Facility: Baltimore City Juvenile Justice Center (BCJJC)
300 North Gay Street
Baltimore, MD 21202
Director of Detention: Derrick Witherspoon
Phone: 443-263-8163

Date(s) of Visit(s): August 14 and 24
September 8 and 20

Visited and Reported by: Philip J. Merson

Nature of Issues during Reporting Period:
- Population
- Staffing
- Safety and Security
- Education
- Programming
- Health/Medical
- Facility Maintenance
- Advocacy, Investigations and Monitoring

Staff Interviewed: Facility administrators, resident advisors and youth

Other Agency Involvement:
- Department of Juvenile Services (DJS) Office of Investigations and Audits (OIA)
- Maryland State Police (MSP)
- Baltimore City Dept. of Social Services (DSS)
- Baltimore City Public Defender’s Office (PDO)

Date of Report: November 6, 2007
INTRODUCTION

The Baltimore City Juvenile Justice Center (BCJJC) is a State detention facility that has the capacity to house 140 youth now that a suicide resistant barrier has been completed for the upper tier railings. The Maryland State Department of Education provides instruction to the youth at the facility. This office conducted four unannounced visits and attended two scheduled meetings at the facility during the past quarter.

DJS signed an agreement with the U.S. Department of Justice (DOJ) on May 22, 2007 regarding conditions of confinement at BCJJC. The agreement requires the state to implement reforms to ensure that juveniles at the Justice Center are protected from harm and provided legally adequate services, including mental health care, suicide prevention, and special education.

The Annie E. Casey Foundation’s Juvenile Detention Alternatives Initiative (JDAI) conducted a self-assessment at the facility from June 25 through June 27. The results of the inspection are currently considered confidential but may be released publicly pending a review by the Executive Committee. Claudia Wright of this Office participated in the inspection.

KEY FINDINGS

1. Population

The facility is rated for a maximum population of 144. The DJS Office of Research and Planning recorded the Average Monthly Population as 124 in July, 131 in August and 141 in September (See graph of Avg. Population in the Aggressive Incidents section, below). The facility’s population has fluctuated this quarter as follows:

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<th>Date 2007</th>
<th>2-Jul</th>
<th>9-Jul</th>
<th>16-Jul</th>
<th>23-Jul</th>
<th>30-Jul</th>
<th>6-Aug</th>
<th>13-Aug</th>
<th>20-Aug</th>
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</table>
a. **Youth Held in Detention**

As of September 30, 23 youth had been in detention (pre-adjudicated) for more than 30 days. Six of those had been in for 60 days or more and one of those youth had been in detention for more than 100 days.

b. **Youth Held in Pending Placement**

The number of youth in a pending placement (post-adjudication) status has remained steady (around 51), as depicted in the chart above. The remaining youth in the facility are in detention (pre-adjudication) status.

As of September 25, 2007, there were 13 youth who had been in a pending placement status for more than 60 days, and 3 of those youth had been in pending placement for more than 100 days. Five youth had been in detention (pre-adjudicated) for more than 60 days and one of those youth had been in detention for more than 100 days.

Even with DJS’ efforts to reduce pending placement periods and find appropriate residential programs for youth, youth continue to be languish in the system. At BCJJC, a youth filed a grievance on July 6, complaining that he had been detained for 4 ½ months.¹ The grievance was reportedly resolved after the youth spoke to his case manager and understood why he was still in detention.

The youth was committed to DJS custody and returned to the facility on July 23 to await placement. Although staff developed a treatment service plan and set behavioral goals for the youth, he had mental health issues that could not be appropriately addressed in a detention setting. For the next two months, they sought an appropriate placement.

On September 19, over six months after his original detention, the youth was released into the community on electronic monitoring. This case raises numerous concerns. Are youth who could be safely monitored in the community being inappropriately detained? Are youth who should be securely detained being released? What additional residential and/or community treatment programs are needed for youth with mental illness?

**Applicable Standards**

**Maryland Rules, Title 11, Rule 11-112.b.2.** Continued detention may not be ordered for a period beyond 30 days. Rule 11-112.c states, “The court may… continue detention or shelter care for a period not longer than 30 days after an adjudicatory hearing.

**Maryland Standards for Juvenile Detention Facilities 8.5.** Detention is defined as the temporary care of youth who, pending court disposition, require secure custody.…

¹ DJS Grievance 5494.
c. **Accuracy of Detention and Pending Placement Data**

As noted in the previous quarter’s report, detention, pending placement and length of stay for youth according to the DJS ASSIST database is still confusing. The number of days in a youth’s length of stay often appears to start, stop and start all over again when he is moved from the facility to community detention and back to the facility again.

Once a youth has been adjudicated and is placed in pending placement, that length of stay in pending placement should be noted in addition to his length of stay in detention to provide an accurate picture of how long the youth has been awaiting proper placement in a facility that will meet his needs.

Transfers between facilities should also be included as cumulative and the youth’s length of stay should not start over each time he moves between detention facilities.

2. **Staffing**

a. **Staff/Youth Ratios and Staffing Shortages**

Throughout this quarter, youth were locked down in their rooms due to staffing shortages. The Seclusion Log Book has 200 separate seclusions due to staffing shortages in August and September.

The Seclusion Log said the first 27 youth secluded because of staff shortages in August were secluded because “all other measures have failed.” The Shift Commander confirmed that the real reason for the seclusions, was the shortage of staff.

On August 25, during the 6am to 2pm shift, youth were locked down in their rooms, except for 6 youth at a time, because only one staff member was on each unit.

According to facility administrators, the facility needs 70 more direct care positions to provide sufficient services for the youth.

**Applicable Standards**

**Maryland Standards for Juvenile Detention Facilities 5.1.3.** Staffing arrangements shall aim to provide a safe, humane, and caring environment. Youth to staff ratios developed by the Department shall ensure adequate supervision of the youth.

**DJS response:** No inaccuracies indicated. However, with regards to youth being secluded due to staffing shortages, the Department wants to first ensure the safety and security of all youth and staff members in its facilities. We have conducted 3 targeted hiring blitzes and have hired approximately 30 new direct-care staff.

b. **Master Control Staffing**

Master control staffing had again slipped to one staff person at times, due to staffing shortages. Master Control requires the presence of two staff to adequately manage all the activities during the hours when youth are awake. On September 20 at
1:00 PM and on September 25 at 2:00 PM, there was only one staff working in Master Control.

c. Identification

This Monitor still recommends staff’s first or last name be Velcroed or sewn into their shirt for easy identification by youth and others. This monitor has experienced numerous examples of youth trying to “describe” a staff person or they only know staff by some type of “nickname” when investigations are being conducted. DJS, MSP and CPS investigators can corroborate this concern. Names on uniforms look professional and also help to instill a greater sense of responsibility and wariness on the part of staff when they consider violating a youth’s rights. The argument that youth will know a staff person’s name for future retaliation does not present a significant issue if staff are treating youth with respect and fairness.

DJS response: What issues have been identified to justify this recommendation?

JJMU Response: Include following in observation: This monitor has experienced numerous examples of youth trying to “describe” a staff person or they only know staff by some type of “nickname” when investigations are being conducted. DJS, MSP and CPS investigators can corroborate this concern. Names on uniforms look professional and also help to instill a greater sense of responsibility and wariness on the part of staff when they consider violating a youth’s rights.

3. Safety and Security

a. Aggressive incidents

Although population has fluctuated, reports of aggressive incidents of youth on youth assaults, youth on staff assaults and use of force rose again this quarter. There were 127 such incidents three quarters ago, 162 incidents two quarters ago, 172 last quarter and 183 this quarter. According to the DJS Incident Report database, there were 123 youth on youth assaults, 40 physical restraints, 11 youth on staff assaults, 8 group disturbances, 1 physical abuse and 17 incidents of Property Destruction.

![Graph of Types of Incidents](chart.png)

Types of Incidents (DJS Incident Report Database)
Youth report that they are jumped or “banked” by other youth and forced to sign contracts with other youth to give them their meals, snacks, etc.

As noted in the charts above, 70% of all incidents at the facility were reported as assaults, use of force and destruction of property.

b. Youth on Youth Assaults

On July 9, a youth submitted a grievance complaining that staff did not prevent him from being harassed and assaulted by other youth. The DJS Child Advocate forwarded the grievance to the DJS OIA investigator. The investigator reportedly reviewed a video tape of the suspected incident and found no improprieties but never filed an Incident Report.

On July 26, youth were involved in two group disturbances. One involved ten youth and the other involved four youth. Numerous minor injuries were reported, but the Incident Report did not identify any injuries. Although this Monitor contacted DJS several times, the report in the Incident Database was not corrected, and no formal investigation was completed.

Applicable Standards

Memorandum of Agreement between DJS and GOCYF, based on HB 971, Chapter 255, effective November, 2003: Independent Monitor Standard Operating Procedures 5.3.5. DJS shall provide the Independent Monitor with copies of all investigative reports relating to youth in facilities within 3 days of each report’s completion.

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2 DJS Grievance Number 5502.
3 DJS Incident Report 57296.
4 DJS Incident Report 57294.
c. **Child Abuse and Inappropriate Behavior by Staff**

Several alleged child abuse incidents occurred at the facility and DJS failed to report some of them to this office as required. Only one of the incidents was reported as an abuse in the Incident Report database. The incidents include:

- On July 1, several youth were involved in an altercation and two staff used unnecessary force to restrain one of the youth and allegedly threw the youth into his room. These actions resulted in injuries to the youth’s face. The case was investigated by MSP, CPS and DJS. CPS “indicated” that abuse had occurred and DJS sustained findings against the staff for unnecessary use of force.

- On August 31, a youth submitted a grievance regarding an altercation with staff about using the bathroom. Following an investigation, several staff were found in violation of DJS Standards of conduct for being unprofessional and making false statements.

- On August 18, a youth accused a staff of searching him improperly and alleged sexual abuse. The incident was reported to DSS and initially “indicated” for sexual abuse after a forensic interviewer stated she believed the youth’s allegation but DSS subsequently reversed its decision and dropped the case. The staff was reportedly terminated following a DJS investigation. Neither DJS nor Child Protective Services notified this office of the case until nearly two months later.

- On August 21, a youth was restrained by several staff and reportedly received injuries to his arm. All investigative agencies ruled out child abuse. Although the DJS Investigative Report was completed on August 28, this office received no initial notice of the charges and did not received the investigative report until September 20. DJS is required to provide all Investigative Reports within 3 days of completion.

**Applicable Standards**

**Department of Juvenile Services Standards of Conduct 2.25.1.** An employee may not strike or use physical force on a delinquent youth...

**Department of Juvenile Services Standards of Conduct 2.25.2.** An employee may only use the minimum amount of force necessary to take the individual into custody or gain control of the situation. Force may never be used as a form of punishment.

**Memorandum of Agreement between DJS and GOCYF, based on HB 971, Chapter 255, effective November, 2003: Independent Monitor Standard Operating Procedures 5.3.5.** DJS shall provide the Independent Monitor with copies of all investigative reports relating to youth in facilities within 3 days of each report’s completion.

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5 DJS Incident Report 56868.
6 DJS Grievance Number 5953.
7 DJS Incident Report 57865.
8 DJS Incident Report 57835.
d. **Contraband**

There were 11 incidents of illegal contraband in the facility. Numerous shanks, lighters and cigarettes were recovered.

**Applicable Standards**

**Department of Juvenile Services Policy 03.14.04.IV.B.3.** Facility employees shall ensure that a youth placed in locked door isolation does not possess belts, matches, weapons, or other objects or materials that might be used to inflict self-injury.

DJS response: No inaccuracies indicated. Nevertheless, facility shake downs and room searches are completed on a daily basis and have resulted in the collection of the aforementioned contraband. These efforts have been successful in preventing youth or staff from being harmed with collected contraband.

e. **Use of Seclusion**

Use of seclusion increased dramatically during this quarter. There were reportedly 59 incidents in April, 45 incidents in May and 60 incidents in June of last quarter. There were 91, 223 and 206 incidents of seclusion respectively for July, August and September. Many of the seclusions were a result of staff shortages.

![Seclusion graph]

**Applicable Standards**

**Maryland Department of Juvenile Services Policy RF-01-07 (7):** Seclusion shall not be used as punishment and is limited to youth who have not responded to less restrictive methods of control or for whom less restrictive measures cannot reasonably be tried, and who: (i) Present an imminent physical danger to self or others; or Have escaped or are attempting to escape.

f. **Attempted Escape**

On August 24, a youth with a violent criminal history and AWOL record attempted to escape when he was transported back to the facility from a placement interview. His case manager had let him and his mother out of her vehicle outside of the secured area...
of the facility and the youth ran away. The youth was apprehended by his mother and brought into the facility. 9)

**DJS Standards of Conduct 2.12.** An employee shall take all reasonable means to prevent escapes….

**DJS Standards of Conduct 2.13.** An employee may not take any action or fail to take any action when the action or failure to act causes a breach of security or a potential breach of security by jeopardizing:

2.13.1. the physical security or integrity of an institution, or the physical security or integrity of any part or area of an institution or

2.13.2. the safety or security of any employee, delinquent youth, offender, client, visitor or member of the public.

**DJS response:** Although the youth indicated above was in the constructive custody of the facility it is noteworthy to mention that at the time of the incident the youth was actually returning to the facility with his community case manager and parent. Even so, the youth was successfully returned to the facility after the attempt.

4. **Education**

   a. **Late or Missed School**

      Youth report they are missing school or are very late due to staffing shortages. Staff advise they sometimes do not have enough staff to transport youth to the school or maintain supervision at the school while also maintaining supervision of youth on the units so youth are provided school work to complete while on the unit.

**Applicable Standards**

**Department of Juvenile Services Detention Standards 4.1.** The Department shall ensure that educational services provided within the detention facility are consistent with state requirements and that they meet the individual needs of the youth.

**DJS response:** School work is still provided for the youth through a modified plan in agreement with the educational staff.

**JJMU Response:** Agreed – added to report.

   b. **Failure to Obtain School Records**

      The education staff report that although facility requests for school records are normally sent out within a week, they have difficulty obtaining school records for some youth. A random review of several youth records revealed that some requests for youth records are not being sent out within one week, and in some cases several weeks elapse before records are received:

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9 Incident Report Number 57968.
• Youth A arrived at BCJJJC on 8/26/2007, records first requested from Baltimore City on 9/13, no reply as of 9/20.
• Youth B arrived at BCJJJC on 8/4/2007, records first requested from Baltimore County on 9/14, no reply as of 9/20.
• Youth C arrived at BCJJJC on 8/16/2007, records first requested from Baltimore city on 8/23, second request on 8/28, no reply as of 9/20.
• Youth D arrived at BCJJJC on 8/15/2007, first request to Baltimore city on 8/28, no reply as of 9/20.
• Youth E arrived at BCJJJC on 4/13/2007 and his IEP was not forwarded until 9/7/2007.

Applicable Standards

Maryland Education Code Annotated Section 8-504. Copies of school information must be sent within three school days following receipt of the request. MSDE personnel must continue to request student records per policy and standards and the schools must return those records in a more timely fashion.

DJS response: No inaccuracies identified with the record reviews; nevertheless, the Applicable Standard referenced is not related to the requester of information but rather the institution who actually received the request.

JJMU Response: Added “MSDE personnel must continue to request student records per policy and standards and the schools must return those records in a more timely fashion.”

5. Programming

a. Lack of Sufficient Daily Activities

Our last report referred to the June 16 Facility Advisory Board meeting at which the DJS Secretary spoke. The DJS Secretary noted that BCJJJC must focus on programmatic changes that would fully engage youth from morning to night. There have been several programs developed to increase structure time after school and/or weekends such as church programs, father support groups, a mentoring program, a behavior management system and activity program, case manager and behavior health groups.; however, as of the end of this quarter, this monitor has still observed youth that still have too much unoccupied time, sometimes causing them to get into fights with one another.

Applicable Standards

Code of Maryland Regulations (COMAR) 01.04.04.18.A. The licensee shall provide services designated to meet the children’s needs for guidance, learning and personal development.

DJS response: There have been several programs developed to increase structure time after school and/or weekends such as church programs, father
support groups, a mentoring program, a behavior management system and activity program, case manager and behavior health groups.

JJMU Response: Incorporated comments.

6. Health/Medical
   a. Altercations Log

   According to BCJJC medical staff, there were 563 youth entered in the Altercations Log for the quarter. DJS auditors and investigators must examine the log and ensure incident reports are being submitted as required.

Applicable Standards

DJS Policy Number: 01.01.23 Subject: Emergency and Critical Incident Reporting: The Department’s Incident Reporting Form (DJJ-00-01 and 02) shall be used to collect and report information.

7. Facility and Maintenance
   a. Suicide Resistant Barriers

   By the end of August, DJS completed construction of the suicide resistant barriers on all housing units

8. Advocacy, Investigations, and Monitoring
   a. Grievances

   DJS Child Advocates do not appear to be following the DJS Grievance Policy that requires a youth to sign his agreement with a proposed resolution of the grievance before it is considered “resolved.”

   Seven grievances received this quarter from DJS did not indicate whether or not the youth agreed with the Advocate’s resolution.10

   b. Child Abuse Investigation Interagency Agreement

   A written interagency agreement has still not been finalized for responding to child abuse incidents at the facility.

Applicable Standards

Department of Juvenile Services Standards of Conduct 7.6.6. The Director [of ICAU] is responsible for contact with officials, other agencies, and appropriate government bodies.

   c. Notifying the Monitor about Serious Incidents

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10 DJS Grievance Numbers 5500, 5501, 5855, 5539, 5547, 5608, 5814.
This Office still does not receive completed DJS investigative reports within three
days as required. Most of the completed investigative reports are received well
beyond the three-day requirement, many are received weeks or even months after
completion, and some are never received.

In addition to cases discussed in the Safety/Security section of this report:

- On September 25, this Monitor was contacted by from Baltimore City DSS about
  an alleged child abuse that was reported on June 27. Although DSS said an
  investigation was completed, it has never been forwarded to this office for review.

  In addition, the DJS Incident Report database contains no reports involving an
  alleged abuse against this youth.\(^\text{11}\)

- Five youth filed grievances about alleged staff assaults and restraints on July 1.\(^\text{12}\)
  A DJS child abuse investigative report was completed on July 17 and attached to
  each grievance.\(^\text{13}\) but DJS never contacted this office about the incident.

**Applicable Standards**

**Memorandum of Agreement between DJS and GOCYF, based on HB 971, Chapter
255, effective November, 2003: Independent Monitor Standard Operating
Procedures 5.3.5.** DJS shall provide the Independent Monitor with copies of all
investigative reports relating to youth in facilities within 3 days of each report’s
completion.

\(\text{d. DJS Internal Monitoring Reports} \)

This Office has not received any DJS Facility Inspection Reports from the Audit
and Compliance Unit of OIA since April 2, 2007. Although DJS has subsequently
assured this office that these reports will be made available, they were not being
provided during this period of observation. The Juvenile Justice Monitoring Unit can not
fulfill its statutory responsibility to evaluate DJS’ internal monitoring reports if the agency
refuses to provide copies of those reports.

**DJS response:** Per a letter submitted to the JJMU on 11/9/07 these reports have been made available to the JJM.

**JJMU Response: Incorporated comment.**

**Applicable Standards**

**Maryland Code, State of Government, Title 6, Attorney General/Subtitle 4.
Juvenile Justice Monitoring Unit.** The Unit shall evaluate at each facility: (ii) the
Department’s monitoring process; (iv) the physical conditions of the facility.

\(^{11}\) Incident Report Numbers 56508, 56702, 56760
\(^{12}\) DJS Grievance Numbers 5489, 5490, 5491, 5492, 5493.
\(^{13}\) Incident Report Number 56868.
e. Suspected Child Abuse, Use of Force and Incident Reports

DJS still has a direct conflict in its reporting system and guidelines. DJS policy requires submission of a separate “Suspected Child Abuse and Neglect” on each alleged incident, but the Office of Investigations and Audits has been allowing staff to submit only an Incident Report of the incident, which is neither timely nor sufficient to meet Family Law requirements.

As noted in last quarter’s report, the Director of Quality Assurance, the Director of the Office of Investigations and Audits and the Director of the Office of Professional Development and Training are reportedly still working to correct this situation.

f. Inaccuracy of Reports and Incident Database

Numerous seclusions are still not being captured properly. On July 4, twelve youth were placed in seclusion for a disturbance\(^{14}\) and although each of the youth was released the next day after between 26 and 31 hours later, only one incident report was written to indicate the youth had been in seclusion beyond 8 hours. The Locked Door Seclusion policy is clear that individual reports should be written for each youth who is held in seclusion beyond 8 hours.

This Monitor contacted DJS twice during the quarter to communicate the concern.

Applicable Standards

DJS Residential Services Locked Door Seclusion Directive, Procedure 14, dated May 21, 2002 Section II,C. An Incident Report must be completed and forwarded to ICAU following the guidelines contained in the Incident Reporting Policy if youth is [note singular] secluded for 8 hours or more.

DJJ Standards of Conduct 2.19.1. Reports submitted by employees shall be clear, concise, factual and accurate.

g. Investigator Restraint Training

There is still no agreement in effect and no trainings have taken place for DSS, DJS and Police investigators relating to the proper use of restraints in DJS facilities.

Applicable Standards

Department of Juvenile Services Standards of Conduct 7.6.6. The Director [of OIA] is responsible for contact with officials, other agencies, and appropriate government bodies.

h. Illegal Escorts of the Monitor

BCJJC still requires the supervisor on duty to escort the Juvenile Justice Monitor on his/her visit through the facility. This action compromises the ability of the monitor to

\(^{14}\) DJS Incident Report 56945.
gather crucial information regarding the safety and security of youth. Staff members interviewed, including supervisory staff members, perceive that this policy inhibits staff and youth from divulging any information that might reflect poorly on DJS. This policy violates the Department’s own standard and creates an appearance of impropriety.

Applicable Standards

Maryland Standards for Juvenile Detention Facilities 7.3.2. The Department shall ensure that internal and independent monitors are afforded the broadest possible access, relevant to their particular function and consistent with notions of privacy, to all appropriate information, records, data, and to staff and youth of the facility that is being monitored.

Conditions Remaining Unabated for More Than 30 Days

1. Time spent by youth in Detention and Pending Placement must continue to be reduced. DJS should adopt a vision that moves beyond merely reducing confinement to providing an environment that meets the youth’s needs.

2. Staffing shortages must be reduced with an aggressive plan to hire more qualified personnel. Youth should not need to be placed in seclusion due to staffing shortages.

3. DJS staff should be readily identifiable to youth in the facility.

   The JJM has provided no significant information to justify the need for name badges for staff members. Additionally, staff members can be identified in that they wear uniforms while on duty.

   JJMU Response: Information included above.

4. Youth must not be abused, neglected or otherwise allowed to be unsafe. The numbers of aggressive incidents throughout the facility must be significantly reduced through more effective and engaging programming.

   DJS does not allow or condone abuse and/or neglect of youth in its custody. Additional programming has been put in place to increase positive interaction as well as decrease violent incidents.

   JJMU Response: Incorporated.

5. Possession of illegal contraband must be closely monitored and controlled.

   As previously mentioned, the facility does shakedowns and room searches on a daily basis.

6. Programming must be focused and consistent on a daily basis.

   Consistent daily programming does exist at the facility.
JJMU Response: Incorporated.

7. Investigative Reports should be comprehensive and thorough. They must be forwarded to this Office within 3 days of their completion.

Internal quality improvement reviews are conducted to monitor various aspects of the program, which includes documentation reviews. Further, DJS have made an agreement with the JJMU to pick up investigative reports on the 15th and 30th of each month and this agreement has been followed.

JJMU Response: Incorporated.

8. The Child Abuse and Neglect Memorandum of Understanding should be finalized.

9. All investigators from DSS, MSP and DJS should be thoroughly familiar with the Crisis Intervention Training being provided to DJS staff.

10. The Incident Report Database is still inaccurate and misleading. Reports must be accurate to provide essential data to help identify problem areas for the effective management of the facility. What?

Internal audits and training are routinely being done to ensure that documentation of incidents are accurate.

11. Monitors should not be escorted through the facility.

DJS contends that our policy does not prohibit facility escorts for monitors. This procedure is in effect to ensure that staff members are readily accessible when question, comments or concerns are identified. Nevertheless, the agency does allow for privacy with regards to monitors interviewing both youth and staff.

Recommendations

1. Information in the ASSIST database must be clear and accurate.

2. DJS should not spend a large amount of its limited time and resources on investigating incidents involving Youth on Staff assaults unless there are other elements within the incident that lead to staffing improprieties. If those other elements are identified, the investigation should proceed under that basis, not as a Youth on Staff assault. Police have normally been charged with handling the youth on staff assaults. What is the basis for this recommendation? How much time is allegedly being spent on these types of investigations? Staff should be afforded the same allowances as youth when it comes to investigations related to their safety and security.

3. Seclusion logbooks must be accurate.
4. Staff returning to the facility with youth should always enter through the secure sallyport area to prevent escapes.

5. Staff must act quickly to prevent any escape of a youth in detention.

6. Attempted Escape reports must be completed promptly and properly. Supervisory staff should ensure compliance and be held accountable.

7. Youth must attend school as required by law.

**The youth at BCJJC do attend school as required by law.**

8. To provide for the educational needs of youth in the facility, school records must be obtained as required by law.

**Education records are being requested by the appropriate personnel at the facility.**

9. DJS internal Monitoring Reports should be forwarded to the Monitor.

10. DJS must ensure it is following Maryland Law for reporting suspecting child abuse and neglect.

11. The Altercations Log maintained in the Nursing Station should be monitored often and compared to the Incident Report database to ensure Incident Reports are being submitted as required.

12. Grievance Reports should indicate if the youth agrees with the resolution.

13. The Monitor should have complete access to the Grievance Report database to ensure proper follow-ups are being conducted.

**The JJMU does have access to grievances and dispositions per SOP ¶ 5.3.4**

**JJMU Response: JJMU does not have access to the Grievance database.**