



Juvenile Justice Crime Prevention Act

Weak Oversight Has Hindered Its
Meaningful Implementation

May 2020

REPORT 2019-116





CALIFORNIA STATE AUDITOR

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May 12, 2020
2019-116

The Governor of California
President pro Tempore of the Senate
Speaker of the Assembly
State Capitol
Sacramento, California 95814

Dear Governor and Legislative Leaders:

As directed by the Joint Legislative Audit Committee, my office conducted an audit to evaluate five counties' spending and reporting of the funds they each received pursuant to the Juvenile Justice Crime Prevention Act (JJCPA). In addition, JLAC requested my office to assess each county's decision-making processes and evaluations of programs supported with those funds. We reviewed Kern, Los Angeles, Mendocino, San Joaquin, and Santa Barbara counties and determined that county and state oversight of the JJCPA is weak, counties misreported or failed to include information in the reports that they submitted to the State, and the Legislature should stabilize the amount of JJCPA funding provided to counties.

Regarding planning, the JJCPA requires that each county take a multiagency approach to reducing juvenile crime and delinquency. To achieve such an approach, each county should establish its own Juvenile Justice Coordinating Council (Coordinating Council) with responsibility for developing and approving the county's comprehensive multiagency juvenile justice plan (comprehensive plan). However, we found that Mendocino and as many as 10 other counties within the State did not have Coordinating Councils. Of the four other counties we reviewed, Kern and Los Angeles had councils, but those councils did not always have the required representatives. Furthermore, those counties with Coordinating Councils made only limited revisions to their comprehensive plans during the last 20 years, despite significant changes to juvenile justice during the same period.

We also found that the Board of State and Community Corrections (Community Corrections) could improve its oversight of the JJCPA. Specifically, Community Corrections' review of plans and reports that the counties submit could address many of the shortcomings we identified. Although state law does not explicitly require it to oversee the JJCPA, the law does require Community Corrections to collect and post the comprehensive plans and year-end reports counties submit. However, we found that some counties misreported information about their JJCPA-funded programs or failed to include required information in the reports they submitted to Community Corrections. Without adequate oversight of counties' submissions, Community Corrections risks reporting inaccurate information to key stakeholders about counties' use of JJCPA funds.

Finally, the five counties we reviewed generally expressed concerns about an increasing amount of unguaranteed JJCPA funds. One of the two allocations that counties receive to fund the JJCPA can change from year to year. This fluctuation results in counties' inability to anticipate their total JJCPA funding; therefore, we believe that the Legislature should increase predictability by acting to stabilize the amount of JJCPA funding the State allocates to counties.

Respectfully submitted,

A handwritten signature in black ink that reads "Elaine M. Howle". The signature is written in a cursive, flowing style.

ELAINE M. HOWLE, CPA
California State Auditor

Selected Abbreviations Used in This Report

Community Corrections	Board of State and Community Corrections
Working Group (the)	California Juvenile Justice Data Working Group
CBOs	community-based organizations
ELEAS account	Enhancing Law Enforcement Activities Subaccount
comprehensive plan	comprehensive multiagency juvenile justice plan
FFIT	Family Focused Intervention Team
JJCPA (the)	Juvenile Justice Crime Prevention Act
Coordinating Council (the)	Juvenile Justice Coordinating Council
MST	Multi-Systemic Therapy Program
Neighborhood Service	Neighborhood Service Centers Program
POOC	Probation Officers on Campus Program
RAND	RAND Corporation
Reconnect	Reconnect Day Reporting Center Program

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Summary

Results in Brief

The Legislature has taken steps to transfer the responsibility for managing juvenile offenders from the State to counties—commonly referred to as *juvenile justice realignment*. For nearly 20 years, the State has allocated funding to counties under the Juvenile Justice Crime Prevention Act (JJCPA) with the goal of helping them reduce juvenile crime and delinquency by implementing crime prevention strategies, among other activities.¹ The JJCPA requires that each county establish a Juvenile Justice Coordinating Council (Coordinating Council) that consists of representatives from a variety of local agencies and community groups to ensure the county's approach is collaborative. The Coordinating Council must develop a comprehensive multiagency juvenile justice plan (comprehensive plan) for the county. The county must annually submit this comprehensive plan to the Board of State and Community Corrections (Community Corrections), along with a separate year-end report that describes the programs the county operated with its JJCPA funds and how those programs may have affected juvenile justice trends. Although state law does not explicitly require Community Corrections to review or approve the information that counties submit to it, state law does require that Community Corrections post the information on its website and annually submit a summarized report of the information to the Governor and Legislature.

Despite being required to use a multiagency approach to develop their comprehensive plans, some counties we reviewed have failed to do so. We reviewed five counties—Kern, Los Angeles, Mendocino, San Joaquin, and Santa Barbara—and found that Mendocino did not have a Coordinating Council and that Kern and Los Angeles did not have all of the required representatives on their Coordinating Councils during fiscal years 2013–14 through 2017–18. In fact, Mendocino has not had a Coordinating Council since 2009. Because Mendocino lacked a Coordinating Council but still received JJCPA funds, we researched whether any of the remaining 53 counties also lacked Coordinating Councils. We found that 10 additional counties either lacked Coordinating Councils or did not indicate they had councils on their websites and did not respond to our inquiries. When a county lacks a Coordinating Council or fails to ensure that its council includes the diverse representation that the JJCPA mandates, that county is unable to meet the JJCPA's requirement that it take a multiagency approach to updating its comprehensive plan.

¹ Throughout this report, we refer to the Schiff-Cardenas Crime Prevention Act of 2000 as the Juvenile Justice Crime Prevention Act, as it is now known.

Audit Highlights . . .

Our audit of the spending, reporting, and evaluation of JJCPA funds by five counties, including their decision making related to these funds, highlighted the following:

- » *Although required to establish Coordinating Councils with members from a variety of local agencies and community groups to develop annual comprehensive plans, some counties we reviewed failed to do so.*
 - *One county did not have a Coordinating Council and two others did not have all the required representatives during fiscal years 2013–14 through 2017–18.*
 - *Despite significant changes in the statewide juvenile justice landscape over the last 20 years, the five counties generally made limited revisions to their comprehensive plans.*
 - *Four of the counties do not define the types of youth they consider to be at risk or identify risk factors in their comprehensive plans.*
- » *Limited oversight from Community Corrections has contributed to counties' inadequate and outdated plans.*
- » *Although counties must annually report to Community Corrections about the effectiveness of their JJCPA-funded programs, none of the counties we reviewed have done so.*
- » *Despite posting JJCPA-funded program information it receives from counties on its website, Community Corrections does not review the information or ensure its accuracy.*

Moreover, the Coordinating Councils at the five counties generally made limited revisions to their comprehensive plans over the last 20 years, despite significant changes in the statewide juvenile justice landscape. For instance, California voters approved propositions in 2014 and 2016 that reduced certain crimes from felonies to misdemeanors and reduced the penalties for certain drug-related offenses. We expected that in response to these shifts in state policy, counties would periodically reassess the areas in their communities at significant risk of juvenile crime or make changes to their strategies for addressing juvenile crime. However, Kern, Mendocino, and San Joaquin made only infrequent changes, such as eliminating or expanding programs that they funded with their JJCPA allocations without indicating whether the changes reflected revisions to their strategies for addressing juvenile crime and delinquency. As a result, these three counties' comprehensive plans are likely outdated. In contrast, Santa Barbara made several significant changes to its plan that indicated shifts in its strategy for addressing juvenile crime and delinquency, and it completely revised its plan for fiscal year 2018–19. Although Los Angeles's changes to its comprehensive plan have been limited over the past 20 years, it also recently took steps to completely revise its plan for fiscal year 2019–20.

Community Corrections' limited oversight of the contents of counties' comprehensive plans contributed to the inadequacies we identified. Community Corrections allowed counties to submit a form indicating that they had made changes to their comprehensive plans but did not require them to submit copies of their revised plans. Further, if counties made no changes to their plans, Community Corrections allowed them to simply indicate that they proposed to continue using JJCPA funding, instead of requiring them to report the reasons they made no changes. Counties that do not update their comprehensive plans limit the ability of the stakeholders, decision makers, and the public to understand whether and how the counties' approaches to juvenile crime and delinquency have changed over time.

Further, four of the five counties we reviewed failed to define the types of youth they consider to be at risk or to identify risk factors in their comprehensive plans. The JJCPA requires counties to describe their approach to responding to at-risk youth in their comprehensive plans. Although it does not explicitly define the term *at risk*, the JJCPA suggests that the term includes youth who are at risk of committing crimes. It is appropriate for counties to have different definitions of at-risk* youth because their at-risk

* AB 413 (Chapter 800, Statutes of 2019) deleted the term "at-risk" used to describe youth for purposes of various provisions in the California Education and Penal Codes and replaced it with the term "at-promise." However, the term "at-risk" currently remains in JJCPA as part of the California Government Code. As a result, we use the term "at-risk" consistent with the JJCPA throughout our report.

populations may have unique needs and face different challenges. However, when counties do not specifically identify their at-risk populations, they cannot demonstrate that they have complied with state law requiring them to develop comprehensive plans that assess existing services for at-risk youth.

Counties have broad discretion to use JJCPA funds for any element of response to juvenile crime that has been proven effective. In fiscal year 2017–18, four of the counties we reviewed used all or most of their JJCPA funds for programs that primarily served juvenile offenders and were operated by their probation departments. Three of the counties used some JJCPA funds to contract with other local government entities and community-based organizations to operate or coordinate with the county probation departments or other agencies to operate programs that served juvenile offenders or at-risk youth. However, regardless of the programs they chose to operate, counties did not demonstrate in the reports they submitted to Community Corrections that their JJCPA-funded programs were effective.

State law requires counties to report annually to Community Corrections how their JJCPA-funded programs may have affected countywide juvenile justice trends. However, the five counties we reviewed did not adequately report such information in their 2018 reports, even though Community Corrections' reporting template specifically directs them to do so. Moreover, when we asked the five counties to provide us with certain information about the participants in their JJCPA-funded programs during fiscal years 2013–14 through 2017–18, they could not provide complete or accurate data. For instance, Mendocino could not provide information about the participants in the single JJCPA-funded program it operated in fiscal years 2016–17 and 2017–18, and Los Angeles did not collect information about the participants in one of its largest programs in fiscal year 2017–18. Both counties explained that they did not collect information about these program participants because state law did not require them to report such information. However, state law does require counties to report whether their JJCPA-funded programs may have affected countywide trends, and without reliable information regarding their program participants, counties cannot determine the effectiveness of their programs.

The State should also improve its oversight of the JJCPA. Community Corrections is responsible for annually collecting program information, including expenses, from counties and for publishing a description or summary of JJCPA-funded programs on its website. However, we identified obvious errors in documents that counties submitted, which Community Corrections did not identify because it simply posts the documents on its website.

Community Corrections explained that it has taken a narrow view of its responsibilities under the law and does not consider reviewing the accuracy of the program information counties submit to be a part of its role. However, we believe that if Community Corrections reviewed the information and directed counties to fix errors, the counties could easily do so.

Further, Community Corrections does not have the authority to compel counties to comply with JJCPA requirements, resulting in counties' continuing to receive funding despite their lack of compliance. For example, as we note earlier, Mendocino and up to 10 other counties that received JJCPA funding did not have Coordinating Councils during our audit period. However, Community Corrections has no authority to compel counties to maintain their Coordinating Councils. In order to address these types of issues, state law needs to provide authority for the State to prohibit counties from spending funding until Community Corrections determines that they meet the requirements of the JJCPA.

Additionally, the State has an opportunity to change the mechanism by which counties receive JJCPA funds to make their amounts of funding more predictable. Currently, counties receive JJCPA funds in two allocations: a guaranteed annual amount and an additional amount that varies based on the vehicle license fees that the State collects. The additional JJCPA funding that counties receive has grown over the years but is unpredictable, making it difficult for counties to anticipate the total amount of JJCPA funds they can spend each year. For instance, the additional funding allocated to counties increased by 135 percent from fiscal years 2014–15 through 2015–16, but it increased by only 15 percent from fiscal years 2018–19 through 2019–20. Because counties are uncertain of the amount of growth funding they will receive in future years, they did not spend all of the JJCPA funds they received from the State from fiscal years 2013–14 through 2017–18. Changing the JJCPA funding structure so that the State allocates more of the funds as an annual guaranteed amount, which Community Corrections should determine, would make this funding more reliable for counties.

Summary of Recommendations

Legislature

To ensure that counties adequately identify how they serve at-risk youth, the Legislature should require counties to define at-risk youth in their comprehensive plans. The Legislature should also require Community Corrections to review counties' comprehensive plans to ensure that each contains an adequate definition of at-risk youth.

The Legislature should direct Community Corrections to monitor reports that counties submit to ensure that they include meaningful descriptions or analyses of how their JJCPA-funded programs may have contributed to or influenced countywide juvenile justice trends.

To enable Community Corrections to provide effective oversight of the required elements of the JJCPA, the Legislature should amend state law to describe a process for restricting the spending of JJCPA funding by counties that do not meet JJCPA requirements. As part of that process, the State should prohibit counties from spending JJCPA funds if they have not established Coordinating Councils.

To make JJCPA funding more stable and predictable, the Legislature should amend state law to increase the amount of guaranteed JJCPA funding the State provides to counties.

Counties

To ensure that it meets statutory requirements, Mendocino should reinstate its Coordinating Council.

To determine the effectiveness of their use of JJCPA funds, Kern, Los Angeles, Mendocino, San Joaquin, and Santa Barbara should include in their year-end reports descriptions or analyses of how their JJCPA-funded programs influenced their juvenile justice trends, as required by law.

Los Angeles and Mendocino should collect data on all individuals participating in each of their JJCPA programs and services to adequately assess the effectiveness of those programs at reducing juvenile crime and delinquency.

Community Corrections

Community Corrections should require each Coordinating Council to specify the comprehensive plan components a county is changing and what those changes are. If the county is making no changes, Community Corrections should require the Coordinating Council to explain why no changes to the plan are necessary.

Community Corrections should review the information counties submit to it and follow up with them to obtain missing information or to clarify information that seems incorrect.

Agency Comments

The five counties we reviewed agreed with our recommendations and indicated they would take actions to implement them. Although Community Corrections generally agreed with our recommendations, it indicated that it currently lacks the resources necessary to implement our recommendation that it improve the JJCPA information it makes available on its website.

Introduction

Background

Juvenile justice realignment refers to the steps the Legislature has taken to transfer the responsibility for managing juvenile offenders from the State to counties. Generally, the Legislature based its realignment efforts on the idea that a rehabilitative model of care and treatment, which is an overarching goal of the juvenile justice system, is more successful when juveniles can be closer to their families or other sources of support, such as social services. In 1996 the Legislature amended state law regarding how counties paid for a share of the State's cost to house juveniles in its custody. Specifically, the counties began paying a higher share of costs for lower-level offenders to incentivize counties to manage less serious offenders locally. About 10 years later, the Legislature amended state law to limit the counties' ability to send juvenile offenders to state juvenile facilities. At the same time, the State authorized reimbursing counties \$300 million to construct or renovate local juvenile facilities. Also, in 2007 state law established the Youthful Offender Block Grant, which allocates state funding for counties to provide services related to the custody and parole of specific juvenile offenders whom the counties would previously have sent to state juvenile facilities. In 2011 the State acted to further realign revenues to local governments in areas related to criminal justice, mental health, and social services programs.

As a part of the 2011 realignment, the State modified how it funds certain existing programs for local agencies. For instance, although the Legislature enacted the Juvenile Justice Crime Prevention Act (JJCPA) in 2000, in 2011 the State shifted the funding source for the JJCPA to a realignment account.² Despite the modification to the source of funding, the State has allocated funding to counties under the JJCPA for nearly 20 years with the goal of helping them reduce crime and delinquency among young people by implementing crime prevention strategies, among other activities. Crime prevention generally refers to a broad array of strategies and programs that address the root causes or risk factors associated with criminal behavior. A research project funded by the U.S. Department of Justice found that although few high-quality evaluations exist that have measured the impact of crime prevention programs, these programs for children can reduce their serious offenses in their early adulthood. According to the 2018 *Juvenile Justice in California* report by the California Department of Justice, sources such as schools, parents, and law

² Throughout this report, we refer to the Schiff-Cardenas Crime Prevention Act of 2000 as the Juvenile Justice Crime Prevention Act, as it is now known.

enforcement agencies referred about 65,000 juveniles—or less than 1 percent of all individuals under the age of 18 in California—to probation departments for determinations about how to proceed with each juvenile.

Required Components of a JJCPA Comprehensive Plan

- An assessment of existing services that specifically target at-risk youth, juvenile offenders, and their families.
- An identification and prioritization of neighborhoods, schools, and other areas in the community at significant risk of juvenile crime.
- A local action strategy for implementing a continuum of responses to juvenile crime and delinquency that demonstrates a collaborative and integrated approach for responding to at-risk youth and juvenile offenders.
- A description of the programs, strategies, or system enhancements funded by the JJCPA.

Source: State law.

JJCPA Planning Requirements

Enacted in 2000, in part with the intent of reducing juvenile crime and delinquency, the JJCPA requires each county to implement a comprehensive multiagency juvenile justice plan (comprehensive plan). Counties must include in their comprehensive plans the four components that the text box lists. These components generally summarize counties' holistic efforts to reduce juvenile crime. Specifically, the JJCPA requires counties to assess the existing services that various local entities, such as county probation departments or social services agencies, may provide juvenile offenders, at-risk* youth, and their families. Counties must also identify and prioritize in their comprehensive plans the areas in their communities that face a significant risk of juvenile crime, including gang activity,

vandalism, truancy, firearm-related violence, and juvenile substance abuse and alcohol use.

Additionally, the JJCPA requires counties' comprehensive plans to describe their local action strategies for providing a continuum of responses to juvenile crime and delinquency. According to the U.S. Department of Justice, Office of Juvenile Justice and Delinquency Prevention, an effective continuum of services and strategies offers a range of programs and services that provide "the right resources for the right individual at the right time." Each local action strategy must also demonstrate a collaborative and integrated approach for implementing a system of swift, certain, and graduated responses for at-risk youth and juvenile offenders. Essentially, counties should describe in this component how they plan to use their programs and services to respond, in collaboration with various local entities, to juvenile offenders and at-risk youth.

* AB 413 (Chapter 800, Statutes of 2019) deleted the term "at-risk" used to describe youth for purposes of various provisions in the California Education and Penal Codes and replaced it with the term "at-promise." However, the term "at-risk" currently remains in JJCPA as part of the California Government Code. As a result, we use the term "at-risk" consistent with the JJCPA throughout our report.

Although the JJCPA requires comprehensive plans to include an assessment of existing resources and strategies for responding to both juvenile offenders and at-risk youth, it does not explicitly define *at-risk youth*. However, it is reasonable to conclude that at a minimum, at-risk youth include youth who are at risk of committing crimes. Accordingly, the law leaves counties to develop their own definitions of the factors that may place youth at risk, based on the specific circumstances in their communities.

Lastly, the law requires counties to describe in their comprehensive plans the programs they will provide with their JJCPA funding. The JJCPA requires counties to base their programs on approaches that are effective in reducing juvenile crime and delinquency. For example, the Pew-MacArthur Results First Initiative created the Results First Clearinghouse Database, an online resource that brings together information from nine national clearinghouses on the effectiveness of roughly 3,000 programs in social policy areas, such as criminal justice, behavioral health, and education.³ Such a database can help counties identify programs for their specific needs and research their effectiveness. The JJCPA also requires that counties design JJCPA-funded programs and strategies to provide data for measuring their success. For instance, counties could measure the rate of arrests for individuals who participated in a JJCPA-funded program compared to the rate for those who did not participate in the program.

The JJCPA requires that each county establish a Juvenile Justice Coordinating Council (Coordinating Council) to develop, review, and annually update its comprehensive plan. State law designates the county's chief probation officer as the chair of its Coordinating Council. In addition, a Coordinating Council must include at least one representative each from several county and local entities, such as the district attorney's office, the sheriff's department, the board of supervisors, the department of mental health, and a local education agency. The law also requires each Coordinating Council to include a representative from a community-based drug and alcohol program and an at-large community member, as well as representatives from community-based organizations (CBOs)—nonprofit entities—providing services to minors. Although state law does not identify a maximum number of representatives from CBOs, it requires each Coordinating Council to inform the county board of supervisors of the participating organizations. Moreover, state law does not identify either the process counties should use to appoint representatives to their Coordinating Councils or how long the representatives may serve.

³ The Pew-MacArthur Results First Initiative provides assistance and a suite of tools to help state and county leaders interested in using evidence to improve their programs and policies.

Allocation and Use of JJCPA Funding

The State provides JJCPA funding to counties based on their populations, and counties have broad discretion in how they use these funds. During fiscal year 2018–19, the State allocated almost \$160 million in JJCPA funds to counties—an increase of nearly 50 percent from the amount the State allocated in fiscal year 2013–14. The State provides the funding through an annual guaranteed funding amount, as well as an additional variable amount if funds are available, known as *growth funding*. The State uses revenue from vehicle licensing fees, which vehicle owners pay annually in California, to fund counties’ JJCPA allocations. Table 1 shows the amounts paid to each of the five counties we reviewed—Kern, Los Angeles, Mendocino, San Joaquin, and Santa Barbara—from fiscal years 2013–14 through 2018–19. Although we found that these five counties used JJCPA funds primarily to pay for services and programs that their probation departments provided, counties may choose to direct JJCPA funds to other county departments or local entities. These can include county departments responsible for overseeing education, mental health, social services, health, and parks and recreation. In addition, counties may use JJCPA funds for contracts with CBOs to provide an array of programs, including individual or family counseling and job-readiness training.

Table 1
The Five Counties We Reviewed Received a Total of Nearly \$260 Million in JJCPA Funding in the Past Six Fiscal Years
(Dollars in Thousands)

Fiscal Year	KERN	LOS ANGELES	MENDOCINO	SAN JOAQUIN	SANTA BARBARA	STATEWIDE
2013–14	\$2,508	\$29,124	\$258	\$2,044	\$1,256	\$107,100
2014–15	2,738	31,548	280	2,229	1,361	113,800
2015–16	3,011	34,855	306	2,473	1,505	122,800
2016–17	3,161	36,549	317	2,612	1,590	138,500
2017–18	3,379	38,765	337	2,813	1,702	149,300
2018–19	3,619	41,194	358	3,028	1,815	159,300
Totals	\$18,416	\$212,035	\$1,856	\$15,199	\$9,229	\$790,800

Source: State Controller’s Office payment documentation.

County Reporting Requirements and State Oversight

The Board of State and Community Corrections (Community Corrections) operates as a quasi-oversight entity of the JJCPA at the state level, collecting information on the JJCPA programs and expenditures from counties and posting it to its website. State law established Community Corrections in 2012 as the successor to

the Corrections Standards Authority, with a mission to provide statewide leadership, coordination, and technical assistance to promote effective state and local efforts and partnerships in California's adult and juvenile criminal justice systems. As part of this mission, Community Corrections is responsible for collecting and maintaining specific information on adult corrections and juvenile justice. It is also responsible for collecting and making publicly available current information reflecting the impact of specified policies and practices, as well as data concerning promising and evidence-based practices.

Community Corrections' responsibility to collect and post information on the counties' uses of JJCPA funds gives it a key role in ensuring transparency. State law requires counties to provide annual updated descriptions of the programs, strategies, and system enhancements they fund with their JJCPA allocations and an accounting of the expenditures associated with each to Community Corrections. Further, based on available information, counties must summarize or analyze how these programs, strategies, or enhancements may have contributed to or influenced the countywide juvenile justice data trends, such as the number of arrests, incarcerations, and probation violations. State law requires Community Corrections to post on its website a description or summary of the information provided by each county and to provide a report to the Governor and Legislature that includes a summary of the counties' programs by March 1 each year.

Although Community Corrections collects, posts, and summarizes information the counties provide, state law no longer requires it to review or approve counties' comprehensive plans or to analyze and interpret their year-end reports. In 2014 state law established the California Juvenile Justice Data Working Group (Working Group) and tasked it with recommending options to coordinate and modernize state and local juvenile justice data systems by, in part, identifying changes or upgrades to improve the capacity and utility of their data. At the time, the State required counties to report outcome data for the programs they funded with JJCPA funds. The Working Group issued a report in April 2015 that concluded that program-specific outcome data revealed little about whether youth in funded programs did better than other youth or about whether the programs reduced crime. Further, the report stated that the data did not provide a coherent picture of progress to assess the impact of the JJCPA and youth grant funds on systemwide results. Therefore, the Working Group recommended that counties instead report data for all justice-involved juveniles in the county's system, rather than just those participating in funded programs, and describe how the JJCPA-funded programs comprehensively contributed to or influenced systemwide trends. As a result, in 2016

the Legislature amended state law to eliminate the requirement for counties to report specific outcome information about participants of JJCPA-funded programs.

Additionally, state law previously required each county to submit separate plans for the JJCPA and the Youthful Offender Block Grant, which is a grant funded by a source other than the JJCPA, and it also required Community Corrections to review and approve these plans. Under current state law, each county submits a comprehensive plan that must include the JJCPA-required components described on page 8 along with Youthful Offender Block Grant information. Rather than reviewing and approving the plans, Community Corrections is required only to post a description or summary of the counties' programs, strategies, or system enhancements to its website. Community Corrections is responsible for specifying the format in which counties submit their comprehensive plans and year-end reports.

Chapter 1

THE COUNTIES HAVE PROVIDED WEAK OVERSIGHT OF THE JJCPA

Chapter Summary

The five counties we reviewed did not adequately oversee their JJCPA planning efforts. One county did not have the required Coordinating Council, and two lacked some of the required representatives on their Coordinating Councils. We determined that up to 10 other counties in the State also lack Coordinating Councils. In addition, although state law requires counties to update their comprehensive plans annually, the five counties we reviewed have made only infrequent and limited revisions since initially developing their plans in 2001, despite significant changes in the statewide juvenile justice landscape. Moreover, the counties' comprehensive plans generally lacked critical information, such as how they define at-risk* youth, despite state law requiring Coordinating Councils to describe how they will serve this population. Plans that are outdated and lack critical information are of limited value for stakeholders and the public because they do not demonstrate how counties are adapting to changes in their juvenile justice environment.

Although counties have broad discretion in how they choose to spend JJCPA funds, they have not demonstrated that the programs they have chosen to operate are effective. State law requires counties to include a description or analysis in their year-end reports of how their JJCPA-funded programs may have contributed to or influenced countywide juvenile justice trends. However, the counties we reviewed have not submitted to Community Corrections meaningful evaluations of the effectiveness of their JJCPA programs, hindering the ability of decision makers and stakeholders to gauge whether the counties are using JJCPA funds in a manner that reduces juvenile crime and delinquency.

The Coordinating Councils We Reviewed Did Not Always Include Statutorily Required Representatives

The JJCPA requires each county's Coordinating Council to develop, review, and annually update its comprehensive plan in part with the goal of reducing juvenile crime and delinquency through crime prevention strategies. A Coordinating Council must include representatives from

* AB 413 (Chapter 800, Statutes of 2019) deleted the term "at-risk" used to describe youth for purposes of various provisions in the California Education and Penal Codes and replaced it with the term "at-promise." However, the term "at-risk" currently remains in JJCPA as part of the California Government Code. As a result, we use the term "at-risk" consistent with the JJCPA throughout our report.

Coordinating Council Representatives

A Coordinating Council must, at a minimum, include the chief probation officer as chair and representatives from the following entities:

- One from the district attorney's office.
- One from the public defender's office.
- One from the sheriff's department.
- One from the board of supervisors.
- One from the department of social services.
- One from the department of mental health.
- One from a community-based drug and alcohol program.*
- One from a city police department.
- One from the county office of education or a school district.
- One from the community at large.
- Two from nonprofit CBOs providing services to minors.

Source: State law.

* This member can be one of the two representatives from nonprofit CBOs providing services to minors.

at least 11 specific entities, which the text box lists. The Coordinating Councils we reviewed met at least annually but had varied processes to update their plans, which we describe later in this section. The diverse representation of Coordinating Councils is key to ensuring the multiagency approach that the JJCPA requires and to directing JJCPA funding toward the services, geographic areas, and programs that councils deem most important.

However, we found that some counties that receive JJCPA funding do not have Coordinating Councils. Of the five counties we reviewed, Mendocino has not had a Coordinating Council since 2009. The county's chief probation officer was unsure why the county lacks a Coordinating Council. Because Mendocino lacks a Coordinating Council but has still received JJCPA funds, we researched whether any of the remaining 53 counties also lack Coordinating Councils. Six counties confirmed that they lacked Coordinating Councils during our audit period. Another four counties' websites are unclear whether they have councils, and these counties did not respond to our inquiries; therefore, they may also lack Coordinating Councils. For instance, Plumas

County received JJCPA funding during fiscal year 2018–19, and its probation department submitted a comprehensive plan to Community Corrections in May 2018. However, the county board of supervisors approved a resolution in September 2019 indicating that it was seeking to establish a Coordinating Council, thus acknowledging that it did not have one. We describe in Chapter 2 why counties without Coordinating Councils likely continued to receive JJCPA funding.

Of the four counties we visited that had established Coordinating Councils, only two had all of the required representatives in each of the five years we reviewed.

Of the four counties we visited that had established Coordinating Councils, only two—San Joaquin and Santa Barbara—had all of the required representatives in each of the five years we reviewed, as Table 2 shows. Kern's Coordinating Council lacked a representative from a drug and alcohol abuse prevention program in fiscal years 2016–17 through 2017–18. The county's probation department attempted to find a representative for the vacancy in August 2016 but did not receive any responses from interested applicants, and it did not revisit this vacancy until September 2019.

Similarly, Los Angeles's Coordinating Council lacked representatives from several required entities throughout each of the five years in our audit period. Although its April 2016 meeting minutes reflect that the Coordinating Council believed it had all of the required representatives, the county did not have

a statutorily complete council until May 2018. Specifically, the county’s Coordinating Council did not include a representative from the county social services department until January 2017, from a community-based drug and alcohol abuse prevention program until February 2017, and from two CBOs until January 2018. It then lacked a community representative from January 2018 through May 2018, when it finally had a fully constituted Coordinating Council. The chair of the county’s Coordinating Council assumed her position in February 2017 and told us that she immediately started working to add the missing representatives, but she did not know why the county did not take steps to fill the vacancies earlier. Without the diverse representation envisioned by the JJCPA, counties are unable to meet the JJCPA’s requirement to have a multiagency approach to juvenile justice planning.

Table 2
The Coordinating Councils Did Not Always Include All Required Representatives
Fiscal Years 2013–14 Through 2017–18

	2013–14	2014–15	2015–16	2016–17	2017–18
Did the Coordinating Council include all statutorily required members throughout the fiscal year?					
<i>Kern</i>	✓	✓	✓	X	X
<i>Los Angeles</i>	X	X	X	X	X
<i>Mendocino*</i>	—	—	—	—	—
<i>San Joaquin</i>	✓	✓	✓	✓	✓
<i>Santa Barbara</i>	✓	✓	✓	✓	✓

Source: State law and Coordinating Council meeting minutes and rosters.

* Mendocino did not have a Coordinating Council during our audit period.

A failure to adopt bylaws may have contributed to the lack of required representatives on some Coordinating Councils. As an established best practice in the absence of statutory or regulatory requirements, bylaws are the main governing document of a board or council and guide how the entity will operate. Bylaws increase the level of accountability, transparency, and effectiveness of entities and clearly outline authority levels, rights, and expectations. As a result, we expected counties to have established bylaws for their Coordinating Councils that describe how they fill their memberships and maintain required representation. San Joaquin and Mendocino, however, did not have any bylaws governing their Coordinating Councils. Mendocino has not had a Coordinating Council since at least 2009, and in response to our inquiry, San Joaquin said that it intended to establish bylaws going forward.

Further, the Coordinating Councils at the counties we reviewed had different processes for updating their comprehensive plans. For example, Kern's and San Joaquin's probation departments updated their counties' comprehensive plans and submitted them to their respective Coordinating Councils for approval. The probation department in Mendocino, which did not have a Coordinating Council during our audit period, updated and submitted the county's plans to Community Corrections. The remaining two counties—Los Angeles and Santa Barbara—have more inclusive plan development processes. Until recently, Los Angeles's probation department updated its county's comprehensive plan and submitted it to its Coordinating Council for approval. However, in 2019 Los Angeles's Coordinating Council established an ad hoc subcommittee, whose members are proportionally representative of the full council's composition, to update and revise its plan. The subcommittee's first plan revision was for fiscal year 2019–20.

Santa Barbara used a work group during our audit period to develop and update its comprehensive plan. Before 2018 Santa Barbara used a temporary, informal work group with members appointed by the Coordinating Council to draft each year's comprehensive plan. In 2018 the county formally established the work group, which meets every month to address issues that the Coordinating Council assigns to it. The work group is composed of members from each county agency required by statute to have a representative on the Coordinating Council, as well as from two city police departments and three CBOs. The county's probation department told us that the Coordinating Council created the work group in part because it allows members to discuss the developing plan and provide input on its goals, objectives, and strategies. The probation department explained that having the work group ensures that juvenile justice agencies, county agencies, and community partners prepare in partnership the draft comprehensive plan that the Coordinating Council reviews and adopts.

Many Counties' Comprehensive Plans Are Outdated and Incomplete

Although state law requires counties to annually update their comprehensive plans to reflect their current approaches to responding to at-risk youth and juvenile offenders, the five counties we reviewed have rarely made substantial revisions to their plans over the last 20 years, despite significant changes in state law and decreases in juvenile arrest rates. Moreover, most of the counties' comprehensive plans failed to define or explicitly identify at-risk youth—a population that state law requires counties to address in their plans. When counties make only minimal updates to their comprehensive plans and fail to adequately identify services and strategies to address at-risk youth, their comprehensive plans are likely to be outdated, incomplete, and of limited use for stakeholders and the public.

The five counties we reviewed have rarely made substantial revisions to their plans over the last 20 years.

Despite Significant Changes in the Juvenile Justice Landscape, the Counties Have Rarely Modified Their Comprehensive Plans

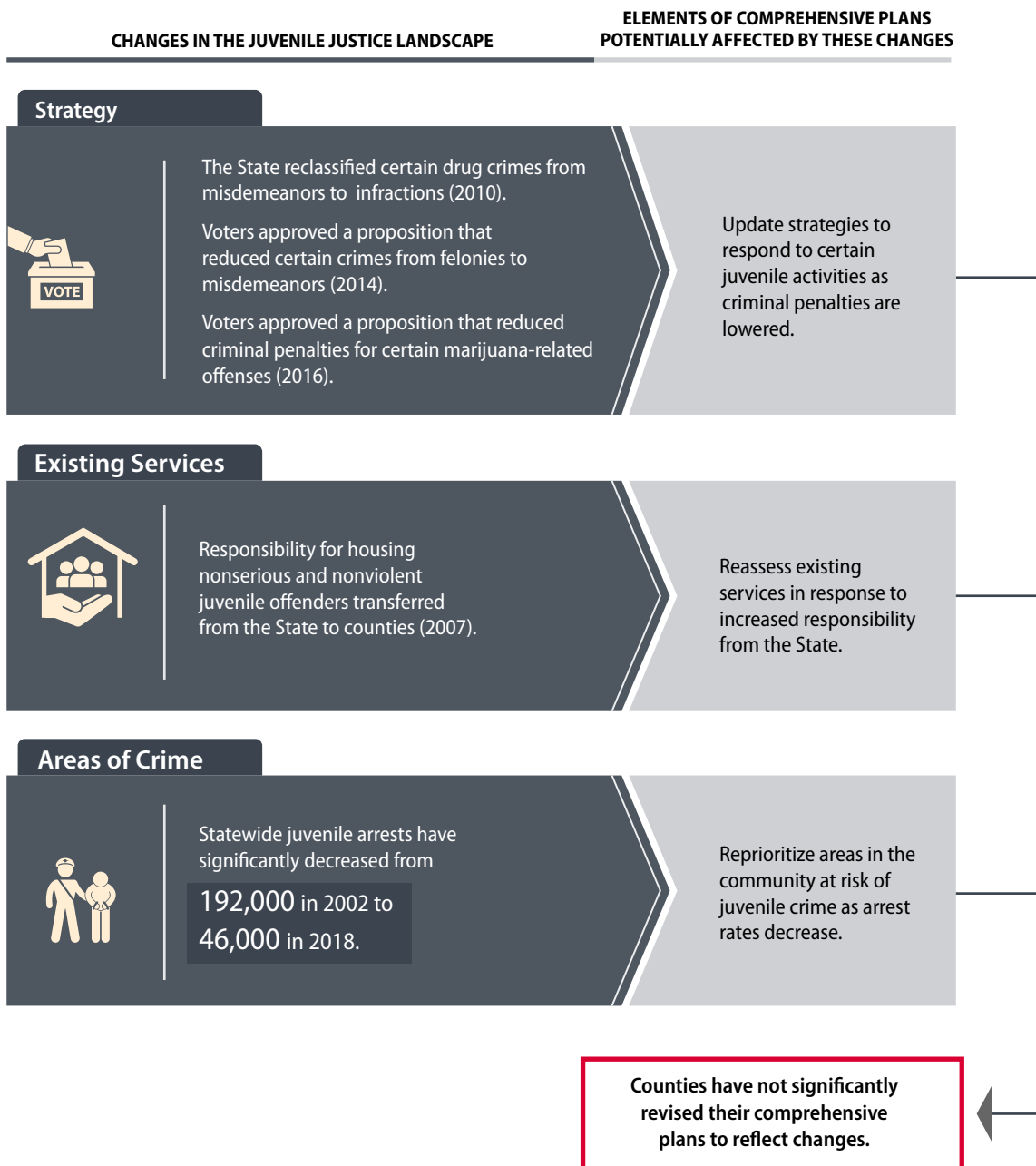
State law requires Coordinating Councils to annually update their counties' comprehensive plans and to submit them for the upcoming fiscal year in the format that Community Corrections specifies. Beginning in fiscal year 2002–03, Community Corrections implemented a template, referred to as an *application for funding*, that required each Coordinating Council to indicate either that the county was applying for continued funding without making changes to its plan or that it had made substantive modifications to its plan. However, even if a county had made a substantive modification to its plan, Community Corrections initially did not require its Coordinating Council to submit the revised plan. In fiscal year 2006–07, Community Corrections modified the application for funding to require a Coordinating Council to include its fully revised plan if it indicated on the application that the county had made substantial changes to the plan components. Such changes could include the removal or addition of a program, changes in the target population served by a program, or significant changes in a program's outcomes. Other modifications to the plan might include changes in the prioritization of areas in the community that are affected by juvenile crime, changes in the resources that provide services to youth and their families, and changes to the county's responses to at-risk youth and juvenile offenders. In fiscal year 2016–17, Community Corrections significantly revised its template by consolidating into one plan the required information for the JJCPA and the Youthful Offender Block Grant, which we describe in the Introduction.

We expected that Coordinating Councils would periodically revise their counties' plans to reflect major changes in the statewide juvenile justice landscape. Since the passage of the JJCPA, various state laws have substantially shifted the way that the State and local governing entities treat juvenile offenders. For example, as Figure 1 shows, in 2014 and 2016, California voters approved propositions that reduced certain crimes from felonies to misdemeanors and reduced the penalties for certain drug-related offenses. These reductions and other shifts in state policy over the last two decades likely contributed to a decrease in statewide juvenile arrest rates, which declined by 76 percent from 2002 through 2018. We expected that in response to the decreasing number of juvenile offenders, counties would have periodically reassessed the areas where juvenile crime occurs and made changes to their strategies for addressing juvenile crime. In fact, according to Community Corrections, the comprehensive plans are intended to describe how JJCPA-funded programs fit within the context of counties' overall juvenile justice strategies. By updating their comprehensive plans, Coordinating Councils could demonstrate to their communities

Reduced criminal penalties and other shifts in state policy over the last two decades likely contributed to a decrease in statewide juvenile arrest rates, which declined by 76 percent from 2002 through 2018.

that their counties are appropriately modifying their strategies for serving juveniles to reflect changes in the State’s approach to addressing juvenile crime and delinquency.

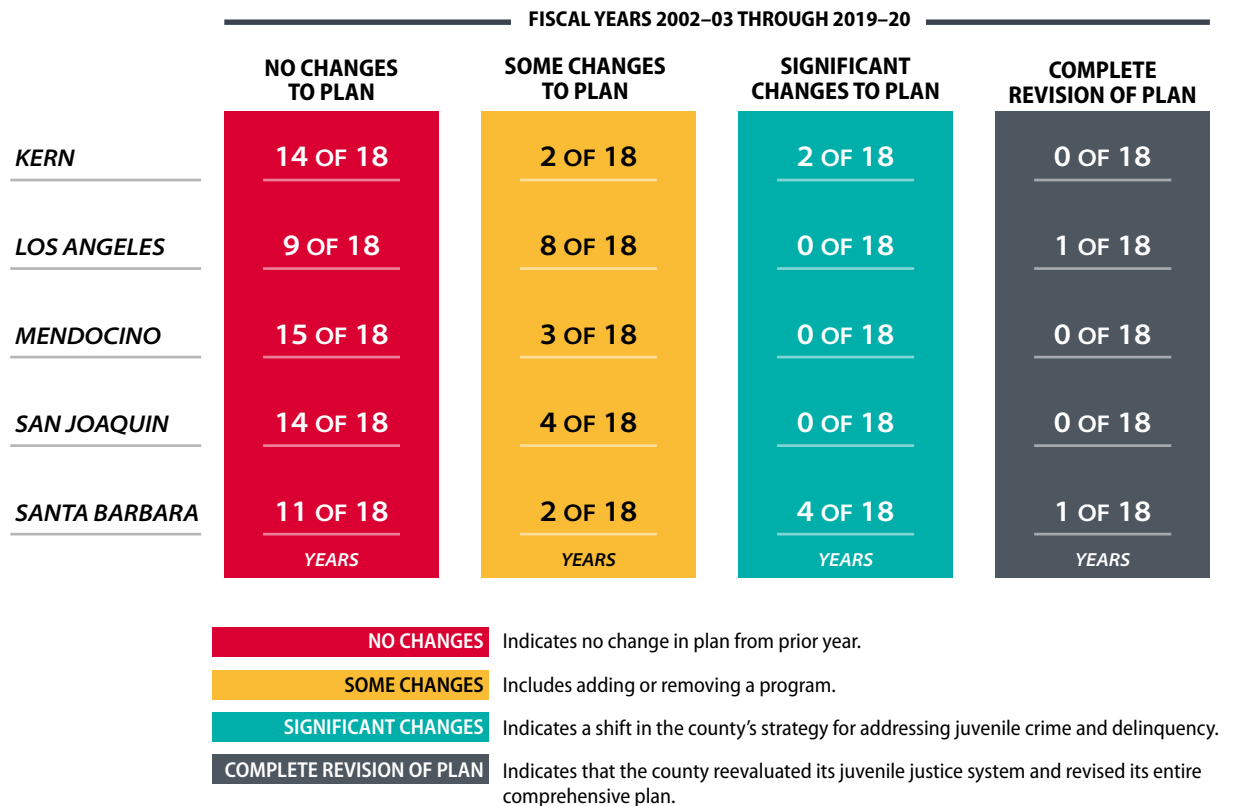
Figure 1
Significant Changes in the Juvenile Justice Landscape Merited Revisions to Counties’ Comprehensive Plans



Source: State law, California Department of Justice’s Juvenile Justice in California annual reports, 2002 through 2018, and the five counties’ comprehensive plans.

However, the Coordinating Councils for the counties we reviewed generally did not update their counties’ comprehensive plans, and when they did, the counties made only limited revisions that failed to demonstrate how their strategies for addressing juvenile crime and delinquency had changed over the last 20 years. For example, as Figure 2 shows, San Joaquin has not reported any significant changes to its comprehensive plan that would indicate a shift in the county’s strategy for addressing juvenile crime and delinquency. Instead, its changes were at the program level, such as when it reported in fiscal years 2004–05 and 2010–11 that it removed programs, and in fiscal years 2015–16 and 2017–18 that it added programs operated by its probation department. However, San Joaquin did not explain whether or how either of these changes represented a shift in its approach to addressing juvenile crime and delinquency. In addition, Mendocino made some changes to its comprehensive plan in fiscal years 2004–05 and 2009–10, but it did so primarily to eliminate certain JJCPA-funded programs, largely because of budget reductions. It did not make any further changes to its comprehensive plan until fiscal year 2019–20.

Figure 2
Coordinating Councils Have Made Few Changes to Their Comprehensive Plans



Source: Counties’ comprehensive plans submitted to Community Corrections, fiscal years 2002–03 through 2019–20.

Some of the plans are likely outdated and do not accurately reflect the counties' strategies for addressing juvenile crime and delinquency.

Similarly, one of the few changes Kern made to its comprehensive plan was in fiscal year 2004–05, when it terminated a program operated by its probation department because of funding constraints. Kern did not update its plan again until fiscal year 2010–11, when it added a JJCPA-funded program and revised its method for assessing whether juveniles are at risk of reoffending. Although this latter change is significant because it represents a shift in the county's strategy for identifying and prioritizing juveniles, Kern made no further significant changes to its comprehensive plan until fiscal year 2019–20. Given that the State's approach to juvenile justice has transformed significantly in the nearly 20 years since the Legislature enacted the JJCPA, we expected to see corresponding shifts in the strategies and services the counties describe in their annual plans. Because the counties' Coordinating Councils generally did not revise their comprehensive plans to reflect changes in state policy, some of the plans are likely outdated and do not accurately reflect the counties' strategies for addressing juvenile crime and delinquency.

Los Angeles and Santa Barbara recently conducted countywide evaluations of their respective juvenile justice systems, resulting in complete revisions of their comprehensive plans. In 2017 Los Angeles contracted with an external evaluator to assess the county's implementation of JJCPA-funded programs, determine the programs' effectiveness, and make recommendations for system improvements. The review contributed to Los Angeles making some changes to its programs in fiscal year 2018–19 and to the county completely revising its comprehensive plan for fiscal year 2019–20. Previously, Los Angeles had acknowledged in its plan for fiscal year 2016–17 that it had not evaluated or redesigned its JJCPA-funded service delivery system since the Legislature enacted the JJCPA in 2000.

Similarly, in 2017 Santa Barbara embarked on a review of its juvenile justice system by comparing various data elements of its system, such as juvenile hall population, against four counties it selected for proximity, demographic similarity, and progressive practices. This review resulted in its Coordinating Council completely revising the county's comprehensive plan for fiscal year 2018–19. In addition, Santa Barbara was the only county we reviewed that described in its comprehensive plan how its juvenile justice system was affected by a state law change in 2007 that shifted the State's responsibilities for housing certain types of juvenile offenders from the State to the counties. By conducting such countywide evaluations of their juvenile justice systems, the Coordinating Councils in Los Angeles and Santa Barbara provided valuable updates to their comprehensive plans about their current approaches to addressing juvenile crime and delinquency. However, had these two counties made significant changes to their plans regularly over the last

two decades, these comprehensive revisions might not have been necessary because their plans would have already reflected changes in state policy and juvenile justice trends.

The other three counties' Coordinating Councils cited different reasons for why they rarely revised their comprehensive plans. San Joaquin acknowledged that it did not make many changes to its plan but stated that it believed it met reporting requirements by noting the few changes it did make in its application for funding. Although it may have satisfied Community Corrections' limited reporting requirements, San Joaquin did not make significant changes to its comprehensive plan to respond to trends in juvenile justice over the last 20 years, as we note in Figure 2. Because of turnover in the chief probation officer's position, Mendocino could not explain why it rarely updated its comprehensive plan, whereas Kern indicated that it did not believe there was a need for substantial changes to its plan. We disagree because state law requires Coordinating Councils to annually reassess their countywide juvenile justice programs and strategies. Moreover, counties should update their plans to reflect changes both to the populations of at-risk youth and juvenile offenders that they need to serve and to the areas in their communities at highest risk of juvenile crime.

Community Corrections' limited oversight of the contents of counties' comprehensive plans and its reliance on the application for funding, which we previously discuss, contributed to the inadequacies we identified in counties' plans. As we describe in the Introduction, Community Corrections was responsible for reviewing and approving counties' comprehensive plans until 2016. From fiscal years 2006–07 through 2016–17, the application for funding stated that Coordinating Councils must include counties' comprehensive plans with their applications for funding if the plans were substantially changed; however, Community Corrections stated that in practice, it did not require Coordinating Councils to submit the revised plans. In addition, the application for funding allowed Coordinating Councils to check a box if they had not revised their plans, without requiring them to explain their reasons for leaving their plans unchanged. As a result, the applications for funding may not have always contained the most up-to-date information about counties' juvenile justice strategies and may not have provided stakeholders with the reasons Coordinating Councils did not make changes to their plans for significant lengths of time.

Although Community Corrections revised its template for comprehensive plans for counties to use beginning with fiscal year 2017–18, its current instructions do not require counties to explain any updates to their comprehensive plans or to justify why their plans remain unchanged. Community Corrections

Community Corrections' limited oversight of the contents of counties' comprehensive plans and its reliance on the application for funding contributed to the inadequacies we identified in counties' plans.

explained that it assumes that counties are complying with their JJCPA responsibilities and does not believe that the JJCPA requires counties to explain why they have or have not modified their comprehensive plans. However, we believe that nothing prevents Community Corrections from collecting this information and trying to hold counties accountable for preparing comprehensive plans that provide meaningful, up-to-date information regarding their approaches to serving juvenile offenders and at-risk youth.

County Plans Would Benefit From Defining At-Risk Youth

The JJCPA requires counties to describe their approaches to responding to juvenile offenders and at-risk youth in their comprehensive plans. Although it does not explicitly define the term *at risk*, the JJCPA suggests the term includes youth who are at risk of committing crimes. The JJCPA also does not identify risk factors—which, according to the National Institute of Justice, are preexisting personal characteristics or environmental conditions that increase the likelihood of delinquent behavior or other negative outcomes. For instance, repeated absences from school or an unstable home life are risk factors that may lead to a youth engaging in delinquent behavior, according to the Office of Juvenile Justice and Delinquency Prevention. Because counties must plan for responding to the needs of at-risk youth, we expected their comprehensive plans to have clearly defined what type of youth they consider to be at risk.

Four of the five counties we reviewed have not defined in their comprehensive plans the types of youth they consider to be at risk or formally identified the factors that make those youth at risk.

However, four of the five counties we reviewed have not defined in their comprehensive plans the types of youth they consider to be at risk or formally identified the factors that make those youth at risk. Without specific, documented definitions of at-risk youth, counties cannot effectively complete the required components of their comprehensive plans. Specifically, if counties do not identify the youth who are at risk, their comprehensive plans cannot identify all the resources available or their strategies for responding to those youth. Moreover, stakeholders cannot be certain whom the counties intend to serve, other than juvenile offenders, and which youth may be eligible to participate in both JJCPA-funded services and other services that the counties provide. Of the five counties' comprehensive plans that they submitted since the inception of the JJCPA, only Los Angeles included a definition of at-risk youth in its comprehensive plan, and it did that only in its fiscal year 2019–20 plan. Its definition includes a robust list of risk factors that indicate when a youth is at risk of engaging in delinquent behavior.

According to the Office of Juvenile Justice and Delinquency Prevention, there is no single path to delinquency, but the presence of several risk factors often increases a youth's chance of offending.

Because counties’ youth populations may have unique needs and face different challenges, it may be reasonable for each to have a different definition of at-risk youth. For instance, one county may focus on preventive programs that address truancy or literacy, while another may focus on rehabilitative services for formerly incarcerated juveniles. Since the Coordinating Councils of four counties we reviewed had not formally defined at-risk youth in their comprehensive plans, we asked the county probation departments how their counties informally defined at-risk youth. As Table 3 shows, these four counties’ definitions varied, and none of them formally identified risk factors. For example, we expected the counties to have specified risk factors in a manner similar to those Los Angeles outlined in its definition, which includes cognitive factors, family situations, peer associations, and academic factors.

Table 3
The Five Counties We Reviewed Had Varied Definitions of At-Risk Youth

	DEFINITION OF AT-RISK YOUTH USED BY COUNTY	DOES THE COUNTY’S COMPREHENSIVE PLAN FORMALLY:	
		DEFINE AT-RISK YOUTH?	IDENTIFY RISK FACTORS?
Kern	Youth—both those who have already committed a crime and those who have not—who are at risk of future criminal behavior if their needs are not addressed.	X	X
Los Angeles	Uses the National Conference of State Legislatures’ description of risk factors that increase a youth’s likelihood to engage in delinquent behavior, including the following: <ul style="list-style-type: none"> • Early antisocial behavior, poor cognitive development, and hyperactivity. • Poverty, maltreatment, family violence, divorce, familial antisocial behaviors, and single-parent family. • Association with deviant peers and peer rejection. • Failure to bond to school, poor academic performance, low academic aspirations, and neighborhood disadvantage. 	✓	✓
Mendocino	Youth who do not successfully transition into adulthood. For example, youth with delinquent behavior that could lead them to not complete their high school education or to become involved with the justice system.	X	X
San Joaquin	Youth at risk of entering the juvenile justice system or increasing system involvement.	X	X
Santa Barbara	Youth at risk of being removed from their homes.	X	X

Source: Comprehensive plans and interviews with county probation officials.

By defining their at-risk populations, counties can effectively plan their comprehensive juvenile justice strategies and stakeholders can easily identify appropriate services for youth who are at risk. For example, Los Angeles’s probation department told us that parents often ask what services might be available for their children who

are exhibiting delinquent behavior. Counties' comprehensive plans could serve as helpful resources for stakeholders interested in knowing what services counties provide and the characteristics of the populations they serve. When counties do not specify and publicize who their at-risk populations are, parents and stakeholders may not know where to turn for services to assist the youth in their care. Likewise, without this definition, the counties themselves cannot demonstrate that they have complied with state law requiring them to develop comprehensive plans that assess existing services for and includes responses to juvenile offenders and at-risk youth.

Counties Have Not Demonstrated Whether Their JJCPA-Funded Programs Are Effective

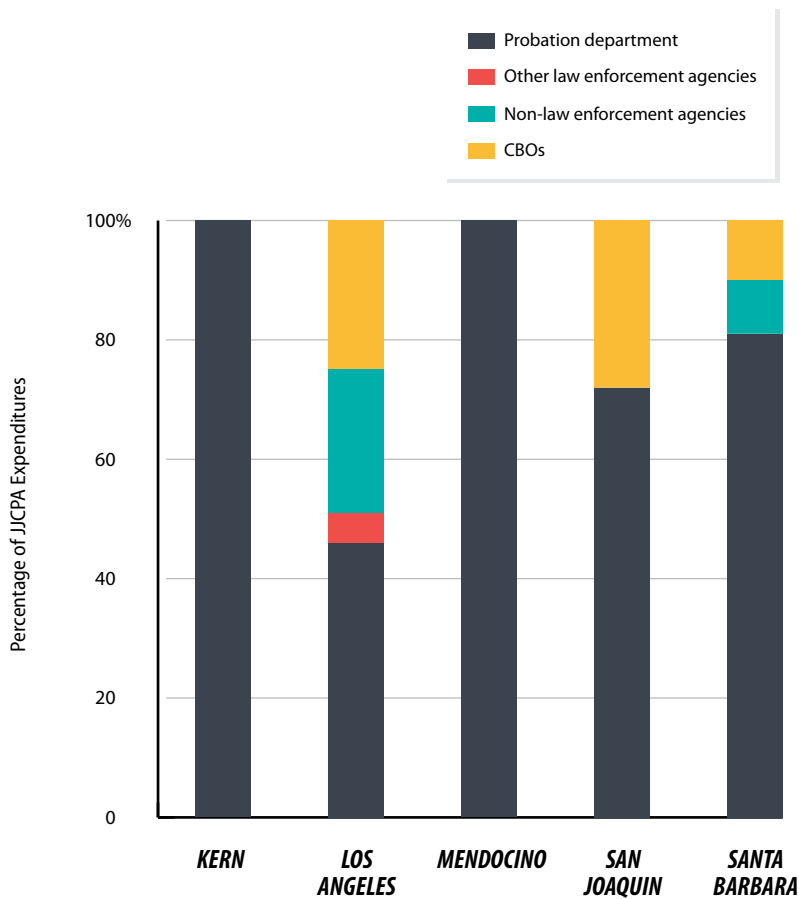
The counties we visited generally have not demonstrated that the programs they have chosen to operate represent an effective use of JJCPA funds. Although counties have broad discretion to use their JJCPA funds for any element of response to juvenile crime that is proven effective, not evaluating the effectiveness of those uses hinders a county's ability to maximize the use of the funds. Nonetheless, three of the five counties we reviewed have not evaluated the effectiveness of their JJCPA-funded programs. Further, although the two other counties—Los Angeles and San Joaquin—contracted with external evaluators for several years to assess the effectiveness of their JJCPA-funded programs, they did not include the results of the evaluations in their year-end reports to Community Corrections. As a result, Los Angeles and San Joaquin missed an opportunity to inform decision makers, stakeholders, and other counties about the promising results from their program evaluations.

Four of the five counties we reviewed generally used JJCPA funds for probation department programs, which primarily serve juvenile offenders. As Figure 3 shows, with the exception of Los Angeles, the counties each used more than two-thirds of their JJCPA funds for probation department programs in fiscal year 2017–18. This was a consistent theme in the four counties' spending over our five-year review period. Two of the counties, Kern and Mendocino, used their JJCPA funding solely for programs their probation departments operated, including gang prevention and suppression programs that provide supervision and supportive services to juvenile offenders who are involved with gangs. Kern's probation department also operated a second JJCPA-funded program that focuses on increasing efforts to ensure that juvenile offenders successfully transition from custody to their communities. Kern's probation department indicated that the county funds programs for juvenile offenders because these youth have the most serious needs and require more intensive services to prevent them from reoffending than youth who have not yet committed offenses.

Three of the five counties we reviewed have not evaluated the effectiveness of their JJCPA-funded programs.

In contrast, San Joaquin and Santa Barbara both used JJCPA funds for school-based programs that their probation departments provided. San Joaquin’s probation department operated a school-based program that assigns probation officers to specific school sites where they work with school staff to supervise juveniles on probation and to ensure their educational needs are met. Although this program focuses primarily on juvenile offenders, the county’s program description indicates that probation officers at the school sites also have regular contact with at-risk youth and provide them with intervention and referral services. Similarly, the probation department for Santa Barbara operated a school-based program that combined probation supervision with counseling opportunities.

Figure 3
In Fiscal Year 2017–18, Most Counties We Reviewed Spent the Majority of JJCPA Funds on Programs Their Probation Departments Operated



Source: County expenditure records.

In addition, three of the five counties either contract with other local entities and CBOs or coordinate with probation departments or other agencies to operate programs that serve juvenile offenders or at-risk youth. For example, San Joaquin contracts with a CBO to operate neighborhood service centers that work with juvenile offenders and at-risk youth and their families by assessing their needs and connecting them with services such as health and nutrition education and counseling. Los Angeles, which has the most diverse blend of service providers for JJCPA-funded programs, operates an after-school program to provide juvenile offenders and at-risk youth with enrichment programs, supervision, and individualized treatment through the coordinated services of CBOs; the probation department; and other local government entities, such as county and city parks and recreation departments and local school districts. It also contracts with a CBO that operates a writing program that teaches interpersonal skills to juvenile offenders subject to long-term detention in juvenile hall. Santa Barbara, although it operates two probation programs, also coordinates with CBOs and the county behavioral wellness department to provide services to juvenile offenders. For the five counties we visited, we present in Appendix A program descriptions; program expenditures incurred by probation departments, other local government entities, and CBOs; and select demographic information for participants in their JJCPA programs.

Counties have not submitted meaningful evaluations of the effectiveness of their respective JJCPA-funded programs in their year-end reports.

Regardless of the programs they choose to operate with JJCPA funds, counties have not submitted meaningful evaluations of the effectiveness of those programs in their year-end reports. Unlike their comprehensive plans, the year-end reports that counties submit to Community Corrections must include an assessment of the effectiveness of their JJCPA-funded programs. Specifically, counties must include descriptions or analyses of how their JJCPA-funded programs may have contributed to or influenced countywide juvenile justice trends, such as declining arrests. However, the five counties we reviewed did not include such descriptions or analyses in their October 2018 year-end reports—the most recent reports available during our audit—even though Community Corrections’ reporting template specifically directs them to do so. One county—Kern—failed to identify any juvenile justice trends or how its JJCPA-funded programs may have affected those trends. The remaining four counties generally described juvenile justice trends within their counties but did not specifically identify whether or how their JJCPA-funded programs may have affected those trends. For example, in its October 2018 year-end report, Santa Barbara stated that the number of juveniles referred to probation had decreased, as had juvenile arrest rates, and it noted that these trends were reflective of similar statewide trends. Although the county concluded that its JJCPA-funded strategies had undoubtedly played a role in the trends, it did not offer evidence to

support this assertion. Similarly, Mendocino noted that its juvenile arrest rates had declined but did not specify whether or how its JJCPA-funded programs might have contributed to this decrease.

Los Angeles and San Joaquin have contracted with external evaluators for several years to assess the effectiveness of some or all of their JJCPA-funded programs. For our audit period of fiscal years 2013–14 through 2017–18, the counties' most recent evaluations involved programs they operated during fiscal year 2016–17 and for which they could have reported information to Community Corrections in October 2018. When we reviewed the year-end reports the two counties submitted to Community Corrections, we were surprised to find that they did not include key findings from their respective program evaluations. For example, San Joaquin's external evaluator found that juveniles participating in one of its school-based programs had lower arrest rates and incarcerations. However, in its 2018 year-end report, San Joaquin made no mention of these positive outcomes. Instead, the county listed juvenile justice statistics and concluded that the programs it operated with JJCPA funds were highly effective, without citing any evidence. In the case of Los Angeles, its external evaluator concluded that participants in its school-based probation program were less likely to reoffend within six and 12 months after program enrollment than youth on other forms of probation. However, Los Angeles's 2018 year-end report did not mention this positive result. Rather, the county briefly described its crime statistics and mentioned that one of its recently funded programs significantly improved educational outcomes for juvenile offenders, but it did not offer evidence for how it had reached this conclusion. By not including details of the reduced rates of arrest and incarcerations in their year-end reports, these two counties missed an opportunity to inform decision makers, stakeholders, and other counties about the effectiveness of their use of JJCPA funds.

Los Angeles's and San Joaquin's external evaluators identified positive results for their respective JJCPA-funded programs, yet neither county mentioned the positive outcomes in their 2018 year-end reports.

Counties Can Increase Their Ability to Measure Program Effectiveness by Using JJCPA Funds to Improve Their Data Collection

Since 2017 counties have been required to include in their comprehensive plans a description of data that they intend to use to measure the success of their JJCPA-funded programs. All five counties we reviewed reported that they planned to use data primarily from their county probation departments' case management systems, such as sentencing information, to track information and outcomes for participants in JJCPA-funded programs. However, we found that the counties' case management systems' capabilities may be insufficient to track and produce information on program participants. Specifically, when we requested basic information about the participants in JJCPA-funded

programs, the five counties were not always able to provide this information and, in some instances, provided inaccurate information. Without reliable information about the individuals who participated in JJCPA-funded programs, counties cannot adequately assess the effectiveness of those programs in reducing juvenile crime and delinquency.

Mendocino, Los Angeles, and San Joaquin could not provide any data, such as age, race, or gender, on participants in at least one of their programs for certain fiscal years. Specifically, Mendocino could not provide any information about the participants in its gang intervention program for fiscal years 2016–17 and 2017–18. Similarly, Los Angeles did not collect and therefore could not provide data on participants in one of its largest programs during fiscal year 2017–18—a mental health program that the county spent roughly \$4.5 million of JJCPA funds in that year to operate. Los Angeles explained that state law no longer required it to report these data. However, we question why Los Angeles stopped collecting data for this program but continued collecting data on participants in other JJCPA programs that it chose to fund. We also found a case in which Los Angeles could not identify the JJCPA program an individual participated in or, once the program could be identified, how long the individual participated.

Mendocino and Los Angeles explained that they did not collect data for these programs because the Legislature amended state law removing the requirement to report on specific outcomes in 2017. Although the JJCPA no longer requires counties to report program-specific outcome data, such as the arrest and probation violation rates for program participants, it requires counties to assess the effectiveness of their JJCPA-funded programs. For example, counties must summarize or analyze, based on available information, how their funded programs may have contributed to or influenced countywide juvenile justice data trends, such as the number of incarcerations within the county. To determine how their funded programs may have contributed to countywide juvenile justice trends, counties must maintain data on participants in those programs.

To determine how their funded programs may have contributed to countywide juvenile justice trends, counties must maintain data on participants in those programs.

San Joaquin could not provide data for three of its five programs because the probation department does not track the data for these programs in its juvenile probation case management system and therefore could not compile it for our request. San Joaquin indicated that its external evaluator collects and analyzes the data directly from the CBO operating one of these programs and that the probation department plays no part in this program other than to provide it with funding. Similarly, the probation department explained that the county could not provide data for the other two JJCPA programs, which began operation in fiscal

year 2017–18, because the data for these programs exist in its adult case management system and in a separate referral system. The probation department stated that the data for these programs were not formatted in a way that could be retrieved or compiled in order to respond to our request. However, the probation department indicated that moving forward, it will capture or integrate this information into its juvenile case management system and analyze it for the county’s annual JJCPA program evaluation report.

Although Kern asserted that it collects and tracks data on participants in its JJCPA programs, it too was unable to identify all who had participated. Because of data issues it attributed to its case management system that it was not aware of until we requested the information, the probation department had difficulty identifying all of the participants in its JJCPA-funded programs. In fact, Kern’s juvenile programs probation director informed us that when she assumed her position in 2018, she wanted to determine whether the county’s two JJCPA-funded programs were the most effective use of JJCPA resources. However, she said, the outcome data available were limited and did not allow for a review of outcome measures for the programs. The probation department stated that the county has had plans since 2015 to implement a countywide criminal justice information system, but it indicated that the county is still working to identify how best to implement such a system. Without accurate data on participants in its JJCPA-funded programs, Kern cannot assess the effectiveness of those programs toward reducing juvenile crime and delinquency.

Santa Barbara tracks the individuals to whom it provides JJCPA services in its case management system, but it cannot always identify in which of its two programs they participated. As a result, the county cannot consistently assess how effective each of its programs is at reducing the likelihood of at-risk youth or justice-involved juveniles committing crimes.

In addition to the limitations we identified with the counties’ data and their case management systems, we found that Los Angeles has been aware of other issues with its data for several years but has not taken the steps necessary to improve its ability to conduct meaningful evaluations of its programs’ effectiveness. Since at least 2013, Los Angeles has contracted with the RAND Corporation (RAND) to evaluate the effectiveness of its JJCPA programs. From fiscal years 2013–14 through 2016–17, RAND consistently reported that Los Angeles did not maintain the information necessary to measure program-specific outcomes for several programs the county operated with JJCPA funds. For example, Los Angeles’s Department of Mental Health administers an evaluation before and after an individual’s participation in one of the county’s JJCPA-funded mental health programs to reflect any changes in

Kern was unable to identify all who had participated in its JJCPA programs because of data issues it attributed to its case management system.

the participant's overall psychological state. However, because few participants completed both evaluations for this program, RAND indicated that limited information was available to assess the impact of the program. In fact, in fiscal year 2016–17, only 13 percent of the participants in the mental health program completed both of the evaluations. As a result, RAND called into question the appropriateness and reliability of its findings on the effectiveness of this program and any programs that similarly lacked sufficient information. RAND noted that measuring these outcomes can be problematic because the probation department's data are only as reliable as the information it obtains from the entities that operate programs, such as CBOs and other local entities.

Finally, the counties we reviewed have not maximized their use of JJCPA funding to improve their data collection and tracking efforts. Although counties may use this funding for system enhancements to provide data for measuring the success of their JJCPA programs and strategies, none of the five counties reported doing so over the past five fiscal years. This is particularly troubling given that each county has unspent JJCPA funds. As we discuss in Chapter 2, the counties we reviewed did not spend roughly 4 percent to 14 percent of the JJCPA funds they received from fiscal years 2013–14 through 2017–18. Counties are missing an opportunity to enhance their ability to conduct meaningful evaluations of their JJCPA programs when they do not use available funding to make improvements to data collection and tracking efforts.

Recommendations

Legislature

To ensure that counties adequately identify how they serve at-risk youth, the Legislature should require counties to define at-risk youth—including identifying specific risk factors—in their comprehensive plans.

To ensure that counties comply with juvenile justice planning requirements to serve both juvenile offenders and at-risk youth, the Legislature should require Community Corrections to review counties' annual comprehensive plans to ensure that they include an adequate county-specific definition of at-risk youth.

The Legislature should direct Community Corrections to monitor counties' year-end reports to ensure that they include meaningful descriptions or analyses of how their JJCPA-funded programs may have contributed to or influenced countywide juvenile justice trends, as required by state law.

Counties

To ensure that their Coordinating Councils meet statutory requirements and are transparent to stakeholders, both Mendocino and San Joaquin should develop and implement bylaws for their Coordinating Councils and Mendocino County should reinstate its Coordinating Council.

To determine the effectiveness of their use of JJCPA funds, Kern, Los Angeles, Mendocino, San Joaquin, and Santa Barbara should include in their year-end reports to Community Corrections descriptions or analyses of how their JJCPA-funded programs influenced their juvenile justice trends, as required by law.

To adequately assess the effectiveness of their programs at reducing juvenile crime and delinquency, Los Angeles, Mendocino, and San Joaquin should collect data on all participants in each JJCPA program and for each service they provide.

To accurately assess the effectiveness of their programs, Kern, Los Angeles, and Santa Barbara should determine how to accurately identify in their case management systems the JJCPA programs and services in which each individual participates or should enhance these systems to provide this capability.

Community Corrections

To ensure that counties' comprehensive plans are informative and up to date, Community Corrections should revise its comprehensive plan template to require Coordinating Councils to specify plan components their counties are changing and to describe those changes. If a county is making no changes, the template should require the Coordinating Council to explain why no changes to the plan are necessary.

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Chapter 2

THE STATE HAS NOT PROVIDED SUFFICIENT OVERSIGHT OF THE JJCPA

Chapter Summary

In the previous chapter, we identify numerous shortcomings in the counties' administration and planning of the JJCPA. These shortcomings—which include counties' lacking Coordinating Councils, not having all the required representatives on their councils, and not always meaningfully updating their comprehensive plans—indicate the importance of effective state oversight. Community Corrections plays a key role in ensuring transparency related to the JJCPA, as state law requires it to collect and post information to its website that counties submit. Although it determines the format in which counties provide that information, Community Corrections does not review their reporting or require the counties to address deficiencies in that reporting. As a result, the value of the information on Community Corrections' website is diminished. Additionally, state law does not include a mechanism for Community Corrections or any state agency to restrict the counties' spending of JJCPA funding if they fail to comply with key legal requirements. Finally, although the amounts of JJCPA growth funding that counties receive have increased significantly in recent years, the State does not guarantee the amounts of this funding, and consequently some counties explained that they are hesitant to spend it on long-term programs. Increasing the guaranteed amount of base JJCPA funds to capture and stabilize some of the growth funding would provide counties with a more reliable source of funding.

Community Corrections Does Not Provide Oversight of Counties' Implementation of the JJCPA

Community Corrections plays a key transparency role with regard to the JJCPA because of its responsibility to collect and post information from counties to its website. Community Corrections has specified formats for counties to use in reporting their comprehensive plans and year-end reports, which helps ensure consistency among the counties' submissions. Consequently, we expected that it would review and assess whether the information it receives from counties is reasonable and provides a meaningful response to the elements the JJCPA requires. However, Community Corrections takes a narrow approach to its role with regard to the JJCPA. Specifically, it believes its JJCPA responsibility is limited to collecting information from the counties, posting that information

We reviewed the fiscal year 2013–14 through 2017–18 year-end reports that counties submitted to Community Corrections and found several instances in which counties did not report information correctly.

to its website, and reporting a compilation of that information annually to the Governor and Legislature. Community Corrections states on its website that it will not review or make any changes to information counties submit.

We reviewed the fiscal year 2013–14 through 2017–18 year-end reports that counties submitted to Community Corrections and found several instances in which counties did not report information correctly. For example, six counties reported in their October 2017 and 2018 year-end reports that they operated a JJCPA-funded program titled Salaries and Benefits. One of these counties—Calaveras County—explained in its description of its Salaries and Benefits program that it placed minors into one of two JJCPA programs, early intervention or intensive supervision. Although some expenses in Calaveras County may have indeed been for salaries and benefits to operate their two programs, we question why Community Corrections did not follow up with Calaveras or counties that similarly did not report their programs correctly.

Moreover, although Community Corrections provides on its year-end report template 35 program expenditure categories for direct services—such as after-school services, gang intervention, and substance abuse screening—we found counties were overly relying on unspecific categorizations that were not helpful in determining the type of programs that they operated. Specifically, we identified more than 200 instances in the past five fiscal years in which counties categorized their program expenditures as Other Direct Service. Of those, we identified nearly 80 instances in which counties could have categorized the activities as school-based or truancy programs, which are not currently categories. We believe the counties' overreliance on the category Other Direct Service reduces the usefulness of categorizing programs. If Community Corrections expanded its list to include more categories of programs, such as school-based and truancy programs in its list of categories, other counties and stakeholders may find more value in its website as they search for specific types of programs.

In response to these issues, Community Corrections stated that it does not consider overseeing how counties name and describe their programs as part of its role. We believe these issues would be relatively simple for counties to correct if Community Corrections conducted a review of the information they submit to ensure that they have accurately reported and appropriately categorized their programs. Community Corrections could then request counties to fix the identified issues. By not reviewing the information counties submit, Community Corrections is missing an opportunity to

expand its list of program classifications so that counties can appropriately categorize their programs and key stakeholders can properly identify them.

Although we believe it should oversee the information counties report to it and request that counties fix reporting errors, Community Corrections has no authority to compel counties to comply with key requirements of the JJCPA. Until 2017 state law required Community Corrections to review and approve only those comprehensive plans that fulfilled the plan requirements of the JJCPA. The law also prohibited the counties from allocating JJCPA funding until Community Corrections had approved their comprehensive plans. However, an amendment to state law that took effect in 2017 generally removed the requirement for Community Corrections to approve comprehensive plans, and thus the law no longer requires that the counties' spending of JJCPA funds be contingent on approval from Community Corrections. Consequently, counties that do not meet the requirements of the JJCPA continue to receive and spend funding. Specifically, we identified up to 11 counties that may not have Coordinating Councils but have reported to Community Corrections that they are using JJCPA funds.⁴ To compel counties to comply with the requirements of the JJCPA, state law needs to provide authority for the State to prohibit counties from spending funding until they meet those requirements.

Because it receives the comprehensive plans and determines the format in which counties report those plans, Community Corrections is in a good position to provide oversight of counties' implementation of the JJCPA. Specifically, Community Corrections should modify its template for comprehensive plans to require counties to report about their Coordinating Councils, thereby taking steps to mitigate the risk that a county would submit a plan that a Coordinating Council has not approved. Moreover, Community Corrections could take action to identify and mitigate other shortcomings we identified in counties' implementation of the JJCPA that we list in Table 4. Taking such actions would help ensure that counties not only comply with state law but also that they meaningfully plan for and report on their JJCPA expenditures.

Community Corrections has no authority to compel counties to comply with key requirements of the JJCPA.

⁴ Although Alpine County did not have a Coordinating Council, it did not spend any of its JJCPA funds during our audit period. Alpine County stated that it does not currently participate in the JJCPA but that it is considering establishing a Coordinating Council in the future so that it can spend JJCPA funds.

Table 4
By Providing Increased Oversight, Community Corrections Could Have Mitigated Deficiencies in Counties' Implementation of the JJCPA

COUNTIES DID NOT ALWAYS:	
X	Have Coordinating Councils
X	Have all required representatives on Coordinating Councils
X	Meaningfully update their comprehensive plans
X	Include a definition of <i>at-risk</i> * youth in their comprehensive plans
X	Include meaningful descriptions or analyses of the effectiveness of their JJCPA programs in their year-end reports
X	Accurately report information in their year-end reports to Community Corrections

Source: Counties' documentation regarding their implementation of the JJCPA, interviews with county probation departments, and information Community Corrections collects from counties.

* AB 413 (Chapter 800, Statutes of 2019) deleted the term "at-risk" used to describe youth for purposes of various provisions in the California Education and Penal Codes and replaced it with the term "at-promise." However, the term "at-risk" currently remains in JJCPA as part of the California Government Code. As a result, we use the term "at-risk" consistent with the JJCPA throughout our report.

Community Corrections Is Not Maximizing the Usefulness of the Information It Collects From Counties

State law requires Community Corrections to collect and post to its website a description or summary of the programs, strategies, and system enhancements that the counties have supported with JJCPA funds. Community Corrections is also required to submit an annual report to the Governor and Legislature that summarizes this information, along with countywide trend data. These requirements are part of Community Corrections' mandate to collect and maintain information related to juvenile justice so that the public is aware of the impact of state and local programs on juvenile justice and so that local entities can access information about promising practices and innovative approaches to reducing juvenile crime and delinquency. As a result, we expected Community Corrections to maximize the utility of county-reported data by presenting the JJCPA information on its website in a manner that enables users to review and compare the program information from multiple counties. However, Community Corrections does nothing beyond posting on its website the individual reports that counties submit, without synthesizing the information in those reports in a manner that is helpful to users.

According to Community Corrections, it posts counties' information in the format in which it was submitted because it interprets its statutory responsibility to post a description or summary of counties' JJCPA information narrowly. Moreover, Community Corrections has

not calculated the cost of organizing and displaying JJCPA information on its website in more useful ways and therefore has not determined whether it would need additional resources to do so. Community Corrections already displays other statewide data, such as grants counties receive and jail population trends, on its website in a manner similar to the interactive graphic we describe later in this section. Therefore, it seems reasonable for Community Corrections to present JJCPA information in a way that adds value to the individual counties' submissions by aggregating and enabling users to navigate the data. Doing so would help Community Corrections further satisfy its duty to identify and promote evidence-based and innovative programs by enabling users to conduct searches or compare the programs counties are operating using JJCPA funding. At the least, it should determine the resources necessary to make this change. By simply posting to its website the information that counties submit, Community Corrections has missed an opportunity to provide local entities with a valuable resource.

Some of the counties we visited expressed that Community Corrections could improve the information it displays about the programs that other counties are funding with their JJCPA allocations. According to Santa Barbara, for example, it would be helpful if Community Corrections provided more detail about individual programs, such as how a county funded the program and who operated it. Mendocino said that it would be helpful if Community Corrections provided additional analysis of the information that counties submit instead of being only a repository of documents. Similarly, San Joaquin agreed that it would be helpful and increase transparency if Community Corrections' website allowed counties to easily compare information about JJCPA-funded programs that counties operate. A more useful and navigable display would allow users to search for a specific program type, such as gang intervention, and would summarize information about gang-intervention programs from other counties across the State. Community Corrections' website could then provide a summary of program descriptions, funding levels, juvenile trend data, and the counties' opinions about how these programs influenced juvenile trends. Users could then compare similar programs operated by multiple counties.

Using expenditure information from Community Corrections' website, we created an interactive graphic on our website that allows users to search for programs operated by a specific county or to search for similar programs that fall under the same expenditure category operated by any county.⁵ Because Community Corrections does not review or correct information counties submit but instead relies

Some of the counties we visited expressed that Community Corrections could improve the information it displays about the programs that other counties are funding with their JJCPA allocations.

⁵ To view a display of program budgets and information for all counties that participate in the JJCPA, visit our interactive dashboard in the online version of this report at www.auditor.ca.gov/reports/2019-116/supplementalgraphic.html.

Community Corrections has the capability to develop a more robust presentation of JJCPA information.

on them to submit accurate information, our graphic may contain some inaccuracies. Nonetheless, we believe it provides users with easy access to financial information for all of the JJCPA programs each county operated from fiscal years 2013–14 through 2017–18. In particular, users can select an individual county to view a summary of that county’s JJCPA-funded programs. Users can also select a specific program type to view summary information about those programs, including which counties operated them. Community Corrections could incorporate other data that it collects from the counties, such as program descriptions and data the county used to measure program effectiveness, to increase the utility of the comparison between counties beyond the financial information we present. Given that it already collects the information counties report, Community Corrections is best positioned to provide additional value by presenting that information in a manner that enables users to easily review how counties across the State use JJCPA funds to address juvenile crime and delinquency. Moreover, Community Corrections has the capability to develop a more robust presentation of JJCPA information because it currently presents other statewide information using the same software that we used to create our interactive graphic.

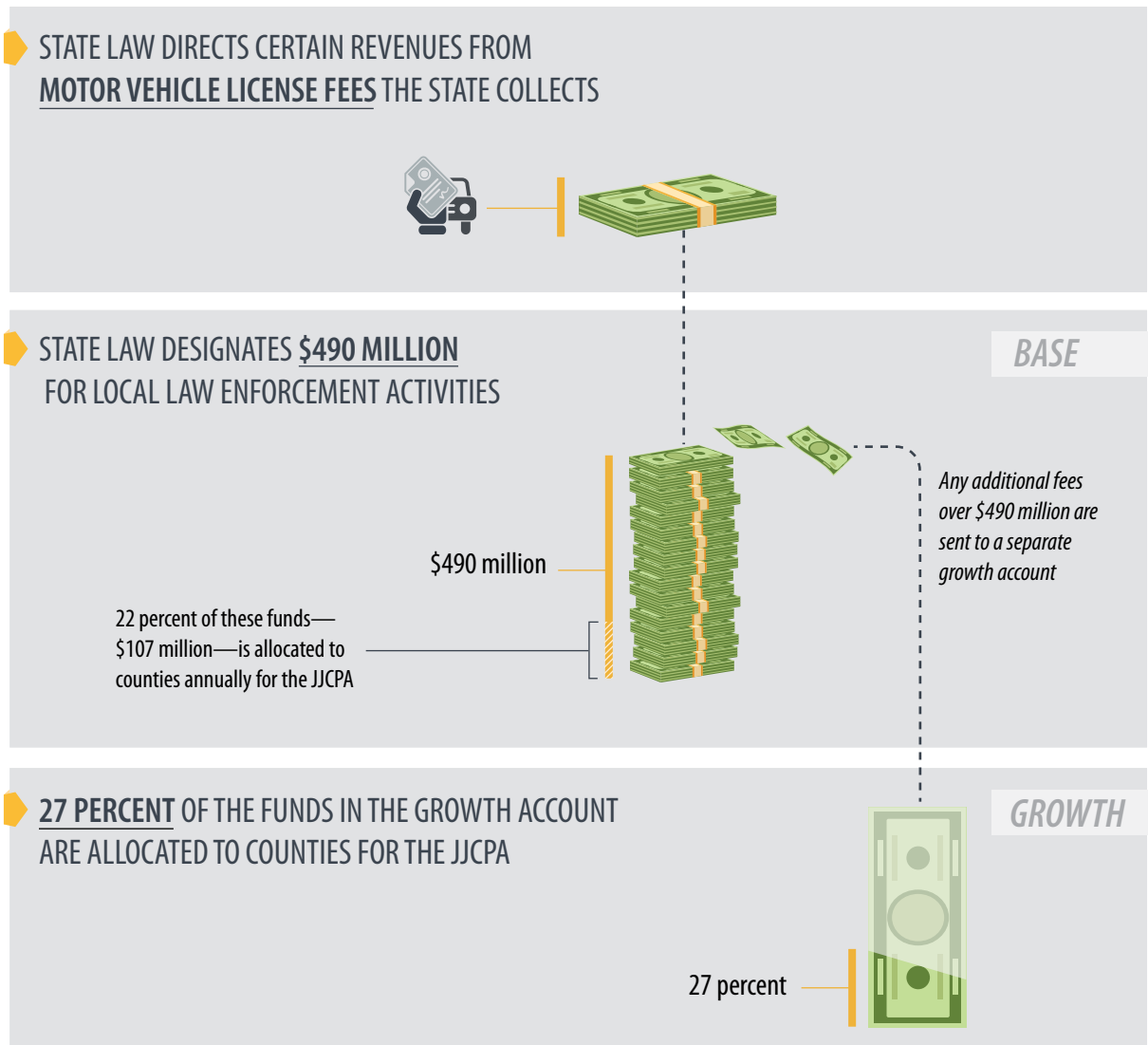
The Current JJCPA Funding Process Is Not Predictable and Should Be Improved

As we describe in the Introduction, the State provides counties with JJCPA funding through an annual guaranteed amount, referred to as *base funding*, and—if funds are available—an additional variable amount, referred to as *growth funding*. Because growth funding relies on several factors that can change from year to year, it is not predictable. The amount of annual growth funding the State has provided to counties has increased significantly since fiscal year 2014–15 and represented about one-third of the \$159 million in total JJCPA funding counties received in fiscal year 2018–19. Because counties have difficulty anticipating how much JJCPA growth funding they will receive each year, they did not spend their total JJCPA allocations during our five-year review period. To encourage counties to spend more of their JJCPA funding each year, the Legislature should act to stabilize the amount of JJCPA funding it allocates to counties.

The State allocates motor vehicle license fee revenues to a number of sources, including the Enhancing Law Enforcement Activities Subaccount (ELEAS account) that provides funding for local law enforcement activities. As Figure 4 shows, state law directs \$490 million from motor vehicle license fees to the ELEAS account each year. From this account, it designates \$107 million as the initial allocation, or base funding, to counties for the JJCPA, which the State Controller’s Office pays to counties at regular intervals during each fiscal year. Since fiscal year 2012–13, the State has consistently

provided the same amount of base funding to counties, which it allocates based on county populations. However, state law also provides for an additional allocation of funding for local law enforcement activities—including the JJCPA—in the event the State collects more motor vehicle license fees than required for its initial allocations. Once the ELEAS account reaches the established limit of \$490 million, the State deposits additional funds into a separate growth account, then allocates this growth funding to counties in the same manner as the base funding.

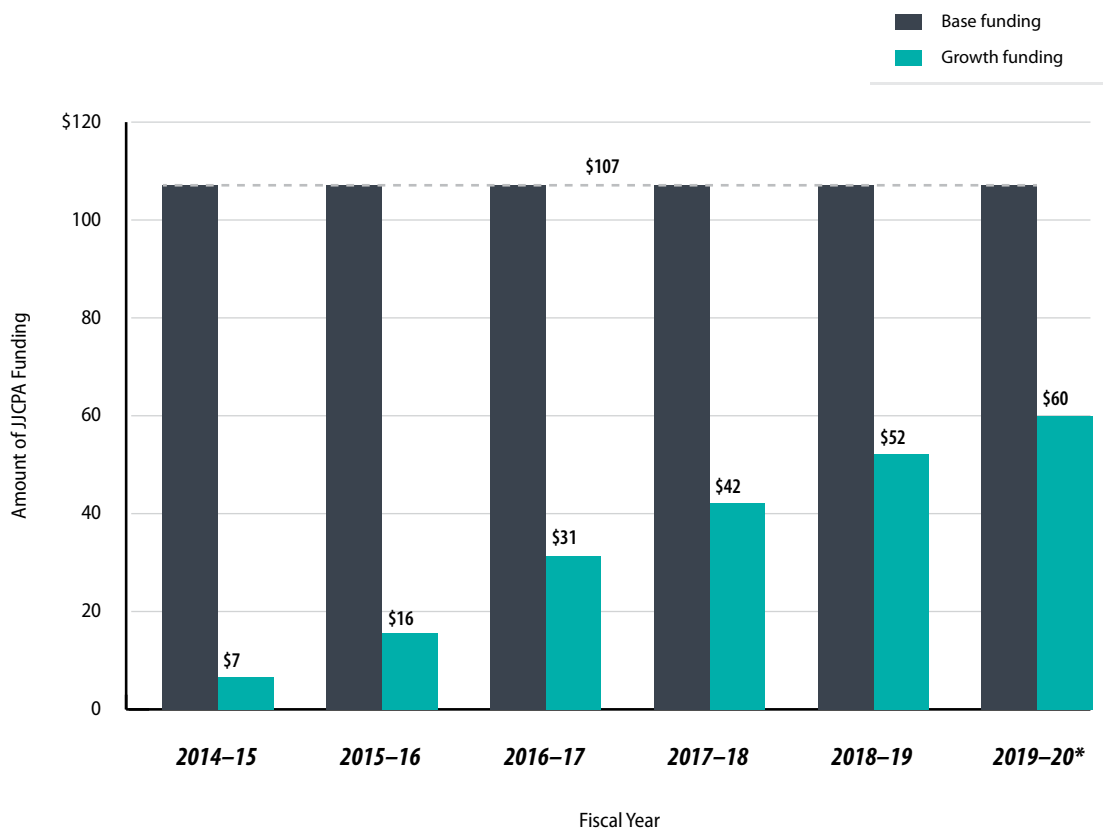
Figure 4
 The State Provides Counties With Both Base and Growth JJCPA Funding



Source: Government Code and Revenue and Taxation Code.

The annual amount of growth funding the State provided to counties increased by \$53 million from fiscal years 2014–15 through 2019–20. The annual growth funding allocations depend on the amount the State collects in vehicle license fees, which reflects the number of vehicles purchased during the year and the market value of each vehicle. In addition, the local law enforcement allocation is only one of the motor vehicle license fee allocations established in state law. As a result of these factors, the amount of JJCPA growth funding the State provided counties in fiscal years 2014–15 through 2019–20 varied significantly, as Figure 5 shows. For example, the State distributed almost \$7 million in JJCPA growth funding to counties in fiscal year 2014–15, nearly \$16 million during fiscal year 2015–16, and \$60 million in fiscal year 2019–20. Because base funding is fixed at \$107 million, the growth funding the State allocated in fiscal year 2019–20 represents about a third of the counties’ JJCPA allocations.

Figure 5
Growth Funding Increased Significantly From Fiscal Years 2014–15 Through 2019–20
 (Dollars in Millions)

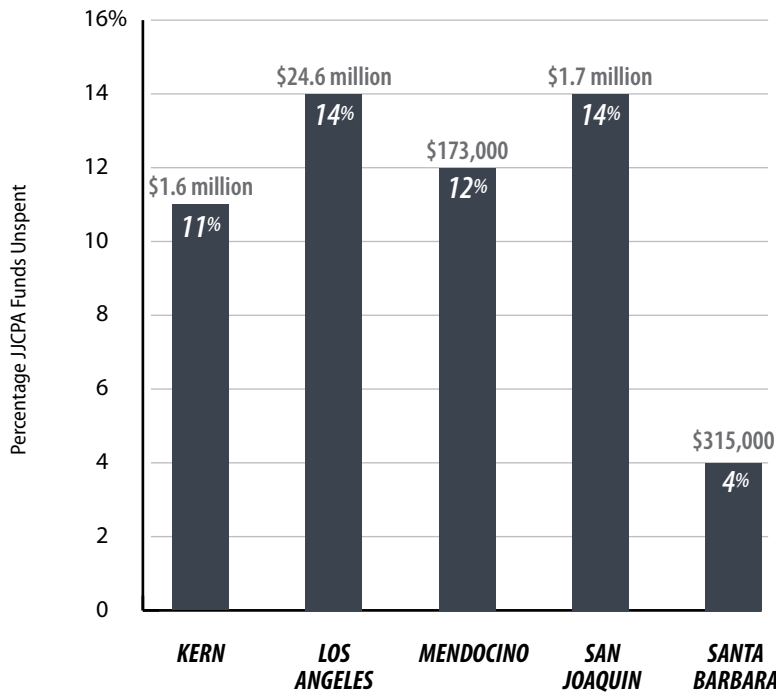


Source: State law and payment records from the State Controller’s Office.

* If there are no changes to state law governing JJCPA allocations, the State will allocate \$107 million in base funding to counties in fiscal year 2019–20.

The five counties we visited have not spent all of the JJCPA funding the State has provided. The State provides JJCPA funding to counties based on their populations. For example Los Angeles, which had roughly one quarter of the State’s estimated total population for 2017, received more than \$212 million in total JJCPA funding from fiscal years 2013–14 through 2018–19, while Mendocino received just \$1.9 million during the same period because it has a much smaller population. However, none of the counties spent all of the JJCPA funding they received, as Figure 6 shows. When we asked the probation departments at the five counties why they had not spent all of their JJCPA funds, Kern, Los Angeles, and Santa Barbara indicated that they had not done so because of the variability in the amount of growth funding they receive each year. Mendocino explained that it had not spent growth funds because it had not yet fully spent the base funds it received and accumulated in years before our audit period. Finally, San Joaquin stated that there is a chance that the State could reduce or eliminate some funding.

Figure 6
Counties Have Not Spent All of the JJCPA Funds They Received From Fiscal Years 2013–14 Through 2017–18



Source: State Controller’s Office payment records and county accounting records.

The counties' approaches to managing growth funds are an indication of the challenge that this funding presents to them.

Because the State does not guarantee the amount of growth funding counties receive, some counties informed us that they limit how they use the growth funds. For instance, in accordance with a county policy, Los Angeles has allocated its growth funding to what it considers to be one-time uses of funds. San Joaquin's chief probation officer stated that it maintains a 12- to 18-month reserve because the State could reduce or eliminate some funds it provides to counties. Santa Barbara, which spent nearly all of the JJCPA base and growth funding it received from fiscal years 2013–14 through 2017–18, is also concerned that amounts of growth funding may decrease in the future. In fact, Santa Barbara explained that it is currently considering what actions it may take if it does not receive growth funding or if growth funding is reduced in future years because of a recession.

The counties' approaches to managing growth funds are an indication of the challenge that the variability of this funding presents to them. Increasing the JJCPA base funding amount would enhance counties' abilities to accurately predict their future JJCPA funding allocations because the State would guarantee a greater amount of total JJCPA funding in law. This change could allow counties to rely on a greater percentage of their total JJCPA funds as a stable source of funding. In fiscal year 2014–15, growth funds represented just 6 percent of the total JJCPA funds that counties received. However, in fiscal year 2019–20, it represented more than one-third. Moreover, the annual amount of growth funds the State has allocated to counties consistently increased from fiscal years 2014–15 through 2019–20. Although the counties we reviewed did not spend all of the JJCPA funds they received—which includes both base and growth funding—from fiscal years 2013–14 through 2017–18, all five counties spent more than just the total of the base funds they received during those five years. If the Legislature were to use some growth funds to increase the amount of base funds counties receive, counties could realize a better balance between stable base funds and less predictable growth funds. Because state law requires Community Corrections to collect JJCPA expenditure information from counties annually, we believe it is well positioned to determine an appropriate higher amount of base funding.

Recommendations

Legislature

To enable Community Corrections to provide effective oversight of the required elements of the JJCPA, the Legislature should amend state law to describe a process for restricting the spending of JJCPA funding by counties that do not meet the requirements of the JJCPA. As part of that process, the State should prohibit counties that have not established Coordinating Councils from spending JJCPA funds.

To make JJCPA funding more stable and predictable, the Legislature should amend state law to increase the amount of guaranteed JJCPA funding the State provides to counties. If the Legislature decides to stabilize JJCPA funding, it should direct Community Corrections to evaluate the expenditure information counties submit and identify an appropriate amount of base funding. The Legislature should further direct Community Corrections to assess every five years the percentage of total JJCPA funds that growth funds represent to determine whether the base funding needs to be adjusted.

Community Corrections

To ensure that counties include accurate information in their comprehensive plans and year-end reports, Community Corrections should review the information counties submit to it and follow up with them to obtain missing information or to clarify information that seems incorrect.

To better promote effective local efforts related to the JJCPA, Community Corrections should include on its website the capability for stakeholders, counties, and other interested parties to review and easily compare the JJCPA information of multiple counties. Specifically, its website should allow users to be able to select a specific type of JJCPA-funded program and easily review information the counties submitted for all programs associated with that program type. Community Corrections should determine the cost of providing this additional service and, if necessary, request additional resources.

We conducted this performance audit in accordance with generally accepted government auditing standards and under the authority vested in the California State Auditor by Government Code 8543 et seq. 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 the audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Respectfully submitted,



ELAINE M. HOWLE, CPA
California State Auditor

May 12, 2020

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Appendix A

JJCPA Program Descriptions, Expenditures, and Participant Demographics at the Five Counties We Reviewed, Fiscal Years 2013–14 Through 2017–18

The Joint Legislative Audit Committee (Audit Committee) requested that we identify all JJCPA funds that the five counties we reviewed spent on salaries and benefits for staff at probation departments, law enforcement agencies, and other public agencies, as well as JJCPA funds spent on CBOs. The Audit Committee also requested that we identify certain demographic information for participants in JJCPA-funded programs at each of the five counties. As we discuss in Chapter 1, the information that counties provided to us about program participants was not always complete or accurate. Nevertheless, this Appendix presents available descriptions, financial information (dollars rounded to thousands), and certain demographic information, such as the race, gender, and age of participants, for each JJCPA-funded program from fiscal years 2013–14 through 2017–18 at each of the five counties we reviewed.

Kern County

Kern operated two programs with JJCPA funding during our audit period. The Aftercare Program focuses on reintegrating previously incarcerated gang members, habitual offenders, and substance abusers to the community, and the Gang Intervention and Suppression Team Program seeks to reduce gang activity. Table A.1 shows percentages of certain demographics for Kern's JJCPA-funded programs from fiscal years 2013–14 through 2017–18.

Table A.1
Percentages of Certain Demographics for Kern JCPA-Funded Programs During
Fiscal Years 2013–14 Through 2017–18

PROGRAM	RACE					GENDER			AGE					
	AFRICAN-AMERICAN	ASIAN AND PACIFIC ISLANDER	HISPANIC OR LATINO	NATIVE AMERICAN	WHITE	OTHER OR UNKNOWN	FEMALE	MALE	OTHER OR UNKNOWN	0 TO 9	10 TO 15	16 TO 18	19 TO 25	OTHER OR UNKNOWN
Aftercare	22%	0%	60%	0%	18%	0%	16%	84%	0%	0%	24%	76%	0%	0%
Gang Intervention and Suppression Team	34	0	60	0	5	1	4	95	1	0	4	37	59	0

Source: Data provided by the Kern Probation Department.

Aftercare Program Description

The Aftercare Program serves juveniles as they transition from custody to the community and who, because of their level of delinquent behavior, require intensive supervision. The primary goal of the program is to increase the number of juvenile offenders who successfully transition from custody to community by eliminating their criminal and delinquent behaviors. Participants are typically probationers who may be criminal street gang members, gang-affiliated violent offenders, habitual offenders, or substance abusers. Probation officers monitor participants' completion of court-ordered programs, restitution payments, weekly reporting, school attendance and behavior, and any new law violations. Officers also monitor juveniles on probation whom they refer to community agencies, and they help design appropriate transition plans for these individuals as they reenter the community. Table A.2 presents expenditure information for the program for fiscal years 2013–14 through 2017–18.

Table A.2
Aftercare Program Expenditures for
Fiscal Years 2013–14 Through 2017–18

FISCAL YEAR	SALARIES AND BENEFITS OF LOCAL AGENCIES			CBOs
	PROBATION DEPARTMENT	OTHER LAW ENFORCEMENT DEPARTMENTS	NON-LAW ENFORCEMENT DEPARTMENTS	
2013–14	\$1,175,000	\$0	\$0	\$0
2014–15	1,326,000	0	0	0
2015–16	1,037,000	0	0	0
2016–17	1,357,000	0	0	0
2017–18	1,386,000	0	0	0
Totals	\$6,281,000	\$0	\$0	\$0

Source: Kern expenditure data.

Gang Intervention and Suppression Team Program Description

The Gang Intervention and Suppression Team Program identifies gang members in target areas and monitors them for gang activity. The program focuses on suppression activities and intelligence-gathering activities to develop specific and detailed information on each gang member and proof of gang affiliation. The program’s probation officers also supervise juveniles with identified gang involvement who were previously incarcerated and have returned to the community or who are on probation. Probationary case management includes frequent contact with juveniles on probation. Table A.3 presents expenditure information for the program for fiscal years 2013–14 through 2017–18.

Table A.3
Gang Intervention and Suppression Team Program Expenditures for Fiscal Years 2013–14 Through 2017–18

FISCAL YEAR	SALARIES AND BENEFITS OF LOCAL AGENCIES			CBOs
	PROBATION DEPARTMENT	OTHER LAW ENFORCEMENT DEPARTMENTS	NON-LAW ENFORCEMENT DEPARTMENTS	
2013–14	\$1,094,000	\$0	\$0	\$0
2014–15	1,080,000	0	0	0
2015–16	1,229,000	0	0	0
2016–17	1,280,000	0	0	0
2017–18	1,337,000	0	0	0
Totals	\$6,020,000	\$0	\$0	\$0

Source: Kern expenditure data.

Los Angeles County

Los Angeles operated 13 programs with JJCPA funding during our audit period. These programs provided mental health treatment, intensive family and community-based therapy, school-based probation supervision, substance abuse intervention, gender-specific services for girls, after-school enrichment and supervision, housing-based day supervision, assistance for probationers transitioning from custody to the community, writing classes, and coordinated support to decrease ongoing delinquency, among other services. The county also funded a program aimed at abolishing chronic truancy, and it operated several one-time projects using growth funds to enhance existing services. Table A.4 shows percentages of certain demographics for Los Angeles’s JJCPA-funded programs during fiscal years 2013–14 through 2017–18.

Table A.4
Percentages of Certain Demographics for Los Angeles JJCPA-Funded Programs During
Fiscal Years 2013–14 Through 2017–18

PROGRAM	RACE							GENDER			AGE			
	AFRICAN-AMERICAN	ASIAN AND PACIFIC ISLANDER	HISPANIC OR LATINO	NATIVE AMERICAN	WHITE	OTHER OR UNKNOWN	FEMALE	MALE	OTHER OR UNKNOWN	0 TO 9	10 TO 15	16 TO 18	19 TO 25	OTHER OR UNKNOWN
Abolish Chronic Truancy	1%	0%	42%	0%	0%	57%	34%	36%	30%	63%	37%	0%	0%	0%
After-School Enrichment and Supervision	11	0	41	0	0	48	29	30	41	2	59	32	0	7
Early Intervention and Diversion*	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gender-Specific Services	16	2	71	1	4	6	97	1	2	1	65	31	0	3
High Risk/High Needs	27	1	64	0	4	4	20	78	2	0	17	81	0	2
Housing-Based Day Supervision	36	2	59	0	1	2	58	42	0	4	74	21	0	1
Mental Health Screening, Assessment, and Treatment	32	0	60	0	6	2	22	78	0	0	32	67	1	0
Multi-Systemic Therapy	22	1	66	0	4	7	24	74	2	6	85	6	0	3
One-Time Projects*	-	-	-	-	-	-	-	-	-	-	-	-	-	-
School-Based Supervision†	18	2	69	1	5	5	35	64	1	0	56	41	0	3
Special Needs Court	24	1	58	0	13	4	36	64	0	0	40	59	1	0
Writing	37	1	54	0	7	1	44	56	0	0	35	64	1	0
Youth Substance Abuse Intervention	18	1	72	0	6	3	16	83	1	0	25	52	1	22

Source: Data provided by the Los Angeles Probation Department.

* The county did not provide demographic data for the program.

† According to the county, demographics for this program are by calendar year.

Abolish Chronic Truancy Program Description

Abolish Chronic Truancy Program is a Los Angeles County District Attorney's Office program that targets chronically truant youth in selected elementary schools. The program objectives are to improve school attendance through parent and child accountability while parents still exercise control over children and to ensure that youth who are at risk of truancy or excessive absences attend school. The program goals are to reduce truancy at selected schools, address attendance problems before children's behavior is ingrained, and improve school performance. The program refers youth with chronic truancy to the district attorney's office, which notifies the parents of the truant youth and follows up with formal criminal filings if the parents fail to take appropriate corrective action. Table A.5 presents expenditure information for the program for fiscal years 2013–14 through 2017–18.

Table A.5
Abolish Chronic Truancy Program Expenditures for
Fiscal Years 2013–14 Through 2017–18

FISCAL YEAR	SALARIES AND BENEFITS OF LOCAL AGENCIES			CBOs
	PROBATION DEPARTMENT	OTHER LAW ENFORCEMENT DEPARTMENTS	NON-LAW ENFORCEMENT DEPARTMENTS	
2013–14	\$8,000	\$354,000	\$0	\$0
2014–15	8,000	392,000	0	0
2015–16	11,000	394,000	0	0
2016–17	10,000	398,000	0	0
2017–18	12,000	398,000	0	0
Totals	\$49,000	\$1,936,000	\$0	\$0

Source: Los Angeles expenditure data.

After-School Enrichment and Supervision Program Description

The After-School Enrichment and Supervision Program strives to reduce juvenile crime by monitoring probationers' peer associations, providing homework assistance, and involving at-risk youth and probationers in prosocial activities. Multiple city and county organizations, such as city and county parks and recreation departments, county offices of education, local school districts, probation departments, and CBOs, collaborate to provide after-school enrichment and supervision for both juveniles on probation and at-risk youth. These programs take place at county and city parks, schools, and CBOs. Services are

offered from 3 p.m. to 6 p.m., when at-risk youth and probationers are most likely to be without adult supervision. Table A.6 presents expenditure information for the program for fiscal years 2013–14 through 2017–18.

Table A.6
After-School Enrichment and Supervision Program Expenditures for Fiscal Years 2013–14 Through 2017–18

FISCAL YEAR	SALARIES AND BENEFITS OF LOCAL AGENCIES			CBOs
	PROBATION DEPARTMENT	OTHER LAW ENFORCEMENT DEPARTMENTS	NON-LAW ENFORCEMENT DEPARTMENTS	
2013–14	\$883,000	\$81,000	\$510,000	\$0
2014–15	926,000	101,000	606,000	0
2015–16	808,000	105,000	602,000	0
2016–17	721,000	100,000	618,000	0
2017–18	726,000	64,000	555,000	0
Totals	\$4,064,000	\$451,000	\$2,891,000	\$0

Source: Los Angeles expenditure data.

Early Intervention and Diversion Program Description

The Early Intervention and Diversion Program provides at-risk youth and their families with coordinated supportive services intended to decrease the likelihood of ongoing delinquency and to keep youth and families out of the justice system. The program provides services to youth and their families whom the probation department has investigated for offenses that it does not refer to the district attorney. The goal of the program is to ensure that youth and their families receive health, mental health, and other services that enhance the family unit and divert youth from entering the juvenile justice system. Table A.7 presents expenditure information for the program for fiscal years 2013–14 through 2017–18.

Table A.7
Early Intervention and Diversion Program Expenditures for
Fiscal Years 2013–14 Through 2017–18

FISCAL YEAR	SALARIES AND BENEFITS OF LOCAL AGENCIES			CBOs
	PROBATION DEPARTMENT	OTHER LAW ENFORCEMENT DEPARTMENTS	NON-LAW ENFORCEMENT DEPARTMENTS	
2013–14*	–	–	–	–
2014–15*	–	–	–	–
2015–16	\$397,000	\$0	\$0	\$0
2016–17	518,000	0	0	0
2017–18	480,000	0	0	1,000
Totals	\$1,395,000	\$0	\$0	\$1,000

Source: Los Angeles expenditure data.

* The program did not receive funding in this year.

Gender Specific Services Program Description

The Gender Specific Services Program focuses on helping girls develop knowledge, skills, and experiences that will promote health and resiliency. The program aims to provide essential elements of effective gender-specific services for adolescent girls, including the following:

- Space that is physically and emotionally safe and removed from the demands for attention of adolescent males.
- Time for girls to talk and to conduct emotionally safe, comforting, challenging, nurturing conversations within ongoing relationships.
- Opportunities for girls to develop relationships of trust and interdependence with other women already present in their lives.
- Programs that draw on girls' cultural strengths rather than focusing primarily on the individual girl.
- Mentors who share experiences that resonate with the realities of girls' lives and who exemplify survival and growth.
- Education about women's health, including female development, pregnancy, contraception, and disease prevention, along with opportunities for girls to define healthy sexuality on their own terms, rather than as victims.

Table A.8 presents expenditure information for the program for fiscal years 2013–14 through 2017–18.

Table A.8
Gender Specific Services Program Expenditures for
Fiscal Years 2013–14 Through 2017–18

FISCAL YEAR	SALARIES AND BENEFITS OF LOCAL AGENCIES			CBOs
	PROBATION DEPARTMENT	OTHER LAW ENFORCEMENT DEPARTMENTS	NON-LAW ENFORCEMENT DEPARTMENTS	
2013–14	\$28,000	\$0	\$0	\$759,000
2014–15	28,000	0	0	885,000
2015–16	39,000	0	0	741,000
2016–17	33,000	0	0	677,000
2017–18	16,000	0	0	533,000
Totals	\$144,000	\$0	\$0	\$3,595,000

Source: Los Angeles expenditure data.

High Risk/High Needs Program Description

The High Risk/High Needs Program targets juvenile probationers who are transitioning from certain facilities to the community, as well as those under other types of supervision who are high risk. Many of these juveniles are involved with gangs, use drugs and alcohol, are low academic performers, and have risk factors across multiple domains. Offenders with these profiles are at high risk for committing new crimes upon reentry to the community. The program consists of home-based services and employment services for juveniles on probation, with the aim of improving school performance, strengthening the family and parental skills, and linking juveniles on probation to job training and placement. Table A.9 presents expenditure information for the program for fiscal years 2013–14 through 2017–18.

Table A.9
High Risk/High Needs Program Expenditures for
Fiscal Years 2013–14 Through 2017–18

FISCAL YEAR	SALARIES AND BENEFITS OF LOCAL AGENCIES			CBOs
	PROBATION DEPARTMENT	OTHER LAW ENFORCEMENT DEPARTMENTS	NON-LAW ENFORCEMENT DEPARTMENTS	
2013–14	\$1,939,000	\$230,000	\$169,000	\$2,562,000
2014–15	1,949,000	287,000	103,000	2,122,000
2015–16	1,464,000	299,000	106,000	2,716,000
2016–17	538,000	286,000	116,000	2,549,000
2017–18	494,000	574,000	162,000	2,263,000
Totals	\$6,384,000	\$1,676,000	\$656,000	\$12,212,000

Source: Los Angeles expenditure data.

Housing-Based Day Supervision Program Description

The Housing-Based Day Supervision Program provides day, evening, and weekend supervision and services for juveniles on probation, at-risk youth, and their families who live in specific housing developments within the county. The program also assists the families of juveniles on probation to access resources and services that will help them become self-sufficient, thereby reducing risk factors associated with juvenile delinquency. The program's goals are to provide early-intervention services for at-risk youth, daily monitoring of juveniles on probation, and enhanced family services to juveniles on probation and at-risk youth. Its goals also include increasing school attendance and performance and reducing crime rates in the housing units. The program places probation officers at selected public housing developments to provide day services and supervision for juveniles on probation, at-risk youth, and their families. The program is designed to empower parents with the skills, resources, and support needed to effectively parent their children. Table A.10 presents expenditure information for the program for fiscal years 2013–14 through 2017–18.

Table A.10
Housing-Based Day Supervision Program Expenditures for
Fiscal Years 2013–14 Through 2017–18

FISCAL YEAR	SALARIES AND BENEFITS OF LOCAL AGENCIES			CBOs
	PROBATION DEPARTMENT	OTHER LAW ENFORCEMENT DEPARTMENTS	NON-LAW ENFORCEMENT DEPARTMENTS	
2013–14	\$24,000	\$81,000	\$772,000	\$0
2014–15	24,000	101,000	776,000	0
2015–16	33,000	105,000	803,000	0
2016–17	28,000	100,000	692,000	0
2017–18	33,000	64,000	864,000	0
Totals	\$142,000	\$451,000	\$3,907,000	\$0

Source: Los Angeles expenditure data.

Mental Health Screening, Assessment, and Treatment Program Description

The Mental Health Screening, Assessment, and Treatment Program screens, assesses, and treats juveniles who are newly admitted to juvenile hall. Upon admission, mental health professionals screen all juveniles to identify those who need treatment and follow-up care for mental health or substance abuse disorders and to develop individual treatment plans accordingly. In conjunction with treatment providers, probation officers and case managers supervise the juveniles. Table A.11 presents expenditure information for the program for fiscal years 2013–14 through 2017–18.

Table A.11
Mental Health Screening, Assessment, and Treatment Program Expenditures
for Fiscal Years 2013–14 Through 2017–18

FISCAL YEAR	SALARIES AND BENEFITS OF LOCAL AGENCIES			CBOs
	PROBATION DEPARTMENT	OTHER LAW ENFORCEMENT DEPARTMENTS	NON-LAW ENFORCEMENT DEPARTMENTS	
2013–14	\$90,000	\$0	\$3,335,000	\$626,000
2014–15	90,000	0	3,321,000	614,000
2015–16	123,000	0	3,212,000	482,000
2016–17	106,000	0	3,846,000	532,000
2017–18	128,000	0	3,808,000	545,000
Totals	\$537,000	\$0	\$17,522,000	\$2,799,000

Source: Los Angeles expenditure data.

Multi-Systemic Therapy Program Description

The Multi-Systemic Therapy (MST) Program comprises CBOs that provide intensive family and community-based treatment to address all environmental factors that affect chronic and violent juvenile offenders and their homes, families, schools, teachers, neighborhoods, and friends. MST works with juvenile offenders who have long histories of arrests. Its interventions aim to reduce risk factors by building individual and family strengths on an individualized and comprehensive basis. MST practitioners are available 24 hours per day, seven days per week, and provide services in the home at times convenient to families to circumvent the barriers to accessing services that families of serious juvenile offenders often encounter. Table A.12 presents expenditure information for the program for fiscal years 2013–14 through 2017–18.

Table A.12
Multi-Systemic Therapy Program Expenditures for
Fiscal Years 2013–14 Through 2017–18

FISCAL YEAR	SALARIES AND BENEFITS OF LOCAL AGENCIES			CBOs
	PROBATION DEPARTMENT	OTHER LAW ENFORCEMENT DEPARTMENTS	NON-LAW ENFORCEMENT DEPARTMENTS	
2013–14	\$10,000	\$0	\$0	\$272,000
2014–15	10,000	0	0	240,000
2015–16	14,000	0	0	186,000
2016–17	12,000	0	59,000	270,000
2017–18	12,000	0	2,000	323,000
Totals	\$58,000	\$0	\$61,000	\$1,291,000

Source: Los Angeles expenditure data.

One-Time Projects Program Description

From fiscal years 2015–16 through 2017–18, the county used one-time growth funds to support or expand various existing programs and services and to fund new projects. For example, the county funded multiple programs that target diversion, prevention, and early intervention throughout the county, such as mental health drug counseling services and services provided by various CBOs. It also used these funds for after-school enrichment and employment services, a Safe Passages program to help youth safely travel to and from school, arts programs aimed at improving youths' problem-solving skills and social competence through creative expression in different art forms, other supportive services, and a comprehensive JJCPA evaluation. Table A.13 presents expenditure information for the program for fiscal years 2013–14 through 2017–18.

Table A.13
One-Time Projects Program Expenditures for
Fiscal Years 2013–14 Through 2017–18

FISCAL YEAR	SALARIES AND BENEFITS OF LOCAL AGENCIES			CBOs
	PROBATION DEPARTMENT	OTHER LAW ENFORCEMENT DEPARTMENTS	NON-LAW ENFORCEMENT DEPARTMENTS	
2013–14*	–	–	–	–
2014–15*	–	–	–	–
2015–16	\$0	\$0	\$0	\$156,000
2016–17	68,000	0	74,000	1,900,000
2017–18	132,000	82,000	700,000	3,545,000
Totals	\$200,000	\$82,000	\$774,000	\$5,601,000

Source: Los Angeles expenditure data.

Note: The table includes expenditures for programs Los Angeles reported to Community Corrections. Specifically, the county indicated the following program names were one-time projects: Enhanced School and Community Services Program, New Programs, Expanded Programs, and 8.4 Million Programs. According to the Los Angeles Probation Department, the county uses these names for internal tracking and for reporting expenditures to Community Corrections.

* The program did not receive funding in this year.

School-Based Supervision Program Description

The main objective of the School-Based Supervision Program is to reduce crime and delinquency in 85 high-risk neighborhoods in the county by providing school-based probation supervision and services for juveniles on probation and at-risk youth in schools. A secondary goal is to enhance protective factors through improved school performance. Among other services, school-based probation officers assess the strengths of and risk factors for juveniles on probation; use evidence-based treatment interventions; and provide prosocial adult modeling, advocacy, and post-probation planning with the juvenile and his or her family. Table A.14 presents expenditure information for the program for fiscal years 2013–14 through 2017–18.

Table A.14
School-Based Supervision Program Expenditures for
Fiscal Years 2013–14 Through 2017–18

FISCAL YEAR	SALARIES AND BENEFITS OF LOCAL AGENCIES			CBOs
	PROBATION DEPARTMENT	OTHER LAW ENFORCEMENT DEPARTMENTS	NON-LAW ENFORCEMENT DEPARTMENTS	
2013–14	\$10,275,000	\$230,000	\$0	\$131,000
2014–15	11,898,000	287,000	0	224,000
2015–16	10,977,000	299,000	0	229,000
2016–17	11,913,000	286,000	0	194,000
2017–18	11,978,000	183,000	0	293,000
Totals	\$57,041,000	\$1,285,000	\$0	\$1,071,000

Source: Los Angeles expenditure data.

Special Needs Court Program Description

The Special Needs Court Program is a full-time court specifically designed and staffed to supervise juvenile offenders who suffer from diagnosed serious mental illnesses, organic brain impairments, or developmental disabilities. The court ensures that these juveniles receive proper mental health treatment both in custody and in the community. The program's goals are to reduce rearrest rates for juvenile offenders diagnosed with mental health problems and to increase the number of juveniles who receive appropriate mental health treatment. Table A.15 presents expenditure information for the program for fiscal years 2013–14 through 2017–18.

Table A.15
Special Needs Court Program Expenditures for
Fiscal Years 2013–14 Through 2017–18

FISCAL YEAR	SALARIES AND BENEFITS OF LOCAL AGENCIES			CBOs
	PROBATION DEPARTMENT	OTHER LAW ENFORCEMENT DEPARTMENTS	NON-LAW ENFORCEMENT DEPARTMENTS	
2013–14	\$213,000	\$166,000	\$554,000	\$315,000
2014–15	213,000	166,000	554,000	315,000
2015–16	222,000	166,000	554,000	316,000
2016–17	217,000	166,000	554,000	316,000
2017–18	224,000	166,000	554,000	316,000
Totals	\$1,089,000	\$830,000	\$2,770,000	\$1,578,000

Source: Los Angeles expenditure data.

Writing Program Description

The Writing Program aims to reduce crime by teaching interpersonal skills through a biweekly writing class for juveniles subject to long-term detention in juvenile hall. The program is voluntary and uses writing to develop juveniles' interpersonal and communication skills. It teaches program participants creative writing to discourage juvenile violence, replacing it with a spirit of honest introspection, values, and skill building. Participants meet weekly, in sessions led by professional writers, to write and critique their written work with others in the group. The program guides participants in their writing and discussions, providing them with an experience in building a supportive community. Table A.16 presents expenditure information for the program for fiscal years 2013–14 through 2017–18.

Table A.16
Writing Program Expenditures for
Fiscal Years 2013–14 Through 2017–18

FISCAL YEAR	SALARIES AND BENEFITS OF LOCAL AGENCIES			CBOs
	PROBATION DEPARTMENT	OTHER LAW ENFORCEMENT DEPARTMENTS	NON-LAW ENFORCEMENT DEPARTMENTS	
2013–14	\$4,000	\$0	\$0	\$193,000
2014–15	4,000	0	0	209,000
2015–16	6,000	0	0	197,000
2016–17	5,000	0	0	208,000
2017–18	6,000	0	0	215,000
Totals	\$25,000	\$0	\$0	\$1,022,000

Source: Los Angeles expenditure data.

Youth Substance Abuse Intervention Program Description

The Youth Substance Abuse Intervention Program provides holistic treatment through individual, family, and group counseling that focuses on the roots of problems and not just on the substance abuse manifestation. The program's goals are to reduce crime and antisocial behavior and to reduce the number of participants with positive drug tests. A central focus of the program is to ensure that high-risk juveniles on probation who are transitioning from certain facility settings to the community see community-based substance abuse treatment providers within 36 hours of their release from those facilities. The program also conducts drug testing to verify abstinence and program progress. Substance abuse treatment providers work collaboratively with school-based

probation officers to develop case plans for juveniles that address their risk factors and provide them with substance abuse refusal skill training and a relapse-prevention plan. Table A.17 presents expenditure information for the program for fiscal years 2013–14 through 2017–18.

Table A.17
Youth Substance Abuse Intervention Program Expenditures for
Fiscal Years 2013–14 Through 2017–18

FISCAL YEAR	SALARIES AND BENEFITS OF LOCAL AGENCIES			CBOs
	PROBATION DEPARTMENT	OTHER LAW ENFORCEMENT DEPARTMENTS	NON-LAW ENFORCEMENT DEPARTMENTS	
2013–14	\$21,000	\$0	\$0	\$1,011,000
2014–15	21,000	0	0	1,011,000
2015–16	29,000	0	0	1,011,000
2016–17	25,000	0	0	1,011,000
2017–18	6,000	0	0	115,000
Totals	\$102,000	\$0	\$0	\$4,159,000

Source: Los Angeles expenditure data.

Mendocino County

Mendocino operated one JJCPA-funded program from fiscal years 2013–14 through 2017–18. The Rural Gang Unit Program provides probation supervision and services to juveniles on probation and youth involved with gangs. Table A.18 shows percentages of certain demographics for Mendocino’s JJCPA-funded program during fiscal years 2013–14 through 2015–16.

Table A.18
Percentages of Certain Demographics for Mendocino JJCPA-Funded Programs During
Fiscal Years 2013–14 Through 2015–16

PROGRAM	RACE					GENDER			AGE					
	AFRICAN-AMERICAN	ASIAN AND PACIFIC ISLANDER	HISPANIC OR LATINO	NATIVE AMERICAN	WHITE	OTHER OR UNKNOWN	FEMALE	MALE	OTHER OR UNKNOWN	0 TO 9	10 TO 15	16 TO 18	19 TO 25	OTHER OR UNKNOWN
Rural Gang Unit	3%	0%	63%	13%	18%	3%	12%	88%	0%	0%	55%	45%	0%	0%

Source: Data provided by the Mendocino Probation Department.

Note: Mendocino explained that it did not collect participant data for its JJCPA program for fiscal years 2016–17 and 2017–18 because Community Corrections ceased requiring counties to submit such data effective for fiscal year 2016–17. According to the probation department, the data reported also reflects only individuals actively supervised on probation or otherwise involved with the probation department. However, the probation department indicated that the program provided prevention and education services to youth who were not on probation, but it did not collect data on those individuals.

Rural Gang Unit Program Description

The Rural Gang Unit Program provides elevated and more intense probation supervision to juveniles who have been involved in gang activities. Probation officers, who focus on local schools with increased levels of gang activity, provide juveniles on probation, at-risk youth, and their families with referrals for services, including individual and family counseling, anger management, tutoring, community service, and after-school activities. This program contracts with the Mendocino County Youth Project for services. Table A.19 presents expenditure information for the program for fiscal years 2013–14 through 2017–18.

Table A.19
Rural Gang Unit Program Expenditures for
Fiscal Years 2013–14 Through 2017–18

FISCAL YEAR	SALARIES AND BENEFITS OF LOCAL AGENCIES			CBOs
	PROBATION DEPARTMENT	OTHER LAW ENFORCEMENT DEPARTMENTS	NON-LAW ENFORCEMENT DEPARTMENTS	
2013–14	\$159,000	\$0	\$0	\$0
2014–15	243,000	0	0	0
2015–16	256,000	0	0	0
2016–17	242,000	0	0	0
2017–18	251,000	0	0	0
Totals	\$1,151,000	\$0	\$0	\$0

Source: Mendocino expenditure data.

San Joaquin County

San Joaquin operated five programs with JJCPA funding during our audit period. These programs place probation officers on school campuses to supervise juveniles on probation who are attending school and provide a day reporting center as an alternative to detention. The county has also established neighborhood service centers to engage youth and their families, both before and after they interact with law enforcement, and a family-focused intervention team to assist parents who are on probation and thereby help reduce the significant risk factors that exist for their children. In addition, the county has integrated policies and procedures that focus on positive youth development, trauma-informed care, and other services that promote improved health and social outcomes for certain youth. Table A.20 shows percentages of certain demographics for San Joaquin's JJCPA-funded programs during fiscal years 2013–14 through 2017–18.

Table A.20
 Percentages of Certain Demographics for San Joaquin JJCPA-Funded Programs During
 Fiscal Years 2013–14 Through 2017–18

PROGRAM	RACE					GENDER			AGE					
	AFRICAN-AMERICAN	ASIAN AND PACIFIC ISLANDER	HISPANIC OR LATINO	NATIVE AMERICAN	WHITE	OTHER OR UNKNOWN	FEMALE	MALE	OTHER OR UNKNOWN	0 TO 9	10 TO 15	16 TO 18	19 TO 25	OTHER OR UNKNOWN
Family Focused Intervention Team*	-	-	-	-	-	-	-	-	-	-	-	-	-	-
JJCPA Oversight and Positive Youth Justice Initiative*	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Neighborhood Service Centers*	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Probation Officers on Campus	36%	8%	42%	0%	12%	2%	13%	87%	0%	33%	66%	1%	0%	
Reconnect Day Reporting Center	46	2	40	1	10	1	12	88	0	35	65	0	0	

Source: Data provided by the San Joaquin Probation Department.
 * The county did not provide demographic data for the program.

Family Focused Intervention Team Program Description

The Family Focused Intervention Team (FFIT) Program provides case management services to parents who are on probation, a situation that could cause significant risk factors to children in their homes. The goal of the program is to intervene in these high-risk families to prevent or reduce violence in the home by providing demonstrated programs that directly address the families' needs. The long-term goal of FFIT is to positively affect at-risk children to prevent them from entering the juvenile justice system. By offering supervision and support, the program helps parents provide an appropriate environment in which to raise children and remain crime-free. Targeted families include those who are experiencing homelessness or whose members suffer from mental illnesses or substance abuse. FFIT officers conduct visits both in the office and at families' homes to monitor compliance with court-ordered conditions of probation, refer families to programs, and complete individualized case plans to address these families' needs. Table A.21 presents expenditure information for the program for fiscal years 2013–14 through 2017–18.

Table A.21
Family Focused Intervention Team Program Expenditures for
Fiscal Years 2013–14 Through 2017–18

FISCAL YEAR	SALARIES AND BENEFITS OF LOCAL AGENCIES			CBOs
	PROBATION DEPARTMENT	OTHER LAW ENFORCEMENT DEPARTMENTS	NON-LAW ENFORCEMENT DEPARTMENTS	
2013–14*	–	–	–	–
2014–15*	–	–	–	–
2015–16*	–	–	–	–
2016–17*	–	–	–	–
2017–18	\$193,000	\$0	\$0	\$0
Totals	\$193,000	\$0	\$0	\$0

Source: San Joaquin expenditure data.

* The program did not receive funding in this year.

JJCPA Oversight and Positive Youth Justice Initiative Program Description

Beginning in 2012, the Sierra Health Foundation for the Positive Youth Justice Initiative Program provided a grant to the probation department. The grant focused on positive youth development, trauma-informed care, and other services to promote improved health and social outcomes for youth who are at risk of or are

fluctuating between the child welfare and juvenile justice systems. The probation department embedded these cornerstones into its policies, procedures, and practices, and although the grant ended in December 2017, the probation department used JJCPA funds to sustain key pieces of the initiative. It continues to function as the liaison between CBOs and probation officers—scheduling and hosting youth orientations and managing and overseeing referrals to CBOs. Table A.22 presents expenditure information for the program for fiscal years 2013–14 through 2017–18.

Table A.22
JJCPA Oversight and Positive Youth Justice Initiative Program Expenditures
for Fiscal Years 2013–14 Through 2017–18

FISCAL YEAR	SALARIES AND BENEFITS OF LOCAL AGENCIES			CBOs
	PROBATION DEPARTMENT	OTHER LAW ENFORCEMENT DEPARTMENTS	NON-LAW ENFORCEMENT DEPARTMENTS	
2013–14*	–	–	–	–
2014–15*	–	–	–	–
2015–16*	–	–	–	–
2016–17*	–	–	–	–
2017–18	\$111,000	\$0	\$0	\$0
Totals	\$111,000	\$0	\$0	\$0

Source: San Joaquin expenditure data for JJCPA funds only.

* The program did not receive funding in this year.

Neighborhood Service Centers Program Description

The Neighborhood Service Centers (Neighborhood Service) Program uses a multidisciplinary team approach to work with at-risk and justice-involved youth and their families. The centers engage youth and their parents or guardians both before and after they interact with law enforcement. The program's primary functions are to facilitate neighborhood-driven initiatives; transform social service delivery in the county by enabling families to easily access services and resources where they are; and provide comprehensive, integrated services, including prevention of issues such as obesity, truancy, and unemployment. Neighborhood Service enables service providers to efficiently convene and coordinate multidisciplinary services. Each center offers intake and assessments, resources and referrals, integrated family plans, leadership development, health insurance enrollment assistance, health and nutritional education, health screening, preventive care, counseling, youth development groups, and parenting groups. Table A.23 presents expenditure information for the program for fiscal years 2013–14 through 2017–18.

Table A.23
Neighborhood Service Centers Program Expenditures for
Fiscal Years 2013–14 Through 2017–18

FISCAL YEAR	SALARIES AND BENEFITS OF LOCAL AGENCIES			CBOs
	PROBATION DEPARTMENT	OTHER LAW ENFORCEMENT DEPARTMENTS	NON-LAW ENFORCEMENT DEPARTMENTS	
2013–14	\$0	\$0	\$0	\$600,000
2014–15	68,000	0	0	550,000
2015–16	0	0	0	650,000
2016–17	5,000	0	0	500,000
2017–18	0	0	0	650,000
Totals	\$73,000	\$0	\$0	\$2,950,000

Source: San Joaquin expenditure data.

Probation Officers on Campus Program Description

Under the Probation Officers on Campus (POOC) Program, probation officers provide intensive supervision at school sites to students on probation, monitor the probationers' attendance, assist in handling disciplinary problems, and work with school staff to address probationers' mental health, substance abuse, and other issues relevant to their behavior. POOC officers have regular contact with at-risk youth who have not yet entered into the juvenile justice system, and when parents, teachers, and school administrators refer these youth, the officers provide them intervention and referral services. The POOC Program also operates a canine team, which searches for and detects narcotics to assist in the supervision, care, custody, and control of participants. Table A.24 presents expenditure information for the program for fiscal years 2013–14 through 2017–18.

Table A.24
Probation Officers on Campus Program Expenditures for
Fiscal Years 2013–14 Through 2017–18

FISCAL YEAR	SALARIES AND BENEFITS OF LOCAL AGENCIES			CBOs
	PROBATION DEPARTMENT	OTHER LAW ENFORCEMENT DEPARTMENTS	NON-LAW ENFORCEMENT DEPARTMENTS	
2013–14	\$915,000	\$0	\$0	\$0
2014–15	689,000	0	0	0
2015–16	793,000	0	0	0
2016–17	940,000	0	0	0
2017–18	913,000	0	0	0
Totals	\$4,250,000	\$0	\$0	\$0

Source: San Joaquin expenditure data.

Reconnect Day Reporting Center Program Description

The Reconnect Day Reporting Center (Reconnect) Program is a collaborative effort between the San Joaquin County Probation Department, San Joaquin County Office of Education, and Community Partnership for Families of San Joaquin. It provides an alternative to detention, with educational services and other programs and services demonstrated to be effective in rebuilding family relationships. Reconnect's two major objectives are to provide a comprehensive alternative to detention by establishing a day reporting center and to reduce recidivism by providing targeted programs to a high-risk population. Additionally, Reconnect aims to decrease truancy for juveniles on probation by integrating on-site family services and helping probationers reconnect and remain in the community. Reconnect provides life skills training, including social skills and problem-solving, as well as substance abuse intervention and anger control training. Table A.25 presents expenditure information for the program for fiscal years 2013–14 through 2017–18.

Table A.25
Reconnect Day Reporting Center Program Expenditures for
Fiscal Years 2013–14 Through 2017–18

FISCAL YEAR	SALARIES AND BENEFITS OF LOCAL AGENCIES			CBOs
	PROBATION DEPARTMENT	OTHER LAW ENFORCEMENT DEPARTMENTS	NON-LAW ENFORCEMENT DEPARTMENTS	
2013–14*	–	–	–	–
2014–15	\$474,000	\$0	\$0	\$0
2015–16	433,000	0	0	0
2016–17	528,000	0	0	70,000
2017–18	516,000	0	0	112,000
Totals	\$1,951,000	\$0	\$0	\$182,000

Source: San Joaquin expenditure data.

* The program did not receive funding in this year.

Santa Barbara County

Santa Barbara County operated two programs with JJCPA funding during our audit period—the Early Intervention Community Supervision Program and the School-Based Officer Community Supervision Program. The programs focused on supervising juvenile probationers and other youth at school sites and intervening with first-time juvenile offenders with less serious offenses to help them exit from probation supervision sooner than might otherwise be the case. Table A.26 shows percentages of certain demographics for Santa Barbara’s combined JJCPA-funded programs during fiscal years 2013–14 through 2017–18.

Table A.26
Percentages of Certain Demographics for Santa Barbara Combined JJCPA-Funded Programs During
Fiscal Years 2013–14 Through 2017–18

PROGRAM	RACE				GENDER			AGE						
	AFRICAN-AMERICAN	ASIAN AND PACIFIC ISLANDER	HISPANIC OR LATINO	NATIVE AMERICAN	WHITE	OTHER OR UNKNOWN	FEMALE	MALE	OTHER OR UNKNOWN	0 TO 9	10 TO 15	16 TO 18	19 TO 25	OTHER OR UNKNOWN
Early Intervention Community Supervision and School-Based Officer Community Supervision	5%	1%	76%	0%	17%	1%	33%	67%	0%	0%	46%	53%	1%	0%

Source: Data provided by the Santa Barbara Probation Department.

Note: Participant demographics have been combined for both programs because Santa Barbara could not always identify to which program its program participants were assigned.

Early Intervention Community Supervision Program Description

This program assigns younger, usually first-time, offenders to probation officers in an effort to minimize their further involvement with the justice system and deter them from future delinquency. These juvenile offenders often have less serious offenses, and the program's intent is to release them from probation supervision sooner than what might otherwise be the case. The program also has a counseling component whereby probation officers refer juveniles on probation to individual and family counseling. The goal is to provide effective, time-limited interventions that increase the involvement of family members. Table A.27 presents expenditure information for the program for fiscal years 2013–14 through 2017–18.

Table A.27
Early Intervention Community Supervision Program Expenditures for Fiscal Years 2013–14 Through 2017–18

FISCAL YEAR	SALARIES AND BENEFITS OF LOCAL AGENCIES			CBOs
	PROBATION DEPARTMENT	OTHER LAW ENFORCEMENT DEPARTMENTS	NON-LAW ENFORCEMENT DEPARTMENTS	
2013–14	\$386,000	\$0	\$29,000	\$97,000
2014–15	402,000	0	3,000	56,000
2015–16	452,000	0	63,000	86,000
2016–17	576,000	0	104,000	109,000
2017–18	624,000	0	154,000	99,000
Totals	\$2,440,000	\$0	\$353,000	\$447,000

Source: Santa Barbara expenditure data.

School-Based Officer Community Supervision Program Description

When the county probation department implemented the School-Based Officer Community Supervision Program, it assigned probation officers to supervise certain juveniles attending specific schools. The probation officers worked with school administrators, educators, and law enforcement officers at the schools to address delinquency- and truancy-related issues. Probation officers made contact with probation-supervised juveniles and others at the school. The program targeted older, more justice system-involved juveniles, and it combined probation supervision with counseling opportunities. Because of caseload capacity and operational considerations, probation officers now supervise these juveniles more traditionally. Specifically, probation officers make contact with juvenile probationers at school sites, but they have less contact

than at the program’s inception and that contact generally relates to specific tasks involving the probationers. The program’s counseling component remains unchanged, and the probation department refers probation-supervised youth for individual and family counseling for reasons including substance abuse, school problems, and family conflict. Table A.28 presents expenditure information for the program for fiscal years 2013–14 through 2017–18.

Table A.28
School-Based Officer Community Supervision Program Expenditures for Fiscal Years 2013–14 Through 2017–18

FISCAL YEAR	SALARIES AND BENEFITS OF LOCAL AGENCIES			CBOs
	PROBATION DEPARTMENT	OTHER LAW ENFORCEMENT DEPARTMENTS	NON-LAW ENFORCEMENT DEPARTMENTS	
2013–14	\$677,000	\$0	\$0	\$122,000
2014–15	606,000	0	0	72,000
2015–16	636,000	0	0	67,000
2016–17	772,000	0	0	73,000
2017–18	697,000	0	0	66,000
Totals	\$3,388,000	\$0	\$0	\$400,000

Source: Santa Barbara expenditure data.

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Appendix B

Scope and Methodology

The Audit Committee directed the California State Auditor to evaluate the spending, reporting, and evaluation of JJCPA funds by the counties of Kern, Los Angeles, Mendocino, San Joaquin, and Santa Barbara, in addition to their decision-making processes related to these funds. Table B lists the objectives that the Audit Committee approved and the methods we used to address those objectives.

Table B
Audit Objectives and the Methods Used to Address Them

AUDIT OBJECTIVE	METHOD
<p>1 Review and evaluate the laws, rules, and regulations significant to the audit objectives.</p>	<p>Reviewed relevant federal and state laws, rules, and regulations related to juvenile justice.</p>
<p>2 Identify the agencies that lead the administration of each county's JJCPA program.</p>	<p>For each of the five counties, interviewed staff at the county probation departments, other county departments, and Community Corrections to identify the county department that administers the JJCPA program. We reviewed counties' comprehensive plans, Coordinating Council meeting minutes, and websites for relevant documentation to substantiate the statements of the staff we interviewed.</p>
<p>3 Evaluate the counties' processes for soliciting JJCPA funding applications and awarding JJCPA funds, including the following:</p> <p>a. Whether the application process is the same for all potential grantees, and the availability, extent, and timing of any technical assistance provided.</p> <p>b. The process for JJCPA funding disbursement and whether contracts differ based on the type of grantee.</p>	<ul style="list-style-type: none"> • Reviewed the five counties' contracting policies and procedures. • Based on contract amount and scope of work, judgmentally selected up to 10 JJCPA-funded contracts per county that were executed by the five counties during fiscal years 2013–14 through 2017–18. Mendocino did not contract with CBOs or other county agencies using JJCPA funding during this period. • Reviewed supporting contract documentation to determine whether applicable county policies and procedures were followed. We interviewed staff of county probation departments to determine what technical assistance they provided to potential contractors. • Determined that the counties that contracted with other local agencies and CBOs to provide JJCPA-funded services appropriately followed county procurement and contracting policies for all potential contractors. In all instances where the counties solicited the contracts competitively, the counties provided technical assistance. <p>Reviewed the selected contracts to identify the counties' processes for paying the contractor and determined that counties appropriately followed their contracting policies and procedures.</p>

AUDIT OBJECTIVE	METHOD
<p>4 Review the counties' processes related to their comprehensive plans and determine the following for each county:</p> <p>a. The number of times the county has revised its comprehensive plan since the JJCPA was enacted, when the last revision occurred, and whether the revision incorporated applicable statutory requirements.</p> <p>b. The processes and accountability measures for writing the comprehensive plan and ensuring its accuracy.</p> <p>c. Whether the county's Coordinating Council is required to obtain approval of the comprehensive plan from the county board of supervisors, as authorized by statute, and, if so, whether the Coordinating Council's decisions have ever been overturned during the last five fiscal years.</p>	<p>Obtained and reviewed the five counties' comprehensive plans for fiscal years 2001–02 through 2019–20 to determine whether the plans included the components the JJCPA requires and the extent to which those components changed during the period. We interviewed county and Community Corrections staff to confirm when no plan was available for review.</p> <p>Reviewed available bylaws for Coordinating Councils and interviewed staff from county probation departments and members of the councils to determine whether processes were in place for each county's council to develop, review, and approve the comprehensive plan. Because Mendocino did not have a council during our audit period, we interviewed only staff from the probation department.</p> <p>Reviewed available bylaws for the Coordinating Councils to determine if the county boards of supervisors are required to approve comprehensive plans. Although county boards of supervisors are not required to approve the plans, Kern and Los Angeles submit their plans to the board of supervisors for approval, who have not rejected any of the plans they received in the last five fiscal years.</p>
<p>5 Determine whether the counties had any accumulated, unspent JJCPA funds from fiscal years 2013–14 through 2017–18, the amount and explanations for any unspent funds, and whether there is a plan for distributing unspent funds.</p>	<ul style="list-style-type: none"> • Obtained county accounting records and supporting payment documentation to identify the total amount of JJCPA funds each county spent for fiscal years 2013–14 through 2017–18. We obtained allocation information from the Department of Finance and payment information from the State Controller's Office to determine the amount of JJCPA funds allocated to each county during fiscal years 2013–14 through 2017–18. We compared total allocations to each county for each year with their annual JJCPA expenditures to determine the amount of unspent funds. • Interviewed staff at each county to gain an understanding of their JJCPA budget processes. We then compared the counties' budgeted and actual JJCPA expenditures to determine the accuracy of county budget estimates. • Interviewed county staff to obtain their perspectives on unspent funds, including the factors that hinder the counties from spending all of the funds and whether the counties have any plans to reduce fund reserves.

AUDIT OBJECTIVE	METHOD
<p>6 Evaluate the authorities, roles, and responsibilities of each county's Coordinating Council and its individual members, and determine whether the Coordinating Council has complied with state law. Determine the following information related to each Coordinating Council:</p> <p>a. The members of the Coordinating Council over the past five fiscal years and what categories of representation they fulfill.</p>	<ul style="list-style-type: none"> • Researched best practices for nonprofit board bylaws. • Reviewed Coordinating Council bylaws for Kern, Los Angeles, and Santa Barbara. Mendocino did not have a council during our audit period, and San Joaquin did not have bylaws for its council. • Reviewed available rosters and meeting minutes for all council meetings held by the four counties during fiscal years 2013–14 through 2017–18 to determine whether council representation complied with state law.
<p>b. Whether all Coordinating Council members have equal powers, access to information, and decision-making authority.</p>	<ul style="list-style-type: none"> • Reviewed Coordinating Council bylaws for Kern, Los Angeles, and Santa Barbara to determine whether they specify the roles, responsibilities, and powers of the council members. Mendocino did not have a council during our audit period, and San Joaquin did not have bylaws for its council. • Interviewed probation department staff and council members to determine their role and decision-making authority in council meetings. • Reviewed available minutes for all council meetings held by the four counties with councils during fiscal years 2013–14 through 2017–18 to understand their decision-making processes for their comprehensive plan.
<p>c. Which agency and position facilitates Coordinating Council meetings, how frequently those meetings occur, and whether the meetings comply with state law applicable to open meetings.</p>	<ul style="list-style-type: none"> • Reviewed Coordinating Council bylaws for Kern, Los Angeles, and Santa Barbara to determine whether they included specific meeting requirements, such as frequency of meetings. Mendocino did not have a council during our audit period, and San Joaquin did not have bylaws for its council. • Interviewed probation department officials and council members to determine which agency and position facilitates council meetings. • Reviewed available minutes for all council meetings held by the four counties during fiscal years 2013–14 through 2017–18 to determine the frequency of meetings and whether a quorum was established during the meetings. • Reviewed county processes for posting council meeting agendas to determine whether they complied with open meeting act requirements, and verified that the counties posted agendas for the meetings they held during fiscal years 2013–14 through 2017–18 in accordance with applicable state law.
<p>d. The bylaws, protocols, procedures, or other governance guidelines the county has established to support the Coordinating Council's decision-making process.</p>	<ul style="list-style-type: none"> • Reviewed Coordinating Council bylaws for Kern, Los Angeles, and Santa Barbara to understand their decision-making processes. Mendocino did not have a council during our audit period, and San Joaquin did not have bylaws for its council. • Interviewed probation department officials and council members to understand the guidelines the counties established to support the councils' decision-making processes and to understand how San Joaquin's council makes decisions without bylaws.

AUDIT OBJECTIVE	METHOD
<p>7 Identify the data JJCPA grantees provide to each Coordinating Council and whether this varies based on the type of grantee. Determine the following for each county:</p> <p>a. The steps the county takes to ensure JJCPA funds are allocated to programs and CBOs that are effective in achieving the goals of the JJCPA.</p> <p>b. The county's process for monitoring program funding.</p>	<ul style="list-style-type: none"> • Interviewed officials from county probation departments and county procurement departments to understand what deliverables, if any, they required their contractors to submit to fulfill their contracts. Mendocino did not contract with CBOs or other county agencies using JJCPA funding during this period. • Reviewed relevant county policies, procedures, and contracts to determine whether they specify how contractors will be evaluated. • Reviewed supporting documentation for the contracts at Kern, Los Angeles, San Joaquin, and Santa Barbara that we selected for Objective 3 to determine if the counties ensured that JJCPA funds were allocated to programs and CBOs that are effective. <ul style="list-style-type: none"> • Interviewed staff from county probation departments and county procurement departments to understand their processes for monitoring program funding. • Reviewed relevant probation department policies, procedures, and contracts to determine whether counties followed their monitoring processes. • Reviewed supporting documentation for the contracts at Kern, Los Angeles, San Joaquin, and Santa Barbara that we selected for Objective 3 to determine whether the counties followed their contract monitoring processes. • Determined that the counties that contracted with other agencies to provide JJCPA-funded services appropriately followed county policies when monitoring program funding.
<p>8 For fiscal years 2013–14 through 2017–18, analyze the following county data by fiscal year, including agency name, organization name, and expenditure description, where applicable:</p> <p>a. Total JJCPA funds budgeted per program.</p> <p>b. Total JJCPA-reported expenditures per program.</p> <p>c. Total JJCPA funds spent on probation department salaries and benefits.</p> <p>d. Total JJCPA funds spent on other law enforcement agency salaries and benefits.</p> <p>e. Total JJCPA funds spent on non-law enforcement public agency salaries and benefits.</p> <p>f. Total JJCPA funds spent on CBOs, and identify those organizations whose primary locations are in the communities they are serving.</p>	<ul style="list-style-type: none"> • Obtained budget and financial documentation at each county's probation department for fiscal years 2013–14 through 2017–18 to identify the JJCPA funds budgeted and the actual expenditures, including for probation department, other law enforcement agencies, and non-law enforcement agencies salaries and benefits; for CBOs; and for any other JJCPA expenses for each program. • Reviewed contracting documentation for Los Angeles, San Joaquin, and Santa Barbara and conducted online searches to identify headquarter locations for CBOs providing services in the counties. We found CBOs were generally located in the county where they provided services. Kern and Mendocino did not contract with any CBOs during our audit period.
<p>9 Determine the percentage of each county's probation department budget that the JJCPA funded for each year from fiscal years 2013–14 through 2017–18.</p>	<p>Using the budget and financial documentation obtained in Objective 8, determined the percentage of each county's probation department budget that was supported by JJCPA funds for fiscal years 2013–14 through 2017–18. The percentage of each county's probation department budget supported by JJCPA funds ranged from roughly 2 percent to 3 percent, depending on the county.</p>

AUDIT OBJECTIVE	METHOD
<p>10 Determine the dollar amount and percentage of each county's JJCPA expenditures for the last five fiscal years that were used to supervise at-risk youth with no prior arrests or contact with the juvenile court. Perform the following for each county:</p> <p>a. Identify expenditures and program descriptions by agency and fiscal year.</p> <p>b. Identify the probation department's definition of at-risk youth for service design, or indicate if no definition exists.</p>	<p>Determined that because of limitations in the data counties provided, we could not accurately assess the expenditures specific to at-risk youth with no prior arrests or contact with juvenile court associated with each county program. As we discuss in Chapter 1, some counties could not identify all of the youth that participated in each of their programs, and some did not track participant data for some of their programs.</p> <ul style="list-style-type: none"> • Interviewed probation staff at each county to identify each county's definition of at-risk youth. • Reviewed each county's comprehensive plan to determine whether it included a definition of at-risk youth.
<p>11 To the extent possible, determine the total number of youth that have been served by each county's JJCPA-funded programs and services in the past five fiscal years by program, race, age, gender, zip code, and charges or activities warranting intervention, and list by program and fiscal year.</p>	<ul style="list-style-type: none"> • Determined how the counties track the total population and demographic data of those served by JJCPA funds, and determined whether the county tracks population and demographic data by program. • Requested from each of the five counties a list of all participants, including their demographics and data on arrests or activities warranting intervention, who participated in the county's programs or services funded by the JJCPA at any time for fiscal years 2013–14 through 2017–18.
<p>12 Determine whether each county spends JJCPA funds for services or programs for youth described under state law, including, but not limited to, specific sections of the Welfare and Institutions Code, including but not limited to sections 236, 654, and 654.2. Under each of the above referenced code sections, identify the amount of JJCPA funds spent on programs or services run by probation departments, other law enforcement agencies, non-law enforcement public agencies, and CBOs.</p>	<ul style="list-style-type: none"> • Determined we could not accurately assess the expenditures associated with youth described under specific Welfare and Institutions Code sections because of limitations in the data that counties provided. As we discuss in Chapter 1, some counties could not identify all of the youth that participated in each of their programs and some did not track participant data for some of their programs. • Interviewed probation department staff to understand the relationship between an individual's Welfare and Institutions Code disposition and program assignment. The counties generally indicated that youth are not assigned to programs based on their Welfare and Institutions Code status, but by their individual needs.
<p>13 To the extent possible, determine whether JJCPA-funded programs effectively reduce interactions between youth and the juvenile justice system, including law enforcement agencies.</p>	<ul style="list-style-type: none"> • Interviewed county probation department staff to determine whether each county has a process for evaluating the effectiveness of its JJCPA-funded programs. • Reviewed evaluation reports to identify methodologies, criteria, limitations, and data the evaluators used to assess the effectiveness of JJCPA programs.

AUDIT OBJECTIVE	METHOD
<p>14 To understand the State's JJCPA grant program administration, evaluate the following information related to the role of Community Corrections in administering the JJCPA grant program:</p> <p>a. How Community Corrections uses its budget for purposes of administering the JJCPA grant program.</p> <p>b. Community Corrections' processes and standards for ensuring county compliance with JJCPA statutory requirements, and the established protocol if Community Corrections finds that a county is not in compliance with state law.</p>	<p>Obtained and analyzed program cost information from Community Corrections to determine the total cost—through staff time—to administer the JJCPA program from fiscal years 2013–14 through 2018–19.</p> <p>• Interviewed Community Corrections staff and reviewed processes and procedures to determine and evaluate the extent and adequacy of Community Corrections' oversight of the JJCPA.</p> <p>• Interviewed county staff to develop an understanding of their interactions with Community Corrections.</p>
<p>15 To understand the State's JJCPA program data collection process, determine the following information related to Community Corrections' data on JJCPA-funded programs, to the extent possible:</p> <p>a. The number of youth statewide who have been served by JJCPA-funded programs or services in the past five fiscal years, disaggregated by race, gender, age, zip code, and charges or activities warranting intervention.</p>	<p>Reviewed relevant state laws and counties' year-end reports to identify JJCPA reporting requirements. We determined that the State does not collect participant information from counties. Therefore, we are unable to present statewide information regarding data about at-risk youth and juvenile offenders who have been served by JJCPA-funded programs.</p>
<p>b. To the extent that statewide data are available, from fiscal years 2013–14 through 2017–18, analyze the following statewide data by fiscal year:</p> <p>i. Total JJCPA funds budgeted per program.</p> <p>ii. Total JJCPA-reported expenditures per program.</p> <p>iii. Total JJCPA funds spent on probation department salaries and benefits.</p> <p>iv. Total JJCPA funds spent on other law enforcement agency salaries and benefits.</p> <p>v. Total JJCPA funds spent on non-law enforcement public agency salaries and benefits.</p> <p>vi. Total JJCPA funds spent on CBOs.</p>	<p>Reviewed available JJCPA program data from Community Corrections to identify and aggregate certain statewide financial information for the JJCPA program reported during fiscal years 2013–14 through 2017–18.</p>

AUDIT OBJECTIVE	METHOD
<p>c. The number of counties statewide that have reported using JJCPA funds to provide services or programs for youth identified under state law, including, but not limited to, Welfare and Institutions Code sections 236, 654, and 654.2. Under each of the above referenced code sections, determine the amount of JJCPA funds spent on services and programs run by probation departments, other law enforcement agencies, non-law enforcement public agencies, and CBOs.</p>	<p>Using the JJCPA program information we reviewed in Objective 15b, identified the amount counties used for JJCPA programs in fiscal years 2013–14 through 2017–18. However, we determined that we could not identify the number of counties using JJCPA funds to serve youth under specific sections of state law because the State does not collect this information from counties. As a result, we also could not disaggregate the amount of JJCPA funds spent on services and programs operated by probation, other law enforcement and non-law enforcement agencies, and CBOs that serve those youth.</p>
<p>16 Review and assess any other issues that are significant to the audit.</p>	<p>Determined that most of the counties we reviewed thought that JJCPA growth funding was potentially unstable. As a result, we reviewed the current JJCPA funding process for base and growth funds to identify the steps the Legislature should take to stabilize the JJCPA funding provided to counties.</p>

Source: Analysis of the Audit Committee’s audit request number 2019-116, state law, and information and documentation identified in the column titled Method.

Assessment of Data Reliability

The U.S. Government Accountability Office, whose standards we are statutorily required to follow, requires us to assess the sufficiency and appropriateness of computer-processed information that we use to support findings, conclusions, and recommendations. In performing this audit, we relied on data provided by the counties to address portions of objectives 10, 11, and 12 related to information about JJCPA-funded program participants. To evaluate these data, we reviewed existing information about the data, interviewed staff knowledgeable about the data systems, and compared the data to a selection of records the counties maintained in their case management systems. As we describe in Chapter 1, we found overarching problems with the data that counties maintained related to participants in their JJCPA programs. Specifically, some counties did not track program participants in some years, some counties could not identify all of their program participants, and one county could not identify the programs in which some youth participated. As a result, we determined that the data each county provided to us are not sufficiently reliable for the purposes of this audit. Nevertheless, because these data represent the only source for this information, we use them to present a breakdown in Appendix A of the counties’ JJCPA program participants by age, gender, and race. Although the problems we identified with the data may affect the precision of some of the numbers we present, there is sufficient evidence in total to support our findings, conclusions, and recommendations.

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May 2020



LINDA M. PENNER
Chair

KATHLEEN T. HOWARD
Executive Director

STATE OF CALIFORNIA

BOARD OF STATE AND COMMUNITY CORRECTIONS

2590 VENTURE OAKS WAY, SUITE 200 ♦ SACRAMENTO CA 95833 ♦ 916.445.5073 ♦ BSCC.CA.GOV



GAVIN NEWSOM
Governor

March 25, 2020

Elaine M. Howle, CPA*
California State Auditor
621 Capitol Mall, Suite 200
Sacramento, CA 95814

Linda Penner, Chair
Board of State and Community Corrections
2590 Venture Oaks Way 200
Sacramento, CA 95833

Dear Honorable Ms. Howle,

The Board of State and Community Corrections (BSCC) has received the California State Auditor's (CSA) recommendations on the Juvenile Justice Crime Prevention Act. We have provided the responses to your recommendations below.

Each header will summarize the recommendations from the CSA and we have numbered the referenced question on the audit report:

SUMMARY OF RECOMMENDATIONS – RESULTS IN BRIEF - (PAGES 7 – 8)

5. BSCC should revise its comprehensive plan template to require Coordinating Councils to specify plan components the county is changing and what those changes are. If the county is making no changes, the template should require Coordinating Councils to explain why no changes to the plan are necessary.

BSCC's Response: BSCC agrees and has implemented this recommendation for the upcoming 2020 reporting period. ①

6. BSCC should review the information counties submit to it and follow up with them to obtain missing information or to clarify information that seems incorrect.

BSCC's Response: On a limited basis, BSCC will follow up with counties to clarify information that seems incorrect. ②

* California State Auditor's comments begin on page 85.

RECOMMENDATIONS CHAPTER 1: COUNTY OVERSIGHT OF THE JJCPA IS WEAK - (PAGES 31 – 32)

4. To ensure that counties' comprehensive plans are informative and up to date, BSCC should revise its plan template to require Coordinating Councils to specify plan components the county is changing and to describe those changes. If the county is making no changes, the template should require Coordinating Councils to explain why no changes to the plan are necessary.

① BSCC's Response: BSCC agrees and has implemented this recommendation for the upcoming 2020 reporting period.

RECOMMENDATIONS CHAPTER 2: THE STATE HAS NOT PROVIDED SUFFICIENT OVERSIGHT OF THE JJCPA (PAGES 46 – 48)

3. To ensure that counties include accurate information in their comprehensive plans and year-end reports, BSCC should review the information counties submit to it and follow up with them to obtain missing information or to clarify information that seem incorrect.

② BSCC's Response: On a limited basis, BSCC will follow up with counties to clarify information that seems incorrect.

4. To better promote effective local efforts related to the JJCPA, BSCC should include on its website the capability for stakeholders, counties, and other interested parties to review and easily compare the JJCPA information of multiple counties. Specifically, its website should allow users to be able to select a specific type of JJCPA-funded program and easily review information the counties submitted for all programs associated with the program type.

③ BSCC's Response: BSCC believes that the information about programs is readily available in the individual county reports that are posted. Although there may be value in providing searchable capability by program type, the BSCC does not currently have the resources for this work.

Howle, E.
Page 3

5. BSCC should determine the cost of providing this additional service and, if necessary, request additional resources.

BSCC's Response: In the event of a statutory change to require this additional reporting, BSCC would cost out the resources that would be needed.

④

If you have questions, please contact Juanita Reynaga at Juanita.Reynaga@bscc.ca.gov.

Thank you,



LINDA PENNER
Chair

Cc: Vance Cable, Senior Auditor Evaluator I
Kathleen T. Howard, Executive Director
Aaron Maguire, General Counsel
Ricardo Goodridge, Deputy Director
Juanita Reynaga, Senior Management Auditor
Adam Lwin, Associate Governmental Program Analyst

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Comments

CALIFORNIA STATE AUDITOR'S COMMENTS ON THE RESPONSE FROM THE BOARD OF STATE AND COMMUNITY CORRECTIONS

To provide clarity and perspective, we are commenting on the response from Community Corrections. The numbers below correspond to the numbers we have placed in the margin of Community Corrections' response.

We look forward to reviewing Community Corrections' 60-day response to the audit recommendations to assess its progress in implementing them.

①

Community Corrections' plan to follow up with counties only on a limited basis to clarify information that seems incorrect is not sufficient. As we describe on page 34, we found several instances in which counties did not report information correctly in their year-end reports to Community Corrections. Further, we state on the same page that these issues would be relatively simple for counties to correct if Community Corrections reviewed the information they submit to ensure that they have accurately reported and appropriately categorized their programs. Thus, we stand by our recommendation that Community Corrections should review all of the information counties submit to it and follow-up with them to obtain missing information or to clarify information that seems incorrect.

②

We acknowledge on page 36 that Community Corrections views its statutory responsibility to post a description or summary of JJCPA information narrowly and that Community Corrections has not calculated the cost of organizing and displaying JJCPA information on its website in more useful ways. We also point out on page 38 that Community Corrections has the capability to develop a more robust presentation of JJCPA information because it currently presents other statewide information using the same software that we used to create our interactive graphic.⁶ Further, as we explain on page 37, some of the counties we visited expressed that it would be helpful if Community Corrections improved the information it displays about the programs that other counties are funding with their JJCPA allocations. Thus, we stand by our recommendation that Community Corrections should improve its website related to JJCPA information and we believe the minimal cost to implement the recommendation would help Community Corrections further satisfy its duty to identify and promote evidence-based and innovative programs.

③

⁶ To view a display of program budgets and information for all counties that participate in the JJCPA, visit our interactive dashboard in the online version of this report at www.auditor.ca.gov/reports/2019-116/supplementalgraphic.html.

- ④ Community Corrections incorrectly implies that our recommendation is contingent on a statutory change. It is not. We believe that Community Corrections should be proactive and determine the cost of providing the additional services on its website and, if necessary, request additional resources.

May 2020

KERN COUNTY PROBATION DEPARTMENT

TR Merickel
Chief Probation Officer



March 19, 2020

Elaine M. Howle*
California State Auditor
621 Capitol Mall Suite 1200
Sacramento, CA 95814

Re: JJCPA Audit Response

Dear Ms. Howle:

Kern would like to thank the State Auditor's staff. During the course of this audit, they were attentive and responsive, and we appreciate their professionalism. The County has received and reviewed the report. While we concur with some of its findings and comments, we disagree with others which will be discussed below. Regardless, we understand the importance of the audit process and will continue to strive to best serve the people of Kern County.

The section titled, "[Kern's] Comprehensive Plan [Is] Outdated" discusses how Kern's plan rarely changed and therefore was outdated. This does not take into account the significant changes outside of JJCPA funded programs. It is true that the JJCPA funded programs (Aftercare and GIST "Gang Intervention and Suppression Team") continued to be JJCPA funded without much alterations since 2009. However, after a series of modifications to the plan in earlier years, we settled on a strategy concept that focused on those youth identified as moderate to high risk based on the PACT (Positive Achievement Change Tool – an evidence-based assessment), significantly gang involved, and released directly from long-term commitment programs (which made up Aftercare and GIST caseloads). Despite other changes made in our juvenile system unrelated to the plan, the number of youths requiring services through Aftercare and GIST justified the continued use of JJCPA funds dedicated to those programs.

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There have been significant changes in our overall approach to juvenile justice in Kern over the same period of time. Examples include but are not limited to the following: Kern created the Juvenile Programs Unit, a unit of non-sworn staff who directly deliver multiple evidence-based treatment programs to youth both in and out of custody. Kern expanded services at our Bridges Academy; a school program operated in conjunction with the Superintendent of Schools. Increased mental health, educational and vocational programs have been offered to at risk youth. The Probation Department implemented use of an evidence-based assessment tool (PACT) that drives much of the decisions to divert youth out of the juvenile justice system, as well as determination of

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JJCPA Audit Response
March 19, 2020
Page 2

supervision level and needed programming in order to address criminogenic needs. Furthermore, Kern has focused on best practices and emerging trends through staff development through trainings and implementation of trauma informed care, motivational interviewing and evidence-based practices.

- ② By focusing on JJCPA funded programs the report fails to paint the full picture of the changes and evolution to the continuum of services offered by Kern. While the JJCPA funded programs are a very important part of that continuum they are not exclusive of our overall approach and response. It was determined by the JJCC (Juvenile Justice Coordinating Council) that the JJCPA funded programs continued to be needed. The JJCC was fully informed and presented information regarding the other changes to the overall juvenile justice system.

- ③ The section titled “[Kern’s] Plan Would Benefit from Defining At-Risk Youth” states that Kern should define “at-risk youth” as part of its plan. While the County would concede that technically this is correct, it disagrees that the County has not, in practice, complied with this requirement. The entire way the County addresses its juvenile justice system is based on evidence-based assessments that determine risk level to re-offend. The County uses this information to make decisions on diversion or formal Court action. It drives how and to what level we supervise youth on probation. It helps dictate individual case plans to ensure that they focus on the top criminogenic needs of the youth. It drove the creation of the Juvenile Programs Unit by identifying the largest gaps in service to address criminogenic needs.

The “Introduction” section of the report discusses the Pew-McArthur Results First Initiate and Clearinghouse Database and its effectiveness and importance. It should be noted that Kern was one of the first four counties in California to implement Results First. This was done in our adult criminal justice system, however, much of what we learned was translated into our Juvenile system as well, resulting in the creation of new programs such as our Juvenile Programs Unit. This program, and others, focus on proven best practices in community corrections in order to reduce recidivism.

- ④ Ultimately, Kern will continue to strive for improvement in order to best serve our youth and our community. We will work diligently to address those areas where we concur changes should be made. However, based on the above stated reasons, we do not concur with several conclusions reach in the report.

Recommendation #1: To determine the effectiveness of their use of JJCPA funds, Kern...should include in its year-end reports to Community Corrections descriptions or analyses of how its JJCPA-funded programs influenced the county's juvenile justice trends, as required by law.

JJCPA Audit Response
March 19, 2020
Page 3

Response to Recommendation #1: Kern agrees with this recommendation and will increase its descriptions and analyses of how its JJCPA-funded programs influenced the county's juvenile justice trends in its year-end reports.

Recommendation #2: To accurately assess the effectiveness of their programs, Kern...should determine how to accurately identify in its case management system the JJCPA programs and services in which each individual participated or enhance these systems to provide this capability.

Response to Recommendation #2: Kern agrees with this recommendation. Our current case management system (CMS) is an older, home-grow system with limited data tracking capabilities. The County has attempted to upgrade its CMS capabilities; however, a new system has not yet been implemented. However, the County will implement alternative solutions to track the needed data to comply with the recommendation until a fully competent CMS solution is online.

Sincerely,



TR Merickel
Chief Probation Officer
Kern County Probation Department
merickelt@kernprobation.org
(661) 868-4102

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Comments

CALIFORNIA STATE AUDITOR'S COMMENTS ON THE RESPONSE FROM THE KERN COUNTY PROBATION DEPARTMENT

To provide clarity and perspective, we are commenting on the response from Kern. The numbers below correspond to the numbers we have placed in the margin of Kern's response.

Although Kern asserts that it has made significant changes to its juvenile justice strategy, its comprehensive plans often did not reflect any changes. As we describe in the Introduction on page 8, the JJCPA requires counties to include four components in their comprehensive plans that generally summarize their holistic efforts to reduce juvenile crime. Additionally, we state on page 17 that according to Community Corrections, the comprehensive plans should describe how JJCPA-funded programs fit within the context of counties' overall juvenile justice strategies. Therefore, to meet the requirements of the JJCPA related to preparing comprehensive plans, Kern should have communicated in its comprehensive plan any significant changes to its approach to juvenile crime and delinquency, including changes to its JJCPA-funded programs. However, as shown in Figure 2 on page 19, Kern made no changes to its comprehensive plan in 14 of the 18 years since the inception of the JJCPA. Consequently, we concluded that Kern's comprehensive plans were outdated and do not accurately reflect the county's strategies for addressing juvenile crime and delinquency.

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We acknowledge in the Introduction on page 8 that in addition to describing the JJCPA-funded programs, the JJCPA requires counties to assess the existing services for juvenile offenders, at-risk youth, and their families and to describe their local action strategies for providing a continuum of responses to juvenile crime and delinquency. As noted on page 73, the Audit Committee directed us to evaluate the spending, reporting, and evaluation of JJCPA funds by five counties, including Kern, and to evaluate their decision-making processes related to these funds. While we were aware of other juvenile justice activities that the five counties performed, these activities were outside of the audit's scope.

②

Although Kern asserts that it complied with this requirement in practice, Kern's comprehensive plan did not formally define at-risk youth or identify risk factors, as we indicate in Table 3 on page 23. We acknowledge on page 20 Kern's efforts to revise its method for assessing whether juveniles are at risk of reoffending, but without specific, documented definitions of at-risk youth in Kern's comprehensive plans, parents and stakeholders may not know where to turn for services to assist the youth in their care.

③

Likewise, without this definition, Kern cannot demonstrate that it has complied with state law requiring it to develop comprehensive plans that assess existing services for and includes responses to juvenile offenders and at-risk youth.

④

We look forward to reviewing Kern's 60-day response to the audit recommendations to assess its progress in implementing them.

May 2020



RAY LEYVA
Interim Chief Probation Officer

COUNTY OF LOS ANGELES PROBATION DEPARTMENT

9150 EAST IMPERIAL HIGHWAY – DOWNEY, CALIFORNIA 90242
(562) 940-2501



March 24, 2020

Ms. Elaine Howle*
California State Auditor
621 Capitol Mall, Suite 1200
Sacramento, CA 95814

Ms. Howle,

Attached is the Los Angeles County response to the draft report titled, "Juvenile Justice Crime Prevention Act: Weak Oversight Has Hindered Its Meaningful Implementation," an audit that was the result of a Joint Legislative Audit Committee Request.

Our County has a history of prioritizing the utilization of our JJCPA funding for direct services to our youth and families. We will continue to work together with our decision makers and stakeholders to implement strategies that positively impact programming for our youth in Los Angeles County.

Additionally, I appreciate the process and time your Audit staff spent with my Department so that we could provide requested information and respond to this audit. Please direct any additional questions to Felicia Cotton, Deputy Director, Juvenile Field Services at (562) 940-2526 or via email at Felicia.Cotton@probation.lacounty.gov.

Sincerely,



Ray Leyva
Interim Chief Probation Officer

Attachment

c: Sheila E. Mitchell, Chief Deputy – Juvenile Services
Tom Faust, Acting Chief Deputy – Juvenile Services
Felicia Cotton, Deputy Director – Juvenile Field Services

Rebuild Lives and Provide for Healthier and Safer Communities

The following includes the County of Los Angeles' detailed response, by Chapter and Recommendation, to the Auditor of the State of California's draft report titled, "Juvenile Justice Crime Prevention Act: Weak Oversight Has Hindered Its Meaningful Implementation."

Overview

① Overall, Los Angeles County's JJCPA funding has been a part of our Juvenile Justice continuum for program and service provision to our youth and families since inception. As mentioned in the draft report, recent efforts to update our County's comprehensive plan expanded and included additional stakeholders in the development process. Revisions throughout the years were based on strategies, which thereby impacted programs. Additionally, Los Angeles County went above and beyond by having our contracted JJCPA evaluator produce an annual report utilized to inform decision makers and stakeholders about promising program results.

Chapter 1: County Oversight of the JJCPA

Recommendation: To determine the effectiveness of its use of JJCPA funds, Los Angeles should include in its year-end reports to Community Corrections descriptions or analyses of how its JJCPA funded programs influenced the county's juvenile justice trends, as required by law.

② **Response: Agree.** Los Angeles County included the intended outcomes in the year-end reports, however there was a rich body of information from the evaluator and other researchers that could have been included as a supplement. This supplemental information has been utilized to inform decision makers and established policies throughout the juvenile justice community in the County of Los Angeles. The RAND Corporation, our JJCPA program evaluator during a portion of the audit period (Fiscal Years' 2013-14, 2014-15, 2015-16) and Resource Development Associates (published evaluation in April 2018 for FYs 2012-13, 2013-14, 2014-15 and 2015-16) published reports on their public websites that affirmed such efforts

Recommendation: Los Angeles should collect data on all participants in each JJCPA program and service to adequately assess the effectiveness of those programs at reducing juvenile crime and delinquency.

Response: Agree.

Recommendation: To accurately assess the effectiveness of its programs, Los Angeles should determine how to accurately identify in its case management systems the JJCPA programs and services in which each individual participated or enhance these systems to provide this capability.

Response: Agree. Los Angeles utilizes several source systems to track the various youth and families who receive services through JJCPA funding. Our case management system is utilized for case information related to Probation youth.

Chapter 2: State Oversight of the JJCPA

Recommendation: None.

Appendix A – Program Descriptions, Expenditures, and Demographics of JJCPA Program Participants at the Five Counties We Reviewed, Fiscal Years 2013-14 through 2017-18

Comments: Table A.4, titled, “Percentages of Certain Demographics for Los Angeles JJCPA-Funded Programs During Fiscal Years 2013-14 through 2017-18,” includes our Base-Funded Programs and only one (1) identified One-Time Projects Program (the Early Intervention and Diversion Program). Additionally, the Table A.4 footnote mentions that “Los Angeles does not track demographic data for its Early Intervention and Diversion Program or its One-Time Projects Program. To clarify, the Early Intervention and Diversion Program is a One-Time Projects Program. Los Angeles has various One-Time funded programs for which we may collect participant or demographic information where applicable; some funded projects included system enhancements, transportation and other programs.”

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Comments

CALIFORNIA STATE AUDITOR'S COMMENTS ON THE RESPONSE FROM THE COUNTY OF LOS ANGELES PROBATION DEPARTMENT

To provide clarity and perspective, we are commenting on the response from Los Angeles. The numbers below correspond to the numbers we have placed in the margin of Los Angeles's response.

On page 27 of our report we acknowledge Los Angeles's contract with an external evaluator to assess the effectiveness of its JJCPA-funded programs. However, we disagree with the county's characterization that it went "above and beyond" because Los Angeles did not include the key findings from its evaluator in its 2018 year-end report that it submitted to Community Corrections. As we note on page 27, by not including its evaluator's key findings in its year-end report, Los Angeles missed an opportunity to inform decision makers, stakeholders, and other counties about the effectiveness of its use of JJCPA funds.

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Although Los Angeles indicates that it included the intended outcomes in its year-end reports, we found it did not report the measures of effectiveness required by state law. As we describe starting on page 27, Los Angeles did not include in its year-end reports descriptions or analyses of how its JJCPA-funded programs may have contributed to or influenced countywide juvenile justice trends, such as declining arrests.

②

Los Angeles incorrectly states that Table A.4 on page 49 includes only one identified One-Time Projects program—the Early Intervention and Diversion program. In fact, Table A.4 includes information for all of the programs Los Angeles reported that it operated from fiscal years 2013–14 through 2017–18, including the Early Intervention and Diversion program and the One-Time Projects program. Further, Los Angeles's assertion that the Early Intervention and Diversion program should be classified as a One-Time Projects program contradicts what it reported to Community Corrections. Specifically, in its year-end reports to Community Corrections, which was the source of the information presented in Appendix A, Los Angeles did not indicate that the Early Intervention and Diversion program was a One-Time Projects program. Thus, we expected Los Angeles to provide demographic data separately for both the Early Intervention and Diversion program and the One-Time Projects program.

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May 2020

Mendocino County Probation Department

Izen Locatelli
Chief Probation Officer



March 19, 2020

Elaine M. Howle, CPA *
California State Auditor
621 Capitol Mall, Suite 1200
Sacramento, CA 95814

Dear Ms. Howle:

Please accept this letter as the County of Mendocino's response to the California State Auditor's draft, redacted report entitled, "Juvenile Justice Crime Prevention Act: Weak Oversight Has Hindered Its Meaningful Implementation". As stated in our response, Mendocino County is committed to the goal of reducing crime and delinquency among young people.

We appreciate the professionalism of your audit team and look forward to seeing the final report.

Should you have any questions, please contact me at (707) 234-6911.

Sincerely,

A handwritten signature in black ink, appearing to read 'Izen Locatelli', written in a cursive style.

Izen Locatelli
Chief Probation Officer

Attachment

cc: Carmel Angelo, Chief Executive Officer
Christian Curtis, Acting County Counsel
Brina Blanton, Deputy County Counsel

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North County Adult Field Office: 472 E. Valley St, Willits, CA 95490 Ph (707) 234-6900 Fax (707) 459-7899
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Juvenile Hall: 585 Low Gap Rd, Ukiah, CA 95482 Ph (707) 463-6368 Fax (707) 463-4460

* California State Auditor's comment appears on page 103.

Mendocino County Probation Department

Izen Locatelli
Chief Probation Officer



March 19, 2020

Mendocino County submits this response to the recommendation and statements made in the draft, redacted State Audit Report 2019-116, "Juvenile Justice Crime Prevention Act: Weak Oversight Has Hindered Its Meaningful Implementation".

Overview of the Report

Mendocino County is committed to the goal of reducing crime and delinquency among the young people in our communities. We appreciate the thoroughness with which this audit was conducted. While the scope of the audit was focused on the Juvenile Justice Crime Prevention Act (JJCPA) funding, Mendocino County wanted to highlight other fund expenditures in the area of juvenile justice. It was mentioned within the report that Mendocino County had not contracted with Community Based Organizations (CBO's) and other agencies for JJCPA funds. It should be noted, however, that Mendocino utilized a significant amount of its Youthful Offender Block Grant (YOBG) expenditures towards CBO's. Specifically, during the 5 years that covered this audit, Mendocino County spent 64% of total YOBG expenditures in those years with a CBO for a community-based Drug and Alcohol Treatment program. This program supports two out-patient, community-based programs to address substance abuse. The Foundations program provides early intervention services to youth with low-level drug and alcohol offenses and juvenile probationers with drug or alcohol-related probation violations. The Passages program provides treatment to youth on probation who have a dual diagnosis (mental health and substance abuse). These programs service not only youth currently in the juvenile justice system, but also serves youth in a pro-active and prevention method through direct referrals from schools and also through diversion alternatives. In the development of our updated Comprehensive Multi-agency Juvenile Justice Plan, this program will now be funded with JJCPA funding.

Also mentioned in the report is the Comprehensive Multi-agency Juvenile Justice Plan being outdated and incomplete. As was noted in the report, this plan has been in place in its current form since 2009-2010. While we continued to operate the same program since that year with no substantive modifications, Mendocino County, in conjunction with stakeholders, acknowledge the need to update our plan. While this is not a recommendation of the report, Mendocino County has taken additional steps beyond the recommendations of the audit report to complete an extensive and in-depth CMJJP which will be presented at our newly reconvened Juvenile Justice Coordinating Council this month.

Response to Recommendations Made in the Draft Audit Report for Mendocino County

Recommendation 1: To ensure that its Coordinating Council meets statutory requirements and is transparent to stakeholders, Mendocino County should reinstate its Coordinating Council, and should develop and implement bylaws for its Coordinating Council.

Mendocino County Probation Department

Izen Locatelli
Chief Probation Officer



Response 1: Mendocino County agrees with this recommendation and has taken the necessary steps in reinstating our Juvenile Justice Coordinating Council (JJCC). We have developed a draft updated Comprehensive Multi-agency Juvenile Justice Plan (CMJJP) by contacting key stakeholders and those required to be a part of the JJCC as defined by 749.22 of the Welfare & Institutions Code. Additionally, draft bylaws have been prepared. At this time our new reinstated JJCC is scheduled to meet on March 27, 2020 at which time the JJCC will be presented with both the CMJJP and bylaws for review, comment and approval. Once the JJCC has approved both the CMJJP and the bylaws, both documents will be presented to the Mendocino County Board of Supervisors for final approval, tentatively scheduled for April 20, 2020.

Recommendation 2: To determine the effectiveness of their use of JJCPA funds, Mendocino should include in its year-end reports to Community Corrections descriptions or analyses of how its JJCPA-funded program influenced the county's juvenile justice trends, as required by law.

Response 2: Mendocino County agrees and will take steps to implement this recommendation.

Recommendation 3: Mendocino should collect data on all participants in each JJCPA program and service to adequately assess the effectiveness of those programs at reducing juvenile crime and delinquency.

Response 3: Mendocino County agrees and will take steps to implement this recommendation. As the updated CMJJP includes new JJCPA funded programs, Mendocino plans to commence data collection on the funded programs at the on-set of these programs. A critical part of this recommendation which Mendocino County will address involves the definition and parameters of the data to be collected. As mentioned in the report, Mendocino County does have limitations in our current case management system to collect all necessary data in a method that will allow effective data extraction and, thus, analysis. We will be working with our system vendor to identify and make system modifications, where possible, to allow for the effective collection and extraction of data through the system. Where the system is unable to support necessary data collection needs, Mendocino County will work on developing alternative data collection methods.

Mendocino County believes the responses above will effectively address the recommendations addressed in the draft audit report.

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Comment

CALIFORNIA STATE AUDITOR'S COMMENT ON THE RESPONSE FROM THE MENDOCINO COUNTY PROBATION DEPARTMENT

To provide clarity and perspective, we are commenting on the response from Mendocino. The number below corresponds to the number we have placed in the margin of Mendocino's response.

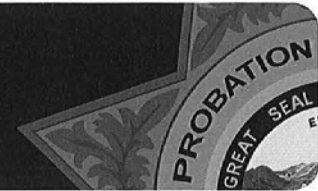
Mendocino asserts that it used funding from the Youthful Offender Block Grant to support a drug and alcohol treatment program operated by a CBO. As we describe on page 12, state law currently requires counties to include information about the JJCPA and the Youthful Offender Block Grant in their comprehensive plans. However, the Audit Committee did not ask us to audit expenditures of the Youthful Offender Block Grant and therefore, we cannot comment on Mendocino's assertion.

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SAN JOAQUIN COUNTY
PROBATION DEPARTMENT
Supporting a Safer, Stronger Community



Stephanie L. James CHIEF PROBATION OFFICER

March 16, 2020

Elaine M. Howle, CPA
California State Auditor
621 Capitol Mall, Suite 1200
Sacramento, CA 95814

RE: State Audit Report – Juvenile Justice Crime Prevention Act

Dear Ms. Howle,

On behalf of the San Joaquin County Probation Department, this letter provides a response to the draft redacted State Audit report titled, “Juvenile Justice Crime Prevention Act: Weak Oversight Has Hindered Its Meaningful Implementation.”

In response to the draft audit report recommendation, the Probation Department provides the following:

Recommendation #1: To ensure that its Coordinating Council meet statutory requirements and are transparent to stakeholders, San Joaquin should develop and implement bylaws for its Coordinating Council.

Response #1: While not required by legislation, the San Joaquin County Probation Department acknowledges that it is a best practice and will implement the recommendation.

Recommendation #2: To determine the effectiveness of its use of JJCPA funds, San Joaquin should include in its year-end reports to Community Corrections descriptions or analyses of how its JJCPA-funded programs influenced the county’s juvenile justice trends, as required by law.

Response #2: The San Joaquin County Probation Department is committed to evaluating its JJCPA programs. As such, we have been under contract with an outside evaluator, the San Joaquin Community Data Co-Op (Data Co-Op) since 2001. The Data Co-Op prepares an annual evaluation report that they present annually to the Juvenile Justice Coordinating Council. The report includes a wide range of findings on program outcomes. However, the California State

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575 W. Mathews Road
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209.468.4068



Stephanie L. James CHIEF PROBATION OFFICER

Auditor is correct and we have not been including these findings on our annual report to the Board of State and Community Corrections. The San Joaquin County Probation Department will begin doing so with our next report.

Recommendation #3: San Joaquin should collect data on all participants in each JJCPA program and service to adequately assess the effectiveness of those programs at reducing juvenile crime and delinquency.

Response #3: The San Joaquin County Probation Department has consistently collected data for the two primary JJCPA Probation Department programs: Probation Officers on Campus and Reconnect Day Reporting Center. The Neighborhood Service Centers provides their data directly to the Data Co-Op for evaluation purposes. However, when we began funding the Family Focused Intervention Team in 2017-2018 and the Positive Youth Justice Initiative in 2018-2019, the Department inadvertently forgot to have the Data Co-Op evaluate those programs. We have since increased our contract with the San Joaquin Community Data Co-Op and will include this information in our next report. It is important to note, the San Joaquin County Probation Department recently entered into a contract to replace its Juvenile Justice Case Management System. It is expected to go live during the 2020-2021 fiscal year.

The Probation Department would like to thank you and your staff for their professionalism and diligence during this audit process. We look forward to seeing the final report.

Thank you,

Stephanie L. James
Chief Probation Officer

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PROBATION DEPARTMENT County of Santa Barbara

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DAMON FLETCHER, CPA
Administrative Deputy Director

March 19, 2020

Elaine M. Howle
State Auditor
621 Capitol Mall, Suite 1200
Sacramento, CA 95814

Dear Ms. Howle:

The County of Santa Barbara submits this response to the recommendations and statements made in the draft audit report 2019-116, entitled "Juvenile Justice Crime Prevention Act: Weak Oversight Has Hindered Its Meaningful Implementation." This audit was conducted at the direction of the Joint Legislative Audit Committee (JLAC) of the California Legislature.

Recommendation 1: To determine the effectiveness of the use of its JJCPA funds, Santa Barbara should include in its year-end reports to Community Corrections descriptions or analyses of how its JJCPA-funded programs influenced the county's juvenile justice trends, as required by law.

County of Santa Barbara Response: We agree that descriptions of how our JJCPA-funded programs influenced juvenile justice trends could be more robust in our year-end reports. Enhanced data collection and program monitoring is key to this analysis. In FY 2018-19, in response to the issues which emerged from the Probation Department's comprehensive data mining, the Department asked our local providers to embrace new models of programming, and introduced the idea of evidence-based practices in our services. In FY 2019-20, the Department introduced very basic performance measures, to help providers understand the concepts of program evaluation and begin the transition to more comprehensive evaluation measures. In FY 2020-21, the Department is implementing robust performance measures for each provider, which include a set of measures standardized across all programs, as well as a set of program-specific measures tailored to the services each provider is contracted to perform. These measures will be incorporated into each provider contract and will be reported on quarterly. The Department has also created a department business specialist position to perform program and contract analysis; that position will be responsible for ongoing evaluation of performance measures, and conducting fidelity checks to ensure evidence-based programs are provided according to the program models.

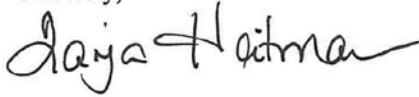
With more comprehensive program/contract monitoring and better performance outcome data, combined with continued scrutiny of our internal data (risk assessment and recidivism information, in particular), we will be able to provide stronger analysis over time of the nexus between funded programs and the county's juvenile justice trends.

Recommendation 2: To accurately assess the effectiveness of its programs, Santa Barbara should determine how to accurately identify in its case management systems the JJCPA programs and services in which each individual participated or enhance these systems to provide this capability.

May 2020

County of Santa Barbara Response: We agree with this recommendation. Many changes have been made to the County's JJCPA-funded services and programs over the last 20 years. Unfortunately, the electronic tracking mechanisms for those programs and services did not always change concurrently, which has led to inaccuracies in the historical JJCPA data. As program names changed and service models shifted, this was not always reflected in the case supervision types used to indicate youth receiving JJCPA services in our case management system. In some cases, supervision types were removed from the system or disabled when a program was renamed or terminated, but without a clear replacement which would enable continuous tracking of those cases assigned under JJCPA-funded programs. This reflects a disconnect between the service and supervision being provided daily, and the electronic tracking components associated with the case management system. Our electronic case management system has the capability we require; the Department has begun exploring solutions to the problem of tracking and identification.

Sincerely,



Tanja Heitman
Chief Probation Officer
County of Santa Barbara Probation Department