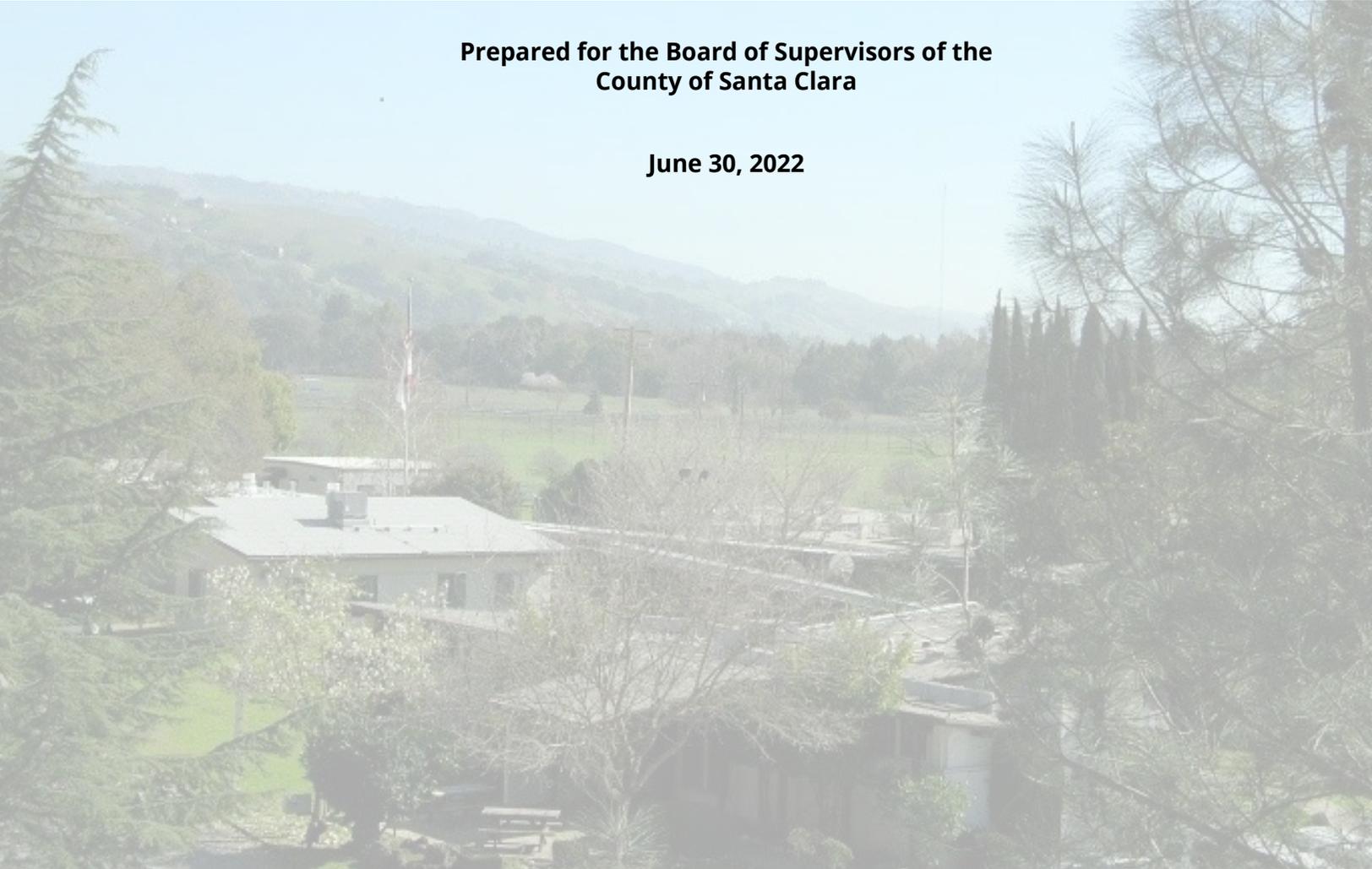


# **Management Audit of the County of Santa Clara Juvenile Probation William F. James Ranch Facility**

**Prepared for the Board of Supervisors of the  
County of Santa Clara**

**June 30, 2022**



**Prepared by the  
Board of Supervisors Management Audit Division  
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# County of Santa Clara

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June 30, 2022

Supervisor Otto Lee, Chair  
Supervisor Cindy Chavez, Vice Chair  
Board of Supervisors' Finance and Government Operations Committee  
70 West Hedding Street San Jose, CA 95110

Dear Supervisors Lee and Chavez:

We have completed the Management Audit of the Juvenile Probation – William F. James Ranch. This audit was added to the Management Audit Division's work plan by the Board of Supervisors of the County of Santa Clara, pursuant to the Board's power of inquiry specified in Article III, Section 302(c) of the Santa Clara County Charter. This audit was conducted in conformity with generally accepted government auditing standards as set forth in the 2018 revision of the "Yellow Book" of the U.S. Government Accountability Office. The purpose of this audit was to examine the operations, management practices and finances of the William F. James Ranch to identify opportunities to increase the facility's efficiency, effectiveness, and economy.

The report includes five findings and 14 recommendations related to the following: improving outcomes monitoring for youth released from the Ranch, identifying and better serving youth with more severe mental health acuity and needs, more consistent staffing schedules with shortened shifts, improved safety and security, and additional contract monitoring for service providers utilizing evidence-based practices.

Although 14 recommendations were directed to Probation, the Department deferred to the Behavioral Health Services Department, the contracted provider of clinical therapy at the Ranch, on six recommendations pertaining to mental health. In the attached responses to this audit, Probation agrees or partially agrees with five of the remaining eight recommendations directed to the Department and disagrees with three of these recommendations. The Behavioral Health Services Department agrees or partially agrees with all six mental health-related recommendations deferred to them by Probation.

**Board of Supervisors:**

Mike Wasserman  
District 1

Cindy Chavez  
District 2

Otto Lee  
District 3

Susan Ellenberg  
District 4

S. Joseph Simitian  
District 5

**County Executive:** Jeffrey V. Smith

If implemented, the recommendations would:

- Ensure there are sufficient measures and outcome data to evaluate the Ranch program and inform program selection and planning;
- Improve mental health severity measures used to identify high-acuity youth and ensure these youth receive sufficient treatment and are appropriately cared for;
- Maximize the consistency of youth and staff interaction to build greater trust and reduce risks associated with working shifts longer than 12 hours;
- Enhance safety and security at the Ranch and reduce risks to youth, staff, and the neighboring community;
- Better ensure that service providers are adhering to the evidence-based practices they are contracted to provide.

We would sincerely like to thank the Probation Department and its staff for their thoughtful, patient, and professional cooperation and assistance throughout this audit.

Respectfully submitted,

A handwritten signature in blue ink that reads "Cheryl Solov". The signature is fluid and cursive, with a large initial "C" and a distinct "S" at the end.

Cheryl Solov  
Management Audit Manager

CC: Supervisor Mike Wasserman  
Supervisor Susan Ellenberg  
Supervisor S. Joseph Simitian  
James R. Williams, County Counsel



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# Executive Summary

## **Section 1: Measuring Program Outcomes**

The Probation Department does not measure long-term recidivism, or incidents that occur more than 12 months after youth are released from the Ranch even though it is one goal of the program. Other life outcomes such as employment and education are also not tracked or monitored post-release despite the Ranch program offering services to help youth committed to the Ranch succeed in these areas. As a result, there is insufficient information and evidence to show whether the Ranch program is effective as designed. This means there is limited accountability for the program, and it is unclear if the \$23 million estimated annual cost of the program is being spent effectively. The Probation Department should define measures that directly relate to the Ranch's goals of reducing recidivism that occurs more than one year after exiting the Ranch and solicit input from the Santa Clara County Office of Education to develop measures of the effectiveness of its educational and vocational programs. The Department should use these measures to inform program selection and planning and ensure its service providers are supporting the Ranch's mission and goals and report these measures to the Board of Supervisors. The Department should conduct in-depth evaluations of the Ranch program every three years.

## **Section 2: Mental Health Acuity and Needs**

The Ranch and the Behavioral Health Services Department use tools to measure risk of the youth and assess behavior, but neither could tabulate or provide a precise count of youth with more severe mental health acuity. This is a problem because both parties report that there is a subset of youth with a higher level of mental health needs that the Ranch cannot fully address with its current staff, contractors, and service. We used several proxy measures to estimate that during 2021, four to six youth, or six to eight percent, were committed to the Ranch who had greater or more severe mental health needs than most. According to the Ranch's policies, these youth may not meet the requirements for the program. However, there are reportedly no alternative placements in the County that meet their needs. The Probation Department should amend its agreement with the Behavioral Health Services Department to require that they measure mental health acuity more precisely. They should use this information to identify youth with high-acuity needs, change the policy to allow them at the Ranch formally, and contract with Behavioral Health Services to provide temporary additional clinical services to support their rehabilitation in the Ranch's program until an improved tool is in place and viable alternatives are evaluated. The Probation Department should use outcomes information for youth who are committed to the Ranch to understand if the added support for youth with high-acuity needs is resulting in improvements and adjust the services targeting this group as needed.

## **Section 3: Schedule and Staffing Structure Interferes With Effectiveness of Program**

The current staffing schedule of Probation Counselors, who are with the youth during most of their waking hours, risks undermining the Ranch's mission. Each month, the schedule has six mandatory 16-hour shifts. The Counselors also work shifts that rotate and skip various days every two weeks. Research suggests that shifts over twelve hours increase the risk of injury to staff and lowers their cognitive abilities. This puts staff and youth at risk physically and risks undermining the Ranch's

mission and model which emphasizes consistent contact and relationship building between the resident youth and the counselors. The Ranch relies on a pool of 47 temporary Extra Help Probation Counselors assigned to fill the gaps in coverage by the Probation Counselors. This can create inconsistency among staff, it exceeds the Department's need for relief coverage for permanent staff, and adds to Department costs since each temporary employee is paid for a fixed amount of training whether they temporarily fill shifts or not. The Department does not routinely assess its total staffing needs or forecast youth populations. We recommend the County renegotiate the labor agreement with Probation Counselors to reflect a more consistent schedule with shifts no longer than 12 hours and prioritize shifts scheduled consecutively and consistently to maximize the consistency of youth and staff interaction. The Ranch should reduce the size of the pool of part-time temporary Probation Counselors to 20 from 47. Finally, every three years, the Ranch should forecast its youth population and related staffing needs and use this to develop a more accurate operating budget.

#### **Section 4: Safety and Security Fortifications Needed at Facility**

During our fieldwork in late 2021, we observed several weaknesses in the facility design's safety and security that could undermine the Ranch's effectiveness to provide secure housing for the current youth and possible future youth aged 18–24 who will require an increased level of security since they often have more serious charges than the current population at the Ranch. Between 2016 and 2021, the Ranch reported a total of two successful escapes by youth in their custody at the Ranch, eight successful escapes during transportation or other off-site activities, and 26 unsuccessful escape attempts at the Ranch. A July 2020 report from the County's Director of Facilities Security reported several risks that were present at the Ranch, including contraband, workplace violence upon employees, illegal substance distribution, resident fights, active shooter risk and potential escape. The Ranch is addressing some of these risks, but not all. For example, according to the County report, they need to make fortification improvements to the facility such as improved lighting, entry gates, door controls, and access cards to list a few, which could reduce the risks to youth, staff, and the neighboring community. The Probation Department should implement the remaining facility improvements recommended by the County's Director of Facility Security in July 2020 and incorporate active shooter training and drills into their existing training and drills.

#### **Section 5: Agreements Not Monitored for Effective Implementation**

Although the Department reviews contractor performance regularly, neither the Probation Department nor the Ranch have a method or practice of measuring and recording if service providers are using evidence-based practices and doing so correctly. An evaluation of the Ranch's practices issued by the University of Cincinnati's Corrections Institute in April 2021 recommended that the Ranch staff should more consistently implement programs themselves because evidence-based practices don't work if they aren't implemented correctly. The same standard can be applied to outside service providers who deliver part of the Ranch's overall program. The Probation Department should implement a requirement where staff who oversee an agreement must observe and document if a provider is adhering to the evidence-based practices they contracted it to provide and doing so correctly. This could be a biannual random evaluation. If they find that the service provider is not implementing the services correctly, they should work with the Department's Contracts and Grants Unit to take corrective action if necessary.

# Introduction

## INTRODUCTION

This Management Audit of the Juvenile Probation – William F. James Ranch (the Ranch) was added to the Management Audit Division's Fiscal Year (FY) 2021–2022 work plan by the Board of Supervisors, pursuant to the Board's power of inquiry specified in Article III, Section 302(c) of the County of Santa Clara Charter. The Board added this audit after considering the annual County-wide audit risk assessment conducted by the Management Audit Division in accordance with Board Policy.

## PURPOSE, SCOPE AND OBJECTIVES

The purpose of the audit was to examine the operations and management practices of the Ranch, and to identify opportunities to increase the Ranch's efficiency, effectiveness, and economy. Work on this audit began with an entrance conference on August 31, 2021, and a draft report was issued to the Probation Department on April 5, 2022.

We also sent the draft audit report to the Office of the County Counsel, and relevant sections of the draft report to the Behavioral Health Services Department for review and comment.

An exit conference was held with the Probation Department on April 12, 2022, and a revised report incorporating feedback from the exit conference was issued to the Probation Department on May 26, 2022.

The William F. James Ranch (the Ranch) is a secure 108 bed residential rehabilitative facility operated by the Probation Department of Santa Clara County. The facility is approved by the State for youth between the ages of 13 and 19 who are committed to six-to-eight-month terms by the County's Juvenile Justice Court. When the commitment period ends and they return to the community, the Department provides a 10-week Aftercare program, followed by six months of case management provided by the Reentry Services Unit.

The facility is regulated under the federal Prison Rape Elimination Act, the State's Title 15 and Title 24 codes, other State law and County policy. The Ranch defines its approach as rehabilitative and restorative, offering an evidence-based program using the "Missouri Approach". The Missouri Division of Youth Services developed the Approach in 1974 and it uses rehabilitative methods that include group therapy, teaching and modeling pro-social skills, and family and community engagement, among others. Youth sentenced to the Ranch live in small residential units, or pods, attend school and vocational training classes at the Ranch, and receive physical health, mental health, substance use and other services from County staff and contractors located at the facility.

The audit's main objectives were to answer the following questions:

- Are 100% of rehabilitative programs and services at the Ranch supportive of the Ranch's mission and are they evidence based? What criteria does the Ranch use to select and monitor the effectiveness of its programs?

- Does the facility have in place effective protections for the physical safety of in-custody juveniles, staff, contractors and the surrounding community, inclusive of compliance with Public Health orders and use of administrative leave and internal affairs services?
- Does the Ranch meet minimum legal requirements pertaining to custody of juvenile offenders?
- Does the Ranch effectively measure the outcomes (educational, recidivism, employment, etc.) of youth treated at the Ranch?
- Are the William F. James Ranch facility's internal controls adequate to protect against waste, fraud, and abuse of County assets and resources?
- Are there opportunities to improve the overall efficiency, economy or effectiveness of the Ranch program?

### **AUDIT METHODOLOGY**

We interviewed executive and upper management personnel from the Probation Department, Ranch management and line staff such as Probation Counselors, and youth who were committed to the Ranch. We toured the Ranch facility and conducted on-site interviews over multiple days. We interviewed representatives of County departments who provide support and services at the Ranch including the Behavioral Health Services Department and the Custody Health Services Department. We also interviewed staff from the District Attorney's Office, the Public Defender Office, the 9-1-1 Communications Department, and the Social Services Agency who interact with the Ranch and youth in the criminal justice process. We spoke with the Santa Clara County Superior Court's Juvenile Court, the Court's Juvenile Justice Commission, community-based service and advocacy organizations, and peer jurisdictions.

We analyzed budgeted and actual revenue and expenditure records for the Ranch from FY 2016-17 to FY 2020-21, and the FY 2021-22 adopted budget; information from the County's timecard system and human resource management system; profile data for youth committed to the Ranch; available program outcomes data; emergency dispatch records; staff training records; and contract solicitation and monitoring documents. We reviewed the Ranch's policy and procedures manual; external oversight reports and information from sources such as the State's Board of State and Community Corrections, Santa Clara County Superior Court's Juvenile Justice Commission, third-party audits of the Ranch's compliance with the federal Prison Rape Elimination Act, the Department of Justice's Juvenile Court and Probation Statistical System; University of Cincinnati's Evidence-Based Correctional Program Checklist of the Ranch; and a facility security report from the County's Director of Facilities Security.

### **LEGALLY PROHIBITED INFORMATION**

The Office of County Counsel determined that for our audit there were two categories of information that were legally prohibited for us to view and assess in our audit. See Attachment A on page 60 for the Office's statement on these restrictions.

The first restrictions relate to sections of State law<sup>1</sup>, which barred us from seeing Peace Officer personnel records including Peace Officers' specific training records or information related to officer discipline. Most of the Probation Department staff at the Ranch who interact with the youth are sworn Peace Officers. Without access to their pertinent records, we could not assess the effectiveness of the Department's personnel controls, the number and type of use of force incidents, and, generally, the staff's role in ensuring safety and security of the youth committed at the Ranch. Our review of training records was significantly limited. For example, we could review lists of trainings attended by staff, but without knowing the identities or hire dates of the attendees, we could not assess if the trainings were taken at the appropriate and required times or compare those trainings to the staff's previous professional or academic experience to see if staff had training in various topics.

The second area of restriction<sup>2</sup> barred us from seeing information that identified youth at the Ranch. In addition, since the population at the Ranch has declined in numbers in recent years, County Counsel prohibited us from seeing some summary statistics about Ranch programs, which they believed would be too readily identifiable to individuals given the small population numbers. Without this information, we could not assess the efficacy of the Ranch's rehabilitative programs, youth's therapeutic treatment, and other critical topics related to the services at the Ranch. Whenever possible, we used proxy measures and reviewed publicly available information from third-party organizations who were granted additional legal access to this information such as the Board of State and Community Corrections, Santa Clara County Superior Court's Juvenile Justice Commission, and the University of Cincinnati's Correction Institute.

### **RANCH MODEL EVALUATION BY THE UNIVERSITY OF CINCINNATI'S CORRECTION INSTITUTE**

The Ranch is currently undergoing an evaluation and redesign of its rehabilitation model by the University of Cincinnati's Correction Institute. To not duplicate these efforts, our audit set out to not directly evaluate the efficacy of the Ranch's rehabilitative program though we did review how Probation Department and Ranch management evaluate the efficacy of services provided at the Ranch. We also considered the impact of factors such as policies, procedures, staffing, contracts with third-party service providers, and administrative practices that affect the operations and program efficacy of the Ranch.

The Institute completed its initial assessment of the Ranch program in 2021, which we discuss further in the introduction. The next phase of their work includes designing and developing changes to the Ranch approach and program, followed by a training phase, implementation, coaching, and quality improvement. As mentioned previously, the Institute was granted greater access than we were to records related to youth at the Ranch, and we cannot validate all the information in the Institute's initial assessment, but we used it as appropriate as corroborating evidence to our own fieldwork and documentation.

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1 California Penal Code Section 832.5.

2 California Welfare and Institutions Code Section 827.

## COMPLIANCE WITH GENERALLY ACCEPTED GOVERNMENT AUDITING STANDARDS

This management audit was conducted pursuant to the Board of Supervisors Policy Number 3.35 as amended on May 25, 2010. That policy states that management audits are to be conducted under generally accepted government auditing standards (GAGAS) issued by the U.S. Government Accountability Office. We conducted this performance audit in accordance with GAGAS as set forth in the 2018 revision of the “Yellow Book” of the U.S. Government Accountability Office. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. In accordance with these auditing standards, we performed the following procedures:

Audit Planning - the Board of Supervisors selected this management audit using a risk assessment tool and an estimate of audit work hours developed at the Board’s direction by the Management Audit Division. After audit selection by the Board, a detailed management audit work plan was developed and provided to the Department.

Entrance Conference - We held an entrance conference with Probation Department management to introduce the audit team, describe the audit program and scope of review, and to respond to questions. A letter of introduction from the Board and the audit work plan were also provided prior to the entrance conference.

Pre-Audit Survey - Audit staff reviewed documentation and other materials to get an overall understanding of the Ranch operations, and to isolate audit areas that warranted more detailed assessments.

Field Work - We conducted field work activities after completion of the pre-audit survey and included: (a) interviews with staff, youth, external oversight bodies, and community organizations; (b) reviews of Federal, State, and County laws and policies; (c) reviews of the Department’s professional service agreements, memorandums of understanding, and labor agreements; (d) analysis of annual reports from the Department; (e) analysis of reports and information from external oversight bodies; and (f) in-person observations of facilities.

Draft Report - On April 5, 2022, we provided a draft report to the Probation Department to describe audit progress, and to share general information on our preliminary findings and conclusions. We also provided portions of the draft report to the Behavioral Health Services Department.

Exit Conference - We held an exit conference with Probation Department management on April 12, 2022 to obtain views on the report findings, conclusions and recommendations, and to make fact-based corrections and clarifications as appropriate. Following these meetings, a revised draft was provided to the Department on May 26, 2022 for preparing their formal written responses.

Final Report - We prepared a revised (final) report and issued it on June 30, 2022. Written responses from the Probation Department and Behavioral Health are attached to the final report as Attachment B on page 61 and Attachment C on page 69, respectively.

## OMITTED INFORMATION

Per GAGAS 9.10(4), we are disclosing that certain confidential information has been omitted from the public report on advice of County Counsel under the California Privacy Rights Act catch-all exemption.<sup>3</sup> However, pursuant to GAGAS 9.64 this information will be furnished confidentially to the Board of Supervisors. See Section 4, starting on page 45 of the audit report.

## OVERVIEW OF DIVISION SERVICES

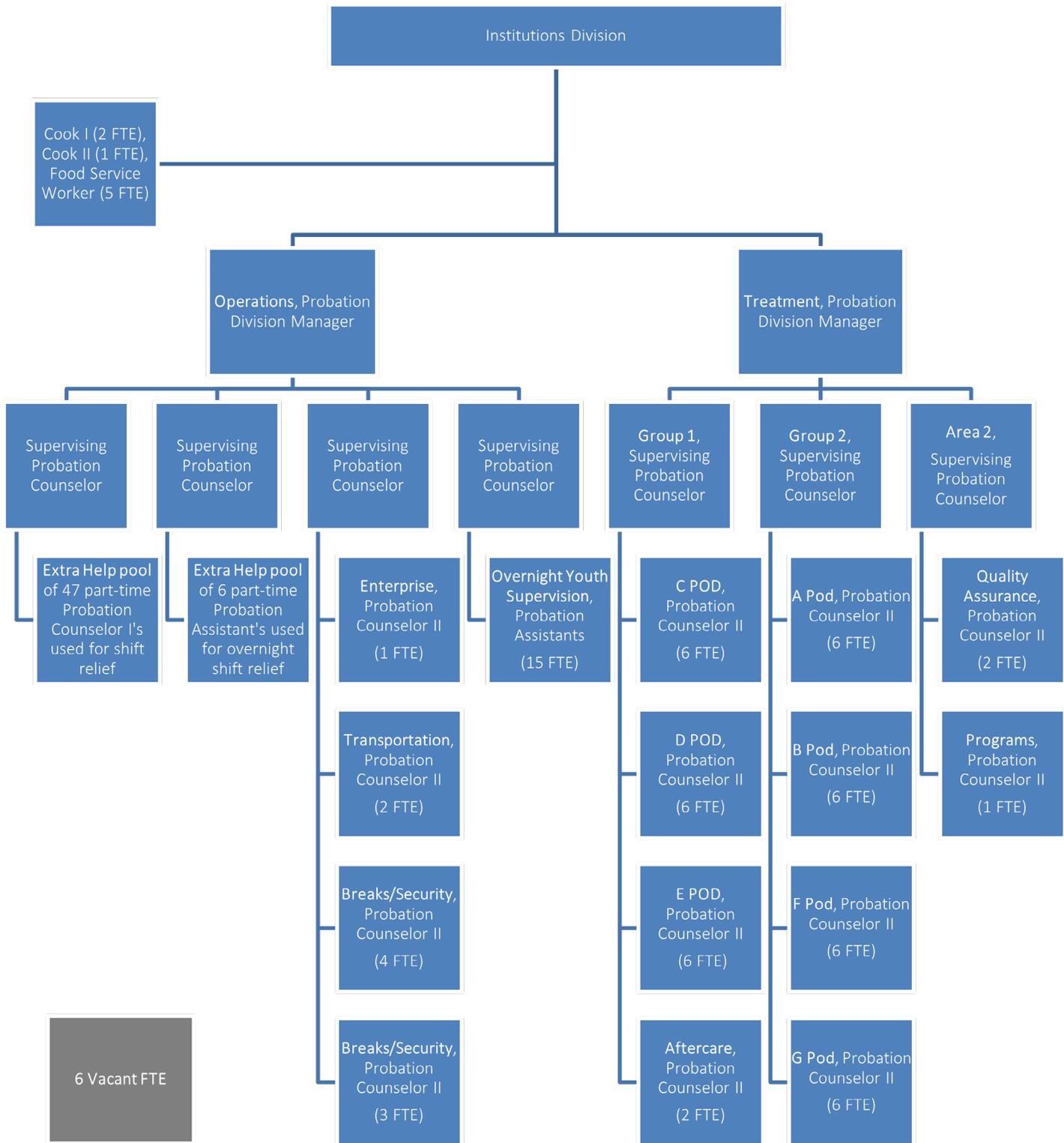
The Probation Department describes the Ranch as a “rehabilitation and treatment facility” with a 108-bed capacity for youth up to the age of 19 for court ordered stays for between six to eight months. Probation Department staff “engage with youth as role models and coaches and provide therapeutic support.” The County Office of Education runs the Blue Ridge School at the Ranch to provide State required educational services to the youth per an agreement with the Probation Department. The County’s Department of Custody Health Services provides medical care to youth at the Ranch, and the Department of Behavioral Health Services provides clinical therapy for the youth with a contracted provider. Community organizations and other contracted providers perform services at the Ranch such as victim awareness and writing workshops among others.

## ORGANIZATIONAL STRUCTURE AND BUDGET

The Ranch is part of the Probation Department’s Institutions division. The Ranch has two managers, one who oversees operations, and the other oversees treatment. In practice, their roles overlap considerably because the Ranch is operated continuously, and they are frequently on call. The Ranch had 94 full-time equivalent (FTE) staff budgeted as of FY 2021–22. In addition, the Ranch has a pool of 47 part-time temporary staff, known as Extra Help Probation Counselors, who provide shift relief to staff who supervise youth. The Ranch also has a pool of six part-time temporary staff, known as Extra Help Probation Assistants, who provide shift relief to staff who supervise the youth overnight. See Figure I.1 on page 8 for a summarized organization chart.

<sup>3</sup> California Government Code Section 6255.

**Figure I.1: William F. James Ranch Organization Chart as of September 2021**

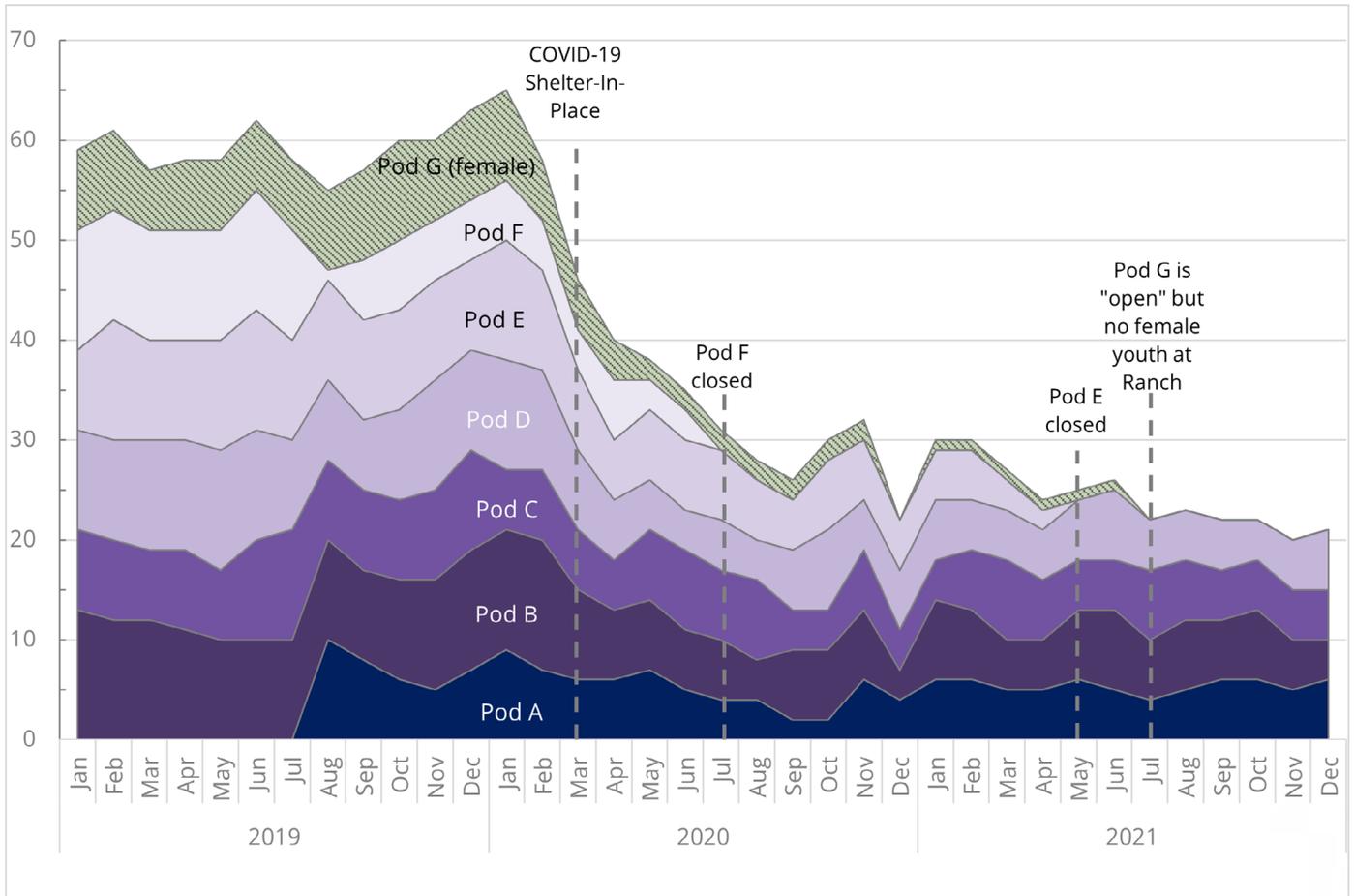


Source: Management Audit recreation of organization chart furnished by Probation Department.

## POPULATION OF YOUTH AT THE RANCH

The Ranch is permitted by the State to accommodate up to 108 youth. The Department reports that the largest recent population of the Ranch was 61 youth during January 2020, based on that month’s monthly average population. Following the start of the COVID-19 pandemic, the Ranch’s population has been reduced to accommodate County health orders and changes in the Court’s commitments of youth to the Ranch, see Figure I.2 below. As of December 2021, the average monthly population at the Ranch was 21 youth. This is a 68% reduction from January 2020. The Ranch is organized around “pods” or groups of youth who live and study together. As of December 2021, the Ranch had a total of seven pods: four pods with youth assigned to them, two male pods and a dedicated female pod with no youth assigned because of low population numbers.

**Figure I.2: Average Monthly Youth Population of Ranch by Pod**



Source: Analysis of Probation Department records.

## SENATE BILL 823 AND SECURE YOUTH TREATMENT FACILITY YOUTH

In 2020, the State passed Senate Bill 823, that amended various sections of the Government, Penal, and Welfare and Institutions code. The bill moved youth aged 18–24 who were tried as juveniles from a State-run facility to County care.<sup>4</sup> This population of youth is referred to as the Secure Youth Treatment Facility youth. As of January 2022, there are four such youth in the custody of the County and housed

<sup>4</sup> Welfare and Institutions Code Section 208.5.

in the Juvenile Hall, which is not designed or intended for long-term commitments. The County is considering developing a program for these and future Secure Youth Treatment Facility youth at the Ranch. According to the Probation Department, the Secure Youth Treatment Facility youth will require an increased level of security since they often have more serious charges than the current population at the Ranch.

### Ranch Revenues and Expenditures

The Fiscal Year 2021–22 Adopted Budget for the Ranch included total expenditures of approximately \$21.2 million, which comprised \$19.3 million in personnel costs and \$1.8 million in other expenses, as shown in Figure I.3 below. Besides \$1.0 million that the Department budgets as transfers into the Ranch from the General Fund and series of grants. They budgeted most of the revenue and funds outside of the Ranch’s cost center in the County’s financial system, so it is therefore mixed with other sources and uses related to juvenile justice. The Department must manually estimate the Ranch’s share of revenue expenditures, as discussed further below. The Department estimates the General Fund ultimately paid for that approximately 75% of personnel costs for the Ranch, or \$14.5 million of budgeted personnel costs in FY 2021–22.

**Figure I.3: Fiscal Year 2021–22 Original Adopted Budget of the Ranch**

<b>FY 2021–22</b>	<b>Budgeted Amount</b>
<b>Expenditures</b>	
Salaries & Benefits	\$19,327,802
Other Expenses	\$1,825,893
<b>Expenditures Total:</b>	<b>\$21,153,695</b>
<b>Revenues</b>	
Transfers In from Public Safety	
Realignment Funds	\$1,084,921
<b>Revenues Total:</b>	<b>\$1,084,921</b>
<b>Net Expenditures:</b>	<b>\$20,068,774</b>

Source: County Financial System.

The Ranch shares some of the personnel and professional services with the Juvenile Hall. Because they are shared, the spending in the County’s financial system does not accurately reflect the true cost of operating the Ranch. The Probation Department routinely estimates the cost to each facility using cost accounting methods. The most recent estimate they could provide was for Fiscal Year 2019–20. They calculated the Ranch spent \$23.3 million on all of its operations for that year. In contrast, the County’s financial system shows the Ranch spent \$19.5 million in FY 2019–20, or \$3.8 million less than they estimate that they actually spent that year. In this audit, we primarily used the Department’s estimated expenditures to more accurately reflect the cost of operating the Ranch.

## EXTERNAL OVERSIGHT OF THE RANCH

There are two main oversight bodies with jurisdiction and responsibility to monitor the Probation Departments compliance with laws and regulations.

### Board of State and Community Corrections

First is the Board of State and Community Corrections (BSCC). The BSCC inspects the Ranch every two years for its compliance with the State’s Title 15 and Title 24 Minimum Standards for Local Detention Facilities, other State requirements, and compliance with federal laws such as the Prison Rape and Elimination Act.<sup>5</sup> This includes reviewing the Ranch’s facilities, policies, procedures, education, programing, and training among other areas. The BSCC has greater legal access to materials and documents that were restricted from us during our audit, such as detailed records related to use of force incidents, case files of the youth, and other sensitive and protected information. With this greater level of access, the BSCC reports it assessed and compared the Ranch’s “policy and practice” for several topics that we could not such as use of force incidents.

Given County Counsel’s assessments of the legal limitations of what we could view in our audit, we reviewed the BSCC’s two most recent inspection reports dated July 23, 2020, and August 15, 2018. Both reports stated they were “very impressed” with the overall function and operations of the Ranch. In 2020, they commended the Ranch’s reduction of incidents and stated that their analysis “revealed staff were fair in their issuance of consequences, as well as respectful and genuine in their treatment.” We contacted the BSCC to request more information about their process, methodology, and inspections of the Ranch, but they did not respond. Copies of the BSCC’s 2018 and 2020 inspection reports are available on their [website](#).

### County of Santa Clara Juvenile Justice Commission

The second key oversight body is the County of Santa Clara Juvenile Justice Commission (JJC). The Santa Clara County Superior Court appoints the JJC. State law mandates that the JJC monitor the County’s juvenile detention facilities, among other duties. Like the BSCC, the JJC had greater access to restricted information than was in our audit. The JJC issued an inspection report in November 2021.

We interviewed members from the JJC and used information in their report to help inform the risk assessment for our audit. In particular, the 2021 JJC report recommended that the County develop additional placements for youth “who require a higher level of behavioral health and developmental services than the Ranch program provides.” We heard a similar sentiment from other parties during our audit fieldwork and we worked with the Probation Department and the Behavioral Health Services Department to estimate how large this need is, and to recommend solutions as described in Section 2, starting on page 32.

Other topics reviewed by the JJC, such as their review of use of force incidents, which we could not evaluate ourselves, informed our finding on safety and security as described in Section 4, starting on page 52.

<sup>5</sup> The Probation Department also contracts with a private Prison Rape and Elimination Act auditor, who is certified by the Department of Justice, to assess the Ranch’s compliance once every two years.

The JJC raised other important topics and recommendations that we included in our risk assessment. Many were straightforward, such as their recommendation that the Ranch resolve its kitchen equipment problems which has been addressed according to the Department. To avoid redundancy, we did not re-evaluate all of these topics in our audit report in order to better use our limited audit resources on topics where we could introduce new information and insight. A full copy of the JJC's 2021 report and prior reports can be found on their [website](#).

### **TOPICS REQUIRING ADDITIONAL REVIEW**

During the course of a management audit, certain issues may be identified and brought to the attention of the agency being audited and the Board of Supervisors, even though a specific finding is not included in the report. One such matter is described below.

#### **University of Cincinnati's Correction Institute Evaluation and Consulting**

As noted previously, the Ranch is currently undergoing an evaluation and redesign of its rehabilitation model with the University of Cincinnati's Correction Institute. In April 2021, the Institute issued a report titled "Evidence-Based Correctional Program Checklist" (see Attachment D on page 75). The report was the first stage of their multi-year engagement with the Ranch. Their next stages involve working with management and staff to redesign elements of their program and then assist them with implementing changes. Because the Institute had greater access to restricted information than our audit team did and because the Probation Department was actively addressing some recommendations that the Institute made, we focused much of our audit on other areas where we could provide greater insight. We used some of the information that the Institute revealed in their April 2021 report, and we cite it in various findings to support our audit findings in related topics.

The Institute's report was complimentary of parts of the Ranch's program but found many deficiencies in the program and structure based on the Institute's assessment criteria. The Institute's rated the Ranch as "low" in its overall adherence to evidence-based practices using its rating scale. The Probation Department reports it is engaged in addressing these problems in collaboration with the Institute, as defined in their agreement and multi-year engagement. As the Probation Department addresses the Institute's findings, the Department should report these changes to the Board of Supervisors and annually update them on its progress. Most of the Institute's recommendations centered on increasing evidence-based practices among staff, improving the consistency of their delivery, increasing collaboration among staff and with community stakeholders, and better supporting the youth at the Ranch with various measures to list just a few of the key recommendations. A copy of their full report is attached as Attachment D on page 75.

## RECOMMENDATION PRIORITIES

The priority rankings shown for each recommendation in the audit report are consistent with the audit recommendation priority structure adopted by the Finance and Government Operations Committee of the Board of Supervisors, as follows:

**Priority 1:** Recommendations that: address issues of non-compliance with federal, State and local laws, regulations, ordinances and the County Charter; would result in increases or decreases in expenditures or revenues of \$250,000 or more; or suggest significant changes in Federal, State, or local policy through amendments to existing laws, regulations and policies.

**Priority 2:** Recommendations that: would result in increases or decreases in expenditures or revenues of less than \$250,000; advocate changes in local policy through amendments to existing County ordinances and policies and procedures; or, would revise existing departmental or program policies and procedures for improved service delivery, increased operational efficiency, or greater program effectiveness.

**Priority 3:** Recommendations that address program-related policies and procedures that would not have a significant impact on revenues and expenditures but would result in modest improvements in service delivery and operating efficiency.

## ACKNOWLEDGMENTS

We would like to thank the Chief Probation Officer, the management and staff of the William F. James Ranch, and the youth there. In addition, we are grateful for the assistance of the Behavioral Health Services Department, the Office of the District Attorney, the Office of the Public Defender, the Office of the County Counsel, various other County departments who assisted in our fieldwork and data collection, the Santa Clara County Superior Court, the Santa Clara County Juvenile Justice Commission, and representatives from many community groups who spoke with us.

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## Section 1: Measuring Program Outcomes

### Background

The William F. James Ranch's (Ranch) mission is to "positively impact our communities by providing appropriate services to the youth and families we serve". The core values of the Probation Department, which oversees the Ranch, include transparency and system accountability and utilization of evidence-based practices. The long-term goals of the Ranch include reduced recidivism at 3, 6, 12, and 18-months from Ranch exit and reductions in offense severity for youth who recidivate. To achieve its mission and goals, the Ranch provides a range of programming, including its therapeutic intervention, education and vocational training, counseling, and mental health and substance abuse treatment, among others. The estimated annual cost of the funding the program in Fiscal Year 2019–20 was \$23 million, when the average daily population was 52, higher than the recent population of 21 in December 2021, but most costs are fixed so we expect costs to be similar.

### Problem, Cause, and Adverse Effect

The Probation Department measures recidivism for up to 12-months out which, according to the Department, captures the majority of recidivating offenses because their 12-month analysis shows most youth who commit a new offense do so within 6-months of exiting the Ranch. However, the Probation Department does not measure long-term recidivism, or incidents that occur more than 12-months after youth are released from the Ranch even though it is one goal of the program. Other life outcomes such as employment and education are also not tracked or monitored post-release despite the Ranch program offering services to help youth committed to the Ranch succeed in these areas. These are important factors because research shows that employment and education attainment help reduce recidivism and improve other outcomes for youth. As a result, there is insufficient information and evidence to show whether the Ranch program is effective as designed. This means there is limited accountability for the program, and it is unclear if the \$23 million estimated annual cost of the program is being spent effectively.

### Recommendations

The Probation Department should define measures that directly relate to the Ranch's goals of reducing recidivism that occurs more than one-year after exiting the Ranch and solicit input from the Santa Clara County Office of Education to develop measures of the effectiveness of its educational and vocational programs. The Department should use these measures to inform program selection and planning and ensure its service providers are supporting the Ranch's mission and goals and report these measures to the Board of Supervisors. The Department should conduct in-depth evaluations of the Ranch program every three-years.

### Savings, Benefits, and Costs

Clearly defining and regularly assessing relevant outcome measures will ensure that the Probation Department is effectively evaluating the Ranch program. Using these measures to inform program selection and planning and reporting these measures to the Board of Supervisors would align with the Probation Department's core values. Further, this information can help ensure if the \$23 million estimated annual cost of the Ranch is an effective use of funds and having its intended impact. We estimate that an in-depth study would cost the Department about \$210,000 every three-years when the recommended assessment would occur. Staff costs to facilitate the work of the outside evaluator are considered part of the job of Department staff and are not calculated separately here.

## FINDING

### Mission, Goals, and Services

The William F. James Ranch's (Ranch) mission is to "positively impact our communities by providing appropriate services to the youth and families we serve." The core values of the Probation Department, which oversees the Ranch, include transparency and system accountability and utilization of evidence-based practices. According to its logic model, which defines how the Ranch is supposed to work and the intended outcomes of the services, the long-term goals of the Ranch program include reduced recidivism at 3, 6, 12, and 18-months from Ranch exit and reduction in offense severity for youth who recidivate. In prior years, the Department's reported goal was to reduce recidivism up to 60-months, or five-years, post-release.

To achieve its mission and goals, the Ranch provides a wide range of programming, including therapeutic intervention, education and vocational training, counseling, and mental health and substance abuse treatment, among others. County staff, the County Office of Education, Starlight Community Service, Inc. (Starlight), the vendor the Behavioral Health Services Department uses to deliver clinical therapy at the Ranch per its agreement with the Probation Department, as well as external contracted service providers provide these services.

### Estimated Cost and Reporting Requirements

The Department estimates that the annual cost of funding the Ranch program in Fiscal Year 2019–20, including salaries, benefits, contracted services, and other expenses, was \$23 million.<sup>6</sup> The Department reports that about three quarters of the spending was paid from the General Fund and the rest by state funding. In FY 2019–20, the average daily population of youth at the Ranch was 52, which translates to an average cost of \$442,307 per youth per year in FY 2019–20. Most costs are fixed so we expect costs to be the same or similar in FY 2021–22. However, the average daily population dropped significantly after COVID-19 shelter-in-place orders went into effect in March 2020. In FY 2020–21 the average daily population decreased to 27. Based on the population in December 2021 when only 21 youth were committed to the Ranch and assuming the same costs as in FY 2019–20, the Ranch program costs on average an estimated \$1.1 million per youth per year as of FY 2021–22.

The Ranch program receives state funding from both the Juvenile Justice Crime Prevention Act and the Youth Offender Block Grant.<sup>7</sup> The Department must provide plans and expenditure details for the program and county-wide juvenile probation data (e.g., recidivism) annually per reporting requirements under the two programs.

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<sup>6</sup> We used the Department's estimate, rather than more current information reported in the County's financial system, because the Ranch shared costs such as staff and professional services with the Juvenile Hall and the financial system does not accurately reflect the annual cost of operating the Ranch.

<sup>7</sup> The JJCPA provides state funding for California probation departments to implement programs that have proven effective in reducing crime and delinquency among at-risk youth and youth who commit offenses. The YOBG program provides funding for counties to deliver custody and care to youth who previously would have been committed to the California Department of Corrections and Rehabilitation's Division of Juvenile Justice.

The Probation Department states that it exceeds the State's reporting requirements for data and provides beyond what is required in its annual evaluation reports for the State, including an analysis of youth's needs and offenses and average length of time between program exit and a new law violation i.e., new recidivating offense.<sup>8</sup>

#### *Outcome Measurements Skipped in 2020*

The Department decided not to measure or report recidivism in their 2020 annual report to the State because they felt it may not be comparable to other years. They report this is because of the disruption of prior patterns of crime and enforcement posed by the COVID-19 pandemic and shelter-in-place orders. Not reporting in 2020 appears in line with state law, which only requires a "summary description or analysis, based on available information[.]"<sup>9</sup> Meaning, because the Department did not measure recidivism in 2020, it was not available to report.

### **Outcomes Monitoring**

The Probation Department only measures recidivism of youth released from the Ranch up to 12-months post-release. Although they reportedly capture most recidivating events because the Department's analysis of 12-months' worth of Ranch post-release data demonstrates most youth who commit a new offense do so within 6-months of program exit, this falls short of their written goal of measuring recidivism for up to 18-months after exiting the Ranch. The Department also does not measure other factors that are known to help reduce recidivism after youth are released and no longer under the supervision of Probation, such as education and employment outcomes for the youth.<sup>10</sup>

The Juvenile Justice Commission of the County of Santa Clara, an oversight body appointed by the Santa Clara County Superior Court, stated the following in their 2021 report on the Ranch.

*"The Commission's recommendations reiterate past calls for more robust outcomes data. Longitudinal data are needed to strengthen the case that progressive juvenile justice practices such as those that guide the Ranch provide commensurate long-term individual and societal benefits. The ultimate yardstick is reduced recidivism and differential gains in education and employment."*

8 California Code, Government Code - GOV § 30061 and California Code, Welfare and Institutions Code - WIC § 1961 are relatively vague and only requires that counties annually report "a summary description or analysis, based on available information, of how the programs, strategies, and system enhancements funded pursuant to this chapter have or may have contributed to, or influenced, the juvenile justice data trends identified in the report".

9 California Code, Government Code - GOV § 30061 and California Code, Welfare and Institutions Code - WIC § 1961.

10 Yu, T. (2018). Employment and Recidivism. EBP Society Evidence-Based Community  
Duwe, G. and Henry-Nickie, M. (2021). A better path forward for criminal justice: Training and employment for correctional populations. Brookings Institute.  
Duwe, G. (2018). The Effectiveness of Education and Employment Programming for Prisoners. American Enterprise Institute.  
Nally, J., Lockwood, S., Ho, T., Knutson, K. (2012). The Post-Release Employment and Recidivism Among Different Types of Offenders With A Different Level of Education: A 5-Year Follow-Up Study in Indiana. Center on Juvenile and Criminal Justice.

Our review of annual reports and evaluations of the Ranch, and discussions with its reporting team, confirmed that the Department does not measure recidivism after more than one-year from exiting the Ranch, and it does not monitor other key outcomes such as educational attainment and employment.

As detailed in the paragraphs below, based on the current measurement and reporting by the Probation Department, we can't fully determine if the estimated \$23 million annual cost of the Ranch is being used effectively and if the program is achieving its stated goals. To know this, and provide assurance and accountability for its work, the Probation Department should adopt a policy that requires it to define and report publicly to the Board of Supervisors measures that directly relate to the Ranch's goals of reducing recidivism, and solicit input from the Santa Clara County Office of Education on measures of the effectiveness of its educational and vocational programs to include in the evaluation. The Department should use these measures to inform program selection and planning and to ensure that its service providers are supporting the Ranch's mission and goals. The Department should regularly report results in these key areas to the Board of Supervisors.

#### *Long-Term Recidivism*

The Department reports that even though they do not measure recidivism longer than one-year post-release, they capture a majority of recidivating offenses, including adult offenses in Santa Clara County, in current evaluations of the Ranch program because their analysis shows most youth who recidivate do so within 3–6-months of their release from the Ranch. However, not measuring long-term recidivism beyond this window does not paint a full picture of recidivism among youth released from the Ranch and does not align with the Ranch's goal and program design to reduce recidivism up to 18-months after program release.

There may be additional recidivating offenses that occur later for youth released from the Ranch that are not captured in current evaluations of the Ranch program. In addition, current evaluations only measure recidivism one-year post-release for about half of youth released for any given year because the data is pulled around the midway point of the following year. For example, if data on new arrests is pulled in June, only youth released from the Ranch from January to June of the evaluation year will have 12-month recidivism data available. For youth released from July to December, the data pulled will only capture 6–11-month recidivism since they have been released for less than one-year at that time. Therefore, current evaluations underestimate recidivism rates among youth released from the Ranch and do not measure one-year recidivism for all youth.

#### *Inconsistent Reporting*

The Ranch reports recidivism rates inconsistently from year-to-year. Recidivism rates for youth released from the Ranch from 2017 to 2019 are not comparable to prior years because they were measured differently. In 2017, the Department narrowed its measure of recidivism to only include youth who successfully completed Aftercare, the last phase of the Ranch program lasting 10 weeks where youth are confined to their homes unless supervised or are subject to a court-mandated curfew, have frequent check-ins with an Aftercare Probation Counselor, and must complete weekly drug tests. In past reports, recidivism rates included all youth who entered Aftercare regardless of whether they completed the program. Further, since the Department did not report recidivism rates for 2020 because of challenges brought on by the

pandemic, we can compare only recidivism rates for three recent years: 2017, 2018, and 2019. Going forward, the Probation Department should have a written, consistent reporting standard for recidivism to allow for comparison of recidivism rates over time and across years, in line with its core values of transparency and accountability.

#### *Education, Employment, and Other Outcomes*

Aside from recidivism after program exit reported in the annual evaluation reports of the state-funded programs, other life outcomes such as employment and education are not tracked or monitored after youth are released despite the Ranch program offering educational and vocational programs and services. These are important factors because research shows that employment and educational attainment help reduce recidivism and improve other outcomes for youth, but the Department has not tracked longer-term outcomes related to education and employment despite offering services to meet those needs. As a result, there is no way to measure or evaluate the effectiveness of its educational and vocational programs or their impact on youth. Without data on education and employment outcomes for youth post-release, it is not possible to evaluate whether these programs and services support the Ranch's mission and goals.

#### *Contract Monitoring*

The lack of long-term measures also affects the Probation Department's ability to monitor contracts with service providers at the Ranch as some require the Department to review outcome data regularly. For example, the Department justified the selection of some single source contracts, such as one with Seneca Family of Agencies from 2018, by stating that the Department will "determine, within one to two-years, whether the intervention is responsive to the needs of the target population by reducing re-offense, frequency of Juvenile Hall entries, and future sustained petitions" i.e., recidivism. However, the Department does not measure recidivism longer than one year after program exit, and our sampled records of this and other contracts suggest outcome data is not routinely monitored to ensure its service providers are supporting the Ranch's mission and delivering the long-term goals of the contracts. We discuss deficiencies with how the Ranch monitors these contracts in more detail in Section 5, starting on page 53. If the Department added additional measures as we recommend here, then it would bolster the recommendations we make in Section 5, starting on page 53 and improve the Ranch's accountability overall.

#### **Measurement Challenges**

The Department reported that it has not measured long-term recidivism greater than one year or attempted to survey other life outcomes such as education and employment because of limited staff capacity, difficulties maintaining contact with youth once they are no longer under the supervision of Probation, and also because it is not legally required to measure these outcomes. The Department has six staff who comprise their Research and Development unit, and provide analysis and reporting for juvenile institutions, adult services, and all other programs in the Department. Conducting an in-depth study annually for the Ranch may not be feasible given their current staffing level. To address this, the Department plans to periodically measure long-term recidivism on a three-year cycle rather than completing annual evaluations of each program and reports that it has requested two additional Research and Evaluation Specialist positions to be assigned to the Juvenile Hall and the Ranch,

respectively, to assist with outcomes monitoring and mandated reporting as part of their Budget Proposal for Fiscal Year 2022–23, but they do not have plans to measure education and employment after youth are released and no longer under supervision. It is unclear what specific length of time the Department would measure recidivism for in such an arrangement, and it is unclear how this plan would still meet the state requirements to report some information annually.

The Department also reports that it is difficult to analyze data using its current case management system. The Department is planning for a replacement system, but it does not know when the new system will be implemented. For the time being, the Department could still use its existing system and records to better assess outcomes. For example, only 21 youth were committed to the Ranch in December 2021. This is a relatively low number, and even if the population doubled, it would be possible to manually review certain data points from case files and information rather than wait for a new system to be implemented at an undetermined future date. These are common challenges faced by other counties and jurisdictions, but as discussed below, we found examples of others who addressed these problems in their evaluations of similar measures for comparable justice-involved youth populations.

### Peer Jurisdictions and Similar Studies

At least two other jurisdictions and studies have successfully tracked long-term recidivism and other related outcomes, such as employment and education for juvenile probation youth. For example, in 2018, the State of Idaho, which has a total population comparable to the size of Santa Clara County, published [a study on the characteristics and outcomes of justice-involved youth](#) in the state up to five-years post-release by merging data from five state agencies. The researchers successfully measured recidivism between one and five-years from program exit, as well as education outcomes (college enrollment) two-years post-release and employment among youth at least 17-years old up to one-year after release. The total cost of the study was \$500,000, the majority (\$400,000) of which was spent on setting up a new data sharing system between four state agencies – the Departments of Juvenile Corrections, (adult) Correction, Labor, and Health and Welfare. The researchers estimate that the cost of the actual study excluding these internal costs was \$100,000. We estimate based on the difference in cost of living and inflation that if done in Santa Clara County today, it would cost approximately \$210,000 for the study.<sup>11</sup>

The Riverside County Probation Department's [2019 evaluation report](#) of state-funded programs includes several academic outcomes, such as school attendance, credits, graduation rates, expulsion rates, and average grades in addition to recidivism.<sup>12</sup> Although it does not measure recidivism more than one-year post-release, the evaluators included and found a positive impact on various educational outcomes. Riverside County Probation Department contracted with a nonpartisan, nonprofit

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<sup>11</sup> We used the Bureau of Labor Statistics' inflation calculator to estimate the cost of conducting the same \$100,000 study in Idaho in 2022. After adjusting for inflation, the cost of conducting the 2018 would be approximately \$114,463. We then accounted for the difference in cost of living between Boise, Idaho and San Jose, California: 84.5%, which means the cost of conducting a similar study in Santa Clara County in 2022 would be approximately \$211,184.24.

<sup>12</sup> Wendt, S., Lam, A., & Pedroza, V. (2019). *Evaluation of Riverside County Probation Department's Juvenile Justice Crime Prevention Act Programs*. WestEd.

research agency, WestEd, to provide external evaluation services beginning in October 2019. The 2019 evaluation was the first annual report completed under the new evaluation contract with WestEd and the services cost approximately \$200,000 per year.

To note, both studies had incomplete or missing data and contained youth that might be less difficult to track than those at the Ranch. For example, 54% of youth in Riverside's sample were missing school credit data. In addition, the youth in the Idaho report were held in state facilities and were tracked into adulthood statewide and youth in Riverside County's evaluation of state-funded programs were all in diversion programs in the community and not in an institution like those who are sent to the Ranch. However, despite these differences and notwithstanding the challenges of tracking transient youth, these studies illustrate that longitudinal studies that measure long-term recidivism and outcomes related to reducing recidivism, though imperfect, are possible given enough time and resources. The Probation Department should conduct more robust and long-term surveys of youth released from the Ranch, in line with the Ranch's mission and goals. To help accomplish this, the Department should find and contract with a qualified outside research group to assist with long-term measures identified as critical to the Ranch's mission and goals and evaluate the Ranch program every three-years. This would allow the Department to maintain its annual reporting requirement conducted by existing staff while also conducting less frequent but more in-depth measurements every three-years with the help of an outside research group.

## CONCLUSION

The Probation Department lacks long-term measures needed to evaluate the effectiveness of the William F. James Ranch program and its impact on youth. The Probation Department does not measure recidivism beyond 12-months after program exit for all youth, and it doesn't measure other outcomes, such as education and employment. As a result, there is insufficient information and evidence to show whether the Ranch program is effective. This means there is limited accountability to know if the Probation Department is achieving its mission of reducing recidivism for youth at the Ranch. Without measures to evaluate the Ranch program's impact on recidivism and other related life outcomes, such as education and employment, it cannot be fully determined if the annual estimated \$23 million cost of the Ranch is being spent effectively. The program may be achieving its intended outcome, but the Department cannot be ensured with the current limited outcomes data measures collected.

## RECOMMENDATIONS

### The Probation Department should:

- 1.1 Adopt a policy that requires it to define measures that directly relate to the William F. James Ranch's goals of reducing recidivism, including a consistent reporting standard for recidivism, and solicit input from the Santa Clara County Office of Education to develop measures of the effectiveness of its educational and vocational programs. The Probation Department should use these measures to inform program selection and planning and ensure its service providers are supporting the William F. James Ranch's mission and goals and report these measures to the Board of Supervisors annually. (Priority 1)

- 1.2 Contract with a qualified outside research group to assist with long-term measures identified as critical to the William F. James Ranch's mission and goals and conduct evaluations of the William F. James Ranch program every three-years. (Priority 1)

### **SAVINGS, BENEFITS, AND COSTS**

Both recommendations will help provide assurance that the Probation's Department's estimated \$23 million annual spending on the Ranch is used effectively and meeting the goals of the Ranch and Department.

Creating a consistent reporting standard for recidivism and clearly defining relevant measures for recidivism and the effectiveness of its educational and vocational programs will ensure there are sufficient outcome measures and data to evaluate the Ranch program and that this information is recorded consistently. Using these measures to inform program selection and planning and reporting these measures to the Board of Supervisors would align with the Probation Department's core values of transparency, system accountability, and utilization of evidence-based practices. This could be done with existing staff resources.

Contracting with a qualified external research group to assist with long-term measures and conduct periodic evaluations of the Ranch program will allow for more robust and long-term surveys of youth released from the Ranch every three-years and ensure that this data is collected. Having an outside entity conduct periodic evaluations of the Ranch program will bring external objectivity to the results as compared to doing this work in-house. We estimate that the average annual cost of contracting with an outside research group will cost about \$210,000 every three-years.

## Section 2: Mental Health Acuity and Needs

### Background

The William F. James Ranch's (Ranch) mission is to rehabilitate youth "with a focus on the development of pro-social skills through systemic intervention in thought, values, actions, and positive relationship building." It delivers behavioral therapy through its Probation Counselors and clinical therapy through an agreement with the Behavioral Health Services Department, who uses a contractor to provide therapists and treatment at the Ranch.

### Problem, Cause, and Adverse Effect

The Ranch and the Behavioral Health Services Department use tools to measure risk of the youth and assess behavior, but neither could tabulate or provide a precise count of youth with more severe mental health acuity. This is a problem because both parties report that there is a subset of youth with a higher level of mental health needs that the Ranch cannot fully address with its current staff, contractors, and service. Neither Ranch nor Behavioral Health Services Department staff can determine which youth have higher level acuity and how frequent a problem this is. Management at the Ranch estimated this population was between 5 to 50% of all youth at the Ranch. We used several proxy measures to estimate that during 2021, four to six youth, or six to eight%, were committed to the Ranch who had greater or more severe mental health needs than most. According to the Ranch's policies, these youth may not meet the requirements for the program. However, there are reportedly no alternative placements in the County that meet their needs.

### Recommendations

The Probation Department should amend its agreement with the Behavioral Health Services Department to require that they measure mental health acuity more precisely. They should use this information to identify youth with high-acuity needs, change the policy to allow them at the Ranch formally, and contract with Behavioral Health Services to provide temporary additional clinical services to support their rehabilitation in the Ranch's program until an improved tool is in place and viable alternatives are evaluated. After implementation of Recommendation 1.1, on page 21 in Section 1, the Probation Department should use the outcomes information for youth who are committed to the Ranch to understand if the added support for youth with high-acuity needs is resulting in improvements and adjust the services targeting this group as needed.

### Savings, Benefits, and Costs

We estimate that the addition of two therapeutic aides such as Rehabilitation Counselors, or an equivalent, would cost an estimated \$279,000 per year but could save the County on criminal justice costs if the youths' rehabilitation is successful and they do not recidivate over the long-term. Additionally, amending the contract to require that Behavioral Health Services and its contractor use a measure to determine and tell the Probation Department which youth need a higher level of support and services than the Ranch currently provides would enable Probation to make more informed recommendations to the Court prior to adjudication and add services at the Ranch for these youth to support their more acute needs.

## FINDING

The William F. James Ranch's (Ranch) mission is to rehabilitate youth "with a focus on the development of pro-social skills through systemic intervention in thought, values, actions, and positive relationship building", see Attachment E on page 107.

The Ranch seeks to accomplish this by addressing the various factors related to the underlying cause of a youth's delinquent behavior, referred to as criminogenic risk or needs.

Part of the Ranch's program is to have trained Probation Counselors deliver behavioral therapy designed by the Probation Department such as group therapy alongside other supports such as education and pro-social activities. They designed these activities to address behavior issues and research by the National Institute of Justice shows promising outcomes, such as reduced recidivism for youth. However, by itself, these behavioral interventions do not address substance abuse or mental health needs of the youth, and Probation Counselors are not trained to provide clinical therapy such as substance abuse or mental health treatment.

The Ranch seeks to address mental health and substance abuse needs of the youth using an agreement with the Behavioral Health Services Department. The agreement requires Behavioral Health Services to provide an integrated treatment approach for youth who have been "exposed to trauma, experiencing ongoing involvement in the juvenile justice systems and may be experiencing mental health, substance use and co-occurring disorders."<sup>13</sup> These services are a clinical function and are delivered by trained and experienced behavioral health clinicians. At the Ranch, Behavioral Health Services uses a vendor, Starlight Community Service, Inc. (Starlight), to deliver services and fulfill its agreement with the Probation Department. Starlight delivers most of these services at the Ranch through daily scheduled therapy sessions with the youth and as-needed sessions when a mental health referral is made by staff or requested by youth.

In addition, equitable treatment is one of the core values outlined in the Probation Department's mission statement. Equitable treatment at the James Ranch could include, but is not limited to, providing additional support for higher needs youth or creating individualized treatment plans based on each youth's specific challenges and needs.

### Mental Health Screening

#### *Pre-Adjudication Screening at Juvenile Hall*

As reported by the Probation and Behavioral Health Services Departments, there are two times when the youth at the Ranch receive an initial mental health screening. The first is before a youth is committed to the Ranch and before their cases are adjudicated. During this phase the youth may be temporarily held at the Juvenile Hall. Staff from Behavioral Health Services who work at the Juvenile Hall perform an assessment using two tools known as the Child and Adolescent Needs and Strengths

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<sup>13</sup> These services at the Ranch are known as Youth Therapeutic Integrated Program, or YTIP. The program is the result of combining previously separate therapeutic agreements for substance abuse and mental health treatment. The combined program started in 2019.

(CANS) and the Diagnostic and Statistical Manual of Mental Disorders (DSM), both discussed in more detail below. The CANS assessment does not provide a clinical diagnosis of mental health or substance disorders but provides a comprehensive assessment of the youth's needs.

Neither Behavioral Health Services nor Starlight share details of the CANS and DSM assessments with the Probation Department because of legal restrictions on the sharing of medical record information and the records of minors. However, Behavioral Health Services staff provides the Probation Department with a recommendation about the youth's needs and possible fitness for various programs within the Probation Department. The Probation Department reports that it uses this information to inform the recommendation it makes to the Santa Clara County Superior Court (Court) when the case is adjudicated.

Because of the legal restrictions on this information, County Counsel concluded that we could not see the records of recommendations the Probation Department makes to the Juvenile Justice Court to assess how information is used regarding the youths' mental health needs and if it informs where a youth is committed to by the Court, such as the Ranch.

#### *Screening at the Ranch*

The second time Ranch youth are assessed is when they are committed to the Ranch by the Court. Starlight staff screens them at the beginning of their commitment, after they arrive at the Ranch. Starlight receives acuity and diagnosis information as part of the hand-off process between Juvenile Hall and the Ranch and uses the CANS and DSM tools to assess the youth again and make recommendations to Probation about the dosage, or amount and type of treatment they need while at the Ranch. Again, the actual CANS and DSM information is not available to Probation staff, and we could not view or verify the records to determine if their treatment at the Ranch aligns with their assessment. In addition, the Behavioral Health Services Department staff did not feel comfortable using most of the CANS or DSM information to provide us with a summary analysis of mental health acuity of youth at the Ranch for the audit because of weaknesses they described in the assessment tools.

#### **Assessments Do Not Measure Severity**

The CANS assessment is an information integration tool used in multiple youth-serving systems that is designed to support individual case planning and the evaluation of service systems.<sup>14</sup> The CANS tool assesses needs and strengths of youth by measuring the number of actionable items across 52 factors both at intake and at discharge (i.e., release from the program). The 52 items cover, or assess, need in eight domains: living situation, family functioning, decision making, depression, anxiety, oppositional, anger control, and social functioning.

Although it can identify a variety of behavioral needs among youth, the CANS assessment does not rate or measure the severity of mental health acuity, nor does it diagnose specific mental disorders such as autistic spectrum or schizophrenia, for example. Diagnosis of mental health and substance disorders is part of the clinical record but these records do not provide information regarding mental health severity or needs. This means information on the acuity level or mental health diagnosis of

<sup>14</sup> Child and Adolescent Needs and Strengths 2.0 (<https://bhdp.sccgov.org/quality-improvement/fc-functional-assessment-tools-cans-psc-35>).

youth committed to the Ranch is only in qualitative form and not aggregated and summarized for review by Probation and Behavioral Health Services departments' management. Behavioral Health Services Department and Starlight staff report that, at any given time, they can identify youth at the Ranch with higher acuity levels but only through clinical qualitative information. However, staff from either organization could not tabulate or provide a precise count of youth with more severe mental health acuity at the Ranch.

Behavioral Health Services reports that part of the problem is that it uses a tool called the Diagnostic and Statistical Manual of Mental Disorders (DSM) to assess and diagnose mental disorders. The Department reported that this tool lost some more nuanced severity measures when they transitioned to the new edition of the manual, DSM-5, because it uses a simplified three-level measure, and CANS and DSM-5 combined do not adequately measure severity.

### **Anecdotal Reports of Youth With High-Acuity Needs**

The management staff of the Ranch, management and staff from Behavioral Health Services, and management from Starlight all anecdotally report that there is a subset of youth who have a higher acuity of mental health and substance abuse needs than others and aren't fully served by the Ranch. However, no one could provide data to support this claim because of limitations of the CANS and DSM assessments and data access, and everyone's estimates about the number of youth varied widely.

During our fieldwork, management at the Ranch estimated that there is anywhere between 5–50% of youth with acute mental health needs. An evaluation report conducted in 2021 by the University of Cincinnati Corrections Institute reported the same anecdotal numbers as the Probation Department. Their report said that the Ranch receives a "substantial number of youth who are deemed by staff not appropriate for placement." They estimated the same 5–50% range and suggested that "some youth have significant mental health concerns, low cognitive abilities which limits their education and therapeutic treatment options, and that some youth have needs beyond staff capability and staff are forced to spend 80–90% of their time focused on one youth."

During our fieldwork Starlight reported to us that some challenging symptoms the youth face and are difficult for staff to help with are autistic spectrum, severe post-traumatic stress disorder, and sexual assault perpetrators. They estimate that typically there may be one or two youth at any time with these higher acuity needs at the Ranch.

### **Estimates of Amount of High-Acuity Youth**

We worked with staff from the Probation Department and Behavioral Health Services to develop methods to better estimate how many youth at the Ranch have high-acuity needs and who might benefit from additional support.<sup>15</sup> This group may not fully benefit from the Ranch's program because they do not receive necessary additional or specialized mental health treatment. This could cause less success in the Ranch's programs and worse long-term outcomes. However, as discussed in Section 1, starting on page 15, we found that the Probation Department does not sufficiently

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<sup>15</sup> Patent Acuity Rating System, Assessment of Patient Prisons, Health Services Policy & Procedure Manual, North Carolina Department of Public Safety ([ACUITY RATING \(nc.gov\)](https://www.nc.gov/acuity-rating)).

measure outcomes for youth who are committed to the Ranch so the full extent of the impact on outcomes is unknown. Further, youth who are not considered to have acute needs may be adversely affected by others in the program who require a significant portion of the Ranch and Starlight's time and attention.

Based on the various estimates we used as proxy measures and discussed in detail below, there were roughly four to six youth, or six to eight%, who were committed to the Ranch in 2021 who had greater or more severe mental health needs.

#### *Child and Adolescent Needs and Strengths (CANS)*

The CANS measures need across several behavioral factors among youth. To the extent behavioral needs reflect mental health acuity, an interpretation of the CANS data can serve as a possible proxy measure for youth with high-acuity needs. The Behavioral Health Services Department assessed the number of actionable items or indicators for youth at intake and discharge in Fiscal Year 2019–20 and identified that four of 70 youth, or eight%, committed to the Ranch had disproportionately higher needs based on the CANS. This small group or subset of the population stood out in terms of greater need in behavioral factors measured in the CANS.

#### *Mental Health Referrals*

Mental health referrals occur at the Ranch when staff request a youth be seen by a Starlight therapist for immediate counseling and support or if a youth requests to see a therapist. This is in addition to daily scheduled therapy sessions between youth and Starlight therapists. Management at the Ranch provided us a summary analysis of mental health referrals that occurred in 2021. If we use the referrals as a proxy measure, we estimate that in calendar year 2021, there were six youth, or eight% of the year's total population of 77, who needed a significant amount of additional therapeutic support. While most youth were only referred once or twice, these six youth had five or more referrals and represented most of the cumulative referrals for the year. This may represent the subset of youth with more acute mental health needs.

### **Better Measure of Mental Health Acuity Needed**

Even though we could use proxy measures to estimate the magnitude of how many youth may have high-acuity needs that exceed the Ranch's current services, the Probation Department and the Behavioral Health Services Department need a more accurate measure to use.

Because mental health acuity assessment is a clinical function behavioral health professionals must carry it out. Therefore, the Probation Department should work with the Behavioral Health Services Department to identify a tool to help determine severity levels of mental health needs among youth and incorporate it into the current screening and assessment tools. The Probation Department should then amend its agreement with the Behavioral Health Services Department to require that this tool and measure be used. The agreement should also require that Behavioral Health Services and its contractor, Starlight, use this measure to determine which youth need a higher level of support and services than the Ranch currently provides and formally communicate to the Probation Department which youth need these additional services. This would enable Probation to make more informed recommendations to the Court prior to adjudication and add services at the Ranch for these youth to support their more acute needs.

### *Neurosequential Model of Therapeutics Might Be a Possible Tool*

Staff of the Behavioral Health Services Department are being trained in a therapeutic assessment tool known as the Neurosequential Model of Therapeutics (NMT). The NMT assessment has severity indicators that will allow for measurement of more detailed mental health acuity than DSM-5.<sup>16</sup> Behavioral Health Services expects it will complete the one-year training program for the NMT in Fiscal Year 2022–23 and are hoping to cross-train Probation Department staff at Juvenile Hall in the core concepts and foundations of the model. If NMT proves successful and provides enough information on the mental health acuity of youth, it may be an appropriate tool to be implemented for the recommended assessment.

### **Current Ranch Policies Not Followed Because of Few Alternatives**

According to the James Ranch policy manual, youth who require significant mental health services and/or high-level residential treatment and youth with severe drug or alcohol addiction that require residential drug treatment are unacceptable cases for Ranch commitments. These are the very youth the Probation Department, the Behavioral Health Services Department, and service providers at the Ranch reported that are being committed to the Ranch but are not being fully or properly served. This indicates that the current program at the Ranch was not designed for such youth. However, there are few alternatives for youth with more acute mental health needs and criminal and behavioral challenges that otherwise qualify them for placement at the Ranch.

#### *State Law*

State law states that juvenile ranches may be established but are optional. They are intended to “secure a better classification and segregation of those wards according to their capacities, interests, and responsiveness to control and responsibility, and to give better opportunity for reform and encouragement of self-discipline[...].” So having youth not fully served by the Ranch’s program or structure is counter to the intent of the law and the goals of Probation Department management. However, high-acuity youth are committed to the Ranch due to the lack of other intervention options for this group of juveniles in the County.

#### *Lack of Alternatives*

Besides Juvenile Hall and James Ranch, there is a lack of alternative residential interventions for justice-involved youth in the County. Without out-of-County placements, the only other option for detained, in-custody youth aside from James Ranch would be Juvenile Hall, which is arguably a less therapeutic environment. In addition, there is also a lack of treatment options for justice-involved youth with mental health issues. There are currently no beds for short-term residential treatment programs in the County. This regional shortage of treatment options affects all youth in the County and is a larger problem beyond the scope of this performance audit of James Ranch. Further, residential treatment programs tend to not accept youth with a history of serious offenses or violent behavior. So, while increasing the number of treatment beds in the County would improve treatment options for youth overall, it would not address the need among high-acuity youth at the Ranch. Therefore, considering that it already provides behavioral health services, James Ranch is the

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<sup>16</sup> The Neurosequential Model of Therapeutics, Bruce D. Perry, M.D., Ph.D., The Neurosequential Model Network (<https://www.bdperry.com/clinical-work>).

most feasible location and a viable option for meeting the needs of high-acuity youth. Given this, the Probation Department should amend its admission criteria policy such that youth who require significant residential mental health and/or substance abuse treatment are officially acceptable cases at the Ranch.

### **Additional Services Needed for High-Acuity Youth at Ranch**

Since the Ranch's current policies exclude the youth with high-acuity needs that are currently committed there, the Probation Department should change the policy to include them and add services to better support them because there are currently no alternatives. High-acuity youth require additional time and help from staff trained in clinical behavioral health services such as mental health treatment. With the estimated number of high-acuity youth currently being so low, the Behavioral Health Services Department and Starlight reported that the most feasible and supportive option is to have aides trained in therapeutic behavioral services for youth who need more ongoing daily support.

The additional support for these youth would contribute to their rehabilitation, which is one of the Ranch's primary goals. In addition, it would provide more equitable treatment of youth, one of the Probation Department's core values.

Finally, as discussed in Section 1, starting on page 15, the Probation Department does not sufficiently measure outcomes of youth who are committed to the Ranch. The Probation Department should implement Recommendation 1.1, on page 21 of Section 1 to conduct periodic evaluations of long-term outcomes, use the outcomes information to understand if the added support for youth with high-acuity needs is resulting in improvements, and adjust the services targeting this group as needed.

### **CONCLUSION**

A subset of youth at the William F. James Ranch are not fully benefiting from the program because they need additional services, such as more frequent or specialized mental health treatment. Outcomes and program efficacy for this group may suffer because they are not receiving the extra support they need, but the full extent of the need for additional support and impact on outcomes is not known because the Probation Department does not employ tools to identify the number of youth with higher needs than it is equipped to address at the Ranch and does not sufficiently measure outcomes of youth committed to the Ranch.

Addressing the needs of high-acuity youth at the Ranch is a longstanding problem because severity of mental health acuity is not sufficiently measured and there are limited alternatives elsewhere in the County and beyond for those who need treatment. As a result, admission criteria for the Ranch are not followed and some youth with significant behavioral challenges are being committed to the Ranch.

High-acuity youth would benefit from additional therapeutic behavioral health services such as individual support from a therapeutic aide trained in challenging symptoms such as severe post-traumatic stress disorder, autistic spectrum, and sexual assault perpetrators. We estimate that two Rehabilitation Counselors, or an equivalent, are needed to provide regular and intensive support to these youth.

## RECOMMENDATIONS

### The Probation Department should:

- 2.1 Amend its agreement with the Behavioral Health Services Department to require an improved tool to help determine severity levels of mental health needs among youth being committed to the William F. James Ranch and incorporate it into the current screening and assessment tools and require that Behavioral Health Services and its contractor, Starlight, use this measure to inform the Probation Department which youth have high-acuity needs. (Priority 2)
- 2.2 Use the information from the recommended improved new Behavioral Health Services Department tool to identify which youth committed to the William F. James Ranch need a higher level of support and services. (Priority 2)
- 2.3 Modify its agreement with the Behavioral Health Services Department to temporarily provide additional clinical services such as mental health treatment to support rehabilitation of youth with high-acuity needs in the William F. James Ranch's program with the addition of Rehabilitation Counselors, or an equivalent, with a minimum of 18 months to three years relevant experience in a behavioral health residential, psychiatric, or juvenile justice setting to serve as therapeutic aides until this issue is further measured and studied. These additional resources should be reassigned and adjusted as needed once an improved tool is in place and viable alternatives are evaluated. (Priority 1)
- 2.4 Assuming implementation of Recommendation 1.1 on page 21 in Section 1, the Department should use the newly collected outcomes information to understand if the added support for youth with high-acuity needs is resulting in improvements and adjust the services targeting this group as needed. (Priority 2)
- 2.5 Using the results of the severity measure in Recommendation 2.1, evaluate and consider whether a specialized pod for higher-needs youth at William F. James Ranch is necessary in three years, or by 2025. (Priority 2)
- 2.6 Amend the William F. James Ranch's admission criteria policy such that youth who require significant residential mental health and/or substance abuse treatment are acceptable cases to allow youth with high-acuity needs at the Ranch formally. (Priority 2)

## SAVINGS, BENEFITS, AND COSTS

All six recommendations would improve the Ranch's ability to meet its mission of rehabilitating youth and align with the Probation Department's core value of equity.

Amending the agreement between the Probation Department and Behavioral Health Services to require they measure mental health acuity more precisely will allow for a precise count of youth at the James Ranch with heightened needs. Amending the contract to require that Behavioral Health Services and its contractor, Starlight, use

this measure to determine which youth need a higher level of support and services and share this information with the Probation Department would enable Probation to make more informed recommendations to the Court prior to adjudication and add services at the Ranch for these youth to support their more acute needs.

Assigning support aides to the Ranch to provide additional therapeutic behavioral services such as mental health treatment will ensure high-acuity youth receive sufficient treatment and are appropriately cared for, which will help fulfill the Department's mission to rehabilitate and core value of equitable treatment. We estimate that the addition of two therapeutic aides such as Rehabilitation Counselors, or an equivalent, would cost \$279,000 per year but could save the County on criminal justice costs if the youths' rehabilitation is successful and they do not recidivate over the long-term.

Amending the James Ranch's written admission criteria to include youth who require significant residential mental health and/or substance abuse treatment will allow youth with high-acuity needs to be at the Ranch formally, ensuring that these youth with limited options and alternatives receive the treatment they need.

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## Section 3: Schedule and Staffing Structure Interferes With Effectiveness of Program

### Background

The Mission Statement of the Probation Department's William F. James Ranch (the Ranch) describes it as a "[...] rehabilitative program with a focus on the development of pro-social skills through systematic intervention in thought, values, actions and positive relationship building". To help meet its mission, in 2006, the Ranch adopted a model known as the Missouri Approach. An aspect of the model is that it places youth in "family-like groups" who live together, attend group treatment, and learn pro-social skills such as helping, sharing, cooperating to name a few.

### Problem, Cause, and Adverse Effect

The current staffing schedule of Probation Counselors, who are with the youth during most of their waking hours, risks undermining the Ranch's mission. Each month, the schedule has six mandatory 16-hour shifts. The Counselors also work shifts that rotate and skip various days every two weeks in order to complete a rotating schedule of between 32–48-hour work weeks. The Ranch relies on a pool of 47 temporary Extra Help Probation Counselors assigned to fill the gaps in coverage by the Probation Counselors. This can create inconsistency among staff, it exceeds the Department's need for relief coverage for permanent staff, and adds to Department costs since each temporary employee is paid for a fixed amount of training whether they temporarily fill shifts or not. Research suggests that shifts over twelve hours increase the risk of injury to staff and lowers their cognitive abilities. This puts staff and youth at risk physically and risks undermining the Ranch's mission and model which emphasizes consistent contact and relationship building between the resident youth and the counselors. Research from the fields of education and social science suggests that staffing inconsistency has adverse effects on youth outcomes and the relationship between youth and staff. The Department does not routinely assess its total staffing needs or forecast youth populations. Because of this, as of December 2021, there were 18 Probation Counselors associated with pods with no youth assigned to them; the Department reports that those Counselors cover vacancies in other pods and/or act as shift relief.

### Recommendations

We recommend the County renegotiate the labor agreement with Probation Counselors to reflect a more consistent schedule with shifts no longer than 12 hours and prioritize shifts scheduled consecutively and consistently to maximize the consistency of youth and staff interaction. The Ranch should reduce the size of the pool of part-time temporary Probation Counselors to 20 from 47. Finally, every three years, the Ranch should forecast its youth population and related staffing needs and use this to develop a more accurate operating budget.

### Savings, Benefits, and Costs

Changing the schedule and reducing the temporary staffing pool could help improve the outcomes of youth who have been committed to the Ranch by building greater trust between youth and staff to help achieve the Ranch's rehabilitative mission for youth. This would help ensure that the County uses its estimated \$23.3 million annual spending on the Ranch as effectively as possible to improve outcomes for youth committed to the Ranch. It would also save an estimated \$228,788 in reduced workers' compensation and training costs. More accurate budgeting of staffing needs could save up to \$3.9 million in annual spending if it reduced staffing to reflect the current low population levels.

## FINDING

The Mission Statement of the William F. James Ranch (the Ranch) describes it as a “[...] rehabilitative program with a focus on the development of pro-social skills through systematic intervention in thought, values, actions and positive relationship building”. To help meet its mission, in 2006, the Ranch adopted a model known as the Missouri Approach. An aspect of the model is that it places youth in “family-like groups” who live together, attend group treatment, and learn pro-social skills.

While there are many staff roles and service providers at the Ranch who affect the outcomes of the youth and the Ranch’s mission, the Probation Counselors spend the most waking hours with the youth and therefore are a powerful influence on the program and youth. The Ranch’s policy manual states the following about the role of Probation Counselors.

*“Your work with these adolescents plays an integral role in carrying out the Department’s mission statement, to ‘help facilitate positive change in our clients, their families and their neighborhoods.’”*

*“As a Counselor, you are in the unique position, in any given day, to bring about positive changes in the behavior of troubled youth. You accomplish this simply by the example you set and the attitude you bring with you to work each day.”*

### Annual Cost of Ranch

The Ranch and Juvenile Hall share some of their costs and services. Because they are shared, the spending in the County’s financial system does not accurately reflect the spending at the Ranch specifically. The Probation Department routinely estimates the cost to each facility using cost accounting methods. The most recent estimate they could provide was Fiscal Year 2019–20, which they calculate the Ranch spent \$23.3 on its total operations, including shared services, that year.

### Current Schedule and Staffing Structure

In 2009, following the Ranch’s transition to the Missouri Approach, the Probation Department (the Department) signed an Alternate Hours Agreement with SEIU Local 521. The Department reports that the agreement was intended to help recruit and keep staff, who may have been resistant at the time to the introduction of the Missouri Approach. The agreement implemented six schedules that rotate on a 28-day basis and include six 16-hour shifts and six eight-hour shifts. According to Department management, the agreement was and remains popular because Probation staff can have some weekend days off on a rotating basis, and the 16-hour shifts reduce the length of the normal work week by compressing two days’ worth of normal work hours into one. See Figure 3.1 on page 35 for an example of one of the schedules assigned during our audit fieldwork. The colored squares in the schedule show assigned work shifts and the particular color indicates the hours of the shift. Work weeks shift between 32-hour weeks to 48-hour weeks and result in an ever-changing schedule throughout the year.

Figure 3.1: Example of a Probation Counselor II's Schedule

<b>3</b>	<b>M</b>	<b>T</b>	<b>W</b>	<b>T</b>	<b>F</b>	<b>S</b>	<b>S</b>	<b>M</b>	<b>T</b>	<b>W</b>	<b>T</b>	<b>F</b>	<b>S</b>	<b>S</b>	
August	9	10	11	12	13	14	15	16	17	18	19	20	21	22	
September	23	24	25	26	27	28	29	30	31	1	2	3	4	5	
	<b>6</b>	7	8	9	10	11	12	13	14	15	16	17	18	19	
October	20	21	22	23	24	25	26	27	28	29	30	1	2	3	
	4	5	6	7	8	9	10	<b>11</b>	12	13	14	15	16	17	
	18	19	20	21	22	23	24	25	26	27	28	29	30	31	
November	1	2	3	4	5	6	7	8	9	10	<b>11</b>	12	13	14	
	15	16	17	18	19	20	21	22	23	24	<b>25</b>	<b>26</b>	27	28	
December	29	30	1	2	3	4	5	6	7	8	9	10	11	12	
	13	14	15	16	17	18	19	20	21	22	23	<b>24</b>	25	26	
January	27	28	29	30	<b>31</b>	1	2	3	4	5	6	7	8	9	
	10	11	12	13	14	15	16	<b>17</b>	18	19	20	21	22	23	
February	24	25	26	27	28	29	30	31	1	2	3	4	5	6	
	7	8	9	10	11	12	13	14	15	16	17	18	19	20	
March	<b>21</b>	22	23	24	25	26	27	28	1	2	3	4	5	6	
	7	8	9	10	11	12	13	14	15	16	17	18	19	20	
April	21	22	23	24	25	26	27	28	29	30	<b>31</b>	1	2	3	
	4	5	6	7	8	9	10	11	12	13	14	15	16	17	
May	18	19	20	21	22	23	24	25	26	27	28	29	30	1	
	2	3	4	5	6	7	8	9	10	11	12	13	14	15	
	16	17	18	19	20	21	22	23	24	25	26	27	28	29	
June	<b>30</b>	31	1	2	3	4	5	6	7	8	9	10	11	12	
	13	14	15	16	17	18	19	<b>20</b>	21	22	23	24	25	26	
July	27	28	29	30	1	2	3	<b>4</b>	5	6	7	8	9	10	
	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
August	25	26	27	28	29	30	31	1	2	3	4	5	6	7	
	8a	8p	16	9 to 5	<b>Holiday</b>					<b>2021-2022</b>					<b>48</b>

Source: Santa Clara County Department of Probation.

## 16-Hour Shifts Put Staff and Youth at Risk

Research from several fields suggests that shifts over twelve hours increase the risk of injury to staff and lowers their cognitive abilities.<sup>17, 18, 19</sup> This puts staff and youth at risk physically because of the potential consequences of staff fatigue when accidents could occur, or when staff must protect themselves or youth from harm. It also risks undermining the Ranch's mission and model due to lower performance of the Probation Counselors who interact with the youth the most often.

Most of the accepted and paid workers' compensation claims at the Ranch, 95.2%, are because of bodily injuries from accidents at work. Excluding claims related to the pandemic, the Ranch spent an average of \$423,385 per year on workers' compensation claims between FYs 2016–17 and 2020–21. Research cited by the Occupational Safety and Health Administration found that "working at least 12 hours per day was associated with a 37% increased hazard rate".<sup>20</sup> If the Ranch eliminated 16-hour shifts, it could save an estimated \$114,345 per year in workers' compensation claims based on this current heightened hazard rate applied to the \$423,385 average claims payment between FYs 2016–2017 and 2020–21.

Research also suggests workers on long shifts face fatigue and may make errors.<sup>21</sup> This could undermine Probation Counselor's ability to protect the safety of the youth and support their rehabilitation. For example, a fatigued Probation Counselor may not as effectively protect another youth if a fight broke out or other physical threats were present. In addition, the Department reports that most youth committed to the Ranch have suffered trauma and some have acute mental health needs. Probation Counselors who are fatigued and near the end of a 16-hour shift may not be in an optimal state to effectively help these youth and respond to any youth who may be in a crisis at that moment. The 16-hour shifts could then undermine the Ranch's mission and work against the goal of rehabilitating the youth.

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17 Claire C. Caruso, PhD, RN, "Negative Impacts of Shiftwork and Long Work Hours" US National Library of Medicine, National Institutes of Health, June 18, 2003.

18 Occupational Safety and Health Administration webpage, "Long Work Hours, Extended or Irregular Shifts, and Worker Fatigue" <https://www.osha.gov/worker-fatigue/hazards>, downloaded January 9, 2022.

19 Lonnie Golden, "Irregular Work Scheduling and Its Consequences" Economic Policy Institute, April 9, 2015.

20 Dembe AE, Erickson JB, Delbos RG, Banks SM. The impact of overtime and long work hours on occupational injuries and illnesses: new evidence from the United States. *Occup Environ Med.* 2005 Sep;62(9):588–97. doi: 10.1136/oem.2004.016667. PMID: 16109814; PMCID: PMC1741083.

21 Smith CS, Folkard D, Tucker P, Evans MS [2011]. Work schedules, health, and safety. In Quick JC, Tetrick LE, eds. *Handbook of occupational health psychology*, 2nd ed.. Washington, DC: American Psychological Association, pp. 185–204.

## The Shift Structure Could Lead to Inconsistency for Youth

The current shift structure risks causing inconsistency for the youth, which undermines the Ranch's goals. During our fieldwork, youth reported that they feel unsure of which staff will be presented when. Staff similarly said that youth frequently ask about the staff's schedule and who will work when. Research from a variety of fields such as education<sup>22</sup>, child development<sup>23</sup>, and psychology<sup>24</sup>, suggests that instability of staffing can have negative effects on the development and outcomes for youth.

The University of Cincinnati's Corrections Institute (UCCI) issued an evaluation of the Ranch in April 2021 as part of multi-year engagement to review and reform the Ranch's practices. The evaluation found that "Ranch policies, procedures, and treatment groups, [and] manuals are not being closely followed." The evaluation stated the "not following the manual or significantly altering the curriculum affects fidelity which can impact the effectiveness of the program." The Ranch's shift and staffing structure could contribute to the inconsistencies that the evaluation found. It would be easier to apply the Ranch's practices more consistently if staff were present more consistently and not undermined by the potential fatigue of 16-hour shifts. See Attachment D on page 75 for the complete copy of the UCCI evaluation.

The current schedule results in work shifts that change every two weeks. This differs from common industry practices of staffing more consistent shifts. For example, the U.S. Department of Justice's National Institute of Corrections' "Prison Staffing Analysis: A Training Manual" is an industry standard tool for assessing and developing staffing plans for correctional facilities. It states that "staff scheduling usually follows two basic cycles—7 days (traditional) and 6 days (4 days on, 2 days off)." If they adopted a similar schedule for the Probation Counselors' annual assignments, it could lead to more consistency of staff who interact with youth.

## Large-Sized Pool of Part-Time Temporary Staff Could Contribute to Additional Inconsistency

When normal absences and leaves are considered, the Ranch's schedules and interaction with youth look even more inconsistent. Currently, the Ranch uses a pool of 47 temporary part-time staff composed of Probation Counselor I's hired as Extra Help and assigned and paid as needed to fill the absences.<sup>25</sup> Extra Help employees submit their availability based on other employment, school, and childcare needs and are used to fill a variety of shifts. While all temporary staff receive training, the temporary part-time staff may be too numerous and sporadically assigned to develop the same level of trust with the youth as full-time staff do.

22 Miller, Raegen T., Richard J. Murnane, and John B. Willett. "Do Teacher Absences Impact Student Achievement? Longitudinal Evidence from One Urban School District." *Educational Evaluation and Policy Analysis* 30, no. 2 (2008): 181–200. <http://www.jstor.org/stable/30128059>.

23 Sandstrom and Huerta, "The Negative Effects of Instability on Child Development: A Research Synthesis" Urban Institute, September 2013.

24 Sulek, Trembath, Paynter, Keen and Simpson. "Inconsistent staffing and its impact on service delivery in ASD early-intervention" July 2017.

25 In the FY 2020–21 the Department has successfully reduced the Ranch's reliance on overtime spending. Instead of using overtime on fulltime staff, they've relied more on the 47 temporary staff. This saved the Department a net of \$238,088 in FY 2020–21 from the peak of overtime spendings in FY 2019–20.

The temporary part-time staff are used infrequently and the cost of training such a large pool of staff is inefficient. Between FY 2016–17 and FY 2020–21, the Ranch assigned temporary staff 1,902 hours per year on average, providing relief to permanent staff who were absent or on leave. The temporary staff also averaged 1,531 hours annually attending training during that time period. We expect this amount of training since all Extra Help are required to attend 216 hours of initial training. After that, all temporary staff must attend 24-hours of State mandated training annually to maintain their peace officer status. Between this and other costs related to the temporary staff, the Ranch spent \$1,181,811 in FY 2020–21 to provide relief using these part-time temporary Probation Counselors.

The initial and ongoing training for 47 staff is not efficient compared to training a smaller group that would have a lower fixed cost to annually train. The Probation Department states that it needs a larger-sized pool because the staff work such erratic and infrequent schedules that a large pool helps ensure their availability, and ultimately save overtime costs for permanent staff. They also report that having such a large pool allows them to better recruit for permanent positions as part-time temporary staff who are hired as full-time employees have already completed their core training, background checks, and, in some cases, have been observed on the job by Probation Department managers.

We assessed the total maximum number of temporary staff assigned to the Ranch by day. Most of the days when the Ranch assigns temporary staff, only one staff person is needed to cover a shift. That means the remaining 46 temporary staff are not covering a shift that day, or they are attending training or performing other administrative duties. We found that during the beginning of the COVID-19 pandemic and shelter-in-place orders in March 2020, there was one day when the Ranch needed eight temporary staff and one other day when there were seven. Beyond these examples, most days the Ranch needed only one extra help, and rarely has the Ranch needed four or more staff per day, see Figure 3.2 below for details. This indicates that the Department has more temporary part-time staff than necessary.

**Figure 3.2: Days When Temporary Staff Were Assigned\***

<b>Number of Temporary Staff Needed per Day</b>	<b>Days in FY 2017</b>	<b>Days in FY 2018</b>	<b>Days in FY 2019</b>	<b>Days in FY 2020</b>	<b>Days in FY 2021</b>	<b>Average per Year</b>
<b>1 staff</b>	101	107	119	131	54	102
<b>2 staff</b>	14	89	34	39	13	38
<b>3 staff</b>	1	30	8	12	4	11
<b>4 staff</b>		11	4	6	2	6
<b>5 staff</b>		2	1		1	1
<b>6 staff</b>		1				1
<b>7 staff</b>				1		1
<b>8 staff</b>				1		1

Source: Analysis of County payroll records.

Note: \*Includes extra help and provisional staff.

The Ranch could replace its pool of 47 temporary part-time staff, with a smaller pool of up to 20 temporary part-time Probation Counselors. Maintaining a pool of 20 would provide enough staff for shift coverage and accounts for unavailability within the pool itself. The Probation Department reports that absences among these staff are more common because their positions are not permanent and their schedule is not set, so other schedule conflicts might interfere. A pool of 20 would still accommodate this. The Ranch could divide weeks into two parts and days into early and late shifts, which would result in a total of four weekly shifts. If each shift were assigned five staff, then it could easily accommodate the days when one to two staff are needed. On the rare occasion when more staff are needed, the remaining three assigned to the shift could be called, and if they weren't available, 15 other staff could be called for emergency shift coverage outside of their normal shift.

Using a pool of not more than 20 positions would save the Probation Department an estimated \$114,443 per year in training-time costs because there would be 27 fewer staff to train each year. There would be no shift-coverage salary savings since the temporary part-time are only paid when they work and we would expect their hours to remain unchanged from the prior usage pattern. Besides reducing Department costs, the reduction could contribute to more consistent contact between staff and resident youth.

### No Forecasting and Budgeting of Staffing Needs

The Department routinely spends between \$1.8 million to \$2.5 million annually on overtime, premium pay, and temporary staff combined. However, they budgeted only \$403,586 for these combined categories every year from FY 2016–17 to FY 2021–22, as shown in Figure 3.3 below. Though the total costs shown in Figure 3.3 decreased between FYs 2019–20 and 2020–21, they were still substantially in excess of the budgeted amount. This mismatch between actual and budgeted amounts suggests the Department is not routinely and accurately forecasting and budgeting its staffing needs. Indeed, management at the Ranch has no records of estimating youth population or staffing needs and no records that show how they calculated budgeted amounts for temporary or permanent staff.

**Figure 3.3: Spending on Overtime, Premium Pay and Temporary Staff**

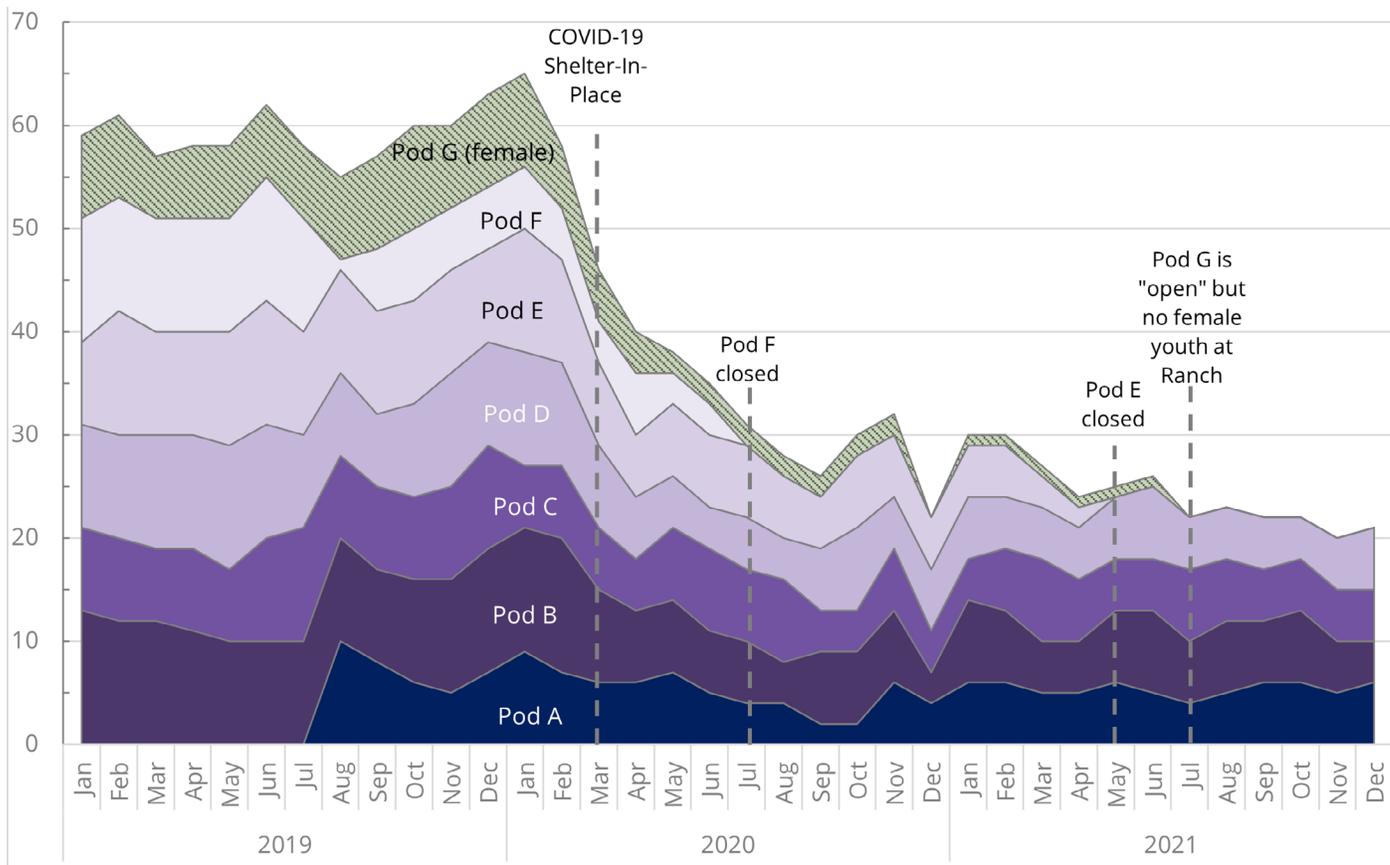
		2016-17	2017-18	2018-19	2019-20	2020-21
Actual Spending	Temporary Employees	\$799,520	\$861,620	\$727,978	\$950,930	\$1,181,811
	Overtime	\$600,689	\$960,944	\$706,729	\$1,021,690	\$457,964
	Holiday Overtime	\$210,892	\$204,954	\$241,150	\$264,589	\$310,909
	Premium Pay	\$273,348	\$287,360	\$286,637	\$318,482	\$366,920
	<b>Total Actual Spending:</b>	<b>\$1,884,448</b>	<b>\$2,314,878</b>	<b>\$1,962,494</b>	<b>\$2,555,691</b>	<b>\$2,317,603</b>
	<i>Budgeted Total</i>	\$403,586	\$403,586	\$403,586	\$403,586	\$403,586
	<b>Under-Budgeted Amount:</b>	<b>(\$1,480,862)</b>	<b>(\$1,911,292)</b>	<b>(\$1,558,908)</b>	<b>(\$2,152,105)</b>	<b>(\$1,914,017)</b>

Source: Analysis of County payroll records.

### Following the Start of COVID-19, Staff Assigned to Pods Without Youth

The State of California permits the Ranch to accommodate up to 108 youth. The largest recent population of the Ranch was 65 youth during January 2020, based on that month's monthly average population. Following the start of the COVID-19 pandemic, the Ranch's population has been reduced to accommodate County health orders and changes in the Court's commitments of youth to the Ranch, reflected in Figure 3.4 below. As of December 2021, 21 youth were committed to the Ranch on average during the month. This is a 68% reduction from January 2020 before the pandemic shutdown.

**Figure 3.4: Average Monthly Youth Population of Ranch by Pod**



Source: Analysis of Probation Department records.

With fewer youth committed to the Ranch since the onset of the pandemic, the Department has reduced the number of youth assigned to each pod. Pods are groupings of youth housed together and supervised by two Probation Counselors. Before March 2020, when the County's Shelter-In-Place orders began, the size of pods for male youth ranged between five to 12 youth per pod. From April 2020 to December 2021, pods ranged in size from two to eight. The Ranch also closed its E and F pods during this period. For the active pods, during our fieldwork, staff reported to us that the smaller number of youth per pods is a positive change, because their supervision of the youth is easier and they provide more one-on-one time counseling with the youth.

**Figure 3.5: Staff and Youth Assignments by Pod During December 2021**

	<b>Average Number of Youth in Pod</b>	<b>Number Of Staff Assigned to Pod</b> <i>(Two Staff Per Shift)</i>
<b>Pod A</b>	6	6
<b>Pod B</b>	4	6
<b>Pod C</b>	5	6
<b>Pod D</b>	6	6
<b>Pod E</b> (closed April 2021)	0	6
<b>Pod F</b> (closed December 2020)	0	6
<b>Pod G</b> (female)	0	6
<b>Total:</b>	<b>21</b>	<b>35</b>

*Source: Analysis of Probation Department records.*

There are 12 staff who are assigned to the two closed pods, see Figure 3.5 above. Probation Counselors assigned to closed pods are used to fill vacancies in other pods and provide shift relief for sick calls, vacation, and trainings. Staff annually bid on assignments to pods under the bidding process in the Alternate Hours Agreement with SEIU Local 521. The Ranch has assigned some of the staff who bid on the closed pods other temporary duties, such as one who is working out of class as a supervisor, while two others are assigned as disaster service worker to assist with the County's COVID-19 response. The nine other staff have not been routinely used to provide relief coverage of active pods. This means the Probation Department has still spent money on overtime and temporary staff to fill absences and leaves in the other four active pods. In fact, as shown above in Figure 3.3 on page 39, spending on temporary staff to provide relief for permanent staff increased in FY 2020–21 when there were permanent employees who did not have their regular duties to perform and could have served in a relief capacity for staff still assigned to the open pods.

Besides the two closed male-pods, the Santa Clara County Superior Court has drastically reduced the number of female youth it commits to the Ranch. From January 2019 to April 2020, the Ranch housed four to ten female youth per month in a dedicated female pod. Since May 2020, the Ranch has housed zero to two females. There have been no female youth at the Ranch since July 2021.

As of March 2022, it is not clear if the number of youth committed to the Ranch will increase again when the COVID-19 pandemic lessens. Changes in the Santa Clara County Superior Court's outlook on commitments may also change, as could the strategies and policies of the District Attorney and Public Defender's Office.

Both the COVID-19 pandemic and the changes in the commitments the Court assigns makes budgeting and planning for staffing needs at the Ranch complex. Despite this challenge, some amount of planning is necessary to ensure the appropriate level of staff is at the Ranch so it can meet State and Federal requirements and achieve its mission and goals. We recommend that the Department adopt a policy of every three years forecasting youth commitments in coordination with the Santa Clara County Superior Court, the District Attorney's Office, and the Office of the Public Defender. The Probation Department should use this forecast to make a staffing plan for the Ranch that considers a range of likely population scenarios and use the staffing

plan to inform the development of the Department's operating budget. Doing this forecast every three years is frequent enough to consider changes in public health and criminal justice strategies. If changes occur in between these intervals, the Department can update its budget requests in the intermediate years.

The two closed male pods, E and F, have 12 Probation Counselor II's assigned to them. The female pod, known as Pod G, has six Probation Counselor II's assigned. Some of these staff may be necessary to accommodate future female youth, but the combined 18 staff are unnecessary when compared to the Ranch's operating model and average youth population, even before the COVID-19 reduction in youths at the Ranch. If the Probation Department adopted a practice of forecasting youth and budgeting using the forecast, it could save up to \$3.9 million in annual spending appropriations for the 18 staff, \$3.0 million of which is funded by the General Fund.<sup>26</sup> The final total amount that could be saved and the optimal number of staff depends on the Department's forecast and resulting budget requests.

## CONCLUSION

The current scheduling practices of the William F. James Ranch contribute to physical risks to both staff and youth, and it does not effectively use the Ranch's \$23.3 million of spending because it undermines the Ranch's mission to rehabilitate youth. A labor agreement that specifies the current schedule causes this in part because it requires staff to work six 16-hour shifts. Research suggests that the resulting sporadic scheduling and the long shifts undermine the effectiveness of staff and the Ranch's rehabilitative program. The Department's use of a pool of 47 temporary part-time Probation Counselors to cover absences among permanent staff compounds this and is excessive compared to need. Reducing the size of the temporary pool of staff, renegotiating a more consistent schedule for staff, and eliminating shifts longer than 12-hours would help reduce costs while better supporting the Ranch's mission to rehabilitate youth.

Finally, while the COVID-19 pandemic casts uncertainty on the size of the population of youth committed to the Ranch by the Court, the Department does not routinely forecast and budget staffing according to the population of youth. Implementing a policy to prepare a forecast every three years will help ensure that the Probation Department uses the estimated \$23.3 million it spends annually on the Ranch as effectively as possible. Based on the current population at the Ranch, it could save up to \$3.9 million in annual budget appropriations if it adjusted its staffing levels accordingly to the current level of youth at the Ranch.

## RECOMMENDATIONS

### The Probation Department should:

- 3.1 Renegotiate "The County of Santa Clara and SEIU Local 521 Probation Counselor Alternate Hours Agreement" to allow a schedule that meets industry standards of a more consistent schedule and with shifts no longer than 12-hours. (Priority 1)
- 3.2 Reduce its pool of 47 Extra Help, part-time temporary Probation Counselors, to a pool of 20 of such staff. (Priority 1)

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<sup>26</sup> The Department estimated in the FY 2021-22 budget that the General Fund pays for 75% of the Ranch's Probation Counselor salaries, and the remainder is paid from various grant sources.

- 3.3 Adopt a policy to once every three years forecast youth commitments in coordination with the Santa Clara County Superior Court, the District Attorney's Office, and the Office of the Public Defender, then use this forecast to make a staffing plan for the William F. James Ranch that considers a range of likely population scenarios, and use the staffing plan to develop the Department's annual operating budget request. (Priority 1)

### **SAVINGS, BENEFITS, AND COSTS**

Changing the schedule and temporary staffing pool could help improve the outcomes of youth who attend the Ranch by building greater trust between youth and staff to help achieve the Ranch's rehabilitative mission for youth. This would help ensure that the Ranch's estimated \$23.3 million it spent in Fiscal Year 2019–20 is used as effectively as possible to improve outcomes for youth committed to the Ranch.

By renegotiating the agreement, they can achieve an improved schedule format with the same number of budgeted staff and no additional annual cost. By eliminating 16-hour shifts, we estimate the Ranch would save \$114,345 per year in workers' compensation claims by reducing fatigue in staff and the frequency of physical hazards. Reducing the size of the Ranch's temporary part time Probation Counselor staff would save the Probation Department an estimated \$114,443 per year in training costs.

Finally, adopting a policy to do a forecast every three years and use it to develop the Ranch's operational budget will help ensure that the \$23.3 million spent annually by the Ranch, as of FY 2020–21, is used as effectively as possible. It could save up to \$3.9 million in annual budget appropriations based on the current low population of youth and closed pods, but the savings will vary depending on future staff needs. This recommendation can be accomplished with existing resources in the Department.

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## Section 4: Safety and Security Fortifications Needed at Facility

### Background

The William R. James Ranch (the Ranch) is regulated under the Federal Prison Rape Elimination Act, the State's Title 15 and Title 24 codes, and other State law and County policy to provide a secure 108 bed facility. In 2020, the State passed legislation that moved youth aged 18–24 who were tried as juveniles from a State-run facility to county care. This population of youth is referred to as Secure Youth Treatment Facility youth who are Santa Clara County youth who generally have been convicted of more serious crimes and sentenced to State Department of Juvenile Justice facilities. As of January 2022, there are four such youth in custody of the County and housed in the Juvenile Hall, which is not designed or intended for long-term commitments. The County is considering developing a program for these and future youth at the Ranch.

### Problem, Cause, and Adverse Effect

In 2019, the Ranch completed a capital improvement project that modernized many of its buildings. While the project improved aspects of the Ranch's safety and security, it was not the focus of the project. During our fieldwork in late 2021, we observed several weaknesses in the facility design's safety and security that could undermine the Ranch's effectiveness to provide secure housing for the current youth and possible Secure Youth Treatment Facility youth in the future. According to the Probation Department, the Secure Youth Treatment Facility youth will require an increased level of security since they often have more serious charges than the current population at the Ranch.

Between 2016 and 2021, the Ranch reported a total of two successful escapes by youth in their custody at the Ranch, eight successful escapes during transportation or other off-site activities, and 26 unsuccessful escape attempts at the Ranch.

A July 2020 report from the County's Director of Facilities Security reported several risks that were present at the Ranch, including contraband, workplace violence upon employees, illegal substance distribution, resident fights, active shooter risk and potential escape. The Ranch is addressing some of these risks, but not all. For example, according to the County report, they need to make fortification improvements to the facility such as improved lighting, entry gates, door controls, and access cards to list a few, which could reduce the risks to youth, staff, and the neighboring community. In addition, they could incorporate active shooter training into the Ranch's existing emergency drills and training. A similar training was planned for August 2020, but was postponed due to COVID-19.

### Recommendations

The Probation Department should implement the remaining facility improvements recommended by the County's Director of Facility Security in July 2020 and incorporate active shooter training and drills into their existing training and drills.

### Savings, Benefits, and Costs

The facility improvements would cost an estimated \$1.0 million dollars. The capital improvement project that renovated the Ranch in 2019 had almost \$1.0 million remaining in its budget as of February 2022. The Probation Department could request to reallocate these available capital funds to improve the safety and security of youth and staff at the Ranch, and for the neighboring community. They could incorporate the recommended active shooter training into existing emergency training and drills at minimal cost.

## FINDING

The William R. James Ranch (the Ranch) is regulated under the Federal Prison Rape Elimination Act, the State's Title 15 and Title 24 codes, and other State law and County policy to provide a secure 108 bed facility. In 2020, the State passed legislation<sup>27</sup> that moved youth aged 18–24 who were tried as juveniles from a State-run facility to county care. This population of youth is referred to as the Secure Youth Treatment Facility youth. According to the Probation Department, as of January 2022, there are four such youth in custody of the County and housed in the Juvenile Hall, which is not designed or intended for long-term commitments. The County is considering developing a program for these and future Secure Youth Treatment Facility youth at the Ranch. According to the Probation Department, the Secure Youth Treatment Facility youth will require an increased level of security since they often have more serious charges than the current population at the Ranch.

### Escapes

According to data provided by the Probation Department, there were two escapes from the Ranch facilities between 2016 and 2021. There were other types of escapes during this time, such as those that occurred during transportation, off-site work, or youth who did not return from weekends away with family, known as furloughs, see Figure 4.1 below for details.<sup>28</sup> However, the two successful escapes from the Ranch itself are notable because the Probation Department has more control over the physical condition of Ranch facilities, and supervision of the youth while on-site.

**Figure 4.1: Types of Escapes As Reported by Department**

	2016	2017	2018	2019	2020	2021	Total
Physical Escape from Ranch	1	0	0	1	0	0	2
Attempted Escape	6	2	6	7	2	3	26
Escape - Ranch Furlough*	16	14	12	9	2	0	53
Escape - Other (Transport/Off-Site Activity) *	1	5	0	2	0	0	8
<b>Total Reported by Department:</b>	<b>24</b>	<b>21</b>	<b>18</b>	<b>19</b>	<b>4</b>	<b>3</b>	<b>89</b>

Source: Probation Department.

Note: \* Weekend furloughs and off-site activities for the youth didn't occur from March 2020 through 2021.

27 In 2020, the State passed Senate Bill 823, that amended various sections of the Government, Penal, and Welfare and Institutions code. Welfare and Institutions Code Section 208.5 specifically requires the transfer of these youth from State care to county care.

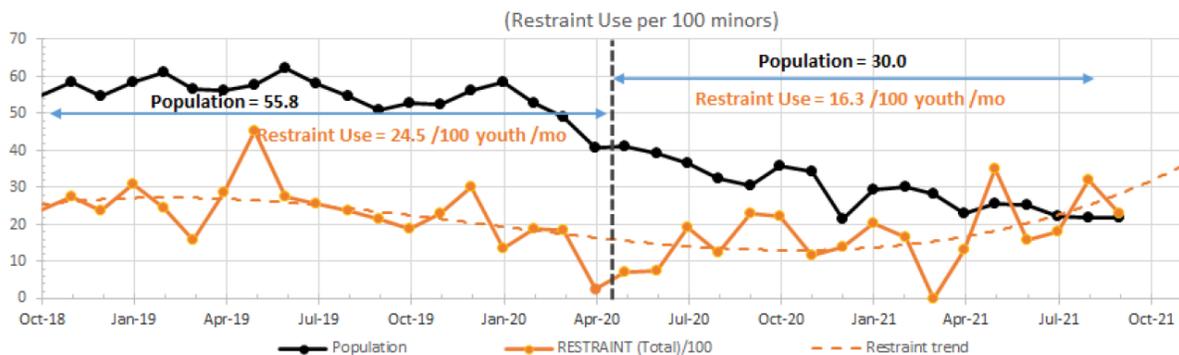
28 With the two escapes from the Ranch, furlough and attempts excluded, there were ten escapes during the five-year period, where youth fled the custody of the Probation Department. Eight of them were during transportation or off-site activities, such as a program where youth build and install picnic tables and fire rings at County parks. The Ranch's policies give discretion to the staff to not pursue the youth "unless it is reasonable and safe to do so." During our fieldwork, one staff reported to us that they do not pursue youth when they attempt to escape during off-site activity because they do not want to risk harm to the youth or themselves. This highlights the balance the Ranch must face in giving youth activities that contribute to personal growth and rehabilitation such as the work in the park, with the risk that such freedom can be misused. As such, off-site escape and furlough escapes are likely to continue as long as the program remains similarly structured.

The two cases highlight the risk that youth can escape the facility, even if only occasionally. This risk undermines the Ranch's responsibility to detain the youth and keep them safe, and it could add risk to the community if an escaped youth were a threat to others. If the County moves Secure Youth Treatment Facility youth to the facility, it will only increase the need to improve security there. These youth are older and often have more serious charges that had previously resulted in a commitment in State facilities before the law changed.

### Restraint Use

According to the Juvenile Justice Commission of County of Santa Clara, an oversight body appointed by the Santa Clara County Superior Court, use of force incidents that occurred at the Ranch from October 2018 to October 2021 were limited to restraint use. Restraint use is not categorized by the US Department of Justice as a use of force, but the Juvenile Justice Commission refers to it as such. Restraint use, according to the Probation Department, ranges from manual restraint, such as physically restraining and guiding a youth, to mechanical restraint, such as using devices like handcuffs. The Commission's analysis shows a decline in such use of force incidents during 2020, when assessed on a monthly per capita basis. However, their data shows a rise in restraint use on a per capita basis during 2021, when the number of youth committed to the Ranch was declining, see Figure 4.2 below. This suggests that the COVID-19 shelter-in-place orders may initially have dampened the occurrence of restraint use incidents, but they have since began trending toward historic levels at the Ranch.

**Figure 4.2: Juvenile Justice Commission Analysis of Restraint Use at Ranch**



Source: William F. James Ranch Inspection Report November 2021 Juvenile Justice Commission of County of Santa Clara.

The Probation Department reports that the Juvenile Justice Commission's analysis of use of force incidents does not align with their own internal records, and they met with the Commission to discuss their methodology but could not verify the Commission's data on restraint use which comes from manual review of the Probation Department's incident reports. The Department reported their own use of force data after the Exit Conference and initial draft was issued that does not show an upward trend in restraint use in 2021 but it was not included in this report as we relied on data regularly made public in Juvenile Justice Commission reports. The Probation Department reports use of force data quarterly to the Board of Supervisors but excludes some types of restraint use as they are not considered true use of force incidents as defined by the US Department of Justice. This data was not made available to our audit team for review.

Use of force related to restraints may be common in detention settings like the Ranch, but research from numerous sources suggests they can cause various types of physical and psychological trauma. Since the rate of these use of force incidents might be increasing and the County may relocate Secure Youth Treatment Facility youth to the Ranch, there is a need to address safety and security needs at the Ranch overall. For use of force in particular, cameras throughout the facility could help provide transparency and accountability for both youth and staff within the facility when use of force is used for restraints and other types of force that could occur in the future.

### **Director of Facilities Security Report in 2020 Recommends Improvements**

A July 2020 report from the County's Director of Facilities Security outlines several risks present at the Ranch including contraband, workplace violence upon employees, illegal substance distribution, resident fights, active shooter risk and potential escapes. The Ranch is addressing some of these risks but not all. Confidential information related to the Director of Facilities Security's July 2020 report has been omitted from this section of the public audit report on advice of County Counsel under the California Privacy Rights Act due to the sensitive nature of certain topics and implications for safety within the facility.<sup>29</sup> However, this information will be furnished confidentially to the Board of Supervisors pursuant to GAGAS 9.64, as noted in the Introduction of this report.

#### *Contraband*

The July 2020 report stated, "the biggest threat is contraband getting into the facility."<sup>30</sup> Two measures will reduce the risk of contraband at the Ranch. In 2019, the Ranch installed a metal detector within the hallway of the dormitory that youth must step over several times per day. This reduces the risk of metallic contraband. Second, in early 2022, the Probation Department purchased a dog trained in narcotics detection. The Department plans to regularly bring the dog to the Ranch for random inspections and during visitation hours. This will help reduce narcotic substances that enter the Ranch and help detect them when they do.

#### *Physical Security and Fortifications*

The Director of Facilities Security report on James Ranch security listed many other physical security and fortification needs at the Ranch facilities. None of them have been installed or are planned to be. These include upgrades to better secure the perimeter, separate visitor parking from the access to the main facilities, replace physical keys with access cards, and bullet proof counter areas, to name some. The Probation Department reports that it has submitted requests for these additional security enhancements for several years but they have not been funded. These upgrades combined would help reduce various risks to youth and staff according to the report. The recommended fortification and estimated costs are shown below in

<sup>29</sup> California Government Code Section 6255.

<sup>30</sup> Staff reported that since the Ranch imposed COVID-19 restrictions that contraband has lessened. The restrictions include moving visitation to an outside area and prohibiting youth from leaving the Ranch on the weekends. These restrictions are not a long-term solution since the Ranch's program encourages family visitation and a gradual re-entry program that includes weekends away in the later phases for youth.

Figure 4.3 below. We excluded the cameras and related equipment that the report recommended from this list because most have been installed or are in the process of installation. The total estimated cost, according to the County's Director of Facilities Security's report for the outstanding items, would be \$1.0 million.

**Figure 4.3: Recommended Fortifications and Estimated Cost**

<b>Recommendation</b>	<b>Estimated Cost</b>
Lighting	\$100,000
Security Impact Window Filming	\$80,000
Full campus Public Address System or emergency messaging system	\$150,000
Two new sally ports	\$150,000
Seven pedestrian gates with employee card access	\$140,000
Bridge automatic gate repair and wiring	\$50,00
Thirteen bullet resistant windows, 3 bullet proof counters	\$150,000
Replace physical keys with access cards	\$100,000
1,000 feet of 10-foot black wrought iron fencing for interior perimeter fence separating visitor parking lot to campus	\$80,000
Modular furniture for lobby of Administration Building	\$50,000
Control door and buzzer opener	\$15,000
<b>TOTAL:</b>	<b>\$1,015,000</b>

*Source: July 2020 report from the County's Director of Facilities Security.*

Besides the safety and security of youth and staff, changing the physical keys to access cards could help reduce the risk of property theft. During our fieldwork, the Probation Department reported that approximately \$100 worth of toilet paper was stolen from a warehouse at the Ranch. This prompted management at the Ranch to change the locks to the warehouse. However, if an access card were in place, the Department would have had an entry log and the ability to temporarily revoke access and review who had accessed the warehouse. While the total value of the reported theft is small, it raises concerns that such theft occurred at all in a detention facility staffed primarily by peace officers. We did not see evidence or hear of other property theft, waste, fraud, or abuse during our fieldwork. Controls such as access cards on doors could reduce the chance that property theft occurs in the future, while better securing the Ranch's facilities.

### **Capital Improvements Completed in 2019**

The County completed its renovation of the Ranch in July 2019. The renovation included a housing facility, laundry room, gymnasium, kitchen and dining facility, admissions building, parking lot, and landscaping improvements. The safety and security fortifications, including the cameras, were not part of the plan or design for the capital project. As of July 2021, the Facilities and Fleet Department (FAF) reported that the renovations were complete and cost \$26.4 million, some of which was funded by State grants. As of February 2022, the County financial system shows that \$973,363 of funds allocated to the project was unspent and available. However, FAF reports those funds may be needed to "complete utility service building." FAF does not have an estimate of the cost or time it will take to complete the building, which means

all these funds may not be available for the safety and security fortifications. To the extent the remaining capital funds cannot pay for all the recommendations, the Probation Department should make a budget request for onetime funds for the rest to implement the recommended safety and security fortifications.

## **Training**

The County Director of Facilities Security also recommends two trainings. First, that staff be trained “to ensure proper access or refusal of access to the different areas of the facility” and training on the new camera, perimeter gate, and access card systems. These trainings could be incorporated into the existing training curriculum for new and existing staff.

Second, the Director recommended a bi-annual active shooter response training with two drills per year in the following year. The training could be added to the curriculum, and the drills could coincide twice a year with the Ranch’s fire drill that occurs monthly. A similar training was planned by the Probation Department in coordination with the Morgan Hill Police Department for August 2020, but was postponed due to COVID-19. While the risk of mass shooters is statistically rare, training for such events is common in schools and other places where youth gather or reside.

## **CONCLUSION**

The William F. James Ranch is required to detain and protect the youth in its custody. However, because of limited security fortifications at its facilities, some escapes have occurred. Although additional cameras have been installed, until 2022, there were only four cameras near the entrance for the entire facility. Surveillance cameras help ensure accountability when use of force (including restraints) occurs, and recent reports suggest use of force may be rising. In 2020, the County Director of Facilities Security reported several safety and security weakness at the facility and made a variety of recommendations to fortify it. These were not part of the capital improvement project to renovate the facility that was completed in 2019. Some of the safety and security weakness identified in 2020 were resolved by the Department in early 2022, such as the use of a narcotics detecting dog and the installation of cameras throughout. However, a variety of physical fortifications and trainings could further enhance the safety and security of the facility and better protect the youth, staff, and neighboring community.

## **RECOMMENDATIONS**

### **The Probation Department should:**

- 4.1 Once again request that the Facilities and Fleet Department implement the remaining safety and security fortifications to the William F. James Ranch that were recommended by the County Director of Facilities Security using the remaining capital project funds. If the funds are now insufficient or encumbered for outstanding projects, the Probation Department should make a onetime budget request for the remaining amount. (Priority 1)

- 4.2 Develop and incorporate training materials into its existing training curriculum that teach staff how to administer access or refusal of access to the different areas of the facility and how to operate the new camera, perimeter gate, access card systems, and other safety and security fortifications. (Priority 1)

### **SAVINGS, BENEFITS, AND COSTS**

The recommended facility improvements would cost an estimated \$1.0 million dollars approximately. The capital improvement project that renovated the Ranch in 2019 had almost \$1.0 million remaining in its budget as of March 2022. However, FAF reports those funds may be needed to “complete utility service building.” FAF does not have an estimate of the cost or time it will now take to complete the building, which means some funds may not be available for the safety and security fortifications. To the extent the remaining capital funds cannot pay for all the recommendations, the Probation Department should make a budget request for onetime funds for the rest to implement the recommended safety and security fortifications.

The Ranch could incorporate the recommended training into existing emergency training and drills.

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## Section 5: Agreements Not Monitored for Effective Implementation

### Background

Utilization of evidence-based practices is a core value of the Probation Department's mission, and the William F. James Ranch (the Ranch) has a mission of rehabilitating youth. Between FY 2018–19 to FY 2020–21, the Ranch had 66 contracts and agreements (agreements) with vendors, other government agencies, and other County departments to provide professional services at the Ranch. The Probation Department estimates they spend approximately \$800,000 per year on these services at the Ranch. Most of the contracted services directly support programming and services for youth at the Ranch. This includes services such as education, therapy, victim awareness training, and writing workshops to name a few. This does not include contracts related to goods, such as food or supplies.

### Problem, Cause, and Adverse Effect

Although the Department reviews contractor performance regularly, neither the Probation Department nor the Ranch have a method or practice of measuring and recording if service providers are using evidence-based practices and doing so correctly. The University of Cincinnati's Corrections Institute issued an evaluation in April 2021 as part of multi-year engagement to review and reform the Ranch's practices. The evaluation recommended that the Ranch staff should more consistently implement programs themselves because "evidence of intervention impact is based on fidelity to the program." This means that evidence-based practices don't work if they aren't implemented correctly. The same standard can be applied to outside service providers who deliver part of the Ranch's overall program to youth.

### Recommendations

The Probation Department should implement a requirement where staff who oversee an agreement must assess if a provider is adhering to the evidence-based practices they contracted it to provide and doing so correctly. This could be a biannual random evaluation conducted by the Ranch to observe and document the service provider. If they find that the service provider is not implementing the services correctly, they should work with the Department's Contracts and Grants Unit to take corrective action if necessary.

### Savings, Benefits, and Costs

This would help ensure the Probation Department meet its core value of using evidence-based practices, they meet the Ranch's mission of rehabilitating youth, and help ensure that the Ranch's over \$800,000 in annual spending on professional services is used effectively.

## FINDING

Between FY 2018–19 to FY 2020–21, the William F. James Ranch (the Ranch) had 66 contracts and agreements (agreements) with vendors, other government agencies, and other County departments to provide professional services at the Ranch. Most of the contracted services are related to support and programming of the Ranch's goal to rehabilitate youth. This includes services such as education, therapy, victim awareness training, and writing workshops, to name a few. This does not include contracts or services related to goods, such as food or supplies.

Some of the professional services are shared between the Ranch and Juvenile Hall. Because they are shared, the spending in the County's financial system does not accurately reflect the spending at the Ranch specifically. The Probation Department routinely estimates the cost to each facility using cost accounting methods. The most recent estimate they could provide was Fiscal Year 2019–20, when they calculated the Ranch spent \$801,325 on contracted services, or 3.4% of the \$23.3 million they estimate the Ranch spent for all of its operations for the same year.

### **Agreements Not Monitored for Adherence to Evidence-Based Practices**

Utilization of evidence-based practices is a core value of the Probation Department's mission, and the Ranch has a mission of rehabilitating youth, see Attachment E on page 107. We reviewed a sample of 20 agreements and found adequate documentation of compliance with terms and conditions and County policies but did not find evidence of staff checking for compliance with evidence-based practices.

Although the Probation Department reviews contractor performance regularly, it does not have a method or practice of measuring and recording if service providers are using evidence-based practices and doing so correctly. The monitoring it does, using narratives written by service providers and lists of clients they interacted with during an invoice period, is primarily used to check against the invoiced amounts and the types of services they agreed to deliver.<sup>31</sup> The Department reports that the Contracts and Grants Unit and the contract monitors assigned to the Ranch meet with all contracted providers monthly to discuss scope of work, service delivery, and outcome measures. However, what's missing is any way to periodically check that services are being delivered correctly, or with fidelity to evidence-based practices.

Delivering evidence-based practices correctly is important because research suggests that if it is not, it is not effective.<sup>32</sup> In fact, the University of Cincinnati's Corrections Institute issued an evaluation in April 2021 as part of multi-year engagement to review and reform the Ranch's practices. The evaluation recommended that the Ranch staff should more consistently implement programs because "evidence of intervention impact is based on fidelity to the program." This means that evidence-based practices don't work if they aren't implemented correctly. The same standard can be applied to outside service providers who deliver part of the Ranch's overall program to youth.

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31 During our fieldwork we tested 20 of the 66 agreements and found that the Department's existing contract monitoring practices are occurring but without checks for contractor adherence to evidence-based practices.

32 Bond GR, Drake RE. Assessing the Fidelity of Evidence-Based Practices: History and Current Status of a Standardized Measurement Methodology. Adm Policy Mental Health. November 2020.

The Probation Department could implement a requirement where staff who oversee an agreement must assess if a provider is adhering to the evidence-based practices they contracted it to provide and doing so correctly. This could be a twice annual random evaluation conducted by each project manager to observe and document the service provider. If the staff finds that the service provider is not implementing the services correctly, they should work with the Department's Contracts and Grants Unit to take corrective action if necessary. This would help ensure the Probation Department meets its core value of using evidence-based practices, and the Ranch's mission of rehabilitating youth.

### **Evidence-Based Practices Criteria is Integrated into Solicitation and Selection of Services**

We reviewed 20 of the 66 agreements to see if evidence-based practices were considered in their solicitations and selection. Our analysis suggests that the Ranch is integrating requirements for evidence-based practices into the solicitation and selection process. Seven of the sampled agreements specifically required evidence-based practices in their solicitation or discussed them in their single-source justifications in two instances when they weren't competitively bid. In the five competitively bid agreements the Department's evaluation notes regarding various bidders show discussion of their respective use of evidence-based practices.

In ten of the samples, the programs that the Department was soliciting or selecting the vendors did not need to show evidence-based practices in their bids because the Department designed the services in advance to use evidence-based practices. We reviewed these services and found reputable scholarly and industry research supporting the basis of the services such as teaching youth career technical skills or providing victim awareness training.

Two of the ten agreements in our sample were not applicable to the purpose of our review, one was a State mandated service, and the other was for hair cutting services.

### **CONCLUSION**

Using evidence-based practices is at the core of the Probation Department's mission and critical for the William F. James Ranch's mission to deliver its services and rehabilitate youth. The University of Cincinnati Corrections Institute found that the Ranch's staff weren't applying evidence-based practices consistently themselves and this could jeopardize the effectiveness of the program. The same standard should apply to the over \$800,000 per year that the Ranch spends to provide professional services at the Ranch. Better monitoring and evaluation of these services would help ensure the County spends the money effectively, and that the youth receive the intended services and treatment from these service providers to support their rehabilitation.

## RECOMMENDATION

### The Probation Department should:

- 5.1 Implement a policy that requires all staff who oversee agreements with a service provider to twice annually randomly observe the provider to determine if the provider is implementing the agreed upon evidence-based practices correctly, and to take corrective action in the event a provider is not implementing services correctly. (Priority 1)

## SAVINGS, BENEFITS, AND COSTS

Better monitoring service providers to ensure they are implementing evidence-based practices correctly will help ensure that the Ranch's over \$800,000 in annual spending on professional services is used effectively and that the services the Ranch provides is meeting the Probation Department's core value of using evidence-based practices, and the Ranch's mission of rehabilitating youth.



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Two categories of records, juvenile case files and peace officer personnel records, were within the scope of this audit but were not reviewed because of limitations imposed by state laws governing access to these categories of records.

Strict confidentiality protections apply to certain records of a youth's juvenile justice system involvement, including records relating to juvenile court proceedings and records maintained by probation officers regarding a youth who is the subject of juvenile proceedings. State law provides for limited exceptions to the confidentiality protections applicable to juvenile case files. Welfare and Institutions Code section 827, which generally governs the sharing of juvenile case files, specifies limited categories of individuals and officials who are entitled to inspect juvenile case files without juvenile court permission. These categories encompass individuals and officials specifically involved in juvenile justice or dependency matters, such as court personnel, the minor's attorney, the district attorney, and members of probation departments and child welfare agencies. Other separately enacted statutory provisions authorize access to juvenile case files for limited purposes, such as compliance with data collection and reporting requirements imposed by state or federal law.

Similarly, confidentiality protections apply to personnel records of peace officers and records from investigations into complaints maintained by a state or local agency pursuant to Penal Code section 832.5, as well as any information obtained from such records. The Penal Code identifies limited exceptions to the confidentiality of these records. One such exception applies to records relating to the report, investigation, or findings of the categories of incidents specified in Penal Code section 832.7, subdivision (b) (e.g., a sustained finding involving a complaint that alleges unreasonable or excessive force), which are not considered confidential and must be made available for public inspection pursuant to the California Public Records Act. Another recently enacted exception allows local agencies that employ peace officers or custodial officers to disseminate data regarding the number, type, or disposition of complaints made against its officers, so long as the data is deidentified. If no exception applies, confidential peace officer personnel information can only be disclosed in a criminal or civil proceeding by discovery pursuant to Sections 1043 and 1046 of the Evidence Code.

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**Response to Management Audit of William F. James Ranch Final Report Recommendations**

*(Updated: 06/15/22)*

No.	Recommendation	Probation Department’s Response
Section 1. Measuring Program Outcomes		
<p><b>1.1</b></p>	<p>Adopt a policy that requires it to define measures that directly relate to the William F. James Ranch’s goals of reducing recidivism, including a consistent reporting standard for recidivism, and measures of the effectiveness of its educational and vocational programs. The Probation Department should use these measures to inform program selection and planning and ensure its service providers are supporting the William F. James Ranch’s mission and goals and report these measures to the Board of Supervisors annually. <i>(Priority 1)</i></p>	<p><b>AGREE-</b> The Probation Department, Research and Development Team, has developed standards to measure recidivism to include tracking and reporting subsequent sustained 602 Petitions. However, challenges arise when comparing recidivism rates across Jurisdictions, as there is no universal definition to measure recidivism across the state. Measures defined continue to be used to identify gaps in services, as well as better assess direct services and their impact on recidivism rates. The Probation Department remains committed to reporting outcome measures during the publication of the annual report.</p> <p>The County Office of Education (COE) is contracted to provide educational, vocational, and secondary education services at the James Ranch Facility. The Probation Department and COE will work in collaboration to identify data collection efforts, which may include tracking graduates, vocational certifications, and college credits. COE may already have internal tracking mechanisms in place to report on students’ long term educational and vocational trajectories and would have unfiltered access to school records for ease in reporting.</p>
<p><b>1.2</b></p>	<p>Contract with a qualified outside research group to assist with long-term measures identified as critical to the William F. James Ranch’s mission and goals and conduct evaluations of the William F. James Ranch program every three years. <i>(Priority 1)</i></p>	<p><b>DISAGREE-</b> The Probation Department has a robust Research and Development Team who supports the James Ranch Facility in collecting, tracking, and reporting data outcome measures. This recommendation would be better suited if completed by the Probation Departments Research and Development Team. They have the internal understandings of the William F. James Ranch</p>

No.	Recommendation	Probation Department's Response
<b>Section 2. Mental Health Acuity and Needs</b>		
2.1	Amend its agreement with the Behavioral Health Services Department to require an improved tool to help determine severity levels of mental health needs among youth being committed to the William F. James Ranch and incorporate it into the current screening and assessment tools and require that Behavioral Health Services and its contractor, Starlight, use this measure to inform the Probation Department which youth have high-acuity needs. <i>(Priority 2)</i>	See attached response from the Behavioral Health Services Department
2.2	Use the information from the recommended improved new Behavioral Health Services Department tool to identify which youth committed to the William F. James Ranch need a higher level of support and services. <i>(Priority 2)</i>	See attached response from the Behavioral Health Services Department
2.3	Modify its agreement with the Behavioral Health Services Department to temporarily provide additional clinical services such as mental health treatment to support rehabilitation of youth with high-acuity needs in the William F. James Ranch's program with the addition of Rehabilitation Counselors, or an equivalent, with a minimum of 18 months to three years relevant experience in a behavioral health residential, psychiatric, or juvenile justice setting to serve as therapeutic aides until this issue is further measured and studied.	See attached response from the Behavioral Health Services Department

No.	Recommendation	Probation Department's Response
	These additional resources should be reassigned and adjusted as needed once an improved tool is in place and viable alternatives are evaluated. <i>(Priority 1)</i>	
2.4	Assuming implementation of Recommendation 1.1 in Section One, the Department should use the newly collected outcomes information to understand if the added support for youth with high-acuity needs is resulting in improvements and adjust the services targeting this group as needed. <i>(Priority 2)</i>	See attached response from the Behavioral Health Services Department
2.5	Using the results of the severity measure in Recommendation 2.1, evaluate and consider whether a specialized pod for higher-needs youth at William F. James Ranch is necessary in three years, or by 2025. <i>(Priority 2)</i>	See attached response from the Behavioral Health Services Department
2.6	Amend the William F. James Ranch's admission criteria policy such that youth who require significant residential mental health and/or substance abuse treatment are acceptable cases to allow youth with high-acuity needs at the Ranch formally. <i>(Priority 2)</i>	See attached response from the Behavioral Health Services Department
<b>Section 3. Schedule of Staffing Structure Interferes with Effectiveness of Program</b>		
3.1	Renegotiate "The County of Santa Clara and SEIU Local 521 Probation Counselor Alternate Hours Agreement" to allow a schedule that meets industry standards of a more consistent schedule and with shifts no longer than 12-hours. <i>(Priority 1)</i>	<p><b>AGREE-</b> The Probation Department has begun discussions at the county level to evaluate staffing classifications in the Probation Assistant Classification, transitioning to Probation Counselor Classification. By transitioning to Probation Counselors, our staff will have the training and skills necessary to provide more flexibility with shift coverage and reduce scheduling limitations for the daily care of youth within this 24-hour facility.</p> <p>With the passing of State legislation Senate Bill 823, it is expected that youth committed to a local Secure Track program would have the opportunity to be "stepped down" to a less secure environment when appropriate. The William F. James</p>

No.	Recommendation	Probation Department's Response
		<p>Ranch will meet this requirement from a facility perspective, with some added security measures. In an effort to accommodate the high complex needs of this population, transitioning the Probation Assistants Classification to the Probation Counselor Classification would meet the needs of the youth.</p> <p>By consolidating these two classifications, amending the work schedule to include shifts no longer than 12-hours would not conflict with job descriptions and duties. This process will need to be vetted through all labor unions to assess the impacted with this request.</p>
<p><b>3.2</b></p>	<p>Reduce its pool of 47 Extra Help, part-time temporary Probation Counselors, to a pool of 20 of such staff. <i>(Priority 1)</i></p>	<p><b>Disagree-</b> James Ranch Extra Help Staff are provided an option to work a maximum of 1040 hours at the facility, which is based on their availability. Maintaining a robust pool of extra help employees has resulted in a dramatic reduction in overtime costs and has supported vacancies through Provisional appointments pending open recruitment for full time employment. Extra Help staff can more readily transition from part time to full time positions, as they are well versed in the job scope and duties, are trained in treatment modalities, and have already passed background, making the hiring process seamless and without delay.</p> <p>However, the Probation Department can become proactive and set a requirement for minimum hours worked. An analysis will be made factoring in the hiring process and training requirements to determine the minimum hours needed to remain advantageous for the county. In the event the extra help employee has restricted availability and cannot meet the annual minimum hours, the county may elect to separate the employee from service.</p>

No.	Recommendation	Probation Department's Response
3.3	<p>Adopt a policy to once every three years forecast youth commitments in coordination with the Santa Clara County Superior Court, the District Attorney's Office, and the Office of the Public Defender, then use this forecast to make a staffing plan for the William F. James Ranch that considers a range of likely population scenarios, and use the staffing plan to develop the Department's annual operating budget request. (<i>Priority: 1</i>)</p>	<p><b>DISAGREE</b>- Forecasting staffing is difficult at best, as the operational and programmatic needs constantly change and evolve. Different factors can impact the client population, as well as the staffing. For example, the Covid19 pandemic required the James Ranch population to be decreased to better accommodate social distancing in line with public health recommendations. Although the population declined, the supervision requirements necessitated an increase in probation staff to facilitate and support rehabilitative programming such as education and virtual therapeutic interventions.</p> <p>Legislative changes can be swift and often require the county and departments to make immediate changes, which may affect and cause a fluctuation in the population. A forecasting committee can be detrimental to swift policy changes and could result in an increase in overtime, as well as the facility being inadequately staffed. For instance, in the event the staffing projections are overrepresented this could result in layoffs to our staff members. To the contrary, if the projections are underrepresented, we cannot quickly hire staff as the county and Probation hiring process takes a significant amount of time due to a thorough peace officer background investigation.</p> <p>Moreover, The Board of State and Community Corrections publishes minimum staffing requirements and if the projections are inaccurate in the recommended three-year plan, this may pose a threat to the overall safety, security, and compliance of the department with state mandated regulations.</p>
<p><b>Section 4. Safety and Security Fortifications Needed at Facility</b></p>		
4.1	<p>Once again request that the Facilities and Fleet Department implement the remaining safety and security fortifications to the William F.</p>	<p><b>AGREE</b>- In July 2020, the James Ranch received a Security Assessment and Recommendations where over 1.265 million</p>

No.	Recommendation	Probation Department's Response
	<p>James Ranch that were recommended by the County Director of Facilities Security using the remaining capital project funds. If the funds are now insufficient or encumbered for outstanding projects, the Probation Department should make a onetime budget request for the remaining amount. <i>(Priority 1)</i></p>	<p>dollars in security advancements were recommended. Since the report was published, the Probation Department has made security advancements to include the addition of over 20 surveillance cameras installed in the inside and exterior of the Main Dormitory, Main Entrance Bridge, and Salley Port.</p> <p>Additionally, the recommendations within the report have been prioritized and requests for security upgrades have been included in the 2022/23 budget proposal. Upon approval of the department's budget, proposed upgrades to the James Ranch Facilities include additional surveillance cameras in all new construction buildings and walkways, the installation of a vehicular sally port at the back service gate, upgrade building and perimeter fence lighting, add safety enhancements to the building entrance/ exit monitoring systems, and create an alternate configuration for public and visitor parking.</p> <p>The Probation Department continues to work closely with The Counties Facilities and Fleet Department to identify project timelines and staffing to complete the necessary upgrades for the safety and security of both residents and staff.</p>
<p><b>4.2</b></p>	<p>Develop and incorporate training materials into its existing training curriculum that teach staff how to administer access or refusal of access to the different areas of the facility and how to operate the new camera, perimeter gate, access card systems, and other safety and security fortifications. <i>(Priority 1)</i></p>	<p><b>AGREE-</b> With the advancement of technology, training videos have been an important way to share information with staff who work on various days, shifts, and schedule rotations. For example, when we moved into the Main Dormitory in 2019, the Supervisors and support staff were provided an opportunity to participate in an in-person facility training showing how to operate the buildings duress system, perimeter gates, detect troubled systems in the fire panels, and oversee access card systems. For staff who were unable to attend the in-person trainings or for those who wished to review the information</p>

No.	Recommendation	Probation Department's Response
		<p>later, a training video was also made available and distributed to staff.</p> <p>As the James Ranch Facility continues to experience upgrades to security systems, the Probation Department in collaboration with the counties Facilities and Fleet Department will continue to provide in-person trainings, as well as the option to review a training video. In the month of July, the Facilities and Fleet Department will be hosting an overview of the newly installed surveillance video system so supervisors and support staff can learn how to properly manage and operate our onsite safety and security cameras. As in the past, this training will also be recorded and stored to incorporate in future training materials.</p> <p>The Probation Department has found success in integrating technology, specifically the use of training videos to enhance learning capacity amongst the staff, this practice will remain, especially as the safety and security features at the James Ranch Facilities evolve.</p>
<b>Section 5. Agreements Not Monitored for Effective Implementation</b>		
<b>5.1</b>	<p>Implement a policy that requires all staff who oversee agreements with a service provider to twice annually randomly observe the provider to determine if the provider is implementing the agreed upon evidence-based practices correctly, and to take corrective action in the event a provider is not implementing services correctly. <i>(Priority 1)</i></p>	<p><b>AGREE-</b> The assigned James Ranch contract monitor, along with the Treatment Programs Supervisor, will meet all contracted providers monthly to discuss scope of work, program observations, service delivery, and outcome measures. If the provider is identified as lacking in any noted area, the department will engage in a performance improvement plan seeking improved services and outcomes for youth.</p> <p>The department is taking additional steps to train staff; specifically, The Probation Department's Program Manager who</p>

<b>No.</b>	<b>Recommendation</b>	<b>Probation Department's Response</b>
		<p>currently oversees Evidence Based Practices. This individual will use their expertise as a subject matter expert to observe the program curriculum and ensure services meet the standards set forth in line with Evidence Based Practices, as well as exceed outcome goals as defined in the programmatic contract agreement. Further, this expert will also play an integral role in training and coaching James Ranch contract monitors in direct observation, communication, and constructive feedback to help support our program providers in implementing Evidence Based Practices to fidelity and with the goal of sustainability.</p> <p>The Department will further consider this recommendation and determine if these parameters should be adopted by all divisions, as to not single out any one service provider and commit to top quality services for all clients served by the Probation Department.</p>



Date: June 16, 2022

To: Board of Supervisors Management Audit Division

From: Sherri Terao, Director, Behavioral Health Services Department

DocuSigned by:  
*Sherri Terao*  
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RE: Response to the Mental Health Acuity Section of the Management Audit of the Juvenile Probation – William F. James Ranch

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The Behavioral Health Services Department (BHSD) has reviewed the Mental Health Acuity Section (Section 2) of the Management Audit of the Juvenile Probation – William F. James Ranch has prepared the following response.

### **Problem, Cause, and Adverse Effect Section**

BHSD Response: Starlight Community Services (Starlight) provides behavioral health services at the Ranch and uses qualitative and quantitative measures that report on acuity within the clinical record. At any given time, Starlight is able to provide information about youth who present with high acuity needs. The clinical presentation of youth typically is not static but dynamic and fluid. It is common for youth to have varying needs throughout their stay at the Ranch vacillating between mild, moderate, and more intense needs. For example, a youth may initially present with mild behavioral health needs. However, as the young person is more comfortable in the environment and receives behavioral health treatment to address their history of adversity and trauma, acuity may go up for a few months, then return to a lower level of need. This pattern is typical in the healing-oriented process of psychotherapy.

### **Mental Health Screening: Screening at the Ranch Section**

BHSD Response: The audit indicates that BHSD was not comfortable using the CANS and Diagnostic and Statistical Manual of Mental Disorders (DSM) information to provide a summary analysis due to the weaknesses of the assessment tools. As part of the audit process, BHSD did provide a summary analysis using the Child and Adolescent Needs and Strengths (CANS) tool, as referenced in the CANS section of the report. For clarification, the CANS and the DSM Manual is part of a comprehensive assessment process and cannot be singled out to represent overall acuity or functioning.

### **Assessments Do Not Measure Severity Section**

BHSD Response: The clinical record does provide information regarding mental health severity and needs. Mental health acuity is determined through a comprehensive assessment rather than one specific measure. The process includes a review of the presenting needs, mental health and substance use history, cultural factors, strengths, psychosocial history, medical history, risk and protective factors, a mental status exam, evaluation of medical necessity, and various screening and assessment tools. The



assessment also looks at areas of functional impairment and diagnostic criteria. The process includes input from youth, parents, teachers, and providers familiar with the youth and results in a care plan which focuses on desired results, goals, and action steps that are mindful of the functional strengths and the process of engaging youth to participate meaningfully in the therapeutic process. Individuals can have the same assigned DSM diagnosis but have very different behavioral presentations. At any given time, Starlight is aware of any youth with higher acuity levels, and they work closely with Probation staff at the Ranch to collaborate on care needs. As mentioned later in the report, Starlight reports there to be one or two youths at any given time with higher acuity needs.

### **Estimates of Amounts of High-Acuity Youth Section**

BHSD Response: Youth at the Ranch receive additional or specialized mental health treatment as part of Starlight's care. Youth care is individualized based on presenting needs. Therefore, it is not uncommon for youth with higher level needs to be seen daily by Starlight's team and receive support from Starlight, Probation, and a wellness specialist through the Santa Clara County Office of Education.

### **Additional Services Needed for High-Acuity Youth at Ranch Section**

BHSD Response: Starlight shared that one option to consider is having one-on-one-aides to provide therapeutic behavioral services for youth who need more ongoing daily support. BHSD agrees that one-on-one support is beneficial for certain youth. When fully staffed, this additional support is a service Starlight has provided under its existing contract using rehabilitation counselors that are part of the current Starlight staffing plan.

### **Recommendations Section**

Recommendation 2.1 The Probation Department should amend its agreement with the Behavioral Health Services Department to require an improved tool to help determine severity levels of mental health needs among youth being committed to the William F. James Ranch and incorporate it into the current screening and assessment tools and require that Behavioral Health Services and its contractor, Starlight, use this measure to inform the Probation Department which youth have high-acuity needs. (Priority 2)

BHSD Response: Partially Agree

BHSD currently requires the contractor to conduct a comprehensive behavioral health assessment that includes determination of severity levels of mental health needs. The information is shared with Probation to ensure that youth with high-acuity needs are known. BHSD is already in the process of working to enhance and streamline communication to ensure that youth needs are known, and that care is coordinated through a systematic approach.

Recommendation 2.2 The Probation Department should use the information from the recommended improved new Behavioral Health Services Department tool to identify



which youth committed to the William F. James Ranch need a higher level of support and services. (Priority 2)

BHSD Response: Partially Agree

BHSD agrees that the Probation Department should use the information identified to support youth with a higher level of need. However, BHSD disagrees that this would be with a single “tool” but instead through a comprehensive assessment process.

Recommendation 2.3 The Probation Department should modify its agreement with the Behavioral Health Services Department to temporarily provide additional clinical services such as mental health treatment to support rehabilitation of youth with high-acuity needs in the William F. James Ranch’s program with the addition of Rehabilitation Counselors, or an equivalent, with a minimum of 18 months to three years relevant experience in a behavioral health residential, psychiatric, or juvenile justice setting to serve as therapeutic aides until this issue is further measured and studied. These additional resources should be reassigned and adjusted as needed once an improved tool is in place and viable alternatives are evaluated. (Priority 1)

BHSD Response: Partially Agree

BHSD agrees that some youth may benefit from one-on-one support. However, additional clinical services should be part of the treatment recommendations following a comprehensive assessment. Not all youth with higher acuity needs will benefit from an increase in one-on-one support, particularly if it brings unwanted attention to the youth from Peers or Probation Staff. The addition of Rehabilitation Counselors as aides will not necessarily ensure a positive outcome for youth with a more severe clinical presentation. Starlight has elected to end its contract on June 30, 2022, and beginning on July 1, 2022, County Staff from BHSD will provide all behavioral health services at the Ranch. BHSD plans to include increased support for youth in the living units, including increased one-on-one support when clinically indicated. BHSD will continue to evaluate the need for one-on-one support.

Recommendation 2.4 Assuming implementation of Recommendation 1.1 in Section One, the Department should use the newly collected outcomes information to understand if the added support for youth with high-acuity needs is resulting in improvements and adjust the services targeting this group as needed. (Priority 2)

BHSD Response: Unable to Response

BHSD was not provided with Recommendation 1.1 in Section One and therefore does not have enough information to determine agreement.

Recommendation 2.5 Using the results of the severity measure in Recommendation 2.1, evaluate and consider whether a specialized pod for higher-needs youth at William F. James Ranch is necessary in three years, or by 2025. (Priority 2)



BHSD: Agree

BHSD agrees that ongoing monitoring and outcomes will benefit the needs of higher needs youth and will work alongside the Probation Department to consider whether a specialized pod would be beneficial by 2025.

Recommendation 2.6 The Probation Department should amend the William F. James Ranch's admission criteria policy such that youth who require significant residential mental health and/or substance abuse treatment are acceptable cases to allow youth with high acuity needs at the Ranch formally. (Priority 2)

BHSD: Partially Agree

Ultimately this recommendation would be a decision by the Probation Department rather than Behavioral Health. However, Behavioral Health is willing to collaborate with Probation on the William F. James Ranch admission criteria to determine whether youth with high-acuity needs can be accommodated.

## Cabral, Nemesio

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**From:** Talamantez, Rachel J  
**Sent:** Wednesday, June 22, 2022 2:40 PM  
**To:** Cabral, Nemesio  
**Cc:** Terao, Sherri; fbrousseau@harveyrose.com; Solov, Cheryl; Faria Costa, Zelia; Garnette, Laura; Birchard, Nick  
**Subject:** RE: Confidential Revised Draft of James Ranch Management Audit  
**Attachments:** BHSD\_Response\_Mgmt\_Audit\_JamesRanch6.2022.pdf; 1. Outcomes Monitoring.docx; BHS\_CONFIDENTIAL REVISED DRAFT Management Audit of the William F. James Ranch\_Section 2.pdf; 2. Mental Health Acuity and Needs\_REDLINE.docx

Hello Nemesio,

Thank you for sending Section 1 for review. BHSD agrees with recommendation 2.4 in Section Two. BHSD will work collaboratively with the Probation Department related to outcomes collected to understand mental health and substance use improvements for all youth, including youth with high-acuity needs. Based on outcome analysis, BHSD focused services will be adjusted where clinically appropriate and with agreement from Probation.

Warmly,  
Rachel

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Rachel Talamantez, Ed.D., LMFT (*Pronouns: she/her/hers*)  
 Behavioral Health Division Director  
 Mobile: 408-821-0923

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**From:** Cabral, Nemesio <nemesio.cabral@BOS.SCCGOV.ORG>  
**Sent:** Wednesday, June 22, 2022 1:41 PM  
**To:** Talamantez, Rachel J <Rachel.Talamantez@hhs.sccgov.org>  
**Cc:** Terao, Sherri <Sherri.Terao@hhs.sccgov.org>; fbrousseau@harveyrose.com; Solov, Cheryl <Cheryl.Solov@bos.sccgov.org>; Faria Costa, Zelia <Zelia.Faria@hhs.sccgov.org>  
**Subject:** RE: Confidential Revised Draft of James Ranch Management Audit

Hello Rachel,

We received your response to Section 2 of the James Ranch audit (attached). Thanks again for sending that. I noticed Behavioral Health was unable to provide a response to one of the six recommendations (2.4) in Section 2 because it referenced Section 1 (Outcomes Monitoring) which I did not send. My apologies for not including that in my previous email.

I have attached the revised confidential version of Section 1 that was referenced in Section 2, Recommendation 2.4. I've also attached the revised and initial drafts of Section 2 I previously had sent for reference.

**Could you please review Section 1 and provide a response to Recommendation 2.4 in Section 2 at your earliest convenience?** Feel free to just send the response by email if that is preferred. It is important that we have a response for each recommendation. Please let me know if you have any questions.

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# **FINAL REPORT**

## **EVIDENCE-BASED CORRECTIONAL PROGRAM CHECKLIST (CPC)**

**William F. James Ranch**  
**County of Santa Clara Probation Department**  
19050 Malaguerra Avenue, Morgan Hill, CA 95037

By:

**Carrie Sullivan, M.A.**  
**Senior Research Associate**

and

**Jodi Sleyo, M.A.**  
**Senior Research Associate**

**Amanda Pompoco, ABD**  
**Research Associate**

Assessment Conducted: **February 15<sup>th</sup>, 2021 – February 19<sup>th</sup>, 2021**  
Draft Report Submitted: **March 9<sup>th</sup>, 2021**  
Final Report Submitted: **April 6<sup>th</sup>, 2021**

*The Evidence-Based Correctional Program Checklist (CPC) was developed and copyrighted by the University of Cincinnati. The commentaries and recommendations included in this report are those of the CPC assessors.*

## INTRODUCTION

Research has consistently shown that programs that adhere to key principles, namely the risk, need, responsivity (RNR), and fidelity principles, are more likely to impact delinquent and criminal offending. Stemming from these principles, research also suggests that cognitive-behavioral and social learning models of treatment for justice-involved individuals are associated with considerable reductions in recidivism. To ensure that high quality services are being delivered, there has recently been an increased effort in formalizing quality assurance practices in the field of juvenile justice treatment and corrections. As a result, more legislatures and policymakers have requested that interventions be consistent with the research literature on evidence-based practices.

Within this context, the University of Cincinnati Corrections Institute (UCCI) was contracted to complete an assessment of William F. James Ranch (Ranch) using the Evidence-Based Correctional Program Checklist (CPC). The objective of the CPC assessment is to conduct a detailed review of the facility's practices and to compare them to best practices within the juvenile/criminal justice and correctional treatment literature. Facility strengths, areas for improvement, and specific recommendations to enhance the effectiveness of the services delivered by the facility are offered. This is the first CPC assessment of this program.

This CPC is the first step in a larger project between Santa Clara County, the Ranch, and UCCI. The team will use this report to collaborate over the next 18 months to develop action plans with the goal of enhancing program process, interventions, and quality assurance measures.

## CPC BACKGROUND AND PROCESSES

The Evidence-Based Correctional Program Checklist (CPC) is a tool developed by the University of Cincinnati Corrections Institute (UCCI)<sup>i</sup> for assessing correctional intervention programs.<sup>ii</sup> The CPC is designed to evaluate the extent to which correctional intervention programs adhere to evidence-based practices (EBP) including the principles of effective interventions. Data from four studies<sup>iii</sup> conducted by UCCI on both adult and youth programs were used to develop and validate the CPC indicators. These studies produced strong correlations between outcome (i.e., recidivism) and individual items, domains, areas, and overall score. Two additional studies<sup>iv</sup> have confirmed that CPC scores are correlated with recidivism and a large body of research exists that supports the indicators on the CPC.<sup>v</sup> To continue to align with updates in the field of offender rehabilitation, the CPC has been revised twice. A substantial revision was released in 2015 (CPC 2.0), and in 2019, minor revisions were made (CPC 2.1). Throughout this document, all references to the CPC are a direct reference to the revised CPC 2.1 version of the assessment tool.

The CPC is divided into two basic areas: content and capacity. The capacity area is designed to measure whether a correctional program has the capability to deliver evidence-based interventions and services for justice-involved individuals. There are three domains in the capacity area including: Program Leadership and Development, Staff Characteristics, and Quality Assurance. The content area includes the Offender Assessment and Treatment Characteristics domains and focuses on the extent to which the program meets certain principles of effective intervention, namely RNR. Across these five domains, there are 73 indicators on the CPC, worth up to 79 total points. Each domain, each area, and the overall score are tallied and rated as either Very High

Adherence to EBP (65% to 100%), High Adherence to EBP (55% to 64%), Moderate Adherence to EBP (46% to 54%), or Low Adherence to EBP (45% or less). It should be noted that the five domains are not given equal weight, and some items may be considered not applicable in the evaluation process.

The CPC assessment process requires a site visit to collect various program traces. These include, but are not limited to, interviews with executive staff (e.g., program director, clinical supervisor), interviews with treatment staff and key program staff, interviews with program participants, observation of direct services, and review of relevant program materials (e.g., participant files, program policies and procedures, treatment curricula, client handbook, etc.). Once the information is gathered and reviewed, the evaluators score the program. When the program has met a CPC indicator, it is considered a strength of the program. When the program has not met an indicator, it is considered an area in need of improvement. For each indicator in need of improvement, the evaluators construct a recommendation to assist the program's efforts to increase adherence to research and data-driven practices.

After the site visit and scoring process, a report (i.e., this document) is generated which contains all of the information described above. In this report, your program's scores are compared to the average score across all programs that have been previously assessed. This report is first issued in draft form and written feedback from you and your staff is requested. Once feedback from you is received, a final report is submitted. Unless otherwise discussed, the report is the property of the program and/or the agency requesting the CPC and UCCI will not disseminate the report without prior approval. The scores from your program will be added to our CPC database, which we use to update scoring norms.

There are several limitations to the CPC that should be noted. First, the instrument is based upon an ideal program. The criteria have been developed from a large body of research and knowledge that combines the best practices from the empirical literature on what works in reducing recidivism. As such, no program will ever score 100% on the CPC. Second, as with any explorative process, objectivity and reliability can be concerns. Although steps are taken to ensure that the information gathered is accurate and reliable, given the nature of the process, decisions about the information and data gathered are invariably made by the evaluators. Third, the process is time specific. That is, the results are based on the program at the time of the assessment. Though changes or modifications may be under development, only those activities and processes that are present at the time of the review are considered for scoring. Fourth, the process does not take into account all "system" issues that can affect the integrity of the program. Lastly, the process does not address the reasons that a problem exists within a program or why certain practices do or do not take place.

Despite these limitations, there are a number of advantages to this process. First, it is applicable to a wide range of programs.<sup>vi</sup> Second, all of the indicators included on the CPC have been found to be correlated with reductions in recidivism through rigorous research. Third, the process provides a measure of program integrity and quality as it provides insight into the black box (i.e., the operations) of a program, something that an outcome study alone does not provide. Fourth, the results can be obtained relatively quickly. Fifth, it provides the program both with an idea of current practices that are consistent with the research on effective interventions, as well as those

practices that need improvement. Sixth, it provides useful recommendations for program improvement. Furthermore, it allows for comparisons with other programs that have been assessed using the same criteria. Finally, since program integrity and quality can change over time; it allows a program to reassess its progress in adhering to evidence-based practices.

As mentioned above, the CPC represents an ideal program. Based on the assessments conducted to date, programs typically score in the Low and Moderate Adherence to EBP categories. Overall, 14% of the programs assessed have been classified as having Very High Adherence to EBP, 20% as having High Adherence to EBP, 24% as having Moderate Adherence to EBP, and 42% as having Low Adherence to EBP. Research conducted by UCCI indicates that programs that score in the Very High and High Adherence categories look like programs that are able to reduce recidivism.

## **SUMMARY OF THE FACILITY AND SITE VISIT PROCESS**

The Ranch, located in Santa Clara County, is a 108-bed secure intensive treatment facility for youth between the ages of 13 and 19 who are committed to the Ranch. Given the current Coronavirus pandemic, fewer youth are being served at the Ranch and the census was in the low 30's during the assessment week. The Ranch has worked to establish itself as a facility committed to providing intensive services designed to meet the needs of youth who have lengthy juvenile justice backgrounds.

Youths referred to the Ranch enter the facility after having been admitted into custody at the county's Juvenile Hall (Hall). Staff from the Ranch visit each youth at the Hall to conduct an informal assessment prior to transfer to the Ranch. Once at the Ranch, each youth receives a lengthy biopsychosocial assessment that examines factors such as readiness for treatment, alcohol and drug screening/assessment, trauma exposure/symptom assessment, mental health screening/assessment, medical needs, and an educational and vocational appraisal. Youths are also assessed by probation staff prior to entering the Ranch using a criminogenic risk and needs assessment. Details regarding the specific assessment tools used is provided in the body of the report.

Youth progress through phases during their stay at the Ranch. First, youth complete an Orientation Phase in which key activities are the intake multidisciplinary team (MDT) meeting and the development of an individualized service plan (ISP). Next, youth move through the Change Phase, during which the youth develops a plan for change. The third phase, called Growth, focuses on preparing the youth for return back to the community and includes a 60-day pre-release MDT meeting, three family sessions, and the start of some off-Ranch activities (i.e., short home furloughs, off-Ranch work crew). The fourth phase, Transition, involves a 30-day prerelease MDT meeting and overnight home furloughs. At the time of the assessment, off-Ranch work crew and home furloughs were suspended due to the pandemic. The last phase, known as Aftercare, involves release into the community while still under Ranch custody. During the Aftercare Phase, youth have intensive treatment services and supervision requirements. Post-Aftercare, the majority of youth are placed in the Re-Entry Probation Unit in which they are placed on standard community supervision. Youths who are not placed in Re-Entry are youths who have other legal requirements for care. The average length of stay for a youth residing at the Ranch is approximately six to eight months and encompasses the first four phases. The last Ranch

Phase (i.e., Aftercare) lasts about two and half months, followed by the approximately four months on standard probation.

While in placement, the Ranch's aim is to provide programming to help develop skills such as thinking, emotion regulation, and social skills. Taken together, the programming aims to help youth refuse antisocial behavior and enable family reunification. The Ranch program offers cognitive-behavioral treatment, traditional education, vocational training, gang interventions, behavioral health services, pro-social activities, victim awareness workshops, mentoring, girl scouts, and trauma healing. Youth also attend school and participate in an array of activities and events that are coordinated by the staff.

It should be noted that while most full- and part-time staff work directly for the county, some full-time staff are contracted agents of the community-based organization (CBO) Starlight Community Services (Starlight). Starlight provides group and individual services targeting mental health and substance use needs. Additionally, the Ranch contracts with a host of other CBOs to provide intervention-specific services.

The CPC assessment took place virtually between February 15th and February 19th, 2021. The platform used to conduct interviews was Zoom. Materials and files were shared by the Ranch to UCCI using secure platforms. Additionally, a staff survey was administered using Survey Monkey. For the purposes of this assessment, both Ranch Managers, Jill Ugalde and Marc Utsey, were identified as the program directors as they share dual responsibilities for overseeing the facility on a daily basis.

The assessment process consisted of a series of structured interviews with people in various Ranch positions. Staff interviewed include the following—the Deputy Chief of Institutions, the two Ranch Managers, a sampling of Supervising Probation Counselors (SPCs), Probation Counselors (PCs), Probation Assistants (PAs), a Programs Coordinator, a Clerk, a transportation staff, a quality systems staff, an Aftercare PC, a Reentry Probation Office (PO), and the Starlight Program Coordinator. A total of 17 staff were interviewed.

Additionally, data were gathered via the examination of representative files (open and closed) as well as other relevant program materials (e.g., policy and procedure manuals, staff training information, assessments, curricula, youth handbook, etc.). Four youth—one on each Level—were interviewed. Finally, four groups were observed across different pods—a Monday Teaching Prosocial Skills (TPS) group, a Tuesday TPS group, the Thursday Adolescent Community Reinforcement Approach (A-CRA) group, and the weekly grading group. Data from the various sources were then combined to generate a consensus CPC score and specific recommendations, which are described below.

## **CORONAVIRUS PANDEMIC IMPACT**

This assessment occurred approximately a year into the Coronavirus pandemic, and Ranch daily practices have been significantly impacted by the pandemic. To illustrate, Ranch Probation Counselors (PCs) are working one 16-hour shift followed by two days off to limit any possible COVID-19 exposure; pod sizes have been decreased from twelve to eight youth; schooling and

most treatment groups are delivered virtually; no new permanent full-time staff have been hired in over a year; Wednesday all-staff meetings have been put on hold; there are restrictions on the Transition Phase of the program as youth are not able to leave on furloughs; until very recently, visits were conducted virtually; and youth are not allowed to be temporarily placed at the Hall for sanctions. Throughout this report, the assessors have specified where the pandemic has affected the assessment. On the whole however, the report is applicable to both COVID and non-COVID timeframes.

## FINDINGS

### **Program Leadership and Development**

The first subcomponent of the Program Leadership and Development domain examines the qualifications and involvement of the program directors (i.e., the individual responsible for overseeing daily operations of the facility), their qualifications and experience, their current involvement with the staff and the youth, as well as the development, implementation, and support (i.e., both organizational and financial) for the treatment services. As noted above, both of the Ranch Managers serve as program directors for the purpose of the CPC.

The second subcomponent of this domain concerns the initial design of the treatment services. Effective interventions are designed to be consistent with the literature on effective correctional services, and facility components should be piloted before full implementation. The values and goals of the facility should also be consistent with existing values in the community and/or institution, and it should meet all identified needs. Lastly, the facility should be perceived as both cost-effective and sustainable.

#### ***Program Leadership and Development Strengths***

Both Ms. Ugalde and Mr. Utsey are very experienced and have worked with juvenile justice populations for over 20 years each. They each bring a solid foundation for working with a juvenile justice-involved population. Related, both of the program directors possess master's degrees. Ms. Ugalde possesses a bachelor's degree in social work and a master's degree in the administration of justice and Mr. Utsey has a bachelor's degree in health sciences and a master's degree in education and counseling. Theoretically, Ms. Ugalde is in charge of the facilities side of the Ranch and Mr. Utsey is in charge of programming. However, given the complexity of the Ranch and the pandemic, both Ranch Managers are involved in most aspects of Ranch functioning.

All county staff that work in the Ranch specifically apply to their positions as a Ranch staff. The program managers both have a role in hiring these staff. While hiring of full-time staff has been paused due to the pandemic, both Ranch Managers are involved in that process. Specifically, Ms. Ugalde receives the list from the county and schedules interviews, creates the interview questions and is involved in either the first or second round of interviews. Mr. Utsey will be involved in the interview process moving forward for full-time hires.

The Ranch staff recognize how important community support is for the success of the facility. Community stakeholders include the county education department, Starlight, New Hope for

Youth, Fly, Peace it Together, Girl Scouts, Young Women's Freedom Center, The Beat Within, Pro-SCR, and Pro-Grip. The Ranch also receives donations. While some barriers have occurred due to the pandemic, regular meetings with these stakeholders have helped ensure that things are getting back on track. Overall, these agencies are supportive of the Ranch and the work they do. Further, the Ranch Managers have numerous ideas to expand community partnerships including a grandparent gardening club.

The Ranch has been in existence for some time, providing treatment services for over five decades. Furthermore, funding for the facility has been stable in the recent past, and no large cuts have jeopardized the smooth functioning of the facility in the last 2 years. The UCCI was very impressed by the facility tour and all of the space that has been prioritized for treatment and educational program delivery. This will be extremely helpful to the redesign process.

Research demonstrates that programs that offer gender-specific groups (i.e., separate genders during treatment) achieve better outcomes than programs that lack this practice. The Ranch keeps boys and girls completely separate from one another, which ensures gender-specific groups.

### ***Program Leadership and Development: Areas in Need of Improvement and Recommendations***

As noted above, both Ms. Ugalde and Mr. Utsey have multiple academic credentials. During their coursework, Ms. Ugalde took classes related to corrections, however, Mr. Utsey did not complete any courses or specializations in working specifically with justice-involved populations.

- ***Recommendation:*** In the future, as administration places staff in the Ranch Manager positions, preference should be given to candidates with at least a bachelor's degree in a helping profession *with* classes/specializations in corrections (criminal justice, forensic psychology, etc.).

The research on program effectiveness asserts that involved program directors are more effective than those who are not. As such, the CPC requires that program directors be involved in hiring, training, and supervising of all staff who provide services to youth served by the Ranch. As discussed above, there are multiple types of staff delivering individual services and group sessions to youth—PCs, POs, and staff from multiple CBOs. While Ms. Ugalde and Mr. Utsey are involved in the hiring of full-time county staff, they have outsourced the hiring of extra help to a SPC and they also do not have a say in which staff from the CBOs work at the Ranch. Related, the Ranch Managers should provide some formal training to all new staff who provide services at the Ranch. While they recently added themselves to the training agenda for extra help staff, they do not provide formal training as part of this process nor do they do this for the new CBO staff. Related, the Ranch Managers should provide some form of supervision for all staff who deliver services at the Ranch. The main venue for this was the Wednesday all-staff weekly meetings; however, these are not occurring due to the pandemic. Additionally, many staff choose not to attend the all-staff meetings, and CBO providers were not included in this process. Lastly, Ranch Managers should deliver some of the services as this helps keep them informed as to population changes and staff challenges. At the time of the assessment, neither Ranch Manager was involved in direct service delivery.

- **Recommendation:** The Ranch Managers should be consulted in all placement decisions for any staff delivering Ranch services. This means that the Managers need to reinsert themselves into the hiring process for extra help. At a minimum, they should review the individuals selected to ensure they will be a good fit for the Ranch. The Managers will also need to work with the CBOs to determine which CBO staff should deliver services and interventions provided in the Ranch—this includes Starlight and all other CBOs who offer services targeting a criminogenic need area. Personal characteristics to consider in the hiring process are provided below in the Staff Characteristics domain.
- **Recommendation:** As new staff are hired to work for the Ranch or are selected from the CBOs to provide services, the Ranch Managers should have a clear role in providing some training (i.e., full-time, extra help, and CBOs) delivering services/interventions (i.e., assessments, groups targeting criminogenic need areas, individual sessions, treatment planning, etc.). The Ranch managers should consider formal training of some of the following elements: overview of the Ranch, mission and values, cognitive-behavioral interventions (CBI), the level system, the behavior management system, roles and responsibilities, documenting services, or any other key topics.
- **Recommendation:** Similar to the item above, the program directors should have a clear role in providing *some* supervision to all staff that are delivering services and interventions. Given the number of staff delivering services and interventions at the Ranch, the Ranch Managers should consider hosting a once a month all-staff hour long meeting to focus on sharing information, providing formal ongoing training, discussing issues and solutions, or even debriefing a youth who failed the Ranch to determine what should have been done differently with the youth. To reduce the burden on the Managers, they can alternate the months in which they host these sessions. Further, these meetings should be recorded and staff that are not in attendance should watch the video during their next shift. Another option to meet this indicator would be to reconstitute the all-staff weekly meetings and ensure that the Managers are both involved in some way during those meetings. Additional guidance on this meeting are provided in the next section of the report—Staff Characteristics.
- **Recommendation:** At the time of the assessment, neither Ranch Manager was able to provide any of the direct services to the youth living at the Ranch. Both Managers should carve out a small block of time to either conduct assessments, carry a small caseload, or facilitate groups as it will help keep them up-to-date with any program population shifts, needed programmatic changes, and staff challenges. No matter which format of service delivery is chosen, it should occur consistently. For example, the Ranch Managers could run TPS on an alternating schedule across the pods. To realistically do this, the administrative team will need to review the Ranch Managers' responsibilities to ensure it is realistic for them to provide direct services.

It is important that the program is based on the effective correctional treatment literature and that all staff members have a thorough understanding of this research. The probation department has a Research and Development (RaD) department that sends out information to support some of Ranch elements via email and maintains a share drive of relevant information. Overall, however, a formal

literature review about what works with justice-involved youth in reducing recidivism has not been conducted and shared with the staff.

- **Recommendation:** The probation department as an agency and/or the Ranch Managers should conduct regular reviews of the literature and ensure that an effective program model is implemented consistently throughout all components of the facility. This literature search should include major criminological and psychological journals as well as key texts. Some examples of these texts are *Psychology of Criminal Conduct* by Don Andrews and James Bonta; *Correctional Counseling and Rehabilitation* by Patricia Van Voorhis, Michael Braswell, and David Lester; *Choosing Correctional Options That Work: Defining the Demand and Evaluating the Supply*, edited by Alan Harland; and *Contemporary Behavior Therapy*, by Michael Spiegler and David Guevremont. Journals to be regularly reviewed should, at a minimum, include *Criminal Justice and Behavior*, *Crime and Delinquency*, and *The Journal of Offender Rehabilitation*. Collectively, these sources will provide information about assessment and programming that can be applied to groups and services delivered at the Ranch. It is important that the core program and all of its components be based on a coherent theoretical model with empirical evidence demonstrating its effectiveness in reducing recidivism among juvenile justice populations (e.g., cognitive-behavioral and social learning theories).
- **Recommendation:** All staff working in the program should receive related research articles regularly, and a portion of each staff/pod meeting should be used to ensure that this information is reviewed and discussed for relevance to the Ranch. Then, the Ranch should ensure that all core services (e.g., group and individual sessions intending to reduce recidivism) are implementing these proven practices (see additional recommendations below).

Changes to the Ranch are not routinely piloted before they become a formal facility practice. Research indicates that effective programs observe a formal pilot period prior to implementing modifications as subsequent revisions are often difficult to make once a change has been formally instituted. Piloting is most successful when it is a regular and formalized process. Most large changes should be formally piloted to ensure they are rolled out with consideration to the facility.

- **Recommendation:** As new components are incorporated into the Ranch, a formal pilot period for each should be undertaken. For example, should the program add a new curriculum, this should first be piloted on one pod to evaluate the new material and how it would best be incorporated into the facility. Specifically, a formal pilot period of at least 30 days should be conducted to sort out content and logistics and identify any necessary modifications to be made. The pilot period should conclude with a thorough review of the changes, including youth and staff feedback, and review of relevant data. Following this review, the decision should then be made about whether to fully implement the new component with the appropriate revisions.

The facility has a lot of criminal justice stakeholders. Stakeholders include the probation department's administration team (e.g., Chief and Deputy Chiefs), the restorative justice PO, judges, attorneys, the Juvenile Justice Commission, and local law enforcement. While some of

these entities clearly support the mission of the ranch, there are concerns about the level of support others provide. For example, inconsistent placement decisions lead to inappropriate Ranch placements and/or returning of youth who have been unsuccessful in the program several times. There seems to be a disconnect between frontline staff and higher level administrators.

- **Recommendation:** The Chief, Deputy Chief of Institutions, and other key administrative staff should visit the Ranch regularly and interact with line staff. This would help to overcome the pervasive “out of sight, out of mind” perception. This will be key as the Redesign process begins and will serve as tangible endorsement of the work that happens at the Ranch.
- **Recommendation:** Quarterly Ranch meetings that include these key stakeholders (e.g., judges, attorneys, and others deemed necessary) should take place to ensure consistent communication and that there is a formal venue for discussing issues and joint problem solving.

Numerous issues with and/or related to funding were reported at The Ranch. While the funding level appears adequate, how the funding is prioritized and staff input into that prioritization need improvement.

- **Recommendation:** The Ranch Managers, in partnership with probation department leadership, UCCI, and the Multidisciplinary Implementation Team (MIT) should purposefully design the formal treatment program. This CPC report provides specific recommendations to support this process (e.g., additional treatment groups and services). Once determined, leadership should then calculate the needed personnel, curricula, training, supervision, and operational costs related specifically to service delivery (i.e., personnel, training, curriculum, workbooks, ongoing training, coaching, etc.) and work to ensure that the funding required to provide all of the treatment services needed to better align with evidence-based practices is allocated.
- **Recommendation:** When funding is limited and there are competing needs, the Ranch Managers and probation department leadership should factor staff opinion into the process for allocating how funds will be spent and share the decision making process to avoid assumptions and gaps in communication.

## STAFF CHARACTERISTICS

The Staff Characteristics domain of the CPC concerns the qualifications, experience, stability, training, supervision, and involvement of the staff. Certain items in this domain are limited to full-time and part-time internal and external providers who conduct groups or provide direct services to the youth. Other items in this domain examine all staff that work in the program. Excluded from this section in totality are the program directors, as they were assessed in the previous domain. In total, 51 staff were identified as providing direct services, including the PCs, POs, and staff from CBOs delivering pod-based groups or individual sessions.

### ***Staff Characteristics Strengths***

The CPC requires that 70% of direct service delivery staff have at least an associate's degree in a helping profession. At the time of the assessment, the Ranch staff far exceeded this requirement. In fact, 88% (45 of 51) of staff who completed the staff survey met the CPC indicator for education. Related, the CPC requires that 75% of direct service delivery staff have at least two years of working with justice-involved individuals. Again, the Ranch staff far exceed this requirement with 96% (49 of 51) of staff who completed the staff survey met this indicator. The Ranch should be commended for selecting such educated and experienced staff.

When hiring, the Ranch selects staff based on certain skills and criterion beyond solely education or experience. Staff are selected based on skills and values supportive of the Ranch's mission and values. Specifically, staff are hired based on their belief in change and recovery, ability to work with a difficult population, communication skills, ability to build rapport with youth, having compassion and empathy, and being youth-centered. Ms. Ugalde develops scenario-based interview questions based on the youth population at the time of the interviews to help gauge these characteristics.

Programs that have a formal mechanism in place for which staff are able to provide input into the how the program runs, demonstrate better outcomes than programs that lack this feature; however, research demonstrates that any programmatic changes brought about by staff input should be approved by the program director before changes are implemented. The totality of the site visit indicated that staff are able to provide input into the program. The Ranch Managers routinely seek input and ask for it through emails and twice a year town hall meetings. Additionally, both Program Managers have an open door policy for any needs and concerns. Changes to the Ranch have been made based on staff input including the pandemic staff schedule, a repeater was purchased so radio communications could be consistent across the campus, and long-term schedules were developed for staff.

The Ranch has a clear mission and values and it is apparent that there is support for the mission and treatment structure of the Ranch from staff members. Staff are clearly supportive of the mission of the Ranch and work to provide a positive experience for the youth.

Finally, staff members are required to adhere to the Ranch's documented ethical guidelines. These guidelines were found to support the mission of the program. These are outlined in the operations manual and include boundaries and interaction with youth.

### ***Staff Characteristics Areas in Need of Improvement and Recommendations***

Programs where all staff meet at least twice a month to discuss cases demonstrate better outcomes than programs that lack this feature. Prior to the pandemic, the Ranch was holding all-staff meetings each Wednesday that included pod specific time to discuss and review youth progress; however, even when these were running, not all pod staff participated in the meetings, nor did the CBO staff participate. At the time of the assessment, those all-staff meetings were no longer being held and few regular meetings were being held. For example, there is a bi-monthly Managers and

Supervisors (PSCs) meeting and some SPCs hold their own unit meetings. As a result, the Ranch does not currently meet this important CPC indicator.

- **Recommendation:** The Ranch should have meetings at least twice a month where all staff discuss each youth. Given that PCs are mostly tied to one pod, each pod should have their own bi-weekly meeting. Given the unique pandemic staffing schedule, this will be challenging to complete. Each supervisor may need to contact each staff during one of their shifts to ensure that the full picture of each youth is captured, or a form could be developed to capture feedback from staff who are not scheduled to work during the scheduled meeting. Staff should be held accountable for providing their feedback as needed. Feedback should be sought from all staff—county and contract—who interact with the youth. Post-pandemic, it is recommended that the all-staff weekly meeting be reconstituted in a format that is improved based on staff feedback so that it is seen as a valuable use of time.

Annual performance evaluations are not a current practice of the Ranch and have not been for many years. The available county form does not fit the needs of the Ranch and as such, this practice was abandoned long ago.

- **Recommendation:** Each staff member providing services and interventions to youth in the Ranch should receive an annual evaluation that includes a summary of direct service delivery skills. As a new annual performance evaluation process is mapped out, the forms developed should incorporate service delivery skills such as knowledge of the treatment intervention model and effective interventions, assessment skills and interpretation of assessment results, core correctional practices (see below in the Treatment Characteristics domain section for additional information on core correctional practices), modeling of new behaviors, behavioral reinforcements and sanctions, group facilitation skills, and the ability to build positive working relationships with youth. All staff, including CBO staff who deliver services at the Ranch need to be assessed annually with a form that examines these key service delivery elements.

Formal clinical supervision by a licensed clinical supervisor is not provided to staff at the Ranch. While the CBOs have their own processes for clinical supervision, pod staff are not provided supervision related to their treatment responsibilities. Given their role as agents of change, staff need to be supported in their use of group and individual interventions.

- **Recommendation:** Clinical supervision should be expanded to include all staff that run groups or meet individually with youth. A qualified and trained clinical supervisor who has a clinical license or certification should provide regular supervision. The Ranch can consider using one of the already contracted CBOs to provide clinical supervision or work with the county to identify a licensed clinical supervisor employed by the county. This supervision can take place in a group format, an individual format, or some combination of the two.

At the time of the site visit, the Ranch did not have a training process or policy in place that required all staff to receive training on the treatment model and curricula before being delivered.

As a result, there are staff delivering groups that have not received the proper training in CBI or the specific curriculum. The program relies on both classroom-based training and shadowing as an informal training mechanism. In addition, the CPC criterion for ongoing training requires that programs receive 40 hours a year of ongoing training related to evidence-based practices. The Ranch requires only 24 hours of annual training and almost all of the required hours are filled by safety, security, and procedural matters.

- **Recommendation:** All staff should receive training on the program model, program practices and training on curricula used. The program should adhere to the specific program manuals being implemented as to whether or not they require certification to use, as shadowing other facilitators is generally not a sufficient means of training staff on adherence to evidence-based manuals. For example, TPS is a derivative of Aggression Replacement Training® (ART), and ART requires staff be trained and certified before delivering the curriculum. The Ranch should make sure all staff delivering any curriculum receive formal training and certification if necessary.
- **Recommendation:** All staff should receive at least 40 hours of ongoing training each year. The majority of these hours should be directly related to delivering criminogenic services to youth involved in the justice system and include a review of the principles of effective intervention, behavioral strategies such as modeling and role play, the application of reinforcers and punishments, risk assessment, group facilitation skills, case planning, and updates to the field of offender rehabilitation.

While outside of the scope of the CPC, the assessors would like to bring up an important issue that was apparent during the assessment process. Overall, morale is very low at the Ranch and the culture has suffered over the past few years. While the Ranch Managers are aware of the contributing issues, the focus over the last year has been almost solely on the pandemic. Now that pandemic related changes have been made and are normalized, effort can be made to focus on morale and culture. Overall, each set of staff (e.g., pod staff, education, supervisors, managers, treatment, aftercare, and reentry) are focused on their own tasks and priorities and this has led to silos and lack of communication, collaboration, and of a clear direction of where the Ranch is heading and how all of these elements fit together.

- **Recommendation:** Department leadership and facility administration should focus on the institutional culture which will affect morale. Security, school, and treatment need to be equally prioritized and staff should be made aware of how they complement one another. Some of the recommendations related to hiring and training of staff (e.g., Core Correctional Practices [CCP] training) will assist with this. Also needed however, is accountability and ensuring staff are each living up to their portion of the mission and supporting other staff in successfully fulfilling theirs. This requires supervisors, managers, and administrators to listen to concerns from staff, be on the unit regularly with staff, and for them to provide staff with feedback and coaching. To do this, the administrative team will need to ensure supervisors and managers have adequate time in their schedules to serve as coaches and mentors.

## OFFENDER ASSESSMENT

The extent to which youth are appropriate for the services provided and the use of proven assessment methods is critical to effective correctional programs. Effective programs assess the risk, need, and responsivity of youth, and then provide services and interventions accordingly. The Offender Assessment domain examines three areas regarding assessment: 1) selection of youth; 2) the assessment of risk, need, and personal characteristics; and (3) the manner in which these characteristics are assessed.

### *Offender Assessment Strengths*

The use of effective risk, need, and responsivity assessment tools is an essential component of effective intervention for all participants involved in the juvenile justice system. Risk assessment tools are a vital aspect of EBP because these assessment scores assist in determining which clients are suitable for services, determining duration of services, and determining the intensity of treatment services. Needs assessment scores are also crucial as they determine which criminogenic need areas youth have, whereas responsivity assessments assist in determining youth's possible barriers to treatment (i.e., mental health concerns, trauma histories, low motivation for treatment, learning or education barriers, to name a few). Each Ranch youth is assessed with the Juvenile Assessment and Intervention System (JAIS) by a PO prior to their placement at the Ranch. The JAIS is a standardized risk and needs assessment.

Effective correctional programs assess a minimum of two responsivity characteristics to ensure that individual level factors that can interfere with interventions are addressed. Starlight staff complete a biopsychosocial assessment that includes the Child and Adolescent Need and Strengths (CANS) and Pediatric Symptom Checklist (PSC-35). The CANS and the PSC-35 are both effective responsivity assessments as they cover many behavioral and medical health indicators.

The Ranch should be commended for prioritizing higher risk youth for placement into the program. The 2019 Annual Report presented statistics that only 10% of the youth housed at the Ranch are low risk to recidivate. Adhering to the risk principle is a key component of providing an effective program.

### *Offender Assessment Areas in Need of Improvement and Recommendations*

While the Ranch has written inclusionary and exclusionary criteria, the Ranch rarely refuses a placement of a youth and the criteria are neither consulted nor used as a reason for excluding a youth. As a result, the Ranch receives a substantial number of youth who are deemed by staff as not appropriate for placement. The estimated percentage of inappropriate clients ranged from 5% to 50% with the reported concerns being that some youth have significant mental health concerns, some youth have low cognitive abilities which limits their education and therapeutic treatment options, and that some youth have needs beyond staff capability and staff are forced to spend 80% to 90% of their time focused on one youth.

- **Recommendation:** The Ranch should revisit the set of exclusionary criteria and ensure that relevant clinical, demographic, and legal criteria are included. These should be revised with stakeholder and staff input.
- **Recommendation:** Once finalized, stakeholder and staff education should take place to ensure that referrals from the bench, attorneys, and probation fit the criteria. When a youth is referred who does not fit a criterion, a process for discussion of where the youth's needs could be best met should take place between all needed parties (e.g., lawyers, judges, probation, Ranch staff, treatment staff, parents, etc.).
- **Recommendation:** As the new criterion are rolled out, the Ranch should track the number of youths rejected and the reasons why. After the new criteria have been in place for six months, Ranch leadership should talk with staff to determine if the rate of inappropriate youth falls below the 20% threshold on the CPC.

The facility serves specialized populations, including substance abuse, sexually-abusive behavior, and violent behavior. These types of youth need additional assessments. While Starlight completes an ASAM-based assessment, no standardized and validated tools are used to more specifically assess youth with these types of offenses or needs.

- **Recommendation:** For each specialized type of youth served, additional needs assessments should be completed to more fully understand the needs presented and how to best provide treatment interventions.
  - For substance use, one of the following assessments could be used: Juvenile Automated Substance Abuse Evaluation (JASAE), Substance Use Survey (SUS) or the Adolescent Self-Assessment Profile (ASAP).
  - For youth who engage in sexually abusive behavior, the Ranch should consider using the Juvenile Sex Offender Assessment Protocol (JSOAP).
  - To fully assess violence, the Ranch should consider using the Structured Assessment of Violence Risk in Youth (SAVRY).

As noted above, Starlight staff complete the CANS and PSC-35 and these are both effective responsivity assessments. However, Ranch staff are currently not provided access to these assessments and cannot use them to help make decisions at the individual youth level.

- **Recommendation:** The Ranch Managers and Probation department leadership need to work with Starlight leadership to ensure that all assessments—those conducted by probation, at the Ranch, or those conducted by Starlight—are freely shared and used by staff to ascertain the full picture of each youth and to help make the best decisions for each youth. Sharing of risk, need, and responsivity assessments needs to be a routine practice across the different entities involved in Ranch services.
- **Recommendation:** The Ranch Managers and Probation department leadership should meet with the non-Starlight CBOs providing services at the Ranch to determine if any additional assessments are being conducted and ensure that this information is shared and factored into treatment planning for the youth.

## TREATMENT CHARACTERISTICS

The Treatment Characteristics domain of the CPC examines whether the facility targets criminogenic behavior, the types of treatment (or interventions) used to target these behaviors, specific intervention procedures, the use of positive reinforcement and punishment, the methods used to train youth in new prosocial thinking and skills, and the provision and quality of aftercare services. Other important elements of effective intervention include matching the youth's risk, needs, and personal characteristics with appropriate programs, intensity, and staff. Finally, the use of relapse prevention strategies designed to assist the youth in anticipating and coping with problem situations is considered.

### *Treatment Characteristics Strengths*

To reduce the likelihood that youth will recidivate, characteristics associated with recidivism (criminogenic needs) must be targeted. The Ranch offers services that target criminogenic needs in numerous areas, including thinking, triggers, coping skills, substance use, aggression, peers, behavior, family, moral reasoning employment, education, gangs, and communication. Overall, the facility is targeting at least 50 percent of their treatment efforts on criminogenic need areas.

Successful justice-involved programs should provide services between three and nine months in length, and should not exceed 12 months (not including aftercare). Currently, the Ranch program lasts between six and eight months, with an average time in the program around six and half months. This average length of stay is shorter than normal as youth are being fast-tracked for release due to the pandemic.

Every youth at the Ranch is in some form of treatment. Further, youth who do go into the community (e.g., restorative justice activities and appointments), are always staff escorted. For youth who go home or into the community on furlough, proper procedures are in place to ensure that youth are engaging in prosocial activities while on furlough. preparation work is completed in various family contacts to ensure proper monitoring at home. This preparation work includes the Aftercare PC completing a family orientation and contacts as needed and Starlight staff who complete up to three family sessions as needed. In total, three formal family contacts must occur prior to furlough. Additionally, the Aftercare PC and Reentry PO check on the youth while on furlough, and the youth is screened upon return to the Ranch. While furloughs were not occurring at the time of the assessment—due to the pandemic—a sufficient process to monitor youth exists for when this activity ramps back up.

The CPC requires that while incarcerated, youth spend at least 40 percent of their time per week in structured tasks (i.e., 35 hours). Youth at the Ranch are busy during the day Monday through Friday, with approximately two to three hours of free time each day. Youth who are not in school participate in vocational programming during typical school hours. While there is more flexibility on the weekends, youth are always supervised by staff, and prosocial behavior is expected.

The county and Ranch staff have developed policy, procedural, and treatment manuals for staff to follow. These manuals are in hard copy and electronic formats. These manuals are comprehensive and outline the major components of the program. Related, all treatment groups are conducted by

direct service delivery staff (e.g., pod and behavioral health staff) from beginning to end; youth do not run groups without the supervision of staff. Group sizes are also appropriate and fall within the guidelines required on the CPC both pre- and during the pandemic. Pre-pandemic, group sizes were 12 with two facilitators and during the pandemic, groups are run with eight youth with two facilitators.

The facility has developed a range of appropriate rewards—verbal praise, privileges by program phase, passing their week, and other rewards staff can issue such as an extra phone call or extra time on a phone call, snacks, candy, and activities. Similarly, appropriate sanctions, including verbal warnings, removal of television, radio, or video games, court review, aftercare extension, and administrative Ranch reviews (ARR) where youth are sent to the hall for a set number of days. At the time of the assessment, ARR were not in use due to the pandemic.

The Ranch design includes an Aftercare Phase, or component. Prior to the youth leaving the Ranch, a 60-day MDT is completed so that the most appropriate services in the community are identified and lined-up and a 30-day MDT takes place to ensure everything is in place for the Aftercare Phase. During the 10-weeks of aftercare, the youth works with a CBO based on the needs identified by the MDT. Generally, the CBO assignment includes a case manager and counselor or therapist. During this time, they also have an Aftercare PC and a Reentry PO. As such, supervision and treatment are occurring during the Aftercare and Reentry Phases.

### ***Treatment Characteristics Areas in Need of Improvement and Recommendations***

To further reduce the likelihood that participants will recidivate, the ratio of criminogenic needs targeted to noncriminogenic needs should at least be 4:1 (80% criminogenic). As mentioned above, although the program targets a number of criminogenic needs, it also targets a number of noncriminogenic needs. These include mental health, boundaries, exercise, self-esteem, gender responsiveness, respect, and victim awareness. The ratio of criminogenic to noncriminogenic needs targeted at the Ranch is approximately 60%. As such, while the amount of services and interventions provided at the Ranch surpasses the 50% ratio of criminogenic to noncriminogenic needs, the amount of time does not meet the 80% ratio. The emphasis of programming should greatly favor criminogenic needs as these are most likely to reduce recidivism.

- ***Recommendation:*** To increase the emphasis on criminogenic targets, the Ranch staff should enhance the topics in the group and individual sessions to focus on the already identified core criminogenic needs and reduce the time spent on noncriminogenic needs. The pod-based TPS group should be run regularly and as designed and youth should be practicing prosocial skills during these groups. Further, additional treatment groups should be offered to target key criminogenic need areas (i.e., attitudes, values, and beliefs; peer associations; and personality characteristics like impulsivity and coping skills) through a core curriculum like Thinking for a Change (T4C) or the Cognitive-Behavioral Interventions – Core Youth (CBI-CY). Finally, youth who move through intensive treatment should be provided advanced practice opportunities throughout their length of stay. These advanced practice opportunities should focus on high risk situations that youth may face on furloughs and in the community when they are released.

Effective programs include case planning as a technique to assist with the change process, and youth should play an active role in its development. According to the research on EBP, case plans should be derived from standardized risk, need, and responsivity assessments, include targets for change, goals and objectives, timeframes for completion, and metrics for measuring progress. At the time of the assessment, there were three different case plans throughout a youth's length of stay. First, youth are provided a case plan by their PO prior to Ranch entry. Second, youth have a Starlight treatment plan completed by their Starlight counselor after intake into the Ranch. Third, the Ranch just started developing a case plan based on the Individual Service Plan (ISP) that is completed by their pod-assigned PC. It should be noted that the Ranch ISP with a case plan is a brand new process and the assessors were not able to see an example of the case plan derived from the ISP. These three different processes are a duplication of efforts that seems to confuse the youth as to what they should be working on during their time in the Ranch Program.

- **Recommendation:** One case plan should be developed for each youth that is derived from the JAIS and other standardized assessments (e.g., a substance use assessment). These plans should be developed in conjunction with the youth, their PC, Starlight counselor, Aftercare PC, and Reentry PO. This could be included as part of the intake MDT for each youth. Youths should be informed of their assessment results and have a say in their case plan. All staff working with that youth should be assisting the youth in completing the elements on the case plan. As such, the plan should be routinely updated as needed during the whole length of stay. Success in meeting the case plan goals should be factored into how each youth is progressing in the program.

The Ranch was originally based on the Missouri Model and incorporated CBI as the main type of treatment. When the county explored the possibility of using the Missouri Model, numerous staff traveled to see the model in practice and then retained the elements that would work for the county. As a result, the Ranch was a localized version of the Missouri Model. While CBI was noted as the main treatment approach, an eclectic approach that uses pieces of CBI, psychoeducational, motivational interviewing (MI), strengths-based, trauma-based, and engagement/relationship building was being used at the Ranch. At the time of the assessment, the primary modality of treatment was observed to be a combination of psychoeducational, process, and advice giving with limited CBI. In addition to what was reported and available in the manuals, the assessors observed multiple group sessions where the primary treatment approach was unclear and/or did not follow the curriculum the facility has adopted. To illustrate some of the concerns with the current treatment, we offer the following observations:

1. As noted elsewhere in this report, the TPS group design is based loosely on ART. However, some of the main pieces of what makes ART effective are not being conducted in the current TPS format. For example, each Pod is running TPS differently and modeling and practicing are not being done consistently or to fidelity.
2. Outside of TPS and ACRA, there is a lack of evidence-based curricula targeting criminogenic needs in use at the Ranch.
3. In individual sessions at the Ranch, staff can use any techniques that they are trained in/comfortable with using, with no clear parameters or guidance about the treatment model that should be used.

4. Each youth is assigned a PC from their pod who is responsible for regularly checking in with that youth. However, the PCs have not been trained in this regard, nor are there clear guidelines for what these sessions should look like. This time should be used to reinforce the new thinking and new behaviors that have been learned in group and individual sessions.

To ensure that effective interventions are being used throughout all the Ranch components, an overarching evidenced-based intervention modality should be adopted, and all group and individual sessions should be consistent with the program model. Modalities such as cognitive-behavioral or structured social learning have been shown to be effective at reducing recidivism among youth involved in the juvenile justice system. The Ranch should make enhancements to include regular cognitive restructuring and structured skill-building throughout a youth's length of stay. We offer several recommendations to help ensure a coherent treatment approach is used throughout all of the services delivered to youth.

- **Recommendation:** The evidence-based curricula that are already in use should be formally taught to staff that are expected to run them, and staff should be provided feedback and coached to enhance their service delivery.
- **Recommendation:** All current and any future curricula should be thoroughly vetted for CBI techniques. The International Community Corrections Association (ICCA) has developed a checklist that may assist in this regard. *This checklist will be provided during the redesign component of this work.* Additionally, Ranch staff can access Crime Solutions (<https://crimesolutions.ojp.gov>) and OJJDP's Model Blueprint Guide (<https://ojjdp.ojp.gov/model-programs-guide/resources#07byc>) to explore effective and promising programs.
- **Recommendation:** Current curricula could be supplemented to ensure that the cognitive-behavioral approach is included. This would require developing cognitive-behavioral activities to supplement the curriculum where they are not already included. For example, sessions that deal with motivation for change could include teaching, practicing, and the application of a cost-benefit analysis. Sessions that explore how thinking drives behavior can include teaching, practicing, and applying the ABC model. Sessions that deal with triggers and coping skills can include specific social skills from Skills Streaming the Adolescent that the Ranch team deems useful. By the end of active treatment, youth should have mapped out their high risk situations and developed new thinking and new coping skills for each of the likely high risk situations. This is referred to as a success plan or relapse prevention plan. Youth should have to demonstrate that new thinking and behavior in group, on the pod, and in individual sessions. The staff at the Ranch may also wish to replace non-CBI curricula with ones with more behavioral aspects. Some examples include T4C or Cognitive-Behavioral Interventions for Substance Use for Youth (CBI-SUY).
- **Recommendation:** Once a youth has completed a service (e.g., complete the full round of TPS or the 14 weeks of ACRA), that youth should not have to repeat the service unless there is a clear need to attend it again. As such, advanced practice groups should be created for youth that have completed the main treatment components but need additional treatment services. As determined by the MIT, this element may be included in the redesign

efforts. The purposes of these kinds of groups is to take all of the skills and concepts a youth has learned and ensure they can use different coping by thinking and different coping by doing skills in realistic high risk situations.

While there are manuals that map out Ranch policies, procedures, and treatment groups, these manuals are not being closely followed. Overall, staff have enormous leeway in what they do in group and when they do it (e.g., staff can pick which parts they want to use and supplement with any activities you want) and in their individual sessions. Not following the manual or significantly altering the curriculum affects fidelity which can impact the effectiveness of the program.

- **Recommendation:** The Ranch staff should consistently follow the manuals provided at the facility level and for the interventions, using the material provided by the manual. This is important because manuals guide the intervention process, provide examples, give homework, etc. Moreover, evidence of intervention impact is based on fidelity to the program.

While the JAIS is conducted, it is not used at the Ranch. As a result, facility staff are placing low risk youth in services with youth who are at moderate and high risk to recidivate. Effective correctional programs inform service delivery using the risk, need, and responsivity levels of the youth. For example, effective programs are structured so that low risk youth have limited exposure to their higher risk counterparts. Research has shown that mixing low risk youth with moderate- or high risk youth can increase their risk of recidivism. Low risk youth may be negatively influenced by the behavior of high risk youth, thereby increasing their risk of recidivism. According to the current data provided by RaD, the percentage of low risk youth is approximately 10% of the Ranch population.

- **Recommendation:** An updated JAIS should be required for placement at the Ranch. The Ranch should give preference to moderate and high risk youth and attempt to screen out low risk youth. If low risk youth are accepted into the facility, they should be housed in a separate pod and should not be mixed with moderate and high risk youth. Since the facility routinely receives serious crime delinquents who have the potential to be low risk, the main risk assessment and the specific risk assessment tools (e.g., JAIS, JSOAP, SAVRY) for this population should both be rated as low risk to meet this low risk qualification.

The Ranch should also vary the dosage (i.e., the number of hours of services) and duration of services according to each youth's risk level. As the facility does not use the JAIS risk level to make decisions, the facility cannot provide more intensive services to higher risk youth. We know that youth who are at higher risk for recidivism by definition have more criminogenic needs, and these youth should be required to attend additional services, informed by the needs identified on the risk and need assessment tools. Types of services that can count toward dosage include interventions targeting a criminogenic need area using an evidence-based approach. Based on the treatment groups observed, very little of the current hours of services would currently count toward dosage. To demonstrate, groups do not use CBI/follow the manualized curricula, groups routinely start late and end early, and there is no expectation that youth have to participate in services (e.g., they can pass on role plays). In the current treatment structure (i.e., groups four times a week, unit

staff check-ins, and individual sessions with Starlight staff), this equates to a maximum of 20 hours per month for dosage that could take place.

- Recommendation:** Overall, the research indicates that youth who are at moderate risk to reoffend need approximately 100 to 150 hours of evidence-based services to reduce their risk of recidivating, and high risk youth need over 200 hours of services to reduce their risk of recidivating. Very high risk youth with multiple high-need areas may need 300 hours of evidence-based services. Only individual sessions, case management sessions, and groups targeting criminogenic need areas (e.g., antisocial attitudes, values, and beliefs, antisocial peers, anger, self-control, substance abuse) using an evidence-based approach (i.e., cognitive, behavioral, cognitive-behavioral, or social learning) can count toward the dosage hours. As stated above, the facility can proactively plan for different treatment dosages based on risk level to ensure that service intensity varies upon risk and need levels. To illustrate, **Track A** (a specific pod) could be reserved for those who are low risk. The youth in Track A would have less requirements for treatment services, and the Ranch should ensure that these youth receive as little services as possible while still addressing key need behaviors (e.g., if the youth is high need for substance abuse treatment). The overall hours and the time spent in the Ranch should be shorter for these individuals (i.e., three to four months) as well. **Track B** (specific pods) could then be reserved for moderate risk youth. The Ranch would then design this track to provide group and individual sessions at the Ranch for approximately four to six months and aim to deliver between 100 to 150 hours. Finally, **Track C** (specific pods) could be reserved for high risk youth. These individuals would receive the highest intensity and length of services—over 200 hours and over the course of six to eight months. The Ranch should develop these parameters and educate stakeholders about the new processes. Should youth not be approved to leave the facility after their treatment track completes, they could be moved into separate housing that offers less intensive booster sessions so they can maintain the skills they have learned.

Furthermore, youth needs and responsivity factors like personality characteristics or learning styles should be used to systematically match each youth to the most suitable type of service and staff. The facility does assess for needs using the JAIS and uses multiple responsivity assessments (discussed above). At the time of the assessment, need and responsivity assessments are not routinely used in matching youth to the specific services they receive, the staff they are assigned, or the pod in which they are housed. Pod placement is based on factors such as age, size, gang affiliation, and cognitive ability. Concerning pod staff, the PC assignment is based on numbers for most of the pods. Additionally, need and responsivity assessment results are not formally used to place youth in the groups they receive. To illustrate, every youth gets every group (e.g., TPS, ACRA) no matter what the assessments state and there are some concerns with this current process. First, youth who do not have a substance abuse problem are required to participate. Second, youth repeat groups even though a need has already been addressed. Third, even if only one youth needs something, the whole pod receives the service. As such, the facility is not assigning youth to Starlight staff, pod staff, or groups/services that match best with their needs *and* their style of learning and other responsivity factors.

- Recommendation:** Results from standardized criminogenic need and responsivity assessments should be used to assign participants to different treatment groups and staff. To illustrate, participants who are highly anxious should not be placed in highly

confrontational groups or with staff who tend to be more confrontational. Likewise, participants who lack motivation may need their motivation issues to be addressed first before being assigned to a service that targets their beliefs and teaches skills. Youth should be matched to each of the services they receive and staff they are assigned to by using the results from the need and responsivity assessments.

The Ranch staff are assigned to the services they deliver based on job title and cases are mostly assigned based on caseload staff. For example, pod staff all run TPS groups. As a result, the staff have very little choice about which groups they run or which youth they work with, as it is based more on the needs of the facility. Great variability in the quality of the pod-based groups exist. One of the barriers in this area is the bidding system. If pods become more specialized, staff should be selected to work on those pods based on their skill sets and the current system does not permit this.

- **Recommendation:** Staff should be assigned to programs/groups/youth based on their skills, experience, education/training, and interest. For example, only those staff certified formally trained in TPS should run TPS. If the bidding system does not allow for this to happen, then the Ranch should consider adapting the process around who facilitates groups.

At the time of the assessment, youth input was not actively being sought. Programs that obtain participant input into the structures and features of the program are more effective than those that don't. Unlike staff input, the CPC requires a formal process for this youth input. While a Youth Advisory Council (YAC) is planned to begin soon, it was not in place at the time of the assessment.

- **Recommendation:** As planned, the Ranch should move forward with starting the YAC which will ensure that youth have a formal voice into the program.

As noted in the strengths section above, the Ranch has identified good rewards. However, they are not being applied consistently, and there is great variation within and across pods. It was noted that staffing shortages due to the pandemic have been a big concern with application of the behavior management system. For example, staff are not formally trained in the application of rewards. Additionally, some of the elements included as rewards are not able to be applied due to the pandemic. Furthermore, reinforcement is most effective when the reinforcer occurs immediately following the desired behavior and when that behavior is clearly linked with the reinforcer. While some staff do immediately point out desired behavior, they do not link the behavior and the reinforcer. Finally, the research is also clear that rewards need to outweigh negative consequences (i.e., punishments) by a ratio of 4:1. Based on the totality of information received and observed during the site visit, the Ranch is falling well short of the 4:1 to ratio required by the CPC.

In addition to appropriate rewards, a good behavior management system has a wide range of negative consequences or sanctions available to promote behavioral change. At the time of the assessment, the Ranch had established a range of punishments (see above in strengths). However, ineffective punishments were also being used. These include inappropriate verbal reprimands and shaming techniques (e.g., yelling). Of note is that most punishments available to staff focus on compliance and control, and do not focus on long-term behavioral change. Staff are also not trained

on how to properly administer effective negative consequences. For example, there is no formal policy concerning negative effects that may occur after the use of punishment. Policy and training should alert staff to issues beyond emotional reactions such as aggression toward punishment, future use of punishment, and response substitution.

The CPC recommendations regarding a behavior modification system are designed to help the facility fully use a cognitive-behavioral model.

- **Recommendation:** Training in effective reinforcement, disapproval, and issuing sanctions should be provided to each staff during their Ranch orientation. Further, booster trainings should take place as well to ensure staff are using reinforcement, disapproval, and authority effectively. The CCP training that is currently being scheduled will assist with this recommendation.
- **Recommendation:** Reinforcers should be monitored to ensure they are being consistently applied, administered as close in time to the desired behavior as possible, and that staff link the reward to the desired behavior. All staff, regardless of their role, should administer rewards as appropriate.
- **Recommendation:** The Ranch should strive to achieve a 4:1 ratio of reinforcers to punishments to encourage desirable behavior.
- **Recommendation:** The use of yelling should be discontinued immediately. When inappropriate sanctions are used by staff, staff should be held accountable. For negative consequences or punishments to achieve maximum effectiveness, the following criteria should be observed : 1) escape from the consequence should be impossible; 2) applied at only the intensity required to stop the desired behavior; 3) the consequence should be administered at the earliest point in the deviant response; 4) it should be administered immediately and after every occurrence of the deviant response; 5) alternative prosocial behaviors should be provided and practiced after punishment is administered; and 6) there should be variation in the consequences used (when possible).
- **Recommendation:** All staff should be trained in the behavior management system and be monitored to ensure they are using the system consistently and accurately. This training should include the CCPs of effective reinforcement, effective disapproval, and effective use of authority (noted above in the Staff Characteristics domain). Staff should understand that punishment may result in certain undesirable outcomes beyond emotional reactions and be trained to monitor and respond to these responses. Policy and training should alert staff to issues beyond emotional reactions such as aggression toward punishment, future use of punishment, and response substitution.

The facility has not yet established criteria that clearly outline the completion criteria for the treatment program (i.e., when the treatment successfully terminates for each offender). The Ranch termination is currently based mostly on time. As a byproduct, progress in acquiring prosocial behaviors, attitudes, and beliefs is not evaluated as part of this process and youth are not differentially discharged from the facility. There is no real distinction between youth who are

successful in treatment, youth who reach maximum benefit, or youth who are unsuccessful with their treatment. According to the FY2019 annual report, the successful completion from the Ranch phases (Orientation, Change, Growth, and Transition) was approximately 79%. However, with the pandemic, most youth successfully complete this portion—for CY2020, 45/47 (96%) completed on time or early. Once youth are in the community (Aftercare and Reentry Phases), that percentage of youth who successfully complete falls to 38%. Both of these rates fall outside of the 65% to 85% range required by the CPC.

- **Recommendation:** As the program develops its comprehensive treatment program, benchmarks should be set as to when youth can complete the in-custody and community portions of the Ranch program. Benchmarks can include attendance and participation standards, scores on pre- and post-testing, meeting a certain percentage of objectives from their case plan, or formal reassessment of offender risk and needs.
- **Recommendation:** Once the Ranch delineates completion status, it should monitor its successful completion rate, which should range between 65% and 85%, indicating that youth do not indiscriminately complete or get terminated from the program.

If correctional programming hopes to increase participant engagement in prosocial behavior, participants have to be taught skills in how to do so. At the time of the site visit, very little of the group and individual services incorporated cognitive restructuring or structured skill building (i.e., skill modeling, participant practice, and graduated practice). These should be a consistent practice at the Ranch and used in individual sessions and groups.

- **Recommendation:** Youth should be taught to restructure their unhelpful thinking to assist them in making prosocial decisions. Specifically, they should be taught how to identify, challenge, and replace their unhelpful thinking across program targets. As Ranch staff select new curricula to include in programming, staff should ensure that they include this component. All staff should incorporate cognitive-restructuring techniques in their discussions/meetings/sessions/groups even if the curricula do not already call for them. To illustrate, if during group check-in, a youth reports a situation, the conversation should center around what the youth was thinking prior to them responding to the situation. If the thinking was leading them to a positive behavior or outcome, praise should be provided. If the thinking was leading them to a risky behavior or negative outcome, that thinking should be challenged and replaced.
- **Recommendation:** Structured skill building should be routinely incorporated across the service elements. Staff should be trained to follow the basic approach to teaching skills, which includes 1) defining skills to be learned; 2) obtaining youth buy-in as to the importance of the skill; 3) staff teaching the steps of the skill; 4) staff modeling the skill for the youth; 5) youth rehearsal of the skill (role-playing); 6) staff providing constructive feedback to youth on their use of the skill; and 7) generalizing the skill to other situations (e.g., homework or advanced role plays). Following this, youth should practice the skill in increasingly difficult situations, which forms their advanced practice noted above. The identification of high risk situations and subsequent skill training to avoid or manage such

situations should be a routine part of programming. All staff members should use these steps consistently and provide constructive feedback to the youth.

At the time of the assessment, some services for family were provided. In addition to family participation in the MDTs, if the family is willing, family counseling sessions are available through Starlight and other CBOs. As designed, the PCs are also supposed to have three contacts with the family prior to the furloughs. Since the furloughs are not taking place, these contacts are not routinely occurring. The CPC requires that significant others (e.g., family and/or friends) receive training to provide structured support to youth. Services should formally train family members to support the youth in making prosocial decisions using skills and concepts they have been taught in the Ranch.

- **Recommendation:** The Ranch should include a formal family (i.e., caregiver) component. The family members (or other prosocial supports) should be formally trained to provide support to the youth. These individuals should learn the skills and techniques that the youth acquired in the Ranch to understand the language of the curricula and support the youth's progress in the community. They should also learn how to communicate effectively with the youth and to identify risky situations and triggers to aid in reintegration. In order to increase the likelihood of family participation, the Ranch may need to incentivize participation in this important effort. Sessions can be delivered in person or virtually and can also be held individually or in a group format. Additionally, given that three contacts are required prior to furlough, these training sessions can take place as part of those pre-furlough preparation sessions.

The facility has developed some discharge planning components. Pre-release MDTs occur 60- and 30-days pre-release. However, the Ranch staff most familiar with the youth do not get to determine what is included in the plan. Instead, that is left to a Reentry PO who has had little contact with the youth at the point the decisions need to be planned. The transition planning that is completed for each youth ensures that all youth step down to another program or additional services. As part of this process, the MDT team walks away with their own individual to do's to help prepare the youth for return to the community. However, a formal discharge plan is not developed and shared with the youth.

- **Recommendation:** Formal discharge plans should be developed for each youth that helps map out the Aftercare Phase requirements and how the youth will meet those elements. The planning should include the youth, the caregiver, the main PC and Starlight assigned staff, and the Aftercare PC. If it all possible, the Re-Entry PO should also be included since there should be continuity between the Aftercare plan and the Re-Entry plan. The plan should include formal referrals to services, progress in meeting target behaviors and goals from the case plan, and areas in need of continued work.

## QUALITY ASSURANCE

This CPC domain examines the quality assurance and evaluation processes that are used to monitor how well the program is functioning. Specifically, this section examines how the staff ensure the program is meeting its goals.

### ***Quality Assurance Strengths***

The Ranch has some established internal quality assurance practices. To illustrate, The Ranch provides regular feedback to youth during their time in the program. This is done by rating the youth on meeting or failing their weeks. Once in the community, regular sessions with their Aftercare PC, their Reentry PO, and then their regular PO allow for this feedback process.

Recidivism for the Ranch is tracked by the RaD and can be pulled and examined as needed. Yearly, there is a report that shares this information and is available to anyone who wants to read the report. According to the 2019 annual report, the recidivism rate was 55%.

Lastly, for strengths, the county has the RaD, which has allocated one staff person to the assist the Ranch with accessing data as needed. This means that someone trained to conduct evaluation is available to assist the Ranch as needed in examining data and using data to make informed decisions.

### ***Quality Assurance Areas in Need of Improvement and Recommendations***

In addition to providing youth regular updates on their progress in the program, two other elements are considered essential to a solid internal quality assurance process. First, formal observation of services (both groups and individual) with feedback provided to all of the staff who offer services in the facility should be a routine practice. Formal group observation rarely occurs for any group facilitators. Second, file review should be conducted to help ensure that services are of high quality—not solely as yes or no that the services are being conducted.

- ***Recommendation:*** A formal file review process should take place on a rotating basis to ensure that services are of high quality. For example, reviewing behavior logs, ISPs/case plans, treatment notes, etc. This can be conducted by supervisors, a peer review process, or some combination of the two types. Areas in need of improvement based on this review should be used to provide ongoing training and supervision to staff.
- ***Recommendation:*** The Ranch Managers, SPCs, or their designees, should be allotted time to observe all staff delivering services in both group and individual formats. This process should allow for feedback and coaching and help to ensure high-quality services are delivered. These observations can also help enhance the feedback provided to employees on an annual basis (see the Staff Characteristics section) and provide topics for clinical supervision meetings and ongoing trainings. Observation should occur once per quarter or once per group cycle for each staff in each service category.
- ***Recommendation:*** The facility should look at all pod staff to identify which have the interest and skills to provide group interventions and which have the interest and skills to provide individual services. After they have been trained in group facilitation, group management, and whichever curricula they are going to deliver, and the expectations for working individually with youth have been set (i.e., length of meeting, meeting topics, and techniques as described above), the facility also needs to develop a pool of coaches who are trained to observe and coach staff. This can be done by using Ranch staff, or other

county or CBO staff as long as they are properly trained. Some facilities have found that dedicating one or two employees to quality assurance practices like these helps increase the consistency of the feedback. These staff should observe group and individual sessions once per quarter or once per group cycle for each staff in each service category.

The facility does rely on some CBOs to deliver services. While there are staff dedicated to monitor these programs, they are tasked mostly with contract compliance and not with ensuring the services provided are of high quality.

- **Recommendation:** The Managers, SPCs, and programs staff should be allotted time to formally oversee these outside providers to ensure that the services being provided are of high quality. This can be conducted by monitoring the groups/sessions regularly, by requiring that each provider submit a regular progress report that is reviewed, or through a regular and consistent file review process. Whichever format is chosen, it must be done on a regular basis, and a summary report of the findings should be developed.

Currently, the RaD conducts a survey of youth every six months and these results are analyzed, and examined. Based on the last survey, three elements were noted as needing improvement and a committee worked to fix the issues. While this is very beneficial, the survey does not include satisfaction with the treatment services, rather it is an institutional rights type of survey mandated by the state.

- **Recommendation:** There are numerous ways the Ranch can achieve this item and the assessors have included the two easiest ideas here. First, Ranch staff could develop and include satisfaction type of questions to include in the bi-annual rights survey. This would fit nicely into an already existing process. Alternatively, Ranch staff can develop an exit survey that a youth would complete at two times: once at release into Aftercare, and once at the end of their probation term (after the Reentry Phase) that can pick up indicators specific to satisfaction with both the in-custody and community portions of the program. Satisfaction with elements like treatment, school, vocational programs, activities, behavior management, and other program essentials should be collected.

The program does not have a periodic objective and standardized reassessment process to determine if youth are meeting target behaviors.

- **Recommendation:** The Ranch should formalize a periodic reassessment process in which objective, standardized reassessment takes place. This can include pre- and post-testing using the JAIS or other standardized risk or need assessment tools that may be adopted. Having a subjective assessment (e.g., professional judgement) is not sufficient to meet this requirement. Monitoring progress through a detailed treatment plan in which changes in the plan occur on a regular basis is sufficient to meet this criterion; however, as noted above, client case plans are not being constructed based on assessed needs. To meet this criterion, case plans would need to be developed based on assessments, individualized, and updated regularly.

The program also has not undergone a formal evaluation comparing its treatment outcomes (recidivism) with a risk-control comparison group. The CPC requires a formal outcome evaluation with proof that the program is able to reduce recidivism.

- **Recommendation:** The Ranch should either internally conduct a risk-controlled comparison study or hire a local university or non-profit to assist this task. In order to meet CPC criterion, the study needs to include a like comparison group and compare the recidivism rates for the treatment group (i.e., Ranch youth) and the like comparison group (i.e., youth who do not go the Ranch). A report should be provided to the Ranch that includes an introduction, methods, results, and discussion sections. Additionally, this study should evidence positive outcomes for the Ranch youth compared to the comparison youth. A risk-controlled comparison study should be undertaken every 5 years to measure changes over time.

## OVERALL PROGRAM RATING AND CONCLUSION

As mentioned previously, the CPC standards represent an ideal program. No program will ever score 100% on the CPC. Based on the assessments conducted to date, programs typically score in the Low and Moderate Adherence to EBP categories. Overall, 14% of the programs assessed have been classified as having Very High Adherence to EBP, 20% as having High Adherence to EBP, 24% as having Moderate Adherence to EBP, and 42% as having Low Adherence to EBP. Research conducted by UCCI indicates that programs that score in the Very High and High Adherence categories look like programs that are able to reduce recidivism.

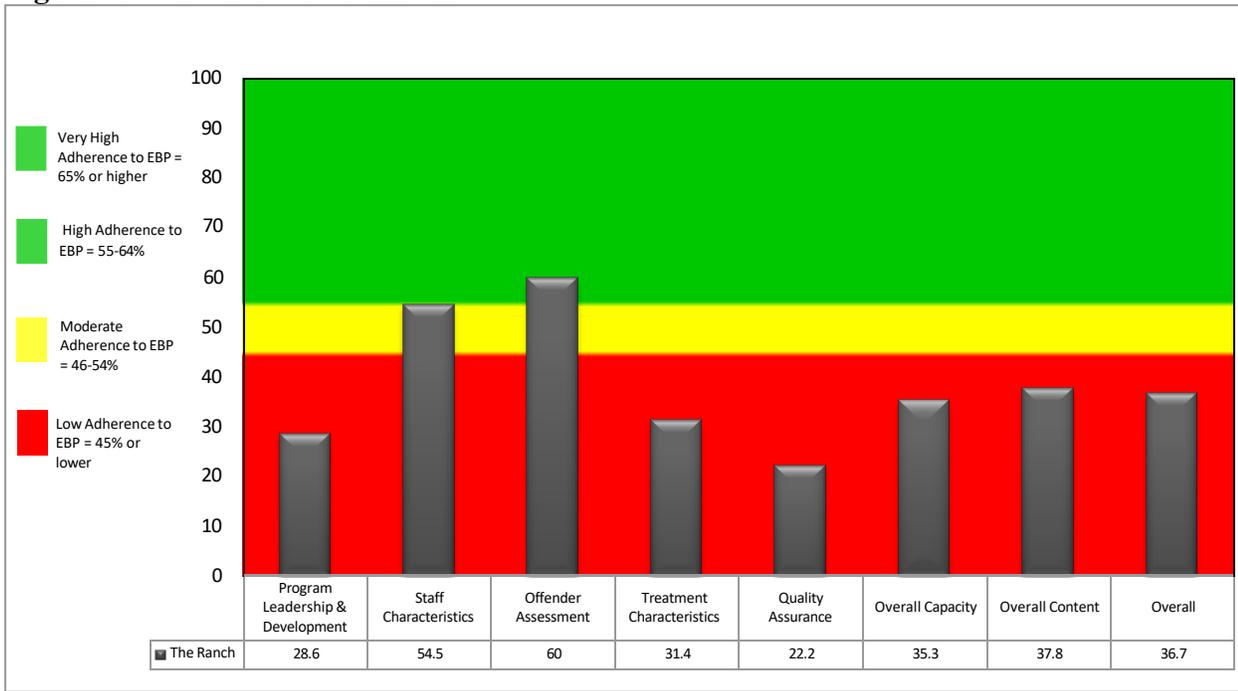
The Ranch received an overall score of 36.7% percent on the CPC. This falls into the Low Adherence to EBP category. Most of domains and both areas (i.e., capacity and content) of the CPC also score in the Low Adherence to EBP category. The Ranch scored higher in the Staff Characteristics domain which fell into the Moderate Adherence to EBP and the Offender Assessment domain which fell into the High Adherence to EBP category. As noted on Page 9 of this report, the Ranch Managers, in partnership with probation department leadership, UCCI, and the Multidisciplinary Implementation Team (MIT) should purposefully design the formal treatment program at the Ranch and then calculate the needed personnel, curricula, training, supervision, and operational costs related specifically to service delivery (i.e., personnel, training, curriculum, workbooks, ongoing training, coaching, etc.) and work to ensure that the funding required to provide all of the treatment services needed to better align with evidence-based practices is allocated.

In reviewing this report, please keep in mind that the facility was not designed with the CPC in mind, and the Ranch staff should commend themselves for the work they have done to date to make treatment a facility focus, especially given the pandemic. Furthermore, the formal redesign process with UCCI will help ensure that all stakeholders and staff are partners in this endeavor to improve services delivered to youth. Recommendations have been made in each of the five CPC domains, and these recommendations should assist The Ranch in making the necessary changes to increase adherence to what works in reducing recidivism.

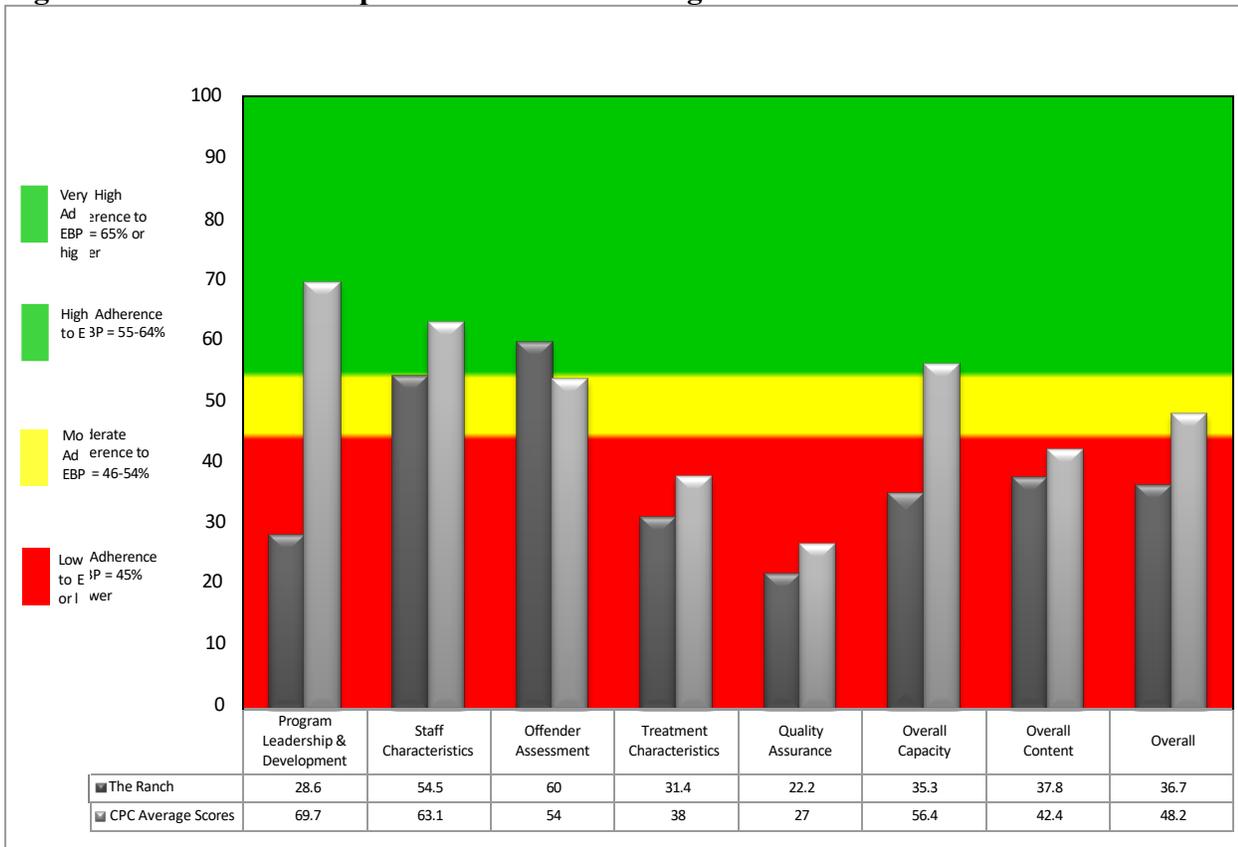
Certainly, care should be taken not to attempt to address all recommendations at once. Facilities that find the assessment process most useful are those that prioritize need areas and develop action

plans to systemically address them. The assessors note that The Ranch staff are open and willing to take steps toward increasing the use of EBP within the facility. This motivation will no doubt help the Ranch implement the changes necessary to bring it further into alignment with effective correctional programming.

**Figure 1: The Ranch CPC Scores**



**Figure 2: The Ranch Compared to the CPC Average Scores\***



\*National Average based on 722 program evaluations completed between 2005 and 2020.

- <sup>i</sup> In the past, UCCI has been referred to as the University of Cincinnati (UC), UC School of Criminal Justice, or the UC Center for Criminal Justice Research (CCJR). We now use the UCCI designation.
- <sup>ii</sup> The CPC is modeled after the Correctional Program Assessment Inventory (CPAI) developed by Drs. Paul Gendreau and Don Andrews. The CPC, however, includes a number of items not included in the CPAI. Further, items that were not positively correlated with recidivism in the UCCI studies were deleted.
- <sup>iii</sup> A large component of this research involved the identification of program characteristics that were correlated with recidivism outcomes. References include:
1. Lowenkamp, C. T., & Latessa, E. J. (2002). Evaluation of Ohio's community-based correctional facilities and halfway house programs: Final report. Cincinnati, OH: University of Cincinnati, Center for Criminal Justice Research, Division of Criminal Justice.
  2. Lowenkamp, C. T., & Latessa, E. J. (2005a). Evaluation of Ohio's CCA funded programs. Final report. Cincinnati, OH: University of Cincinnati, Center for Criminal Justice Research, Division of Criminal Justice.
  3. Lowenkamp, C. T., & Latessa, E. J. (2005b). Evaluation of Ohio's RECLAIM funded programs, community corrections facilities, and DYS facilities. Final report. Cincinnati, OH: University of Cincinnati, Center for Criminal Justice Research, Division of Criminal Justice.
  4. Latessa, E., Lovins, L. B., & Smith, P. (2010). Follow-up evaluation of Ohio's community-based correctional facility and halfway house programs—Outcome study. Final report. Cincinnati, OH: University of Cincinnati, Center for Criminal Justice Research, School of Criminal Justice.
- <sup>iv</sup> Makarios, M., Lovins, L. B., Myer, A. J., & Latessa, E. (2019). Treatment Integrity and Recidivism among Sex Offenders: The Relationship between CPC Scores and Program Effectiveness. *Corrections*, 4(2), 112-125; and Ostermann, M., & Hyatt, J. M. (2018). When frontloading backfires: Exploring the impact of outsourcing correctional interventions on mechanisms of social control. *Law & Social Inquiry*, 43(4), 1308-1339.
- <sup>v</sup> Upon request, UCCI can provide the CPC 2.1 Item Reference List which outlines the UCCI and independent research that supports the indicators on the CPC.
- <sup>vi</sup> Programs we have assessed include: male and female programs; adult and juvenile programs; prison-based, jail-based, community-based, and school-based programs; residential and outpatient programs; programs that serve prisoners, parolees, probationers, and diversion cases; programs that are based in specialized settings such as boot camps, work release programs, case management programs, day reporting centers, group homes, halfway houses, therapeutic communities, intensive supervision units, and community-based correctional facilities; and specialized offender/delinquent populations such as sex offenders, substance abusers, drunk drivers, and domestic violence offenders.

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	<p style="text-align: center;"><b>PROBATION DEPARTMENT JUVENILE RANCHES</b></p> <p style="text-align: center;"><b>PROCEDURES MANUAL</b></p>	Part: 01	Section: 01.05
		Date: 03/22/2010	Page:
		Revised:	
		Part: 01	Section: 01.05
		Date: 07/01/2013	Page:
		Approved by: 	
		Approved Date: 04/18/2016	
Reviewed Date:			

**SUBJECT: MISSION STATEMENT**

**I. MISSION**

- A. The Mission of the Santa Clara County Probation Department is to promote community safety by implementing proven strategies which enhance and support:
  - 1. Positive change in our clients, families and neighborhoods.
  - 2. Reparation of the harm caused by criminal behavior.
  - 3. Exemplary conditions of secure care.

**II. VISION**

- A. The employees of the Santa Clara County Probation Department are committed to being nationally recognized as a leader in Probation Services.
- B. We strive for excellence by creating safe and healthy communities, positive change and lasting impacts.

**III. CORE VALUES**

- A. The Santa Clara County Probation Department believes the following core values are fundamental to the success in realizing our mission and vision:
  - 1. Honesty and Integrity
  - 2. Open Communication
  - 3. Building Healthy Families
  - 4. Restoring Loss to Victims
  - 5. Collaborative Relationships
  - 6. Cultural Responsivity
  - 7. Equitable Treatment

8. Transparency/System Accountability
  9. Investing in Employees
  10. Utilization of Evidence Based Practices
- B. We believe in clients' inherent ability to prosper and are committed to working with their families and communities. We support an environment of innovation and creativity which embraces consistent and objective application of interventions.

#### IV. RANCH VISION AND MISSION STATEMENTS AND PROGRAM GOALS

- A. **Vision Statement:** The Santa Clara County Juvenile Rehabilitation Program envisions a productive life for our youth working with the family, partner agencies and the community to provide our youth the skills and ability to fulfill their needs in a socially responsible manner.
- B. **Mission Statement:** The Mission of the Santa Clara County Juvenile Rehabilitation Program is to positively impact our communities by providing appropriate services to the youth and families we serve. The program will be a holistic model relying on inter-agency and community partnerships for development, delivery and enhancement of services for our youth and families. We are committed to delivering a balanced and collaborative rehabilitative program with a focus on the development of pro-social skills through systematic intervention in thought, values, actions and positive relationship building.
- C. **Program Philosophy:**
1. **Organizational Commitment:** In order for the organization to be effective in fulfilling the juvenile rehabilitation mission statement and goals the organization must believe in and strive to achieve the goals.
  2. **Diversity:** We all live and work in a diverse community. Diversity and cultural competency in the workplace and in programs is valued and strengthens creativity, good decision making and desired outcomes. Our rehabilitation program goals and planning efforts will allow for adaptation to the unique needs of the youth, families, and communities we serve.
  3. **Integrity:** Management with integrity is essential. Management practices must reflect a commitment to the organization vision, mission statement and goals. There shall be an acknowledgement of individual and group accomplishments and a commitment to accountability of actions.
  4. **Leadership:** Leadership must support and encourage the goals of the juvenile rehabilitation program goals. This support and encouragement must occur at all levels of the organization. This includes the support of the agency's goals, philosophy and policies.
  5. **Planning and Flexibility:** A planning process must exist in order for the juvenile rehabilitation program to make effective changes as needed. The organization must continually adjust goals, policy, procedures, and services to meet the needs of youth families and community.
  6. **Training:** Staff at all levels of the juvenile rehabilitation program must receive training necessary for them to perform their duties in a high quality and professional manner.
  7. **Value of System Partners:** The juvenile rehabilitation program is system connected to, and dependent upon, various other systems. Decision making and planning at all levels of the organization must reflect the interrelationships of these various systems/agencies.