revised to show ACPD commitment to partner with directly impacted youth and youth advocates to design and deliver fiscally efficient and equitable plan. Additional language highlighted in red below:

Pg. 61 - 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. For that reason, the Subcommittee believes that Alameda County must take immediate steps to begin a planning and reimagination process. This must, as soon as possible, lead to the design, creation, and implementation of the services and facilities required to serve the Realigned population. While the development of such a process is beyond the scope of this Subcommittee, it is the Subcommittee’s recommendation that the County immediately begin a redevelopment process. To do this Alameda County must partner with directly-impacted youth and youth advocates to design and deliver a fiscally efficient and equitable plan that transitions the County away from a law enforcement response to children and that (1) builds the capacity of community based organizations to serve young people outside the current justice system; (2) results in a significant reduction in the number of young people who are in contact with the justice system; (3) explores a rehabilitative, health-focused, and care-first model of youth justice that is meaningfully different in operations and outcomes from the current system; and (4) prevents the prosecution and incarceration of children in the adult system

The Subcommittee recommends that the County review the working group proposal presented by Free Our Kids (FOK) and undertake that or a similar process for planning. This Subcommittee is committed to working with that process to develop subsequent Realignment Plans and to develop the resources identified as needed to serve the population.

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. It is therefore the Subcommittee’s 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.



18. Specific language for girls and gender expansive youth was added to *Other Options for Step-Down, Transitional, & Post-Release Facilities* (Pages bottom 62-63) – see below:

Special consideration in programmatic development and solutions should be paid for girls and gender expansive young people. Agencies and community partners already existing in Alameda County and the bay area that practice a credible messenger model and that have been extremely successful in working with girls and gender expansive youth that are more deeply system involved and should be advisors and core partners in building out the Gender responsive model.

Programmatic components should include; ensuring staff have lived experience, that enjoy working with young people, are trained in gender responsive best practices, and are committed to supporting the agency and self-determination amongst girls and gender expansive youth. The step-down strategies for girls need to be relational, grounded in best practices, and be built on a continuum of support and care. The Community Based Gender Responsive Credible Messengers will Build relationships with young people at the very first point of system contact (and on the preventative side in the community). During any incarceration, while on probation, while serving a commitment, or any other way the young person is in contact with the system, the community program partners should have complete access to young people during their system involvement as a partner and support for the young person. Decisions by system players (judge, probation, etc.) along the continuum should not sever or interfere with the relationship or contact between the Community partner and young person at any point as gender responsive best practices are relational. The community partner will work most closely with a young person to develop self-determined goals, to navigate the step-down process, and to create individualized plans based on best practices, the self-determination of the young person and goals. They will also partner with the young person and the system players to develop strategies for community-based solutions including developing a network of Credible messenger style homes that are built to address the specific needs of girls, transgender, and gender expansive young people both locally and regionally as a part of a network of services for girls and gender expansive youth.

Additional programmatic components of gender responsive best practices include ensuring young women have access to economic support. Because economic challenges are an additional driver of incarceration, girls and gender expansive youth should receive economic and material support that will allow them to survive day-to-day. The will also be grounded in best practices including research that has shown: that gender-neutral programs are significantly less effective than gender-responsive programs for girls 5 Recent reviews, research, and government-led study groups examining effective gender-responsive programming suggest that the most promising elements in programming for girls include the following: Relational (e.g. attention to healthy romantic and non-romantic relationships) Restorative (e.g. scaffold skills for navigating the justice system with attention to trauma histories) Socio-culturally anchored (e.g. attention to the intersectional identities of girls) Individualized (e.g. tailored to meet a variety of needs) Multi-level (e.g. girls' individual, peer, family, community, and multiple systems of involvement are targeted.) Community-based (e.g. provided flexibly in youth's natural communities) Strengths-based (e.g. orientation on positive development, resisting deficit-orientation and promoting skills and assets in the child.) Community-based organizations contracted to oversee the models detailed below should adhere to the tenants above and offer a variety of programming options that collectively encompass the following approaches. Santa Clara is home to a variety of strong community-based organizations, many of which already incorporate some or all of these programmatic elements.

19. Section added with following bullet points on (Page 63)

Community-Based Options and Placement Models to be Explored and Developed

*Intensive Community-Based Support*

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*Therapeutic Family Based Options*

- Community-supported professional foster homes and family foster home model
- Community-supported respite homes to be paired with other intensive community-based supports to maintain youth in the community

Enhanced Placement Models

- Working with TA from Catalyst Center
  - E-ISFC
  - E-STRTP
  - How these options might be adapted for particular populations of young people based on the services and programs in other models (CHAMPS)
- Consider options that might be developed with the Complex Care Funding available for capacity building
- Consider development of a healing home program within one of these supported models

Transitional Housing Options

20. Added language and commitments for ACPD to NEVER use chemical spray (Page 65)

To ensure that ACPD never uses, and continues to never use OC spray, restraints, and room confinement in the secure track and broader SB823 programming, ACPD shall develop a sustainability plan by March 31, 2022. In addition to detailing ACPD's plan to ensure that OC spray is never used in Unit 3, the plan shall include the following considerations:

- **Crisis Response Teams** – ACPD shall consider adding mobile crisis response teams – consisting of an IS-II Supervisor and licensed clinician – to help intervene during crisis or potential conflict.

**Additional Training:** All staff shall be trained in de-escalation techniques/youth development best practices, including:

- Non-Violent Self-Defense, such as Crisis Prevention Institution (CPI) training
- Advanced Motivational Interviewing (by MINT certified trainers)
- Adolescent brain development
- Trauma-informed care and response
- Vicarious trauma (so staff can recognize when they are traumatized/triggered)

- Restorative Justice
- **Prioritize Employee Wellness:** Offering therapy and mental health support to members of the milieu team and any staff that interact with the youth, including JIO's and Shift Supervisors. Ensuring the mental health and well-being of staff will mitigate the potential for vicarious trauma and/or abusive tactics and behavioral interventions.

21. Oversight & Appeals Process of All Disciplinary/Sanction Decisions (Page 70)

- Erin's questions - What happens to grievance? Where does it go, who decides and what is the appeal process?