



## Virginia Commission on Youth 2022 Legislative Studies and Initiatives

### Evaluating the Effectiveness and Efficiency of Virginia's Juvenile Detention Centers

Draft Recommendations	Public Comment
<p><b>Recommendations related to consolidation:</b></p> <p><u>Recommendation 1</u> Introduce a budget amendment (or request) to direct the Department of Juvenile Justice (DJJ) to implement a process to identify specific juvenile detention centers that potentially should be defunded and consolidated to better align facility capacities with regional needs. Consolidation and repurposing should be done cautiously and deliberately. Factors to take into consideration include: current usage of existing detention homes, building condition and maintenance needs, need for secure detention in the region, distance to other detention homes, detention home culture and staff training, detention home services (e.g., educational, vocational, availability of post-D with programming, use of evidence-based practices, other), and potential for repurposing. DJJ shall report to the General Assembly on the results of the process and specific facilities identified for defunding and consolidation by November 1, 2023. (Amended from JLARC Policy Option 12).</p> <p>Option 1: DJJ could consider defunding one detention center per region to begin the process of reducing the number of detention beds through encouraging</p>	<p><u>Summary of opposition:</u></p> <p>Recommendation one was widely opposed. Recommendations 2-4 were seen as second step recommendations, necessary only if recommendation one is adopted. Reasons for opposition include:</p> <ul style="list-style-type: none"> <li>• Keeping youth near their community allows for greater collaboration with community and faith-based resources, access to families and support systems, and important access to their lawyer.</li> <li>• Distance is a great burden on parents who want to visit their child.</li> <li>• Recommendations do not reflect a consensus of the Advisory Group and were not developed by the Advisory group.</li> <li>• Detention centers already serve communities larger than the county or city where they are located.</li> <li>• Recommendations would result in increased costs to local governments. For example, the recommendations do not include any projections for increased costs at centers having to absorb additional residents.</li> <li>• These facilities are locally owned. The state only provides about 33% of the overall cost to operate the juvenile detention centers in Virginia. Further, local governments have the most invested, and should be consulted, not just informed.</li> </ul>

consolidation with neighboring facilities. The suggested regions based on the distribution of detention homes are the following:

**Northern Virginia** (Fairfax, Loudoun, Northern Virginia, Northwestern (Winchester), and Prince William)

**Central Virginia** (Chesterfield, Henrico, James River, Piedmont, Rappahannock, and Richmond)

**Shenandoah Valley/Western Virginia** (Blue Ridge, Lynchburg, and Shenandoah Valley)

**Tidewater** (Chesapeake, Merrimac, Newport News, Norfolk, and Virginia Beach)

**Southside Virginia** (Crater and Danville)

**Southwest Virginia** (Highlands, New River, and Roanoke)

Option 2: DJJ could consider defunding a percentage of detention centers and conducting a study of where it would be best to reach that percentage goal.

- Warehousing of youth will further stress an already compromised retention issue in the workforce.
- This recommendation will have a serious and adverse impact on Sheriff's Offices across Virginia who would in some cases have to travel hours at a time transporting a youth.
- Commenters stated there has been a recent influx of detention placements and facilities functioning at or near capacity as well as an increase in violent juvenile crime.
- This plan would not result in any cost savings. Under the proposed recommendations, any funds from consolidation would be re-invested, resulting in zero dollars saved. Any specific plans for reinvestment were not elaborated upon.
- No locality would be obligated to house another locality's youth.
- Partnerships already exist within local and established systems of care. Regional partnerships with larger systems are more complex and challenging to forge.
- While still opposed, a couple of commenters stated option 2 would be preferable.
- Delegate Tommy Wright and Senator Frank Ruff submitted their written opposition to the closing of the Piedmont Juvenile Detention Facility.

Oppose:

**Crater Youth Care Commission**

Crater Youth Care Commission • Jack M. Scott, Executive Director, Crater Youth Care Commission

**Fairfax County Juvenile Detention Home**, Jason E. Houtz, Superintendent

**Middle Peninsula Juvenile Detention Commission (Merrimac Center),**

J Randall Wheeler, City manager, City of Poquoson, Executive Committee: Barbara Dameron, Director of Finance, City of Williamsburg, Rodney Hathaway, County Administrator, new Kent County, Sharon McCarthy, Director of Finance, James City County, Alan Partin, Assistant County Administrator, Caroline County, Morgan Quicke, County Administrator, Richmond County, Jim Taylor, Assistant County Administrator, Hanover County

**New River Valley Juvenile Detention Home**

NRVJDH Commission • Mark A. Burnette, Ed.D. Superintendent, Carroll County Public Schools • Riane M. Bolin, Ph.D., Associate Professor and Chair, Department of Criminal Justice at Radford University • Chief Judge Lee Chitwood, 27th Judicial District, Juvenile and Domestic Relations Court • Keren Coffin, citizen • Gina Dean, citizen • Tracie N. Gilmer, citizen • Travis Gilmer, citizen • Robert Graham, Superintendent, Radford City Schools • Justin L. Griffith, Pulaski County Commonwealth’s Attorney • Adam Joel, citizen • Rebecca S. Johnson, Retired Mathematics Instructor • Eddie Johnson, educator • Lisa N. Lafoon, citizen • Malvin D. Lafoon, citizen • Robert Lilly, Jr., Giles County Commonwealth’s Attorney • Cari Marks, English teacher, librarian, and reading remediation teacher • Christina Moore, citizen • Deborah P. Moore, citizen • LCDR Gregory L. Moore USN (Ret.), citizen • Jason A. Moore, M.S.Ed, Special Education Teacher • Grover Nixon, citizen • Sheriff C. H. “Hank” Partin Montgomery County Sheriff’s Office • Lori Phillips, Montgomery County Public Schools • Rhonda Reynolds, Administrative Assistant • Tracy Robertson, citizen • Kelly Rowland, Coordinator of Reading Intervention & Dyslexia Advisor, Montgomery County Public Schools • Keith Rowland, Principal • Heather R. Skeens, Science Teacher • Amy Wood, Math and GED Teacher • Eric Young, educator •

Joseph W. Young Jr., M.B.A., Superintendent, New River Valley Juvenile Detention

**Norfolk Educational Transition Academy**

Brytnee Donald, HS Science Teacher • Patrick Eberhardt, English, Teacher • Clifton Frank, MA, Norfolk Public Schools • Leshia Harold, Transition Specialist • Timothy Jackson • Tracey Mazell, ISAEP Teacher • Dennis Otter, Principal • Arnette Riggins, Literacy Coach

**Piedmont Regional Juvenile Detention Facility**

Piedmont Regional Juvenile Detention Facility • L.A. “Tony” Epps, Sheriff, Prince Edward County • Robert L. Jones, Sheriff, Nottoway County

**Prince William County**, Elijah Johnson, Acting County Executive

**Rappahannock Juvenile Detention Center**

William C. Tignor, Stafford County member, Rappahannock Juvenile Detention Commission

**Richmond Juvenile Detention Education Center**

Tyson J. Etheridge, History Department Chairman, Social Studies • Ta'Neshia Ford, Principal

**Rockbridge County**, Spencer Suter, County Administrator

**Shenandoah Valley Juvenile Detention Center Commission**

Shenandoah Valley Juvenile Detention Center Commission (SVJCC) • Tim Showalter, Executive Director, Shenandoah Valley Juvenile Center

**Virginia Association of Community Services Boards (VACSB)  
Child and Family Council**

**Virginia Beach Juvenile Detention Center, Education Program,**  
Kay Thomas, Principal

**Virginia Juvenile Detention Association (VJDA)**

**Virginia Sheriffs' Association**

**Additional Opposition**

Marilyn Anderson, citizen • Tricia Bassing, Chief of Child and Family Behavioral Health Services, City of Alexandria • Sonnja E. Bennette-Curtis, Fairfax County, citizen • Carola Haas, citizen • Katharine Capuano, citizen • Laurie Cooper, citizen • Dr. Kiriimi Fuller, Alexandria, child clinical psychologist • Charles J. Kehoe, Chief Operating Officer, Kehoe Correctional Consulting, LLC • Greta Rosenzweig, Chief of Child Welfare Services, City of Alexandria • Anna Vijayan, citizen

General comments:

**Virginia Department of Education:** Defunding certain detention centers would increase the population at other centers. That increase would impact the education needs and staffing at the centers whose population increased.

**Virginia Municipal League (VML):** VML is concerned that any state funding saved from closing local and regional facilities would not necessarily be reallocated to address increased costs for transportation and services.

**Virginia Association of Counties:** VACo's view is that any such action should only be undertaken at the initiative of the local governments or commissions responsible for the centers and not through a state-driven process of setting an arbitrary target of detention centers to be consolidated.

	<p><b>Legal Aid Justice Center and Rise for Youth:</b> While we fully support the closure of carceral facilities like Virginia’s Juvenile Detention Centers (JDCs) in favor of less punitive, local, evidence-based alternatives, the current consolidation plan is focused exclusively on saving state dollars at the cost of youth and their families.</p> <p><b>Julie E. McConnell, Professor of Law, University of Richmond School of Law:</b> We must consider the value of having local facilities so that children are not held far from home. We have a unique opportunity to provide comprehensive services to children close to home where their families can also participate. We could use more of these facilities for post-dispositional detention as an alternative to Bon Air Juvenile Correctional Center.</p>
<p><u>Recommendation 2</u> Request that the Secretary of Public Safety and Homeland Security, in coordination with the Secretary of Education, come up with a reinvestment plan to meet the needs of public safety and education for juvenile detention centers. This plan shall take into consideration the cost savings that occurs with detention consolidation and develop ways to reinvest in places or programs for youth who are in or at risk of becoming part of the juvenile justice system (e.g., youth in foster care, with status offenses, on probation, sex trafficked, or with severe mental health needs). Reinvestment dollars should target community-based programs.</p>	<p><u>General comments:</u></p> <p><b>Virginia Department of Education:</b> Centers whose daily population increased would see an increase in operating costs in both personnel and non-personnel requirements.</p> <p><b>Legal Aid Justice Center and Rise for Youth:</b> Reinvestment in the same community and in a continuum of community-based programming is essential to justifying consolidation and closure of JDCs.</p>
<p><u>Recommendation 3</u> Provide additional resources for the added transportation time and expenses as a result of consolidation.</p> <p>Option 1: Provide additional funding for sheriffs for longer distance between courts and detention homes. Introduce a budget amendment to direct the Secretary of Public</p>	<p><u>Specific comments in opposition:</u></p> <p><b>Virginia Juvenile Detention Association:</b> Closures and consolidations will result in increased transportation expenses to local sheriffs’ departments and local police departments that will offset cost savings, increase potential for youths’ behavioral issues while in LEO custody and pull law enforcement away from community policing.</p>

<p>Safety and Homeland Security (or DJJ) to develop a process for reimbursement of sheriffs.</p> <p>Option 2: Introduce a budget amendment to create a state administered fund for off-duty or retired sheriffs and law enforcement officers to provide transportation on an as-needed basis (to court, medical, or other qualifying appointments) for juveniles. (There is perhaps an opportunity to help sheriffs with transportation for mental health TDOs as well.)</p>	<p><b>Virginia Sheriffs’ Association:</b> The costs are not merely financial. The additional time spent transporting youth in detention directly impacts the number of law enforcement officers available to patrol the community and keep it safe.</p>
<p><u>Recommendation 4</u> Introduce a budget amendment to direct the Secretary of Public Safety and Homeland Security (or DJJ) to develop a process to assist families of juveniles impacted by consolidations. Provide additional resources for families to visit with detention youth when they are placed far from home.</p>	<p><u>General comments:</u></p> <p><b>Virginia Department of Education:</b> Superintendents indicate there is already a shortage of available personnel qualified to transport juveniles.</p> <p><b>Legal Aid Justice Center and Rise for Youth:</b> This recommendation requires further development, but it is unlikely that funding alone can address the harms to youth and their family of placement in a JDC further from home.</p>
<p><b>Recommendations related to education:</b></p> <p><u>Recommendation 5</u> Introduce a budget amendment to direct the Virginia Department of Education (VDOE) to determine the extent to which each juvenile detention center currently implements or could further implement cost-effective staffing methods. (Amended from JLARC recommendation 30).</p>	<p><u>Summary of opposition:</u></p> <p>Recommendation five was widely opposed. Most comments spoke about recommendations 5-7 together in their opposition. Reasons for opposition include:</p> <ul style="list-style-type: none"> <li>• Instruction that students receive is tailored to meet the individual needs of each student and a lot of the focus is on forming relationships with students that would not be possible in a traditional classroom.</li> </ul>

This may include looking at education models around the country to establish a system in Virginia that distinguishes between short-term stays (pre-adjudicatory, pre-dispositional) and longer-term stays (CPP, post-dispositional) for detained juveniles.

The Department of Education shall develop a plan to implement the following recommendations as outlined in the 2021 Board of Education report, *Recommendations for Appropriate Staffing and Funding Levels Necessary for State Operated Programs (SOPs) in Regional and Local Detention Centers*:

- Develop “regional” models moving multiple facilities to one school division under cooperative agreement so that staff can be shared/better utilized with efficiency and compliance in mind.
- Have building administrators provide leadership and supervision across multiple facilities.
- Create a “pool” of staff which could serve as needed based on JDC population and other demographics (special education, ELL, etc.).
- Use “lead teacher” positions instead of a principal position at certain facilities.
- Share staff within the cooperating school division.
- Use enhanced online/asynchronous instructional options; such as Virtual Virginia, Edgenuity, etc.

An implementation plan shall be reported to the Chairs of the House Appropriations Committee and the Senate Finance and Appropriations Committee by June 1, 2024.

- JDC population students historically have major gaps in their learning that require carefully designed instruction by education staff who are trained to teach and support this diverse population of students and not by education staff that lack the training skills necessary to target the various needs of students housed in detention centers.
- Students who receive inadequate or no instructional services are more likely to be rearrested and reincarcerated within 12 months of their release.
- The Commission on Youth already conducted a separate study on education programs which resulted in no legislative action. This topic was not explored with this Advisory Group.
- Virtual Virginia is not designed for this population.
- Students with disabilities will be disproportionately affected, but all students will suffer the negative effects of the proposed changes.
- It is critical to keep all students, even “short time” students progressing towards graduation.
- The *Code of Virginia* currently states that detention home education programs must offer comparable education services. This recommendation contradicts the Code and this tenet.
- Decreasing funding to State Operated Programs, you will be decreasing the services currently offered to medically fragile students at CHKD, MCV, and UVA hospitals.

Oppose:

**Crater Youth Care Commission**

**Fairfax County Juvenile Detention Home**, Jason E. Houtz, Superintendent

**Middle Peninsula Juvenile Detention Commission (Merrimac Center),**



J Randall Wheeler, City manager, City of Poquoson, Executive Committee: Barbara Dameron, Director of Finance, City of Williamsburg, Rodney Hathaway, County Administrator, new Kent County, Sharon McCarthy, Director of Finance, James City County, Alan Partin, Assistant County Administrator, Caroline County, Morgan Quicke, County Administrator, Richmond County, Jim Taylor, Assistant County Administrator, Hanover County

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**Prince William County**, Elijah Johnson, Acting County Executive

**Rappahannock Juvenile Detention Center**

Dr. Janet Hodges, Spotsylvania County Public Schools, Principal, RJDC Education Program • William C. Tignor, Stafford County member, Rappahannock Juvenile Detention Commission

**Richmond Juvenile Detention Education Center**

Keshia Anderson, Compliance Coordinator/ Special Education Teacher • Tyson J. Etheridge, History Department Chairman, Social Studies • Ta'Neshia Ford, Principal • Jennifer Young, Reading Specialist

**Virginia Beach Juvenile Detention Center, Education Program,**  
Kay Thomas, Principal

**Virginia Juvenile Detention Association (VJDA)**

**Additional Opposition**

Marilyn Anderson, citizen • Katharine Capuano, citizen • Laurie Cooper, citizen • Charles J. Kehoe, Chief Operating Officer, Kehoe Correctional Consulting, LLC • Leslie Magee, Music Therapist, CHKD School Program • Lucas Tressler, English Teacher, W. W. Moore • Anna Vijayan, citizen

General Comments:

**Virginia Department of Education:** Increasingly more pre-dispositional students are currently being detained for a longer period of time ... Those students require the same quality of educational services and support as students with a post adjudication status.

Reducing education requirements to students with a short stay would not meet state and federal requirements for comparable education services or services determined by the student's IEP Team.

	<p>The VDOE has also previously explored staff sharing options with inconsistent results. The VDOE enters into Cooperative Agreements with local school divisions who serve as the fiscal and HR agent for the programs. This limits the ability to share staff, use a “lead teacher” or a “pool” of staff.</p> <p>The majority of students enrolled in detention academic programs do not possess the academic acuity required to be successful in an asynchronous mode of instruction.</p> <p><b>Legal Aid Justice Center and Rise for Youth:</b> Priority should be given to plans that prevent credit loss and promote educational continuity. JDCs should shift to implementing the curriculum of the home school so that course credits can be earned.</p>
<p><u>Recommendation 6</u> Introduce legislation that would allow a teaching ratio of 1:8 in detention facilities without community placement programs (CPPs), while maintaining current standards for detention facilities with CPPs.</p>	<p><u>General Comments:</u></p> <p><b>Virginia Department of Education:</b> The VDOE has previously explored the use of ratios for education staffing. Due to state and federal requirements, the utilization of a ratio requirement may not be best practice when staffing detention academic programs.</p>
<p><u>Recommendation 7</u> Amend § 22.1-209.2 of the <i>Code of Virginia</i> to eliminate the 1:12 ratio of one teacher for every 12 beds based on the capacity of the facility.</p>	<p><u>General Comments:</u></p> <p><b>Virginia Department of Education:</b> Establishing a ratio for all 24 of the detention centers to follow would create inequities in smaller facilities and result in noncompliance with state and federal expectations.</p>

<p><b>Recommendations related to recidivism:</b></p> <p><u>Recommendation 8</u>          Introduce a budget amendment to amend paragraph F of Item 426 of the 2022 Appropriation Act to include annual reporting on the performance and recidivism rates of community placement programs (CPP). The Department of Juvenile Justice complies with this item of the Appropriation Act by publishing an annual document known as the Data Resource Guide (DRG). The Data Resource Guide provides an overview of DJJ, highlighting fiscal year data and trends in all program and service areas. The DRG includes a chapter on recidivism, but does not currently provide this information for the CPP.</p>	<p>No comments were received on this recommendation.</p>
<p><b>Recommendations related to targeted repurposing efforts and evaluation:</b></p> <p><u>Recommendation 9</u>          Introduce a budget amendment to allow the Lampstand, a Department of Social Services licensed residential facility, to enter into an agreement with the Roanoke Valley Juvenile Detention Center to repurpose a wing of the detention center for a residential assessment center for young girls who have been sexually exploited and trafficked.</p> <p>The Secretary of Public Safety and Homeland Security in coordination with the Secretary of Health and Human Resources, shall streamline licensing regulations for such a purpose that allows for minimum security on the residential assessment wing. This residential assessment center wing shall be used for assessment and short-term stabilization.</p>	<p><u>Oppose:</u></p> <p><b>Charles J. Kehoe, Chief Operating Officer, Kehoe Correctional Consulting, LLC:</b> The idea that we would ever allow DSS or any other organization to repurpose a wing of a juvenile detention center for a residential assessment center for “young girls who have been sexually exploited and trafficked,” is, frankly, offensive. If such a facility is under the same roof with a juvenile detention facility these young victims will know, they are being treated as if they are the criminals.</p>

Recommendation 10

Introduce a budget amendment directing the Department of Juvenile Justice to work with (three) local detention centers that are willing to repurpose a portion of a detention facility to meet the needs of the youth in their community. Repurposing may be for mental health services for juveniles, including a crisis receiving center, shelter care, or assessment centers for human trafficking victims. The Department shall assist these local areas in identifying other needs if necessary. The Department shall work with local detention centers to determine the steps necessary to repurpose, including collaboration on the sources of grant funding, and report back to the Commission on Youth with a repurposing plan by November 1, 2023.

Support:

**Virginia Association of Community Services Boards (VACSB) Child and Family Council:** We support the recommendations that provide support for jurisdictions to repurpose portions of detention facilities to meet community behavioral health needs. The C&F recognizes that localities and regions have unmet substance use and mental health needs that, if met, would reduce the need for congregate care, including detention. We have concerns that the opportunity to receive this support would be limited to a small number of jurisdictions and recommend extending the resources to all who are able to justify need.

**Tricia Bassing, Chief of Child and Family Behavioral Health Services, City of Alexandria and Greta Rosenzweig, Chief of Child Welfare Services, City of Alexandria:** We support the recommendations that provide support for jurisdictions to repurpose portions of detention facilities to meet community behavioral health needs. We recognize that localities and regions have unmet substance use and mental health needs that, if met, would reduce the need for congregate care, including detention.

Oppose:

**Legal Aid Justice Center and Rise for Youth:** Generally opposes the repurposing of JDCs and wings of JDCs to serve youth. The perception of the community, family, and individual youth of the facility will remain as detention and punishment whether there are locked doors or not.

**Charles J. Kehoe, Chief Operating Officer, Kehoe Correctional Consulting, LLC:** I have been in nearly 700 adult and juvenile detention and correctional facilities in my career and I have never seen an adult or juvenile detention or correctional facility repurposed to serve victims where the facility takes on the image of a shelter for victims.

General Comments:

**Virginia Department of Education:** Current regulatory language does not support or allow detention education staff to provide instruction to students who are not court ordered to secure detention.

**Virginia Juvenile Detention Association (VJDA):** VJDA takes no position on the remaining recommendations, 9-13.

**Virginia Municipal League (VML):** VML believes it could be helpful for VCOY to pursue streamlining regulatory and licensure processes for individual facilities that want to team up with nonprofit organizations to offer targeted services to particular groups of youth.

Additionally, VML supports state re-investment in the Virginia Juvenile Community Crime Control Act (VJCCCA).

**Virginia Association of Counties:** While there may be opportunities for repurposing some excess capacity in juvenile detention centers, any decisions regarding consolidation should be made by the affected local governments so that the full spectrum of community needs can be considered, to include opportunities for the reinvestment of savings into the provision of additional services, as well as potential drawbacks, such as housing youth farther from their families and communities.

**Jason E. Houtz, Superintendent, Fairfax County Juvenile Detention Home:** There were some discussions in the advisory committee meetings around the potential repurposing “unused” detention bedspace and if that might be an alternative to explore independent of any closure or consolidation of entire detention facilities but to my knowledge the advisory committee did not formulate any formal recommendations for this.

**Julie E. McConnell, Professor of Law, University of Richmond School of Law:** We could also set aside part of the space at

	<p>detention homes to create programs at these facilities that holistically address all the needs of these families. One side of the facility could be opened up to the public and set aside for community services... It seems that it would be cost-effective to convert part of these facilities to child-serving hubs that help address the root causes of children’s involvement in the youth legal system.</p>
<p><u>Recommendation 11</u>          Introduce a budget amendment directing the Secretary of Public Safety and Homeland Security in coordination with the Secretary of Health and Human Resources to work with a local detention facility that is willing to repurpose a portion of their facility to meet the needs of Virginia’s youth:</p> <p>Option 1) who have a temporary detention order (TDO) or acute mental health needs and are committed to the Department of Juvenile Justice or in the custody of a local detention center.</p> <p>Option 2) for a crisis receiving center, to be used for youth under age 18 in mental crisis, who can stay for observation for up to 23 hours. The crisis receiving center will help divert youth from the criminal justice system.</p> <p>The Department of Juvenile Justice shall work with this local detention center and the Department of Behavioral Health and Developmental Services to determine the steps necessary to repurpose, including collaboration on the sources of grant funding, and report back to the Commission on Youth with a repurposing plan by November 1, 2023.</p>	<p>Public comments received for recommendation 10, can be generally applied to recommendations 11-13.</p>
<p><u>Recommendation 12</u>          Permit localities and regional commissions that are responsible for overseeing juvenile detention centers to enter into agreement with entities that are licensed by the Department of Social</p>	<p>Public comments received for recommendation 10, can be generally applied to recommendations 11-13.</p>

Services or the Department of Behavioral Health and Developmental Services, for the purpose of repurposing a wing or part of a detention facility for DSS or DBHDS licensed uses, including DSS or DBHDS children’s residential facilities for assessment, shelter, or mental health purposes. (And)

Recommendation 13

Require (or request) that the Secretary of Public Safety and Homeland Security in coordination with the Secretary of Health and Human Resources streamline the regulations for the licensing of DSS and DBHDS facilities that share the same building or location as a certified juvenile detention center.

As part of streamlining these regulations, include the flexibility for DSS and DBHDS to license facilities that have a minimum security component.

The Secretary of Public Safety and Homeland Security shall report back to the Commission on Youth, by November 1, 2023, regarding any legal or statutory barriers to the licensing of DSS and DBHDS facilities that share the same building or location as a certified juvenile detention center.