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Improving Outcomes for Status Offenders in the JJDPA Reauthorization

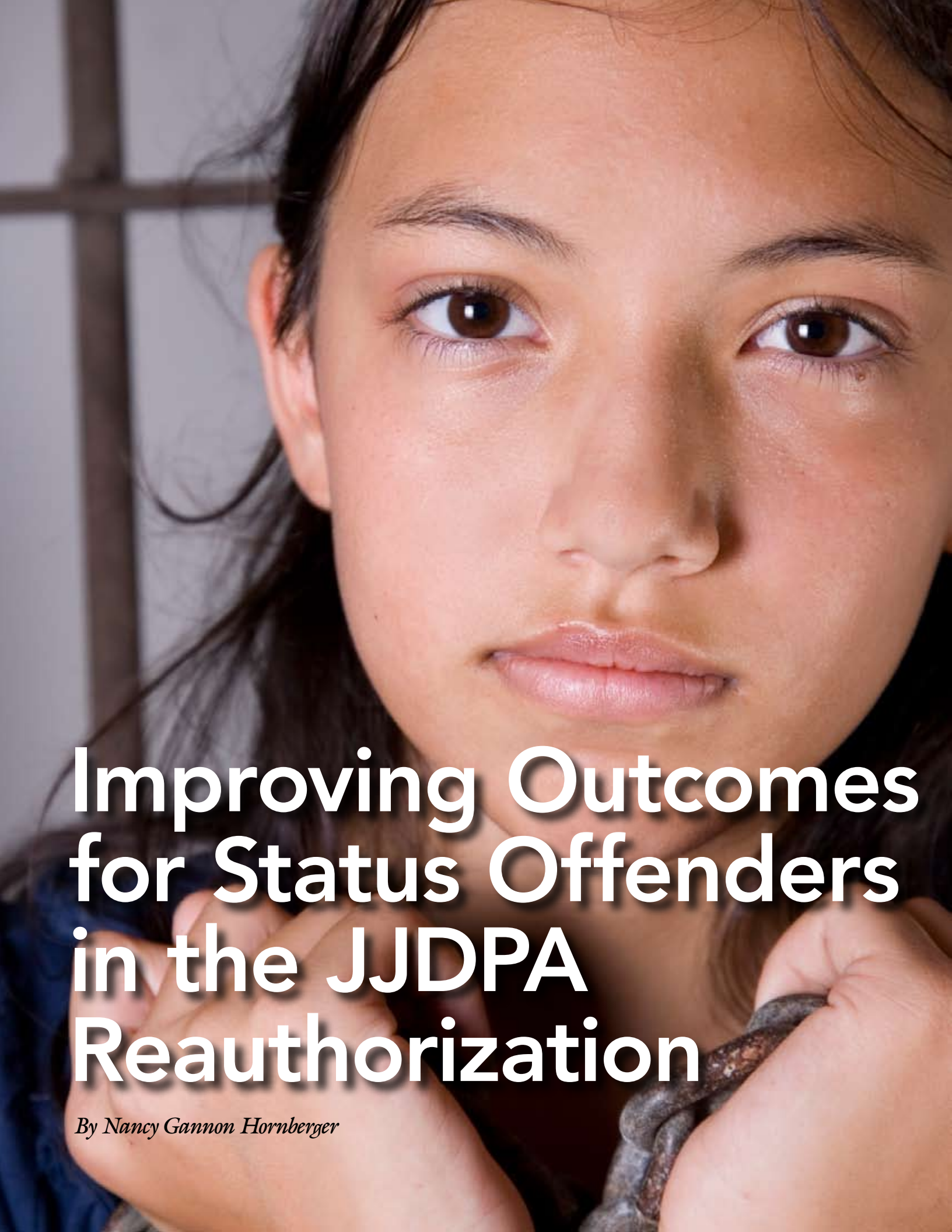
By Nancy Gannon Hornberger

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Improving Outcomes for Status Offenders in the JJDPA Reauthorization

By Nancy Gannon Hornberger

For more than 35 years, the federal Juvenile Justice and Delinquency Prevention Act (JJDPA)¹ has set high standards for best practices and established safeguards for the care and custody of children and teens involved with the delinquency court. By any measure, it has been a successful law, generating both widespread positive change and voluntary compliance by states and localities with its primary goals and requirements. Today, 55 of the 56 states and territories eligible to participate in the JJDPA do so, and more than 85% are in compliance with its core requirements.

Since its enactment in 1974, the over-riding goal of the JJDPA has been to prevent harmful and unnecessary confinement of children and teens, while enhancing public safety and family well-being through comprehensive delinquency prevention efforts. To support its key purposes, the JJDPA created a unique partnership between states and localities with a federal office dedicated to juvenile matters with the U.S. Department of Justice—the Office of Juvenile Justice and Delinquency Prevention (OJJDP)—and established incentive grants to engage states and localities in system reforms.

Title II of the JJDPA is perhaps best known for its core requirements to which federal formula grants are tied. Title II stipulates that states may receive a full share of the federal funds if they comply with four core requirements, one of which prohibits the placement of status offenders in locked detention. Just six years following enactment of this JJDPA requirement to “Deinstitutionalize Status Offenders,” it was modified in 1980 under pressure from judges, to allow judges to detain status offenders alongside delinquent offenders if a juvenile status offender is found to have violated a valid court order: the Valid Court Order (VCO) exception.

CURRENT STATUS OF JJDPA LEGISLATION

The U.S. Senate has taken initial steps to reauthorize the JJDPA with the full force of updated research and contemporary understanding of the challenges of delinquency prevention. The current bill, S. 678,² authored by Senators Leahy, Kohl, Specter and Durbin, boasts bipartisan co-sponsors and advances principles widely embraced by more than 360 national, state, and local organizations (see sidebar below). The policy advances in S. 678 are primarily aimed at bolstering and updating the JJDPA core requirements, as follows:

- Extends the requirements regarding removal of juveniles from adult jails and lock-ups, and ensures sight and sound separation between youth and adult inmates whenever they are confined together, so that this requirement would protect all youth under the age of 18 held pre-adjudication, whether charged in juvenile or criminal court;
- Strengthens the Disproportionate Minority Contact (DMC) requirement by directing states to take specific steps including data collection and analysis, measurement, and evaluation;

- Increases funding as well as training and technical assistance for alternatives to detention and to support a continuum of research-based services to meet unmet needs of court-involved youth and their families, including screening, diversion, assessment, treatment, and re-entry services;
- Restores funding designed to support these provisions and other purposes of the JJDPA.

Senator Cardin and then-Senator, now Vice President Biden, championed a significant change to the DSO requirement in the 110th Congress that has carried over to the current bill. This amendment would require states to phase-out use of the VCO exception within three years after enactment of the legislation, with limited hardship extensions. In addition, the bill requires states to enact procedural safeguards and limits on lengths of stay for status offender detention, all of which apply until states are able to eliminate the VCO altogether. This amendment prevailed and gained greater congressional, practitioner, and public support in the current bill, S. 678. This spring, the National Council of Juvenile and Family Court Judges (NCJFCJ) gained national recognition and widespread support for its position to fully support the active Senate reauthorization bill, including its provision to phase-out the VCO exception and return to the original intents of the DSO core requirement. This action by NCJFCJ has been widely applauded by OJJDP Acting Administrator Jeff Slowikowski and others.

To date, several hearings have been held by the U.S. House committees of jurisdiction for JJDPA reauthorization, also addressing the elimination of the VCO in testimony by judges and juvenile justice practitioners from states where the VCO exception is permissible, as well as those where it is not. No bill has yet been introduced in the House.

Act-4-JJ Campaign Principles for Reauthorization of the JJDPA:

- I. **Keep children and youth out of the justice system:** Whenever possible, keep children and youth out of the juvenile and criminal justice systems by addressing their needs and those of their families early and effectively.
- II. **Ensure equity and competence:** Do everything possible to ensure equity and competence with regard to race, ethnicity, culture, language, gender, and sexual orientation, in legal representation before the courts and throughout all system practices and policies.
- III. **Ensure responses appropriate to a young person’s age and stage of development:** Do everything possible to ensure that children and youth in the justice system are treated in an age-appropriate manner and provided with developmentally appropriate, evidence-based services and supports. Ensure, when needed, that sanctions are appropriate to a youth’s age and offense.
- IV. **Strengthen the federal partnership with state and local governments:** Strengthen the federal role in supporting state and local needs by providing sufficient resources and appropriations for jurisdictions to effectively implement the JJDPA, to fully comply with its core requirements/protections and to ensure state and local adherence to high standards of performance.

For more information: www.act4jj.org

RE-EVALUATING THE VCO EXCEPTION

To effectively address the complex needs and circumstances related to juvenile status offenders, a common definition is helpful. In general, across the United States a status offense is a type of misbehavior best described as illegal conduct for children only; these offense categories exist only because of the minor status of the offenders involved. There are three primary types of status offenses: habitual truancy, running away from home or foster care, and incorrigibility or behavior found to be beyond the control of parents/guardians. With some variation from one jurisdiction to another, other status offenses include violating curfew, as well as use of tobacco and alcohol. Adults who perform these same acts are not subject to court sanction. Therefore, it is the status of childhood, in combination with the troubling nature of these actions that may subject a child to court review.

Many questions have been raised about the effectiveness of sanctioning status offenders to secure detention where they are co-mingled with delinquent offenders and their liberty and access to community supports curtailed. The greatest concern is that too often they are not being placed in the least restrictive, pro-social, safe and rehabilitative environments. Nearly 20% of status offenders, technical parole violators and non-offenders are placed in living units with youth who have killed someone and more than 25% reside with felony sex offenders. In addition, while in placement, more than half of all of these less serious offenders participate in programming with youth who have been charged with murder and/or rape.³

The nation is split. Twenty-five U.S. states and territories do not allow or do not use the VCO exception; in 30 states [hereafter, “states” is used as a generic term to describes states, territories, and Washington, D.C.], the VCO exception is allowable, and typically used on a limited basis by a single court or small number of judges. When surveyed in 2008, 44% of compliance staff across the states cited the DSO core requirement as presenting the “greatest challenge to maintaining state compliance” with the JJDP, and pointed to use of the VCO exception as the reason.⁴

Currently, OJJDP reports that the VCO exception is used approximately 12,000 times per year in these 30 jurisdictions. Yet, nearly 60% of all such uses of the VCO occur in just three states: Kentucky, Washington and Texas.⁵ Notably, several states that allow for the use of the VCO exception are modifying their laws and practices to reduce and eliminate detention of non-offenders and status offenders. For instance, Alabama, Idaho, Louisiana, Michigan, Ohio, and Utah have recently cut by more than half the use of the VCO exception through a range of actions including procedural and administrative changes, legislation, and alternatives to detention.

When the DSO requirement was codified in the JJDP initially, without the VCO exception, it had substantial impact. In his statement of support for the 1974 JJDP, Senator Specter cited 200,000 as the documented annual rate of detention orders involving status offenders and non-offenders. Between 1974 and 1980, referrals of status offenders to juvenile court decreased by 21%, and detention of status offenders was cut in half.⁶ States and local jurisdictions desiring to meet the federal standards and participate in the JJDP modified their laws and practices to prohibit detention of status offenders, and re-purposed funding resources and other resources to create alternative services and sanctions.

By the time the Congress reauthorized the JJDP in 1992, as the number of status offenders embroiled in the delinquency system rapidly increased, procedural and due process safeguards were added

to the DSO requirement and the VCO exception, both in law and in regulation, to guard against prolonged detention of non-offenders and status offenders. Despite mixed opinion and practice, status offender detentions have been driven down from a high of approximately 200,000 per year across all 56 states to approximately 6,000 per year in just three states and another 6,000 in the remaining 27 states.

Today, the VCO exception, although cited by some judges as necessary to effectively enforce the law, is considered to be outside of the norms of juvenile justice best practice. There is widespread agreement with the DSO requirement in non-VCO states, where a range of remedies have been used by courts to grant services and sanctions to youth. Overcoming laws that allow detention of status offenders and/or practices that channel non-offenders and status offenders toward the court has been achieved wholesale in some states. Congressional champions, OJJDP, and others calling to phase-out and eliminate use of VCOs see that states, given time, increased resources, training and technical assistance, and determination can make needed changes, and stand ready to help.

KENTUCKY'S ONGOING EFFORTS TO REDUCE DETENTION OF STATUS OFFENDERS

Efforts underway in Kentucky, one of the three states with the highest rates of VCO use, illustrate momentum for reform. To adopt more effective, cost-efficient practices and better meet the needs of status offenders and their families, the state's Department of Juvenile Justice (DJJ), Administrative Office of the Courts (AOC), Department of Community-Based Services, and members of the state legislature teamed together to reduce and move toward elimination of the use of VCOs.

Central to the Kentucky reform, the DJJ supports Detention Alternatives Coordinators who actively work with county courts to encourage and support judicial leadership and to assist in the provision of the most updated information regarding:

- JJDP requirements for DSO, as well as those of the newly adopted Kentucky law (HB 384) that defines non-offenders to include status offenders and explicitly prohibits detention of non-offenders;
- Detention alternatives available to judges, including electronic monitoring with daily intensive case management, emergency shelter care, a field release program to safe holding sites in the community, and private providers of staff-secure residential care;
- How the AOC and DJJ work together to prevent detention of non-offenders/status offenders and prevent violations of state and federal laws.

Kentucky has also used cost incentives and disincentives to spur change. DJJ charges counties for reimbursements when status offenders are held in detention (\$94 per day per youth). Additionally, the JJDP State Advisory Group in Kentucky provides funding for much-needed emergency shelter beds and will partner with DJJ and AOC to provide information on best practice approaches for addressing status offenders. Kentucky demonstrates better outcomes for youth and families at significant cost savings: \$168 per youth per day for secure detention *versus*

- \$23 per youth per day for electronic monitoring and intensive daily case supervision;
- \$75 per youth per day for therapeutic foster care;
- \$93 per youth per day for emergency, staff-secure shelter care.

As a result of these reforms, Kentucky has reduced use of VCOs by nearly 15% from approximately 2,000 uses in 2006 to fewer than 1,700 in 2008, with no adverse effects.⁷

BENCHMARKS FROM STATES THAT PROHIBIT AND LIMIT STATUS OFFENDER DETENTION

Connecticut offers a striking example among many states trending toward administrative, legal, and practice changes to prevent detention of status offenders. Until recently, Connecticut allowed courts to detain status offenders for VCOs. Yet, the state's General Assembly changed the law in 2007 and directed funding to family support centers, as well as community-based case management and services, including crisis intervention services. Within 18 months, Connecticut's detention of status offenders due to VCOs fell from 300 per year to zero, and positive youth and family outcomes increased.⁸

New York, which never allowed use of VCOs, amended its laws in 2005 to prohibit any form of detention of non-offenders/status offenders and to close possible "loopholes" with an overall goal of reducing out-of-home placements. The statutory changes also included enhancing diversion requirements. To comply with the new law, New York counties utilize crisis response systems, intensive probation supervision and partnerships with family-centered, evidence-based interventions. Out-of-home placements of status offenders decreased by 28% following the changes in the law.⁹

Iowa and Pennsylvania classify status offenders as dependent youth to be served by the child welfare system, rather than allowing them to be processed through the juvenile justice system. Strategies in both states involve statutory mandates prohibiting the secure detention of status offenders and funding schemes to support the prohibition. For example, Pennsylvania reimburses its counties at 80% when status offenders are placed in community settings versus lower rates of reimbursement when they are placed in residential settings.¹⁰

BEST PRACTICES TO AVOID DETENTION OF STATUS OFFENDERS

When asked by Kentucky Congressman John Yarmuth during a JJDPA hearing in 2007 how to address over-reliance on detention of status offenders, Paul Lawrence, the Presiding Justice of the Goffstown (NH) District Court, stated, "You have to take that option off the table." He went on to say that detention of status offenders has never been an option in his state so there is no perception that it is necessary for accountability or that judicial authority is undermined. He added:

"Judges on the juvenile bench possess considerable power over the life pathways of young people and their families, particularly those that are vulnerable, troubled and fragile. Given this power, what judges do may prove productive and helpful, or regrettably, cause unintended harm. Every time a judge shepherds a young person through the juvenile justice system, he/she must be certain that all steps have been taken to enhance the youth's competencies before imposition of predominantly retributive measures. In fact,

if judges—as well as congressional and federal decision makers—are to do what is best for children and youth involved in the courts, we would make a primary commitment in juvenile justice much like the Hippocratic Oath: first, do no harm."¹¹

If, as Judge Lawrence suggests, detention of status offenders is off the table—what then? The following provides strategies and approaches used by diverse jurisdictions across the United States to address the main concerns related to status offenders: habitual truancy, running away, and incorrigibility.

BEST PRACTICES IN ADDRESSING HABITUAL TRUANCY

Ensuring student safety, increasing student achievement, and enhancing the potential for youth to graduate from high school—especially for habitually truant students—are widely shared goals among judges, juvenile court professionals, parents, and educators. Turning around repeated, habitual truancy may be difficult and take time, but it is possible.

Research from the University of Wisconsin-Madison demonstrates that sanctions that increase student absences, like juvenile detention, are far less effective at reducing truancy than approaches that target risk factors at the student, family, school, and neighborhood levels. "Research shows the child needs attachment to school, to work out issues there; to be successful and eventually graduate," says Glenn Larson, supervisor of the youth and delinquency unit of the Racine County (Wis.) Human Services Department.¹²

Youth, particularly with special needs and/or multiple unmet needs, who experience a period of detention are far less likely to return to school and complete high school. When youth return to school after incarceration, within a year of re-enrolling two-thirds to three-quarters have withdrawn or dropped out of school.¹³

Non-detention interventions for habitual truancy, found to be impactful, include:

- Truancy abatement programs/officers at the local school district level that assess the individual circumstances and needs of youth referred for possible prosecution and divert them to supportive community and home-based services;
- Codes and laws that compel school districts to establish graduated sanctions and alternatives to detention/incarceration for children charged with truancy, including cases of chronic truancy in violation of a court order or in contempt of court, as well as cases of youth subject to suspension and/or expulsion from school;
- Placement in alternative schools often accompanied by case supervision/probation and daily contact;
- Specialized alternative education settings for girls, youth with special needs, and youth in re-entry from institutional care;
- Extended-day programs which provide enriched education,

Additional online resources:

Act-4-JJ Campaign: Information on the Juvenile Justice and Delinquency Prevention Act, including fact sheets and testimony: <http://act4jj.org/>

American Bar Association: Information on "Representing Juvenile Status Offenders": http://new.abanet.org/child/Pages/rjso_pre.aspx

Coalition for Juvenile Justice (CJJ): Information on policy positions and reports representing the views of the JJDPA State Advisory Groups: <http://www.juvjustice.org/>

Office of Juvenile Justice and Delinquency Prevention (OJJDP) at the U.S. Department of Justice: Information and resources regarding status offenders: <http://ojjdp.ncjrs.gov/search/topiclist.asp> (click on Status Offenses).

Vera Institute of Justice: Information on its work to improve outcomes for youth and families in crisis with the MacArthur Foundation's Models for Change project: <http://www.vera.org/project/models-change>



supportive counseling, and youth development opportunities beyond the typical school day, often accompanied by meal programs, health services, and access to laundry and transportation;

- Day reporting centers, alternative schools, or smaller cohorts within a mainstream school that have a strong education/remedial education component.

As needed, non-detention sanctions used by various jurisdictions include:

- Suspension/revocation of a teen driver's license;
- Parental fines;
- Court requirements for parental engagement in a treatment plan to reverse the truancy;
- Electronic monitoring with daily case supervision.

Incentives used by some jurisdictions include:

- Monetary incentives for youth who attend school for 60 or more days, consecutively;
- Monetary incentives for youth who increase their grades/academic performance or who achieve graduation;
- Vouchers for transportation, babysitting, tutoring, etc.;
- Assisting youth to access employment and juggle work and school.

BEST PRACTICES IN ADDRESSING RUNAWAYS

When Connecticut quickly enacted its prohibitions on locked confinement of status offenders, one of the most salient concerns pinpointed runaway and homeless girls found in dangerous circumstances. For instance, questions were raised about what to do with girls who had run from foster homes, surrogate care, or protective custody and were living on the streets in the company of adult men. Drawing on the core principle of tailoring service decisions to the needs of girls, the state undertook a comprehensive review of court-involved girls, conducted focus groups with them and their families, as well as with judges, court professionals, and service providers, and re-aligned its continuums of care to ensure that a range of non-detention options would be available. Critical to the process was investigating the relationships between sexual abuse and/or family trauma and troubling behavior such as aggression, substance use, depression and suicide, defiance, truancy, running away, and sexual acting out.¹⁴

One key decision Connecticut made was to guard against youth "failing" in residential placement or treatment by making placement decisions in the context of a network of actors and providers. The networks are managed by parole (probation) to ensure consistency, continuity, and case coordination with a team approach, engaging

wrap-around services, schools, employers, families, mentors, and hospitals for crisis stabilization and trauma care.

In Minnesota, a nurse intervention program designed to help sexually exploited runaway girls and their families has enabled the girls to re-connect to family life, school, and health care, while reducing trauma and restoring healthy behavior. Research has shown that girls in the program experience significant improvements in family and school relationships, self-esteem, and grades. Researchers also found significant reductions in emotional distress, substance use, suicide attempts, and risky sexual behavior.¹⁵

Judges across the nation faced with determining what to do with runaway and homeless youth who are sexually exploited and/or self-injurious cite protective custody as a needed option to ensure the safety of the youth involved. Yet, in non-VCO states, short protective custody cannot and does not equate with locked detention in delinquency facilities. Instead, a range of trauma-reducing interventions are utilized for girls and boys to help them and their families rebuild their lives:

- Sustained family intervention and reunification supports;
- Family support teams;
- In-home child and adolescent psychiatric services;
- Evidence-based mental health treatment approaches including Multi-systemic Therapy, Functional Family Therapy, and Cognitive Behavioral Therapy;
- Kinship care, foster care, and a range of other types of surrogate care including small residential group homes and shelters;
- "National Safe Place" providers qualified to respond to youth in crisis and connect them with youth shelters or youth-serving agencies at various access points including fast food restaurants, convenience stores, fire stations, libraries, and city buses;
- Providers for runaway and homeless youth that operate basic center and emergency shelters with support from the Family Youth Service Bureau, and federal Runaway and Homeless Youth Act, via the U.S. Department of Health and Human Services;
- Housing assistance and post-secondary tuition supports for older teens.

BEST PRACTICES IN ADDRESSING INCORRIGIBILITY

When a child is brought before the court for behavior felt to be beyond the control of the parent/guardian, ideally there would be many alternatives to filing a petition in court, such as mental health services, family intervention and support, mediation or alternative dispute resolution, and other community-based services and supports aimed at helping these children in the context of their family and

community life. Here, too, cross-system collaboration and service integration are most effective.

The mode of thought about “incorrigibility” has shifted considerably over time, such that youth so labeled are not viewed as being in crisis as individuals; rather their needs are viewed as family crises. Moreover, families may relinquish their custodial duties to the court out of frustration or because they cannot afford to pay for services. Both such circumstances are widely viewed as system failures, rather than child or family failures.

Florida was one of the first states to re-direct individual juvenile status offenders into a “families in need of services (FINS)” system with the express goal of keeping families together. Upon referral to the FINS system, families receive immediate crisis intervention, available 24 hours per day, seven days a week, through a network of 32 providers offering both nonresidential intervention as well as residential respite centers. As needed, family conferencing occurs, engaging other stakeholders such as court service personnel and school staff. The success of the Florida FINS system has been dramatic:

- Between 2005-2008, only 6% of FINS cases were petitioned to court. If so petitioned, judges may order a youth to participate in treatment services or place the youth in a locked shelter for up to 90 days.
- Ninety-percent of youth successfully complete the services, and 90% of successful completers are offense-free for six months after exiting the program.
- Florida TaxWatch estimates that the FINS system saved the state in the range of \$31-\$37 million in fiscal year 1998.¹⁶

Clearly the movement across the nation is to divert families in crisis and “incorrigible children” away from the courts and avoid adjudication. Sometimes this is best accomplished by assigning a case manager and engaging in various levels of intervention and support, such as:

- Parenting skills classes;
- Employment and counseling support for families;
- Individual counseling or treatment for the child and/or parent;
- Alcohol and/or substance abuse counseling (parent, family, child);
- Psychiatric evaluation;
- Home investigation where safety issues may be involved;
- Assignment of a case advocate;
- Structured mediation or alternative dispute resolution services;
- Involving family advocates and support groups;
- Temporary supportive custody by another party (kinship care, respite care, foster care).

CONCLUSION

As I speak with judges, nationwide, who are members of the Coalition for Juvenile Justice and the NCJFCJ, it is clear that judges largely embrace the leadership decision of NCJFCJ to, again, do the best by children, youth, families, and communities with its decision to fully support the Senate JJDP A reauthorization bill.

Deep, long-standing concerns persist about the VCO exception allowing the courts to “bootstrap” children into delinquent status, even when these children have never committed a delinquent offense. Deep concerns also persist about the circumstances of families in crisis and parents whose communication with their children has broken down, who look to the court for outside help and relief, yet find their children locked away as a result—sometimes repeatedly—without any resolution of the underlying problems.

As the reauthorization of the JJDP A moves forward and best practice changes, such as the phasing-out of the VCO exception, unfold over several years ahead, there will be many opportunities for collaborative work with national partner organizations, including

OJJDP, state agencies, and private foundations. Together we can stay ahead of the potential changes in law and explore and enact state and local policies and procedures to de-criminalize status offenses, eliminate locked detention of status offenders, and expand community and family-centered systems of care. Big changes require bold leadership and positive conditions. The JJDP A changes, as anticipated, will be built on leadership of many justice experts, judges, and practitioners coupled with strong policy and effective, cost-efficient alternatives to detention shown to produce positive outcomes for youth and families even in the most difficult of circumstances.

AUTHOR'S NOTE:

Tara Andrews, Coalition for Juvenile Justice; Annie Salsich, Vera Institute for Justice; and Terry Schuster, Juvenile Law Center, contributed to this article.

ABOUT THE AUTHOR

Nancy Gannon Hornberger is Executive Director of the Coalition for Juvenile Justice (CJJ), the nonprofit national association of the state advisory groups chartered under the federal Juvenile Justice and Delinquency Prevention Act (JJDP A). Gannon Hornberger joined CJJ in 1999, bringing experience in youth violence prevention and crime prevention at the local, state, and national levels, as well as experience as a special educator and counselor with court-involved teens. Correspondence: nancy@juvjustice.org

END NOTES

¹ Juvenile Justice and Delinquency Prevention Act of 1974, Pub. L. No. 93-415, 88 Stat. 1109 (codified as amended at 42 U.S.C. § 5601 et seq. (2002)).

² To view the current status of the bill online <http://thomas.loc.gov/cgi-bin/query/z?c111:S.678>:

³ Sedlak, A. J., & McPherson, K. S. (May 2010). *Conditions of confinement: Findings from the Survey of Youth in Residential Placement*. Washington, DC: Office of Justice Programs, Office of Juvenile Justice and Delinquency Prevention, U.S. Department of Justice.

⁴ Andrews, T. et al. (September 2009). *A pivotal moment: Ensuring and sustaining the success of the Juvenile Justice and Delinquency Prevention Act*. Washington, DC: Coalition for Juvenile Justice.

⁵ Unpublished data provided via e-mail to the Coalition for Juvenile Justice by the Office of Juvenile Justice and Delinquency Prevention, January 2010.

⁶ Office of Juvenile Justice and Delinquency Prevention. (Fall/Winter 1995). *Deinstitutionalizing status offenders: A record of progress, Juvenile Justice, II(2)*. Washington, DC: Author.

⁷ Conversation and correspondence with Kentucky Department of Juvenile Justice Branch Manager for Detention Alternative Services, Mavis Williamson, May 2010.

⁸ Families with Service Needs Advisory Board, State of Connecticut, *Report to the Connecticut General Assembly* (February 2008). Hartford, CT: Author.

⁹ Mogulescu, S., & Caro, G. (December 2008). *Making court the last resort: A new focus for supporting families in crisis*. New York: Vera Institute of Justice and Models for Change.

¹⁰ Conversation with Terry Schuster, Juvenile Law Center, Philadelphia, PA, May 2010.

¹¹ Testimony by the Honorable Paul Lawrence before the U.S. House of Representatives, “The Juvenile Justice and Delinquency Prevention Act: Overview and Perspectives,” July 12, 2007.

¹² Fiori, L. (May 22, 2010). New truancy program focuses on counseling, not locking up offenders. Racine, WI: *The Journal-Times*.

¹³ Mendel, R. A. (2009). *Two decades of JDAI: From demonstration project to national standard*. Baltimore, MD: Annie E. Casey Foundation.

¹⁴ Connecticut Department of Children and Families Girls’ Services Steering Committee. (Feb. 14, 2005). *Plan for continuum of community based services for female status offenders and delinquents in response to Substitute House Bill No 5366, Special Act No. 04-05*. Hartford, CT: Author.

¹⁵ University of British Columbia, “Runaway girls reap strong benefits from nurse interventions: UBC-Children’s Hospitals and Clinics of Minnesota study,” posted Aug. 26, 2009 at http://www.eurekaalert.org/pub_releases/2009-08/uobc-rgr082509.php

¹⁶ Mogulescu & Caro, *supra* note 9.