City of Chicago

F2020-16

Office of the City Clerk

Document Tracking Sheet

Meeting Date: 4/22/2020

Sponsor(s): Dept./Agency

Type: Report

Title: Inspector General's audit of Chicago Police Department and Department of Family Services' administration of Juvenile Intervention and Support Center

Committee(s) Assignment:

FEBRUARY 2020

CITY OF CHICAGO OFFICE OF INSPECTOR GENERAL

AUDIT OF THE CHICAGO POLICE DEPARTMENT AND DEPARTMENT OF FAMILY AND SUPPORT SERVICES' ADMINISTRATION OF THE JUVENILE INTERVENTION AND SUPPORT CENTER

JOSEPH M FERGUSON
INSPECTOR GENERAL

CITY OF CHICAGO
OFFICE OF INSPECTOR GENERAL
740 NORTH SEDGWICK STREET, SUITE 200
CHICAGO, ILLINOIS 60654
TELEPHONE (773) 478-7799
FAX (773) 478-3949

FEBRUARY 25, 2020

TO THE MAYOR, CITY COUNCIL, CITY CLERK, CITY TREASURER, AND RESIDENTS OF THE CITY OF CHICAGO:

The City of Chicago Office of Inspector General (OIG) has completed an audit of the Juvenile Intervention and Support Center (JISC). JISC is a partnership between the Chicago Police Department (CPD) and Department of Family and Support Service (DFSS) implemented to divert youth away from the juvenile justice system. The objectives of this audit were to determine if JISC is designed according to best practices for law enforcement-based youth diversion and if JISC's administration of diversion programming is consistent with its goal of reducing youth recidivism.

OIG concluded that, due to poor record-keeping and a lack of collaboration, program partners CPD and DFSS cannot reliably determine whether JISC is meeting its stated goal of reducing recidivism. As a result, the City cannot determine if it is creating positive or negative outcomes for the over 3,000 youth it processes each year, nor calculate the return on its over $5 million annual investment in the program. Additionally, some components of JISC's design do not align with best practices for youth diversion programs.

Our recommendations focus on improving JISC's multidisciplinary strategy, record-keeping, and data quality procedures in order to allow for proper review of the program. We also recommend bringing JISC's design into alignment with diversion program best practices—in particular, to apply a more trauma-informed approach—and implementing proper controls and review mechanisms to prevent inconsistent and inequitable outcomes for youth.

In response, CPD and DFSS said they mostly agree with the recommendations. However, CPD did not confirm whether it intended to notify the Local Records Commission of its failure to retain JISC risk screening forms per the Local Records Act. Both departments responded that they have begun to implement corrective actions. They report that these changes, including establishing shared goals and improving policies and procedures, will help JISC align with best practices and accomplish its intended goal of reducing youth recidivism.

We thank CPD, DFSS, and SGA Youth & Family Services staff and management, as well as the youth and young adults we interviewed, for their cooperation during the audit.

Respectfully,

Joseph M. Ferguson
Inspector General
City of Chicago

TABLE OF CONTENTS

ACRONYMS

CLEAR	Citizen and Law Enforcement Analysis and Reporting Database
CPD	Chicago Police Department
DFSS	Department of Family and Support Services
IDT	Mayor's Innovation Delivery Team
JISC	Juvenile Intervention and Support Center
OIG	Office of Inspector General
SGA	SGA Youth & Family Services (formerly Scholarship and Guidance Association)
YASI	Youth Assessment and Screening Instrument
YID	Youth Investigations Division of the Chicago Police Department

CITY OF CHICAGO
OFFICE OF INSPECTOR GENERAL

AUDIT OF THE JUVENILE INTERVENTION AND SUPPORT CENTER

Fourteen years after the Juvenile Intervention and Support Center's (JISC) creation, the Chicago Police Department (CPD) and the Department of Family and Support Services (DFSS) have yet to demonstrate the program's impact on recidivism.

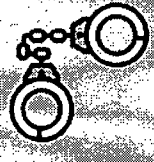
JISC's case management agency did not keep accurate and consistent records of youth participation

CPD destroyed youth screening records without Local Record Commission approval

JISC has been hampered by a history of poor cooperation between CPD and DFSS

While it is unlikely the program is leading to a greater number of arrests, diversion of JISC arrestees from further involvement in the justice system is inconsistent and inequitable.

CPD's JISC staff are not specially trained to work with youth, and its facility risks retraumatizing youth.



CPD overrode the recommended arrest disposition in one quarter of JISC cases. For every youth it diverted from having more involvement with the juvenile justice system, it sent two deeper into the system.

I. EXECUTIVE SUMMARY

The Office of Inspector General (OIG) conducted an audit of the Juvenile Intervention and Support Center (JISC), a partnership between the Chicago Police Department (CPD) and Department of Family and Support Services (DFSS) implemented to divert youth arrested for low-level offenses away from the juvenile justice system and into social service case management.[1] The objectives of the audit were to determine if JISC is designed according to best practices for law enforcement-based youth diversion and if JISC's administration of diversion programming is consistent with its goals, including reducing youth recidivism.

A. CONCLUSION

OIG concluded that although JISC has been in operation since 2006, the City still does not know whether the program is meeting its stated goal of reducing recidivism. This uncertainty is due to poor record-keeping and a lack of collaboration among the JISC program partners. Additionally, components of JISC's design do not align with best practices for youth diversion programs, and may actually retraumatize youth or increase their likelihood of reoffending.

B. FINDINGS

OIG found that the JISC program partners cannot reliably assess the case management program's effect on youth recidivism due to poor record-keeping and communication among program partners. The contracted case management agency overseen by DFSS—SGA Youth & Family Services (SGA)—did not keep complete and consistent records of its cases, and CPD destroyed youth screening records in violation of the Local Records Act. DFSS and CPD have resisted sharing program data with each other and with the public, and have operated JISC for almost fourteen years without demonstrating evidence of its effectiveness. JISC has no charter, memorandum of understanding, or governing board to establish goals and accountability measures. Moreover, CPD and DFSS have different visions for JISC and have found it difficult to come to a shared understanding of the program's purpose and goals. JISC cannot function effectively without collaboration between the partner agencies and other relevant stakeholders.

OIG also found that because JISC is not designed according to best practices for youth diversion programs, it subjects youth to a negative experience that does not encourage their success. The JISC facility does not present a trauma-informed setting; it operates much like a traditional police station. CPD staff bid for positions at JISC based on seniority rather than experience or aptitude for working with youth, and

[1] We use the terms "youth" and "juvenile" interchangeably to mean individuals under 18 years of age

they receive no specialized training. CPD does not use an empirically validated screening tool to determine which youth to offer diversion through JISC. Further, less than half of referrals to SGA for case management are made in person; this undermines a crucial feature of the program.

Lastly, OIG found that the existence of JISC is probably not leading officers to arrest more juveniles than they otherwise would, and that the vast majority (89.9%) of eligible arrestees were brought to JISC for processing. However, while we found that JISC is diverting many youth from court, we also found inequities in the process for determining which JISC arrestees were diverted from further involvement in the justice system, and that, in 34.7% of cases, SGA recommended social services the youth did not need. SGA acknowledged that sending low-needs youth to unnecessary services may do more harm than good and could ultimately increase the risk of recidivism.

C. RECOMMENDATIONS

OIG recommends that CPD and DFSS improve their record-keeping procedures and collaboration. This should include creating accountability mechanisms for JISC's case management contractor and the establishment of partnerships with external agencies. CPD and DFSS should engage with community organizations, subject-matter experts, and criminal justice system stakeholders to bring JISC's design into accordance with best practices for diversion programs and to provide a more trauma-informed experience for youth. CPD should also select and train its JISC staff in accordance with best practices, use a validated risk screen to determine diversion eligibility, and ensure that disposition overrides are justified and equitable.

D. CPD AND DFSS RESPONSE

CPD and DFSS mostly agreed with OIG's recommendations. However, CPD did not confirm whether it intended to notify the Local Records Commission of its failure to retain JISC risk screening forms per the Local Records Act. Both departments report that they have begun corrective actions, noting that the Mayor's Office has convened an advisory council to oversee JISC reform efforts. CPD and DFSS have engaged the University of Chicago Crime Lab to assist with ongoing data tracking and evaluation, and have begun to improve their case management and risk screening records and tools. The departments also intend to redesign the JISC facility to create a more welcoming and less detention-focused environment, to select and train officers with the skills and aptitudes suited for working with youth, and to engage with other stakeholder agencies in the juvenile justice field and the broader community.

The specific recommendations related to each finding, and the departments' responses, are described in the "Audit Findings and Recommendations" section of this report.

II. BACKGROUND

A. JUVENILE DIVERSION

Juvenile diversion is an intervention strategy that redirects youth who may have engaged in certain defined categories of criminal behavior away from formal processing in the juvenile justice system. Diversion advocates argue that adolescents have difficulty appreciating the consequences of their actions and engage in impulsive and risky behavior.[2] As their brains continue to develop and they enter adulthood, many will simply abandon this sort of behavior without intervention.[3] However, when the behavior amounts to even minor criminal activity, youth may find themselves burdened with arrest and prosecution records that can make it difficult to secure employment, pursue higher education, or serve in the military. These social, educational, and vocational limitations can ultimately spur further criminal behavior.[4]

Diversion programs interrupt this cycle by providing alternatives to traditional processing in the juvenile justice system, including social services, restorative justice practices, and simply sending the youth home without further action. Independent studies have shown that diversion programs reduce youth recidivism.[5] As shown in

---

[2] Models for Change Juvenile Diversion Workgroup, *Juvenile Diversion Guidebook* (Models for Change, 2011), accessed September 24, 2019, http://www.modelsforchange.net/publications/301/Juvenile_Guidebook.pdf, Illinois Mental Health Opportunities for Youth Diversion Task Force, *Stemming the Tide: Diverting Youth with Mental Health Conditions from the Illinois Juvenile Justice System* (Chicago: NAMI Chicago and Illinois Justice Project, 2018), accessed September 24, 2019, https://www.iljp.org/reports/stemmingthetide, Gina M. Vincent, Laura S. Guy, and Thomas Grisso, *Risk Assessment in Juvenile Justice: A Guidebook for Implementation* (Models for Change, 2012), Accessed September 24, 2019, http://modelsforchange.net/publications/346, Amy Hoffman, *Nebraska Pre-Trial Diversion Guidelines* (Lincoln: Nebraska Commission on Law Enforcement and Criminal Justice, 2015), accessed September 24, 2019, https://ncc.nebraska.gov/sites/ncc.nebraska.gov/files/pdf/juvenile_justice_materials/DiversionGuidelines.pdf, and Coalition for Juvenile Justice, *Emerging Concepts Brief: What are the Implications of Adolescent Brain Development for Juvenile Justice?* (Coalition for Juvenile Justice, 2006), accessed May 1, 2019, https://www.juvjustice.org/sites/default/files/resource-files/resource_134.pdf

[3] Edward P. Mulvey and Anne-Marie R. Iselin, "Improving Professional Judgments of Risk and Amenability in Juvenile Justice," *Future Child* 18, no. 2 (2008): 35-27

[4] Illinois Juvenile Justice Commission, *Burdened for Life: The Myth of Juvenile Record Confidentiality and Expungement in Illinois* (Illinois Juvenile Justice Commission, 2016), accessed September 24, 2019, http://ijjc.illinois.gov/sites/ijjc.illinois.gov/files/assets/Burdened%20for%20Life.pdf, and Akiva M. Liberman, David S. Kirk, and KiDeuk Kim, "Labeling Effects of First Juvenile Arrests: Secondary Deviance and Secondary Sanctioning" (Urban Institute, 2014), accessed September 24, 2019, https://www.urban.org/research/publication/labeling-effects-first-juvenile-arrests-secondary-deviance-and-secondary-sanctioning/view/full_report

[5] Holly A. Wilson and Robert D. Hoge, "The Effect of Youth Diversion programs on Recidivism: A Meta-Analytic Review," *Criminal Justice and Behavior* 40, no. 5 (May 2013): 497-518, accessed September 24, 2019, https://nicic.gov/effect-youth-diversion-programs-recidivism-meta-analytic-review, National Institute of Justice Office of Justice Programs, "Practice Profile: Juvenile Diversion Programs," accessed

Figure 1, diversion programs can also help realize goals beyond reducing recidivism, such as decreasing justice system costs and increasing employment.

FIGURE 1. YOUTH DIVERSION GOALS GO BEYOND REDUCING RECIDIVISM[6]

Source: OIG visualization

Diversion can be initiated at any point youth have contact with the justice system, from their interactions with officers in their communities, to the police station, to the courtroom or detention facility. Because increased contact with the justice system can adversely affect youths' well-being and lead to higher rates of recidivism, some diversion programs prioritize intervening with youth as early as possible.[7]

Jurisdictions operating diversion programs must take into account that a disproportionate share of youth who come into contact with the criminal justice system have mental illnesses, substance use disorders, or both, and are far more likely than their peers to have experienced a traumatic event.[8] Diversion programs can offer such youth the opportunity to receive community-based treatment instead of punishment. It also bears noting that youth of color make up a disproportionate share of those who come into contact with the juvenile justice and child welfare systems.[9]

September 24, 2019, https://www.crimesolutions.gov/PracticeDetails.aspx?ID=37, and Mark W. Lipsey, "The Primary Factors that Characterize Effective Interventions with Juvenile Offenders: A Meta-Analytic Overview," *Victims and Offenders* 4, (2009): 124–147, accessed September 24, 2019, http://www.episcenter.psu.edu/sites/default/files/community/Lipsey_Effective%20Interventions%20-%202009.pdf

[6] Office of Juvenile Justice and Delinquency Prevention (OJJDP), "Diversion from Formal Juvenile Court Processing: Literature Review" (Washington, D.C.: OJJDP, 2017), accessed September 24, 2019, https://www.ojjdp.gov/mpg/litreviews/Diversion_Programs.pdf, Elizabeth Seigle, Nastassia Walsh, and Josh Weber, *Core Principles for Reducing Recidivism and Improving Other Outcomes for Youth in the Juvenile Justice System* (New York: Council of State Governments Justice Center, 2014), accessed September 24, 2019, https://csgjusticecenter.org/wp-content/uploads/2014/07/Core-Principles-for-Reducing-Recidivism-and-Improving-Other-Outcomes-for-Youth-in-the-Juvenile-Justice-System.pdf, National Institute of Justice Practice Profile, and Models for Change, 2011.

[7] Models for Change, 2011, Seigle et al, 2014, Hoffman, 2015, Liberman et al, 2014, Vincent et al, 2012, and Wilson et al, 2019.

[8] National Center for Mental Health and Juvenile Justice, *Strengthening Our Future: Key Elements to Developing a Trauma-Informed Juvenile Justice Diversion Program for Youth with Behavioral Health Conditions* (Policy Research Associates, 2015), accessed October 10, 2019, https://www.ncmhjj.com/wp-content/uploads/2015/12/Strengthening-Our-Future.pdf

[9] Susan Lebold and Paul Elam, *Addressing Racial Imbalances in Child Welfare and Juvenile Justice* (Public Policy Associates, Inc., 2015), accessed September 25, 2019, http://publicpolicy.com/wp-content/uploads/2017/04/Guidebook-for-Local-Communities.pdf, Josh Rovner, "Policy Brief: Racial

Authorities can help correct this imbalance by offering diversion on an equitable basis to all who qualify.

Diversion programs sometimes lead to "net widening," a situation where the existence of a program to keep youth out of the justice system unintentionally leads to more youth entering the system.[10] Some diversion programs attach criminal justice conditions to the alternatives they offer, such as a mandate to complete social services or face possible prosecution. This causes net widening when a low-risk youth is sent to social services rather than sent home, and later faces prosecution for failing to complete the services. Similarly, programs that do not accurately determine a youth's service needs or risk of reoffending may also send low-risk youth further into the system.

B. JISC OVERVIEW

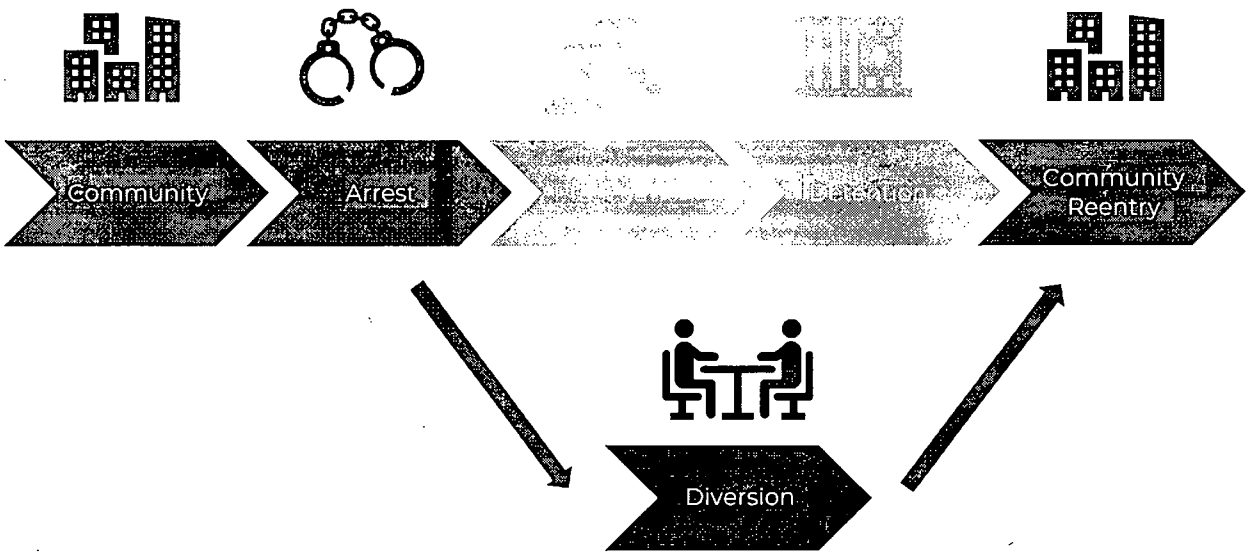
The Juvenile Intervention and Support Center (JISC) is a partnership between the Chicago Police Department's (CPD) Youth Investigations Division (YID) and the Department of Family and Support Services (DFSS) implemented to divert youth arrested for low-level offenses away from the juvenile justice system and into social service case management. The program's stated goal is to reduce youth recidivism. The Juvenile Court Act of 1987 allows police departments in Illinois to divert some youth through a process known as "station adjustment."[11] As Figure 2 illustrates, JISC is an example of a post-arrest, pre-court diversion program.

Disparities in Youth Commitments and Arrests" (Washington, D.C.: The Sentencing Project, 2016), accessed September 25, 2019, http://www.njjn.org/uploads/digital-library/Sentencing-Project_Racial-Disparities-in-Youth-Commitments-and-Arrests_April%202016.pdf, and National Juvenile Justice Network (NJJN), "Reducing Racial and Ethnic Disparities in Juvenile Justice Systems: Promising Practices" (Washington, D.C.: NJJN, 2014), accessed September 25, 2019, http://www.njjn.org/uploads/digital-library/RED-Policy-Update-0914-FINAL.pdf

[10] Models for Change, 2011

[11] 705 ILCS 405. See section 5-301

FIGURE 2: JISC INTERVENTION OCCURS AFTER ARREST, BEFORE COURT



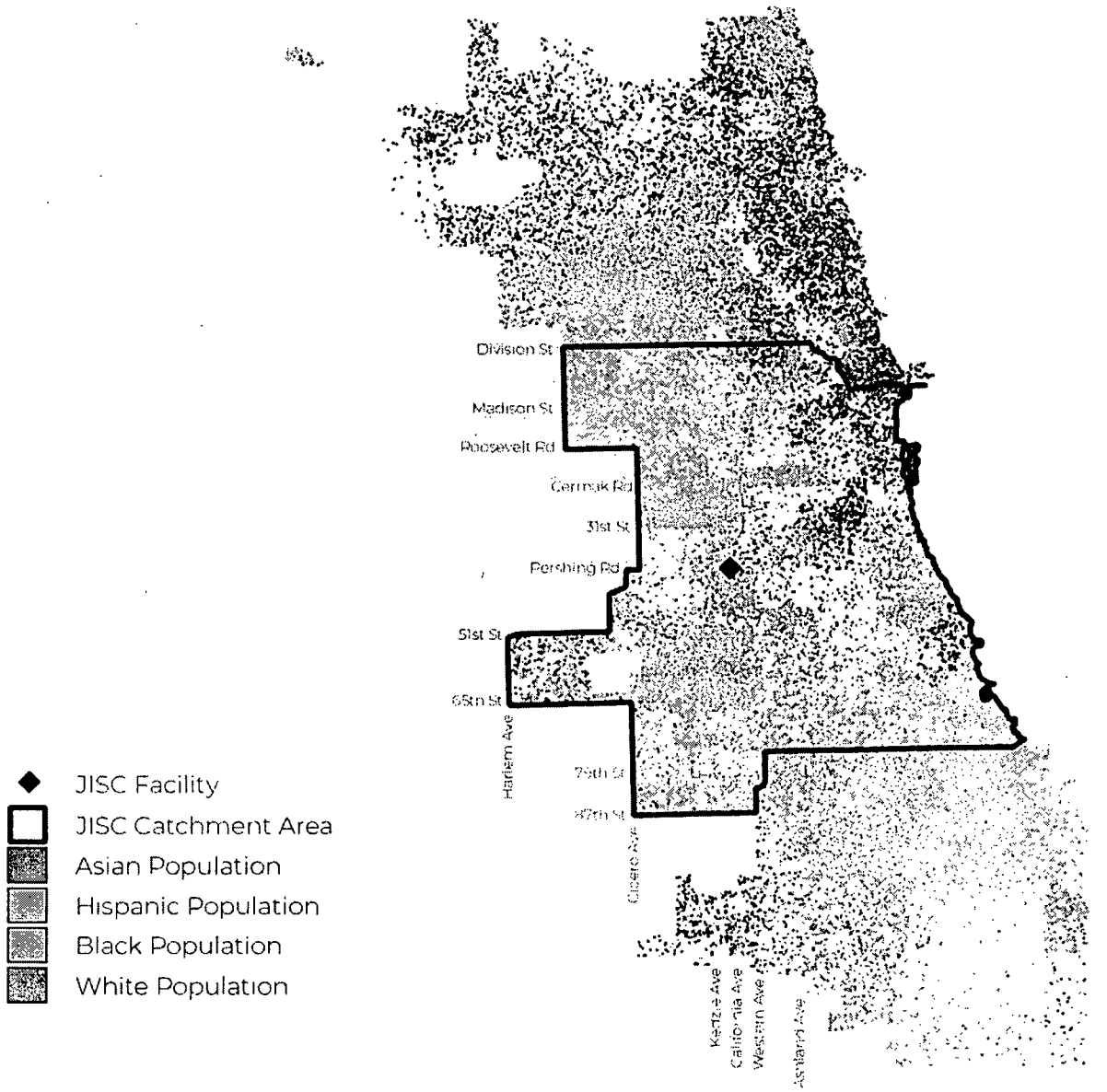
Source: OIG visualization

JISC offers social services to diverted youth in lieu of sending them to court. These services are managed by a case management contractor, currently SGA Youth & Family Services (SGA). DFSS oversees the case management contract. CPD and DFSS intend for JISC to use a "multi-agency/multi-disciplinary approach" that draws upon resources from partner entities in government and local communities. In practice, however, JISC activities are conducted by CPD alone, without the involvement of other agencies, until a youth is referred for services. At that point, SGA takes over the youth's case.

JISC operates out of a CPD facility at 3900 S. California Ave. The building is a former district police station that houses juvenile arrest processing and temporary detention functions, as well as SGA's JISC case management offices on its top floor. CPD staffs the building for juvenile arrest processing 24 hours a day, 365 days a year. JISC serves 10 of the city's 22 police districts, covering a "catchment area" comprising most of the

West and near South Sides.[12] As Figures 3 and 4 illustrate, these are primarily lower-income communities of color.

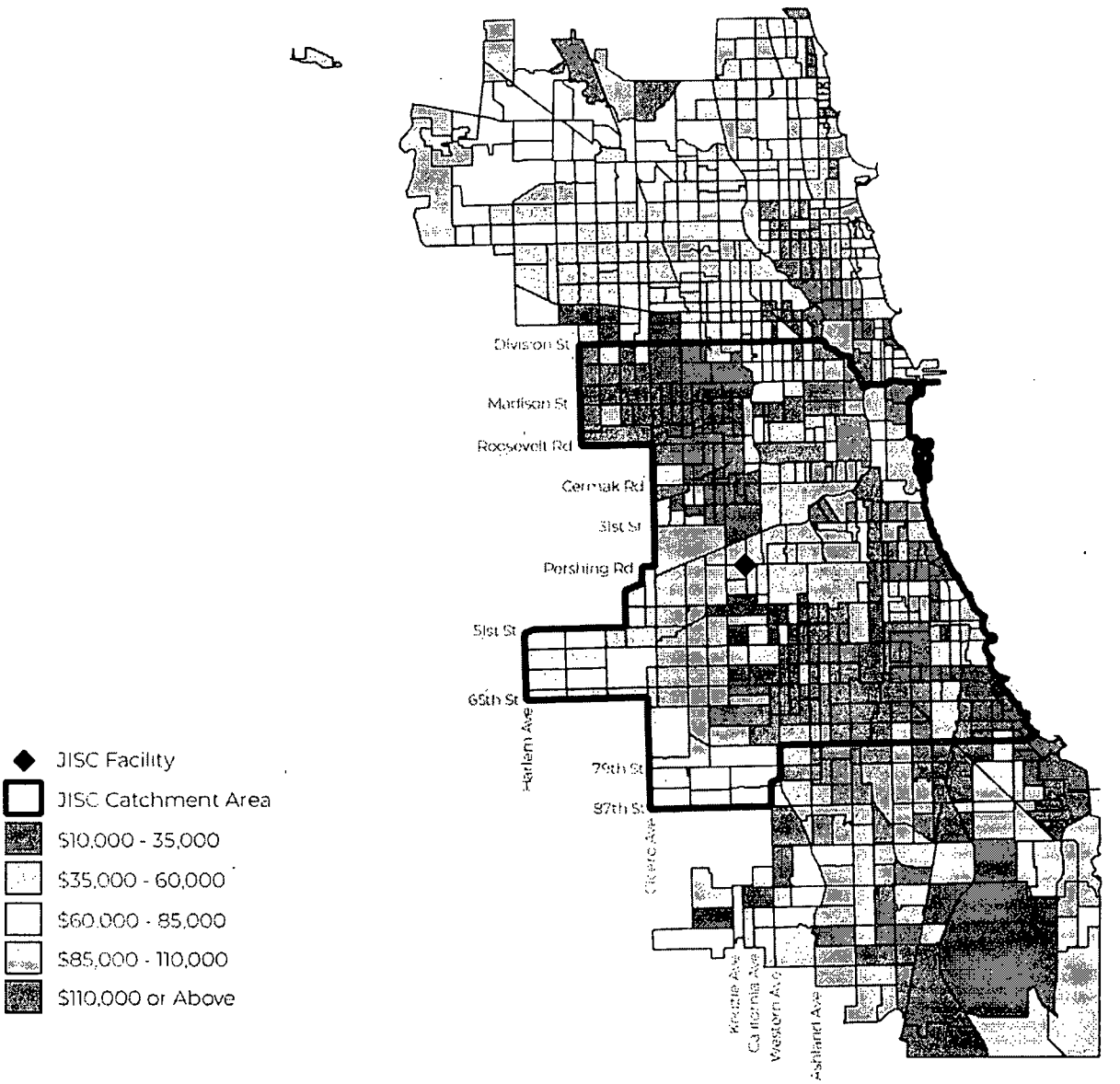
FIGURE 3: THE JISC CATCHMENT AREA PRIMARILY COMPRISES COMMUNITIES OF COLOR



Source: OIG visualization of American Community Survey 2017 5-Year Estimate population data. Each dot represents 100 residents.

[12] JISC was expanded to serve districts 001, 003, and 015 in September 2017. Prior to this, it served districts 002, 007, 008, 009, 010, 011, and 012.

FIGURE 4: THE JISC CATCHMENT AREA PRIMARILY COMPRISES LOWER-INCOME COMMUNITIES



Source: OIG visualization of American Community Survey 2017 5-Year Estimate Median Household Income data

The City launched JISC in March 2006. CPD used one-time funds from a federal Juvenile Accountability Block Grant to renovate the station that houses the program. CPD and DFSS originally intended to collaborate with program partners from Chicago Public Schools, the State's Attorney's Office, Cook County Juvenile Probation,

and others, but these entities' levels of involvement with the program have varied over its history.[13]

Tensions have existed between CPD and DFSS over the design and direction of the program almost from the start. For example, DFSS claims that JISC was modeled on a modified version of the Juvenile Assessment Center concept employed in Miami-Dade County, though it does not fully follow that model.[14] CPD takes the position that JISC was not based on a specific model, but agrees that the program has never been fully implemented. This lack of a shared vision, disagreement about the amount of control CPD should have over JISC, and reliance on a confusing oversight structure have led to difficult interactions between CPD and DFSS.[15] To this point, Chicago's juvenile justice community has raised questions about JISC's transparency and performance.[16]

According to CPD's arrest database, in the 12-month period ending May 31, 2018, JISC processed 3,356 arrests out of a total of 7,786 booked juvenile arrests citywide (43.1%). Juvenile arrests in Chicago are at a twenty-year low. As Figure 5 shows, CPD reported making 6,620 youth arrests in 2018, the latest year of data available from the FBI's Uniform Crime Report, which tracks long-term crime trends. This is down from 62,505 youth arrests reported in 1997.

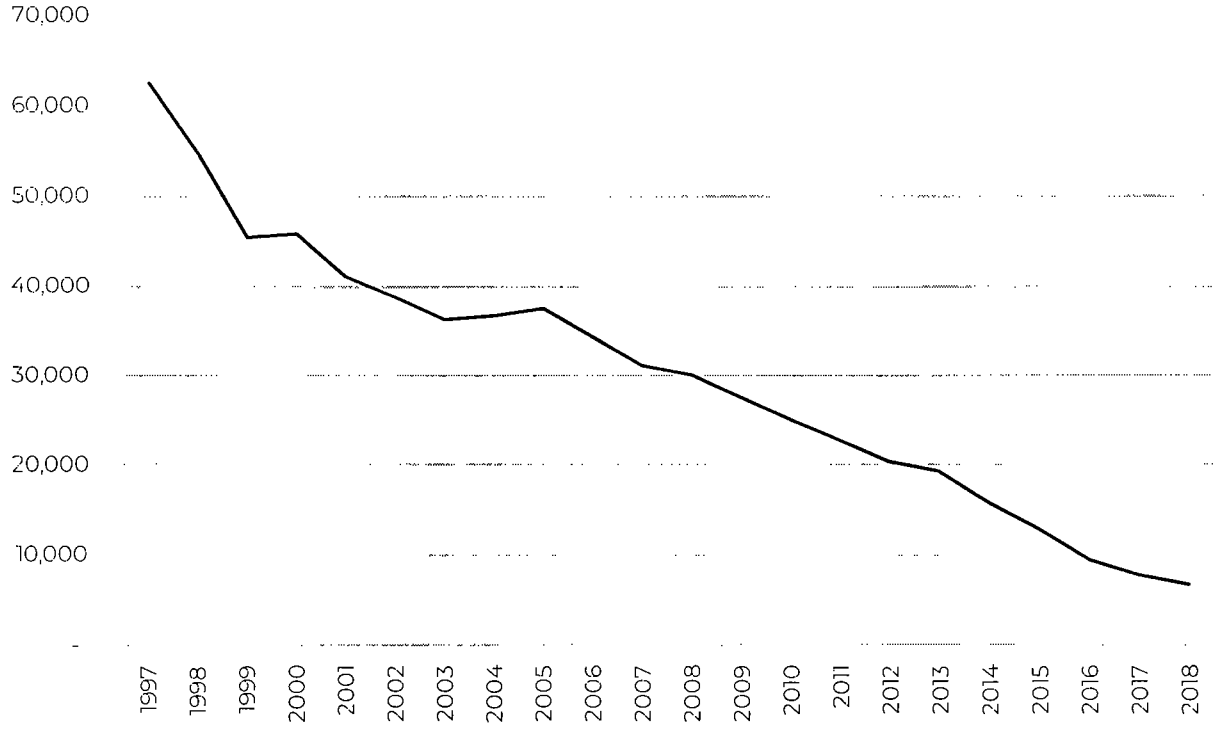
[13] As noted in Finding 3.5, these entities currently have no presence at JISC.

[14] Some of the stakeholders we spoke to during this audit view Miami-Dade's Juvenile Assessment Center as setting a national standard for juvenile diversion. Information on the Center can be found at https://www8.miamidade.gov/global/juvenileservices/home.page

[15] DFSS summarized its perspective on the history of these interactions and the program's design in a July 2019 memo, provided in Appendix C.

[16] Shannon Heffernan, "Costly Chicago Program for Juveniles Has Questionable Outcomes, Lacks Transparency" (WBEZ, June 21, 2019), accessed September 25, 2019, https://www.wbez.org/shows/wbez-news/costly-chicago-program-for-juveniles-has-questionable-outcomes-lacks-transparency/b1f86218-f7c9-4210-88ca-8fbf0900fddb

FIGURE 5: YOUTH ARRESTS IN CHICAGO ARE IN LONG-TERM DECLINE



Source: Federal Bureau of Investigation's Uniform Crime Report. Youth are classified as anyone under 18 years old.

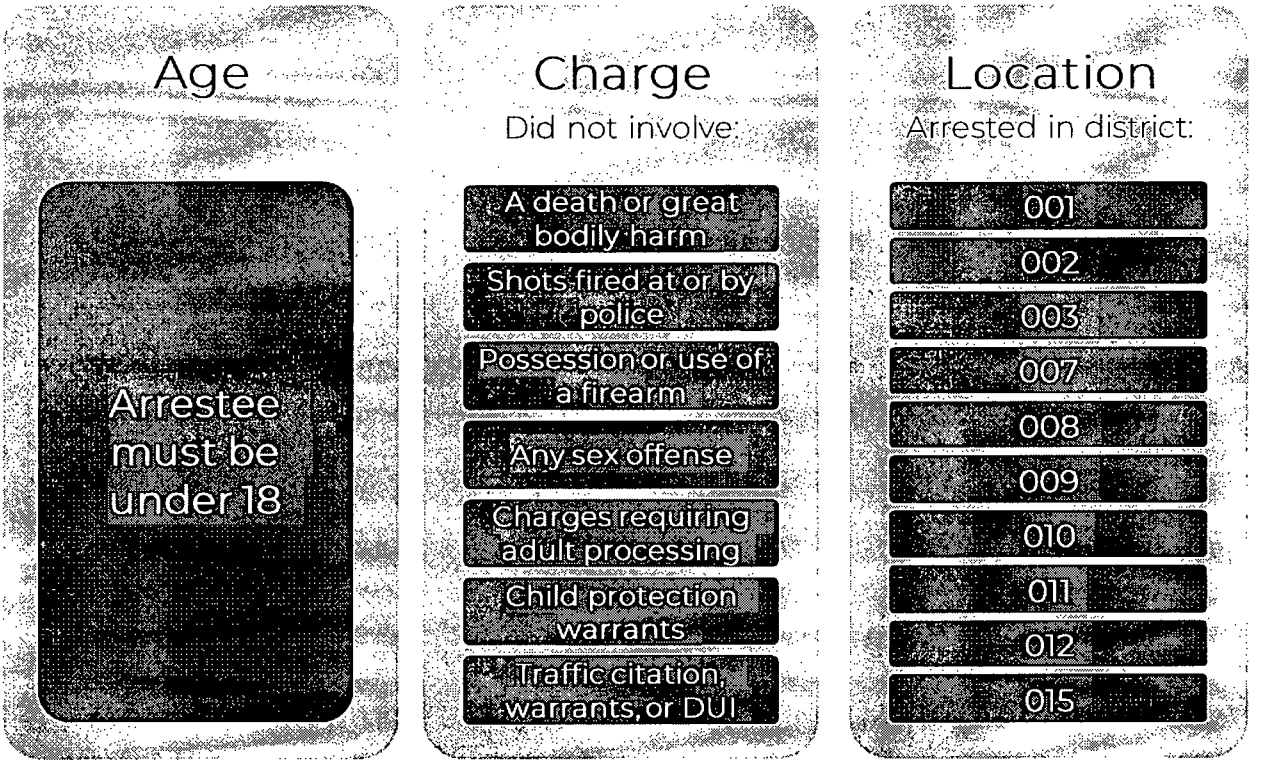
CPD's 2020 budget allocation for JISC personnel is $4.8 million.[17] In 2019 DFSS paid SGA $530,000 for JISC case management services.

C. THE JISC PROCESS

CPD's Special Order S06-04-06 outlines eligibility criteria for youth arrestees' JISC eligibility, shown in Figure 6.[18] Youth arrested for serious offenses such as homicide, possession of a firearm, or sex offenses are not eligible for processing at JISC.

[17] A depiction of annual funding over the history of the program is not possible because CPD's JISC budget was not broken out from the overall Youth Investigations Division budget prior to 2019.
[18] Chicago Police Department Directives System, "Juvenile Intervention and Support Center (S06-04-06)" (issued September 2017), accessed September 18, 2019, http://directives.chicagopolice.org/directives/

FIGURE 6 ARRESTS MEETING AGE, CHARGE, AND LOCATION REQUIREMENTS MUST BE PROCESSED AT JISC



Source OIG visualization of information from CPD Special Order S06-04-06

Arresting officers bring youth who meet these criteria to JISC for processing, rather than to a district or area police station.[19] Once at the JISC facility, the arresting or transporting officer submits the youth's arrest information in the same manner as they would at any other police facility. At this stage, the youth is typically handcuffed to a stationary rail.[20] The watch coordinator on duty must approve probable cause before the youth is charged and the arrest processed.[21] Youth are fingerprinted, photographed, and moved to a secure area staffed by civilian detention aides. CPD contacts the youth's parent or guardian to alert them that their child has been arrested and is being held at the JISC facility Youth wait in the secure area for their

[19] There are some exceptions to this procedure For example, juveniles arrested together with an adult will be processed at a district station, then transported to JISC

[20] As described in Finding 3.1, CPD's practice of handcuffing youth to a rail does not comport with JISC's stated aims and may worsen the youth's symptoms of traumatic stress

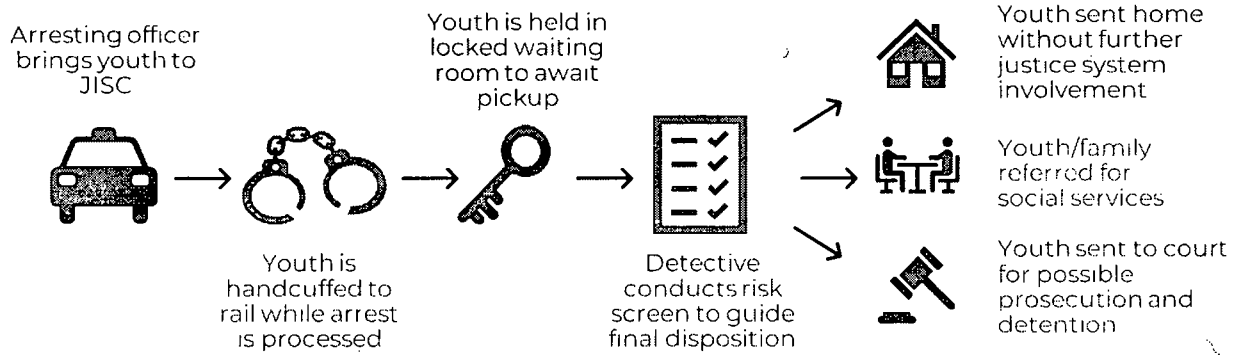
[21] At JISC, watch coordinators are typically sergeants, although the supervising lieutenant may serve as watch coordinator as well At CPD district stations, this role is assigned to lieutenants

parent or guardian to pick them up. State law and CPD policy sets the following maximum amounts of time a youth may be held in secure custody:[22]

- Juveniles under 10 years old may not be placed in secure custody.
- Juveniles under 12 years old may not be held in secure custody for more than 6 hours.
- Juveniles over 12 years old may not be held in secure custody for more than 12 hours unless the offense is a crime of violence, in which case they may be held up to 24 hours.

While a youth is being held at JISC, a CPD processing detective is assigned to their case. Applying the criteria in a risk screen, the detective decides on one of three arrest dispositions: referring the youth to court for possible prosecution, offering them a referral to case management services at SGA, or sending them home.[23] The Illinois Juvenile Court Act refers to the latter two options as "station adjustments."[24] Figure 7 gives an overview of the JISC arrest process.

FIGURE 7: THE JISC ARREST AND DISPOSITION PROCESS



Source: OIG visualization of information provided by CPD

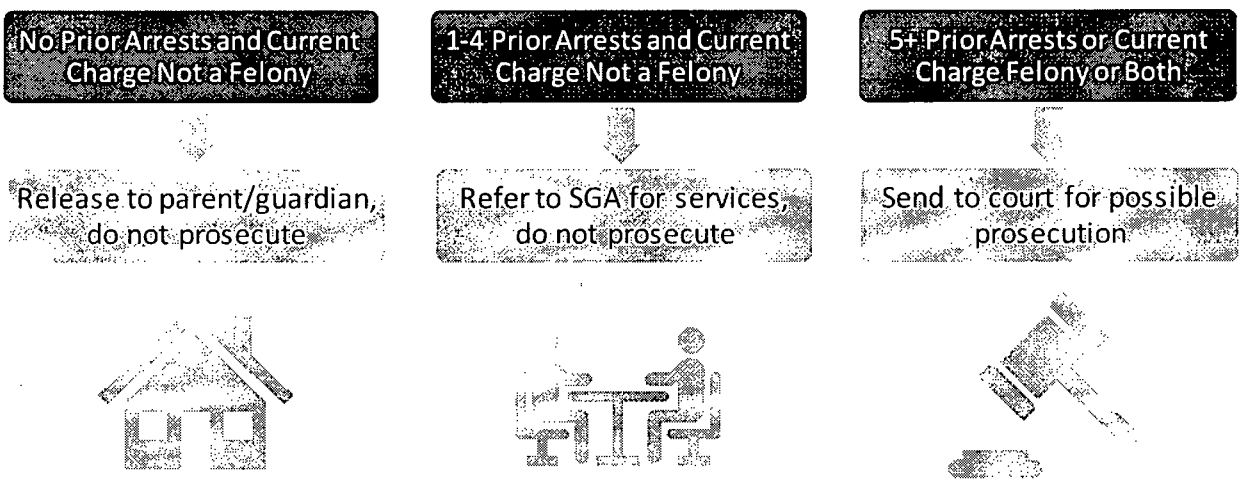
[22] 705 ILCS 405, see section 5-410 (2)(c), and Chicago Police Department Directives System, "Processing of Juveniles and Minors Under Department Control (S06-04)" (issued May 2017), accessed September 18, 2019, http://directives.chicagopolice.org/directives/. While 705 ILCS 405/5-105(11) does not define "secure custody," it defines "non-secure custody" as "confinement where the minor is not physically restricted by being placed in a locked cell or room, by being handcuffed to a rail or other stationary object, or by other means. Non-secure custody may include, but is not limited to, electronic monitoring, foster home placement, home confinement, group home placement, or physical restriction of movement or activity solely through facility staff."

[23] The processing detective must also consult a charge list issued by the Cook County Juvenile Detention Center. This list assigns point values to many criminal charges. If an arrest's total points exceed a set limit, the youth will be referred for possible prosecution and the detective must call the Cook County Juvenile Detention Center. Center personnel then determine whether the youth should await court in a secure or non-secure facility, in an alternative non-secure facility, in home confinement, or should not be detained.

[24] 705 ILCS 405, see section 5-301.

The processing detective makes this decision using a JISC Detention and Risk Screen form developed by CPD.[25] Some processing detectives choose to meet with the youth to conduct the screen, while others complete it using only the youth's arrest paperwork.[26] The screening tool recommends a disposition based on both the current offense and the youth's previous arrest and station adjustment history. The screening tool JISC used during the period of OIG's analysis is described in Figure 8.[27]

FIGURE 8: CPD'S JISC RISK SCREEN RECOMMENDS DISPOSITIONS BASED ON THE YOUTH'S PRIOR ARREST HISTORY AND CURRENT CHARGE



Source: OIG visualization based on CPD JISC Detention and Risk Screen in Appendix A.

Processing detectives have discretion over the final disposition and may override the screen's recommendation. CPD policy requires watch commanders to approve processing detectives' dispositions, including their reasons for any overrides, before the arrest is closed. If a youth is sent home without a service referral to SGA, they may leave when their parent or guardian arrives.

To participate in case management services, the youth and their parent or guardian must sign a Conditions of Station Adjustment Notification and Agreement. This agreement states that if the youth does not meet with a case manager and fully

---

[25] CPD has revised this screening tool over time. We describe the screen in use from 2014 through June 2018, which covers the period of OIG's analysis. The risk screen currently in use leads to similar dispositions. We include both versions of the screen in Appendices A and B.

[26] As noted in Finding 3.2, CPD does not provide specialized training for JISC processing detectives or detention aides. Staff bid for the positions based on seniority; there is no system for selecting the candidates with the greatest aptitude for working with youth.

[27] As described in the Methodology section below, OIG analyzed JISC arrests from June 2017 through May 2018.

participate in assigned services, CPD may forward their case may to court for possible prosecution. If both the youth and their parent or guardian sign the agreement, CPD will make an in-person introduction—also called a "warm handoff"— to an SGA case manager, if one is available. Because SGA case managers work a limited number of hours at JISC each day,[28] CPD may instead make an "overflow" referral—i.e., forward the youth's paperwork to a case manager for follow-up later.

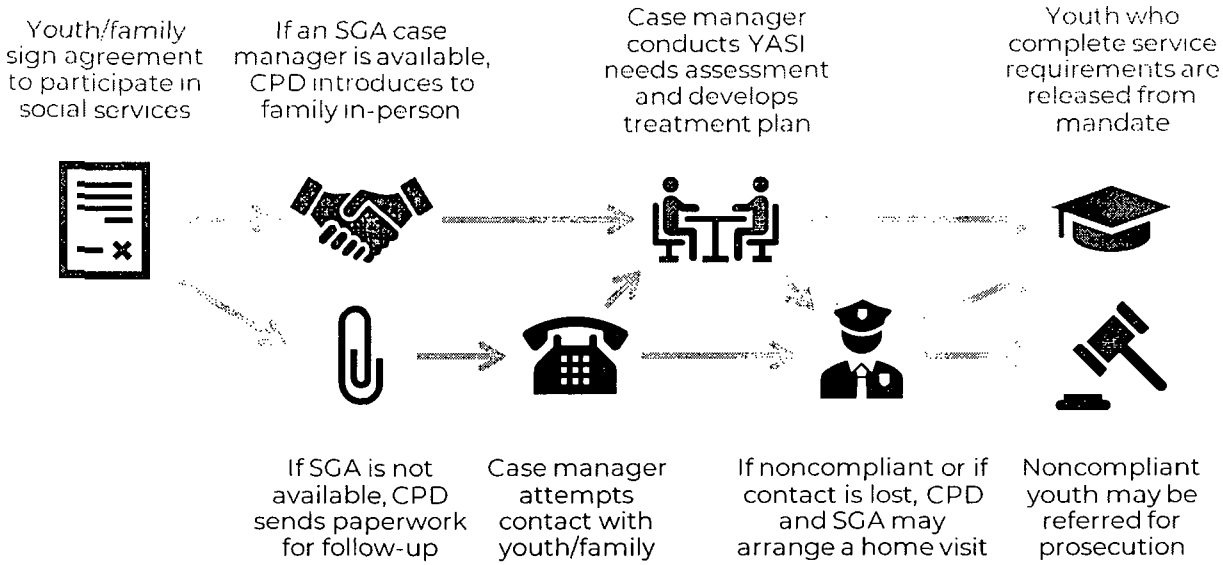
In most cases, at the first meeting with a youth, the case manager will conduct a service needs assessment using the Youth Assessment and Screening Instrument (YASI).[29] The YASI identifies priority service areas for the youth, such as anger management, substance abuse intervention, or family counseling. Guided by these results, the case manager develops a service plan for the youth, including referrals to services provided within SGA and by its network of partner agencies. The case manager may meet with the youth multiple times over the course of the service program, which is designed to last 90 days but can be extended. SGA's contract with the City requires SGA to record the youth's progress and maintain its case notes in an application called Cityspan, though in practice SGA also relies heavily on an Excel file designated as its "master log."

If a youth complies with the terms of their service mandate, SGA will close their case as successful. If not, SGA may refer the case back to CPD for a home visit to encourage compliance. Home visits are typically done by a combination of plain clothes CPD officers and SGA representatives. CPD has expressed frustration that a large portion of youth do not complete their service mandates. CPD is authorized to refer noncompliant cases for possible prosecution, but stated that it rarely makes such referrals. Figure 9 illustrates the service referral and case management process.

[28] During the period OIG audited, SGA's office hours at JISC were Monday through Friday 9:00 am to midnight and Saturday 2:00 pm to 10:00 pm.

[29] https://orbispartners.com/assessment/youth-assessment-yasi/

FIGURE 9: JISC CASE MANAGEMENT



Source: OIG visualization of information from CPD and SGA

In recent years, the JISC program has experimented with new programming. CPD launched a pilot partnership with the Center for Conflict Resolution, an independent nonprofit, for family mediation services, and created a workshop for youth arrested for the offense of Criminal Trespass to Vehicles (designed to discourage progression to more serious vehicle offenses).

D. PRIOR EVALUATIONS OF JISC

On five occasions prior to this audit, academics and City employees have evaluated JISC's design and performance. These reviewers found several issues, including conflicts between JISC's program partners, an unwelcoming JISC facility, data limitations that make it difficult to assess effectiveness, poor performance by SGA, and a lack of transparency. Two of the reviews recommended terminating JISC altogether. We summarize the conclusions of each review below.

Process Evaluation by Chapin Hall at the University of Chicago (2009), Republished by John Jay College of Criminal Justice 2011[30]

In 2007 and 2008, researchers from Chapin Hall at the University of Chicago reviewed JISC's operations since its launch in March 2006. The report found that the program partners fundamentally disagreed about JISC's mission and philosophy, in particular

[30] Jeffrey A. Butts, *Process Evaluation of the Chicago Juvenile Intervention and Support Center* (New York: Research and Evaluation Center, John Jay College of Criminal Justice, 2011), accessed September 23, 2019, https://jeffreybutts.files.wordpress.com/2011/04/jisc20112.pdf

whether the program should emphasize positive youth development or criminal punishment. The authors write,

> Like other aspects of the juvenile justice system, however, the JISC seems to embrace both choices without true fidelity to either. The JISC's stated mission is to use social services to prevent future criminal behavior and to engage youth in community supports and opportunities that bind them to conventional social structures. When youth come into the JISC, however, they are immediately handcuffed, fingerprinted, and photographed before spending up to several hours in what amounts to a holding cell. Youth receive mixed signals... In a matter of hours and within the same small building, the JISC process demands that youth go from a lock-up environment to a therapeutic milieu, and they are expected to cooperate fully with the staff in each setting.[31]

The report concluded that JISC was becoming a successful program, but that its long-term success would largely depend on how it managed ongoing disagreements between CPD and the social service stakeholders about solutions to the issues facing at-risk youth. The report recommended that JISC staff at CPD, DFSS, and the case management agency receive thorough and regular training in positive youth development and restorative justice, and that these partners improve cross-agency data sharing.

Outcomes Evaluation by the University of Chicago Crime Lab (2013, Updated 2016)

The Crime Lab study used a quasi-experimental design that compared recidivism rates for youth arrested just inside the JISC catchment area's border to those arrested just outside of it. It found that being arrested in a JISC district predicted a "10% reduction in the odds of re-arrest within one year" for the first year under study (2007) only. For all subsequent years (2008 to 2015), it found that recidivism outcomes between JISC district and non-JISC district subjects were indistinguishable. While this appears to suggest that JISC has no effect on recidivism, its authors cautioned that due to the limitations of the study's methodology, its results do not establish a causal relationship.

Engagement with the Mayor of Chicago's Innovation Delivery Team (2014-15)

In 2014 and 2015, the Mayor's Innovation Delivery Team (IDT) engaged with JISC to assess some of its program metrics and develop improvements. IDT found that about 15% of the youth processed at JISC had been referred to SGA for services, and that, after referral, SGA had lost contact with and could not locate 50% of them. Noting low caseloads among SGA's case managers, IDT worked with CPD to develop a new risk

[31] Butts, 2011, 26

screen designed to encourage more referrals for case management. Using the new screen, however, CPD referred 20% of JISC-processed youth to SGA—far less than the 42% IDT had projected. IDT observed that overflow referrals, which comprised 58% of CPD's referrals to SGA, did not change, even after adjusting the case management agency's hours at JISC.[32] It also reported that the physical design of the JISC facility was "not a welcoming and supportive environment for youth and their families." IDT recommended closing the JISC facility and replacing it with a virtual youth diversion system at local police stations, as well as refocusing on pre-arrest and post-court diversion.

Ongoing Engagement with the Crime Lab

In 2018, CPD and DFSS engaged the University of Chicago Crime Lab to answer programmatic questions on a continuous basis using JISC data. A June 2019 descriptive analysis found that SGA's data on which youth had completed the case management program was not reliable enough to measure its correlation to re-arrest rates. The researchers instead used service administration data, which they acknowledged was similarly incomplete.[33] The researchers found that 46% of JISC youth who (1) had been referred for services and (2) had one or more individual visits or other service contacts through SGA were re-arrested within one year, compared to 56% of similarly-referred youth who had no such contacts.

2019 Mayoral Fellow Review

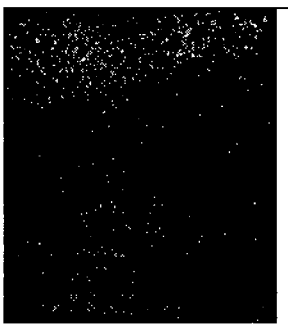
In August 2019, a Mayoral Fellow conducted a review of JISC, comparing it to diversion programs in peer jurisdictions. She shared her findings with DFSS. Her summary noted the distinctly law-enforcement characteristics of the JISC facility, the incongruity between CPD's goals and those of SGA and DFSS, the lack of transparency to external stakeholders, and the inadequate evaluation of the program's performance. It also noted that the commander of CPD's Youth Investigations Division, which oversees JISC, is not empowered to choose the officers who staff the program. The summary recommended ending JISC as it exists and implementing a community-focused model at an alternate site, replacing the CPD-led diversion eligibility determinations with a clinician-driven process that uses appropriate assessment tools, and improving processes for monitoring service provider performance.

---

[32] "Overflow" referrals occur when a case manager is not available for an in-person introduction. The youth's paperwork is forwarded to SGA for follow-up later.

[33] As explained in the Methodology section below, OIG found SGA's program completion and closure data to be not sufficiently reliable for analysis in this audit, which follows Generally Accepted Government Auditing Standards.

III. FINDINGS AND RECOMMENDATIONS



FINDING 1: CPD AND DFSS CANNOT ACCURATELY ASSESS THE JISC PROGRAM'S EFFECT ON YOUTH RECIDIVISM DUE TO POOR RECORD-KEEPING AND COMMUNICATION BETWEEN PROGRAM PARTNERS.

Communication and record-keeping issues between DFSS and CPD have prevented the partners from comprehensively assessing JISC's performance and sharing their assessment with the public.

1. SGA DID NOT KEEP ACCURATE AND CONSISTENT RECORDS OF ITS JISC SERVICE ADMINISTRATION

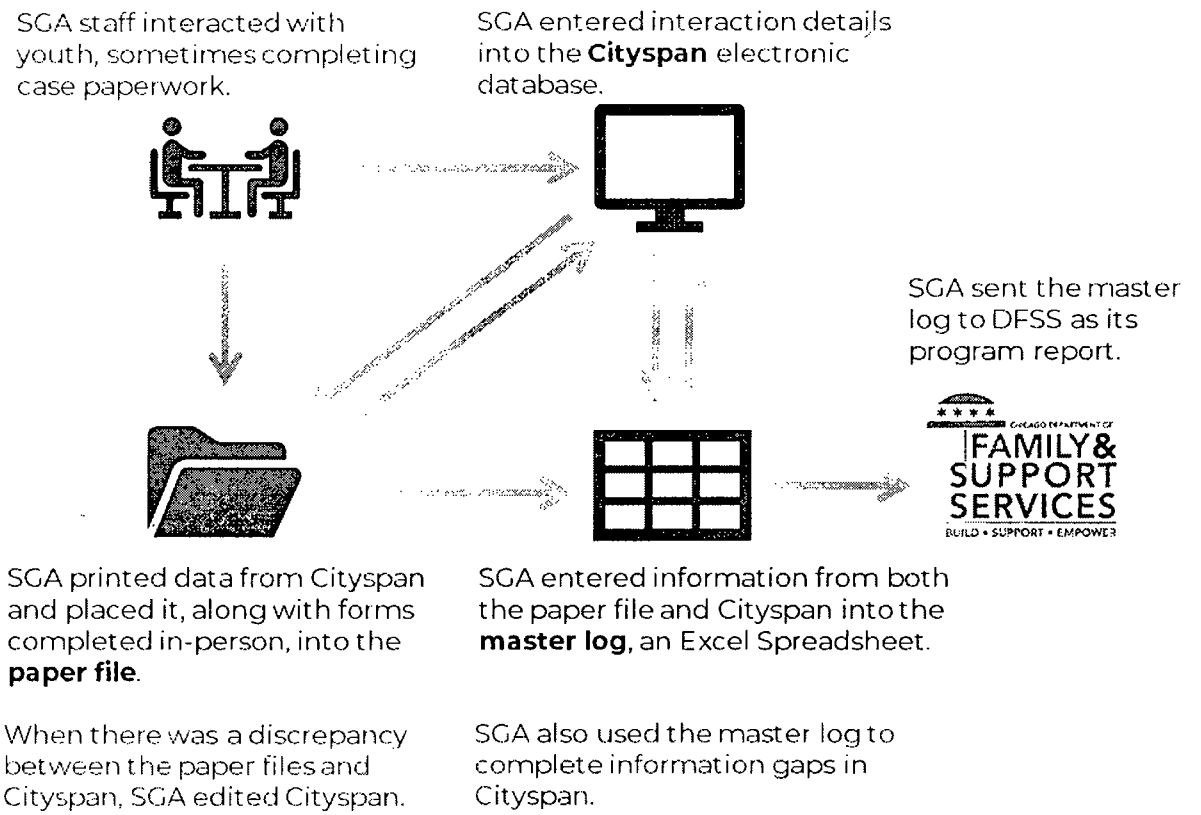
As part of this audit, OIG intended to determine the re-arrest rates of youth who completed the JISC case management program. However, we found that SGA's case records, including participation in and completion of the program, were inconsistent and frequently inaccurate.[34] DFSS—the agency responsible for managing the JISC case management contract—did not ensure that SGA met its data collection and reporting obligations. Because the data is unreliable, it is not possible to determine whether JISC is creating positive or negative outcomes for the over 3,000 youth it processes each year, nor calculate the return on the City's over $5 million annual investment in the program. Past assessments of JISC have relied on problematic data or proxy factors, such as case manager visits, to gauge the program's effectiveness; no one has achieved an accurate count of how many youth have successfully completed the program.

Under its contract, it was SGA's responsibility to enter program information into Cityspan, including determinations on which youth successfully completed the service mandate and which did not, the reasons behind those determinations, and the number of re-arrests among program participants in the short and long term. In practice, SGA used three separate tracking systems to collect this information: Cityspan, an Excel file known as the "master log," and physical files for each participant. OIG found that all three of these sources contained incomplete, inconsistent, and inaccurate data. Additionally, as Figure 10 illustrates, data was often manually moved between the various tracking systems and edited at later dates,

[34] The Mayor's Innovation Delivery Team's 2014-15 JISC review also found a lack of consistency in SGA's use of assessment tools and documentation of cases.

thereby obscuring the original data sources, introducing errors, and making it impossible to verify information. SGA data therefore could not be confidently used to evaluate the program

FIGURE 10: SGA MIXED INFORMATION AMONGST ITS TRACKING SYSTEMS



Source OIG visualization of information provided by SGA

To fulfill its reporting requirements, SGA sent its master log spreadsheet to DFSS. The Department did not fully understand the sources of the data in those reports and did not always review them for accuracy. For example, DFSS provided OIG several months of SGA reports where the summary and detail versions contained different numbers of program completions. As described above, DFSS did not hold SGA accountable for providing this inaccurate program data.

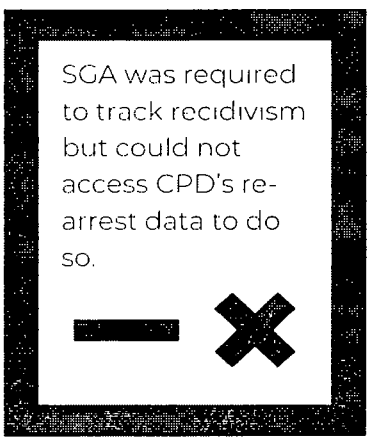
Further, SGA case managers entered data into these three systems in an inconsistent manner. SGA did not provide written guidance to its case managers regarding the standards for closing a case As a result, two case managers might perceive and record the same youth's performance differently. The justifications for certain case closures were frequently omitted, contradictory, or listed as "other" with no further information. Also, the terminology used to denote case closures was not consistent between the three systems, or between cases within the same system SGA has never

comprehensively assessed the accuracy and consistency of its data across the three systems.

These errors were possible in part because Cityspan contained few controls to ensure the accuracy or completeness of its data. For example, SGA case managers could enter a case closure into Cityspan without providing the closing date. The database also allowed entry of closure types that were inconsistent with the case notes. For youth who were arrested and engaged with SGA more than once, it was not possible to connect a case closure to a specific arrest because the system's developer did not initially configure the database to track outcomes in this way. Instead, Cityspan and SGA treated each youth as a single "case," regardless of how many times they were arrested. This configuration forecloses any attempt to determine JISC's relationship to recidivism.

The developer claimed it was DFSS' failure to communicate a clear set of reporting expectations for the system that led to the delivery of a database unsuited for evaluating outcomes. Acknowledging this problem, the Cityspan developer, DFSS, and SGA collaborated on a new version of the database, launched in 2019. OIG reviewed a sample of the data from the new Cityspan system and found that it is now properly configured to track cases at the arrest level, and that a system control now ensures that case closures include closure dates. However, the new system still does not contain measures that ensure the consistency and accuracy of case closure types and justifications.

DFSS also did not provide realistic performance expectations. The contract called for SGA to manage a higher number of JISC cases than CPD is likely to refer. Furthermore, SGA was contractually required to track short and long-term recidivism, but it lacked access to the re-arrest data in CPD's Citizen and Law Enforcement Analysis and Reporting (CLEAR) arrest system. This lack of access prevented SGA from performing the required analysis.



2. CPD AND DFSS DID NOT SHARE INFORMATION NECESSARY TO ALLOW FOR COMPREHENSIVE PROGRAM ASSESSMENTS

JISC's stated purpose is to reduce the number of youth entering and returning to the criminal justice system. A comprehensive assessment of the JISC program, including a recidivism analysis, would require comparing the lists of:

- youth processed at JISC, maintained by CPD;

- youth referred to SGA, indicating whether they successfully completed the case management mandate, maintained by SGA and reported to DFSS; and
- youth processed at JISC who were subsequently re-arrested, maintained by CPD.

As mentioned above, SGA did not have access to youth re-arrest data in CPD's CLEAR database. As a result, rather than track recidivism among all program participants as required by the contract, SGA was forced to track recidivism as a measure of how many youth were referred to SGA for case management, subsequently re-arrested, and again referred for case management. This did not constitute the true recidivism rate. SGA stated that CPD was happy to discuss particular cases, but that the Department had not made the entire set of relevant data available.

For its part, CPD did not have access to DFSS' data regarding which youth successfully completed services prescribed by SGA.[35] Processing detectives stated that they collaborated well with SGA, who provided compliance information for particular youth on a case-by-case basis upon request. But, in the aggregate, CPD did not know what ultimately became of the youth processed at JISC, unless they were arrested again. According to CPD, this hampered its ability to assess the effectiveness of its diversion choices. Moreover, JISC processing detectives appeared to have varying levels of involvement with SGA. One detective stated that they felt disconnected from the agency and did not know exactly what role SGA played at JISC. As a result, they never contacted SGA about the status of any youth they referred to the agency.

Collaboration is vital to the success of diversion programs, but JISC has no charter, MOU, or governing board to establish goals and accountability measures

Collaboration and communication between partners are vital to the success of diversion programs. But JISC has no charter, memorandum of understanding, or governing board to establish goals and accountability measures. Without these or similar measures to ensure effective collaboration, the program partners cannot assess JISC's impact, identify trends and improvement opportunities, or even ensure consistent data collection.

DFSS has expressed its belief that CPD, as the program gatekeeper, is reluctant to give up its control over JISC and therefore to share its program data. Similarly, CPD stated that DFSS' unwillingness to provide program data on even an ad hoc basis has

[35] As noted above, OIG found that this data is not sufficiently reliable. To achieve a meaningful assessment of the JISC case management program's relationship to re-arrest rates, the program partners need to compare accurate data regarding both program completions and subsequent arrests.

increased over time. CPD and DFSS have engaged the University of Chicago Crime Lab, which is providing ongoing program analysis using data from both departments. While this is a step in the right direction, serious communication gaps remain

RECOMMENDATIONS

1. CPD and DFSS should create a charter, memorandum of understanding, or similar agreement concerning JISC that establishes shared program goals between all partner agencies, delineates each entity's responsibilities and accountability measures, allows for data sharing between the agencies, and creates a uniform set of reporting standards to allow for comprehensive program assessment of JISC The results of any such assessment should be published to ensure transparency and accountability. Establishing a governing or advisory board over the entire JISC program may assist in this effort.
2. DFSS should ensure that the case management agency records program tracking and deliverables in Cityspan per its contract, and stops using the master log. DFSS should also ensure that the case management agency,
    a. works with Cityspan developers to implement input controls that ensure data accuracy and completeness, and to create a record of retroactive edits; and
    b. develops written policies and procedures to ensure consistent data entry among users, including specific case and closure terminology, and operational guidance that is consistent with both the contract and the case management agency's paper files. While OIG recognizes that clinical work should be tailored to the unique circumstances and needs of each youth, case managers should have a shared understanding of the definitions of each closure type and how to apply them
3. DFSS should revise the case management contract language to reflect the number of referrals it realistically expects from CPD (with the caveat that all referrals should be guided by a validated risk screen and not by the number expected in the contract).[36]
4. In addition, DFSS should either remove the requirement that the agency report on recidivism figures, or ensure that the agency (or a third-party researcher, such as Crime Lab) has access to complete re-arrest data to calculate those figures and hold the agency accountable for them.
5. DFSS should thoroughly review the performance reports it receives from its JISC case management agency for completeness, accuracy, and contract compliance. When these reports are incomplete or inaccurate, DFSS should

[36] We discuss validated risk screens below in subsection 3 of Finding 3

send them back to the agency for correction. DFSS should also utilize this information to make data-driven program decisions and publish the case management agency's performance figures to ensure transparency and accountability for program outcomes.

MANAGEMENT RESPONSE

1. CPD Response: *"CPD stands as a ready and willing partner to enter into a formalized agreement with DFSS in order to better accomplish the JISC's mission of crime prevention, service intervention, and rehabilitation for youth at risk of further criminal involvement. CPD agrees that all of the parameters outlined in the OIG's recommendation should be included in such an agreement, but specifically advocates that the agreement commit CPD, DFSS, and the City of Chicago to use available information technology resources to create an electronic data system that will allow both agencies to readily track a child's progress from the time that he or she is referred to SGA until the completion of programming. CPD commits that it will work with DFSS and partner agencies to monitor this information with a focus on the outcomes of programming, and the number of participants completing programming. CPD will also focus on incomplete participation, the initiation of services, and the types of services offered, and will work to improve outcomes based on these metrics.*

   "CPD recommends that an independent research agency such as the University of Chicago Crime Lab participate to assist with ongoing statistical data tracking and evaluation.

   "CPD also agrees that aggregate data on the number of youth and children referred into services, participation rates, desistance, and recidivism rates should be produced and made publicly available, so long as the information is de-identified and formatted in accordance with state and local laws and regulations.

   "Finally, CPD agrees that the Youth Diversion and JISC Advisory Council established by the Mayor's Office should oversee implementation of reforms and programming goals would benefit the JISC's mission and assist in properly aligning City resources and partner agencies to fulfill this critical effort."

   DFSS Response: *"DFSS agrees with the finding that a MOU/charter is needed between DFSS and CPD. DFSS will work with CPD to craft an MOU/charter to provide clarity on roles for the remainder of DFSS' services contract at the JISC (through December 31, 2020). DFSS also agrees that the Youth Diversion and JISC Advisory Council established by the Mayor's Office should oversee the implementation of reforms and programming goals that would benefit the*

JISC's mission and assist in properly aligning City resources and partner agencies to fulfill this critical effort. DFSS further recommends that members of that Advisory Council should be invited to formally join an MOU/Charter for the JISC as members committed to joint oversight of this initiative."

2. DFSS Response: *"In 2018, DFSS leadership started working with CitySpan to update the system including reviewing the data fields and how it could capture more case management progress as well as simple outputs.*

   "Since April 2019, DFSS has been working closely with CitySpan and the case management agency to align data to ensure there is a match between the Master Log and CitySpan and ensure that the monthly case management report and weekly compliance report can be captured through CitySpan. Some of the technology issues have been hampered by limited or no access to Wi-Fi/internet within the JISC.

   "The last phase of this effort is to reproduce the monthly case management report and compliance report through CitySpan. We hope to have a complete reporting build out in CitySpan by February 2020.

   "In addition, we are completing a User guide for CitySpan and a program manual for the case management agency regarding the terminology, meanings and guidance regarding communication between CPD leadership, officers and families."

3. CPD Response: *"CPD does acknowledge that all parties to the JISC operate with limited resource capabilities, and can only accept so many cases. CPD has experienced situations in the past where it was requested that CPD temporarily stop making referrals of youth and children that were eligible for services due to the service provider's staff and resource limitations. CPD finds this to be an unacceptable practice, and seeks to work with the City of Chicago and its partner providers to make necessary arrangements and align resources at the JISC to ensure that every youth and family that is eligible for service intervention is linked to the appropriate provider."*

   DFSS Response: *"DFSS has already removed the language in the workplan that requires a certain number of referrals from CPD. The current workplan language called for referrals from various sources equally (community referrals, walk ins, Cook County probation and CPD)."*

4. CPD Response: *"CPD contends that it is imperative for JISC partners to understand recidivism and desistance figures after contact with the JISC. CPD especially needs to have this information available in order to tailor its operations and training to produce the best possible long-term outcomes for youth and children who make contact with the JISC. As such, CPD agrees with the latter part of OIG's recommendation to grant access to a reliable, third-*

party researcher who is already intimately familiar with the JISC's operations and programming, such as the University of Chicago Crime Lab, in order to publish recidivism and desistance figures to JISC partners."

DFSS Response: *"DFSS has already removed the recidivism reporting requirements in the 2020 case management agency workplan given the difficulty in our access to CPD data*

"DFSS and the Mayor's Office will continue to work with external analytical partners, such as the University of Chicago Crime Lab, to understand re-arrest rates and other recidivism data related to outcomes for the young people impacted by JISC. We are also working to build our own internal capacity to perform this analysis ourselves."

5. DFSS Response: *"Since early 2019, DFSS has been reviewing monthly reports (weekly compliance reports, monthly case management reports) provided by the case management agency. We have also been following up on any and all incomplete and inaccurate information requesting further clarification with clear deadlines for completion by the case management agency. This is communicated via email as well as in person and phone calls that are conducted monthly with the lead contact(s) at the case management agency. This information is also reviewed in CitySpan monthly by DFSS Youth Division staff.*

"Since mid-2018, DFSS has been utilizing data to make programmatic decisions and, when necessary, program shifts including adding additional staff, changing the schedule of services/operations for the case management agency, and creating caseload limits since late 2018. The DFSS Youth Division management team also began working with CitySpan to update and review its data collection fields to ensure they were aligned with and focused on capturing all relevant performance measures.

"Finally, since June 2019 the current Prevention & Intervention Portfolio Director began reviewing JISC case management agency data monthly for accuracy. The case management agency has been asked to correct or address any discrepancies and retroactively adjust their submissions. This process is also in place for the weekly compliance report.

"In the spirit of transparency, DFSS will commit to providing performance outcome data via DFSS' website, but it should be noted, because DFSS only services 25% of the youth seen at the JISC, we can only provide data on the smaller sub population which we serve."

FINDING 2: CPD VIOLATED THE LOCAL RECORDS ACT BY DESTROYING YOUTH SCREENING RECORDS WITHOUT LOCAL RECORD COMMISSION APPROVAL.

As part of our audit fieldwork, OIG sought to collect completed JISC Detention and Risk Screens from a sample of youth arrests.[37] While we acquired a portion of the screens, the majority were missing from the JISC facility, the YID arrest records storage at CPD headquarters, and CPD long-term records storage.

The JISC Detention and Risk Screen—which forms part of a youth's arrest record—is used to make operational decisions about their arrest disposition. As such, it is a public record as defined by the Illinois Local Records Act.[38] The Act prohibits destroying public records without the prior approval of the Local Records Commission. Under the Act, it is up to the Commission, not to the public entity, to decide which records may be destroyed. CPD violated the Act by failing to retain the JISC Detention and Risk Screens. Because the records are unavailable, agencies seeking to assess JISC's performance—such as OIG, DFSS, CPD, and interested non-governmental stakeholders—are unable to do so.

CPD stated that it shredded at least some of these records because it did not have the capacity to store them at JISC. The Department also said that, prior to mid-2018, the screen had not been designated as an "official" form and listed on CPD's Forms Retention Schedule.[39] Moreover, the Department's procedures for compiling JISC arrest packages prior to this time did not include sending the screens to YID. This has since been corrected: the JISC arrest records OIG examined from June 2018 forward properly retained the screen, and CPD has included a revised version of the screen on the Department's Forms Retention Schedule.

---

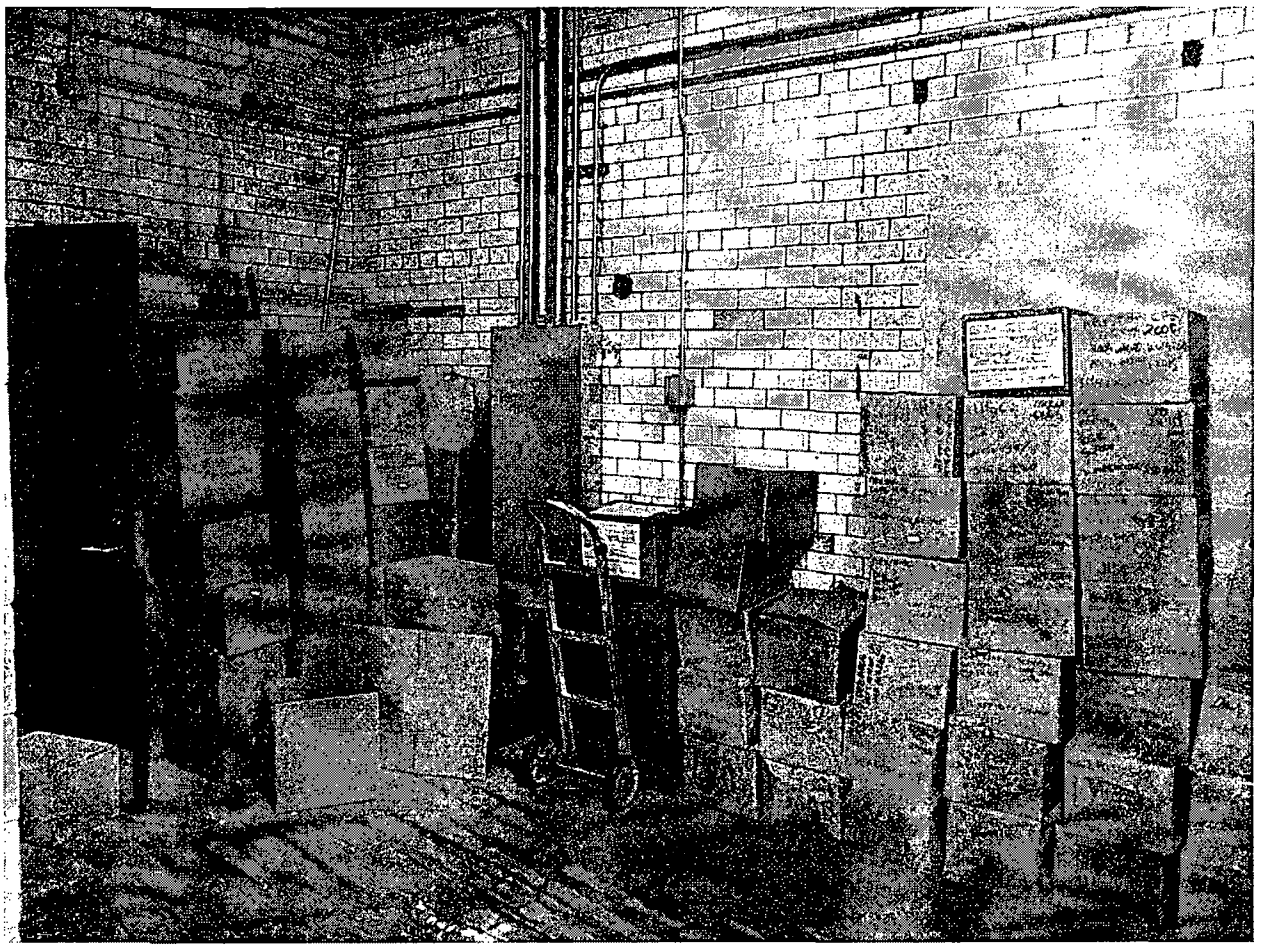
[37] OIG intended to compare the screens to the dispositions logged for these cases in CLEAR to determine if there were differences between the youth's risk as predicted by the screen, the processing detective's assessment of the youth's risk (i.e., whether the detective overrode the screen's recommendation), and the youth's ultimate arrest disposition. The time scope for this test was June 1, 2017 through May 31, 2018. See Appendix A for a blank JISC Detention and Risk Screen.

[38] See 50 ILCS 205/1 et seq.

[39] CPD's directive on retaining forms and links to the Retention Schedule (CPD-11.717) are available online at http://directives.chicagopolice.org/directives/data/a7a57bf0-12d7f16c6-c3512-d7f16-c93ba1320f2a0a14.html (accessed December 26, 2019).

Further, as illustrated in Figure 11, we observed haphazard records storage at JISC. Some records from JISC (as well as other programs) were stacked, in no apparent order, in a JISC facility garage bay.

FIGURE 11: PROGRAM RECORDS STORED IN A JISC GARAGE



Source: OIG photo taken April 16, 2019

CPD had no inventory of the screens maintained in these boxes. We noted a generally poor understanding between leadership at YID and the JISC facility about who was responsible for these records.[40]

Additionally, CPD did not consistently follow the instructions in its JISC CLEAR User's Guide to enter processing and risk screening information into that database. According to the Guide, CPD intended the JISC CLEAR module to "combine the disparate pieces of the present juvenile arrest process into a single web-based

[40] Insofar as they may contain documents of juveniles whose criminal records have been expunged under the Juvenile Court Act, CPD may be in violation of that act as well. OIG did not test any particular records for CPD's compliance with the expungement provisions of the Juvenile Court Act.

automation environment." OIG found that CLEAR users at JISC frequently did not enter all JISC processing information into the system. For example, many records we examined contained JISC facility entry times, but not exit times. Many records also lacked risk screening information—these fields were almost all populated by default values. CLEAR's interface did not contain input controls to ensure that these fields were completed accurately for each youth. JISC processing detectives told us that the risk screening fields in CLEAR were redundant to the paper Detention and Risk Screen form, so some did not see the value in completing both. Because many of these forms were destroyed, risk screen results were not available in either paper or electronic format, which prevented a full analysis of the risk determinations that processing detectives made.

RECOMMENDATIONS

6. CPD should notify the Local Records Commission of its failure to retain JISC risk screens.
7. CPD should implement and enforce a written policy for collecting and retaining risk screens, and sending them to YID at CPD Headquarters for storage.
8. CPD should ensure that its staff understand the Department's responsibilities under the Local Records and Juvenile Court Acts, and receive approval from the Local Records Commission before destroying covered records.
9. CPD should ensure that all timestamped JISC entry and exit fields are accurately completed in the CLEAR database. To this end, the Department should create input controls in the system, such as required text fields. If CPD chooses to use a validated risk screening tool in electronic format, the tool should likewise include input controls to ensure that all fields are entered completely and accurately. CPD should also implement strict written policies in this area, and perform regular reviews of the JISC CLEAR data—and electronic risk screening data, as appropriate—to ensure completeness and accuracy. Finally, the Department should communicate to its processing detectives the importance of having comprehensive electronic JISC data available for performance assessments.

MANAGEMENT RESPONSE

6 CPD Response: *"In June of 2018, CPD took appropriate steps to make its risk screen an official Department-approved form, which is now accessible to Youth Investigations Division and CPD members as CPD-24.419 'JISC Arrest Disposition Screening Instrument.' Fortunately, during the time period between 2017 and 2018 where it was discovered that risk screen forms were*

not retained, CPD Youth Investigations detectives were entering the risk screening instrument information into CLEAR, which preserved the information.

"Since the inception of the Department of Justice pattern and practice investigation in December of 2015, CPD has discontinued following a record retention schedule, and is instead following a record preservation order. Pursuant to the investigation and now under the requirements of the consent decree, CPD has continued to comply with the preservation order, maintaining records and data systems past the prescribed retention dates.

"With the JISC risk screen instrument now an official form, it will fall under the preservation order CPD has complied with under its consent decree obligations for the foreseeable future. Once the preservation order is lifted, CPD will ultimately work to make the risk screening form part of its form retention schedule under the Local Records Act, 50 ILCS 205/ et seq."

OIG Reply: As reported in Finding 2, OIG observed that many JISC arrest records recorded in CLEAR during the time period CPD cited above lacked risk screening information, contrary to the Department's assertion that the information was entered and preserved.

We also note that, even if this information were stored electronically, a paper risk screening form constitutes an original public record that the Local Records Act requires CPD to retain, regardless of whether it is denoted as an "official form." The Department's response does not address whether it intends to notify the Local Records Commission of the failure to retain these screens. We asked CPD to clarify its position on this point, but the Department declined.

Further, the preservation order CPD references above makes clear that "all documents, forms, reports and data created by Department members in the course of official Department business" must be permanently retained, including any documents used on a "regular or recurring basis." Whether the screen was an "official form" is immaterial to this requirement.

7. CPD Response: *"As discussed in Item #6, in June of 2018, CPD took appropriate steps to make its risk screen an official Department-approved form, which is now accessible to Youth Investigations Division and members assigned to the JISC as CPD-24.419 'JISC Arrest Disposition Screening Instrument.'*

"Since the inception of the Department of Justice pattern and practice investigation in December of 2015, CPD has discontinued following a record retention schedule, and is instead following a record preservation order. Pursuant to the investigation and now under the requirements of the consent

decree, CPD has continued to comply with the preservation order, maintaining records and data systems past the prescribed retention dates.

"With the JISC risk screen instrument now an official form, it will fall under the preservation order CPD has complied with under its consent decree obligations for the foreseeable future. Once the preservation order is lifted, CPD will ultimately work to make the risk screening form part of its form retention schedule under the Local Records Act, 50 ILCS 205/ et seq *CPD will update its orders and retention schedule accordingly to ensure that screening instruments are retained to bolster further assessment and evaluation of the JISC process."*

8. CPD Response: *"CPD As discussed in Item #6, in June of 2018, CPD took appropriate steps to make its risk screen an official Department-approved form, which is now accessible to Youth Investigations Division and members assigned to the JISC as CPD-24.419 'JISC Arrest Disposition Screening Instrument.'*

   "Since the inception of the Department of Justice pattern and practice investigation in December of 2015, CPD has discontinued following a record retention schedule, and is instead following a record preservation order. Pursuant to the investigation and now under the requirements of the consent decree, CPD has continued to comply with the preservation order, maintaining records and data systems past the prescribed retention dates.

   "With the JISC risk screen instrument now an official form, it will fall under the preservation order CPD has complied with under its consent decree obligations for the foreseeable future Once the preservation order is lifted, CPD will ultimately work to make the risk screening form part of its form retention schedule under the Local Records Act, 50 ILCS 205/ et seq. *CPD will update its orders and retention schedule accordingly to ensure that screening instruments are retained to bolster further assessment and evaluation of the JISC process, and requisite notifications will be made to JISC personnel following these updates."*

9. CPD Response: *"CPD will revise the JISC applications in CLEAR to require all fields to be completed in order to submit an entry. JISC supervisory staff will review each submission for accuracy and continuity with paper forms. Refresher training will be provided to JISC staff that will emphasize the importance of having accurate and complete information available for performance assessments."*

FINDING 3: JISC IS NOT DESIGNED ACCORDING TO BEST PRACTICES FOR YOUTH DIVERSION, AND IT CREATES A NEGATIVE EXPERIENCE THAT DOES NOT ENCOURAGE SUCCESS.

OIG compared JISC to best practice recommendations from several juvenile justice agencies and organizations. We found that CPD's focus on security and policing at JISC, CPD's isolation from stakeholders (including SGA), and SGA's limited presence at the JISC facility combine to create a program that does not encourage successful youth diversions.

1. CPD'S JISC FACILITY DOES NOT MEET BEST PRACTICES FOR A YOUTH DIVERSION SITE

Youth diversion programs should be trauma-informed, however CPD's JISC facility is not.

The consensus of the literature on best practices in the field of youth diversion programs is that diversion settings should be "trauma-informed"—i.e., sensitive to youth who have experienced trauma.[41] OIG found that CPD's JISC facility, a former police station, contradicts this principle; it operates more like a traditional police station than a youth diversion site.[42] Interactions with the criminal justice system that are not trauma-informed risk distressing youth and worsening symptoms of traumatic stress. This may increase the likelihood of recidivism, particularly for the large portion of justice-involved youth who have developmental disabilities, mental health issues, or histories of trauma, victimization, or substance abuse.

---

[41] According to the International Association of Chiefs of Police, "Trauma histories are widespread—with many youth having experienced violence as either victims or witnesses, including those who have suffered physical or emotional abuse, neglect, or abandonment. These youth present distinct challenges for law enforcement—both in terms of how they interact with police and what their needs are. As such, law enforcement would benefit from a deeper understanding of adolescent development and mental health in order to better interpret and respond to youth behavior beginning with the initial point of contact." *Law Enforcement's Leadership Role in Juvenile Justice Reform: Actionable Recommendations for Practice & Policy* (Alexandria, VA: IACP, 2014), 41, accessed October 10, 2019, https://www.theiacp.org/sites/default/files/2018-07/JuvenileJusticeSummitReport.pdf. See also Karen Tamis and Cymone Fuller, "It Takes a Village: Diversion Resources for Police and Families" (New York: Vera Institute of Justice, 2016), accessed October 10, 2019, https://ncc.nebraska.gov/sites/ncc.nebraska.gov/files/doc/it-takes-a-village-report.pdf, National Center for Mental Health and Juvenile Justice, 2015, and OJJDP, 2017.

[42] This building also previously served as the center of operations for the Brighton Park Area under Commander Jon Burge. Officers under Burge's command allegedly tortured prisoners at the site

The CPD practice of handcuffing youth to a rail does not comport with JISC's aims

OIG visited the JISC facility on multiple occasions. We toured the building and were walked through the JISC process. We also interviewed multiple youth and young adults who had been arrested by CPD and processed at JISC.[43] In contrast with the well-established philosophy of youth diversion, we found that the JISC experience was primarily punitive in nature. In particular, the practice of handcuffing arrested youth to a rail during processing is a measure that does not comport with JISC's stated aims. A JISC supervising lieutenant described this as an optional but "standard practice" that is followed by most officers, and estimated that a youth is typically handcuffed for 35 to 40 minutes during initial processing. CPD also stated that youth are handcuffed while in transport to JISC—like any arrestee being brought to any CPD facility—and that, because the door to the arrest processing area at JISC is not locked, youth are handcuffed to the rail to prevent escape. Because CPD does not track the practice of handcuffing JISC arrestees to stationary objects, we could not conclusively determine how often it occurs.

A CPD special order on processing juveniles places some restrictions on officers' ability to restrain minors, stating,

> Whenever it is necessary to take a person under the age of 18 into a police facility for any offense, Department members will avoid, if practical, handcuffing a juvenile to a stationary object or placing a juvenile in a locked room. The time-restriction clock automatically begins with any of these actions. NOTE. Department members will not jeopardize their own safety, that of the arrestee, or others to conform to this policy.[44]

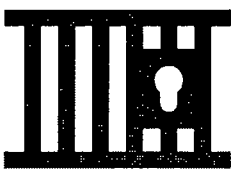
Relatedly, CPD's general order on restraining arrestees states, "An arrestee taken into custody will be handcuffed unless... handcuffing the arrestee would be an excessive measure of restraint (e.g., the arrestee's age, physical health, or condition)."[45] The latter order—which is not unique to juvenile arrestees—establishes that, while CPD has discretion over when it is appropriate not to use handcuffs as restraints, it must consider the severity of the tactic taking into account the arrestee's age, among other factors. These orders align with JISC's objectives by placing caveats on the use of

---

[43] See Section C in the Background section for a walkthrough of arrest processing at the JISC facility
[44] Chicago Police Department Directives System, "Processing of Juveniles and Minors Under Department Control (S06-04)" (issued May 2017), section IV J, accessed October 10, 2019, http://directives.chicagopolice.org/directives/
[45] Chicago Police Department Directives System, "Restraining Arrestees (G06-01-02)" (issued December 2017), section V A 2 c and e, accessed October 10, 2019. http://directives.chicagopolice.org/directives/ Parentheticals from source

restraints against youth; however, they also leave ample room for subjective interpretation as to the appropriate level of security at JISC.

This emphasis on security and restraint persists after a JISC arrestee is brought to the second-floor waiting area—a locked room, bare except for plastic seating and another stationary rail—and placed under the watch of one or more detention aides. CPD staff repeatedly described this area as a "lockup," or described security characteristics akin to traditional station "lockups." Youth we interviewed described being held in this area as a difficult and austere experience, and stated that they were not kept informed of their status while being held there. This holding period can last several hours. Arrestees are not made aware of the existence of JISC case managers unless and until they are screened by a processing detective and referred to SGA. Those who are not referred may never learn that case management services exist.



CPD staff describe the JISC waiting room as a "lockup" and the JISC facility itself may re-traumatize youth

Previous reviews of JISC have recognized the facility's distinctly law-enforcement nature; many of the same concerns were identified by Chapin Hall in the 2009 process evaluation described above. In this context, it is particularly relevant that JISC serves a lower-risk population of arrestees by virtue of its eligibility requirements, which automatically screen out youth arrested for more serious offenses. Insofar as its security features are disproportionate to the actual risk the arrestees represent, the JISC facility itself undermines the program's diversion mission and risks re-traumatizing the youth brought through its doors.

2. CPD PROVIDES NO SPECIALIZED TRAINING TO ITS JISC STAFF, AND SELECTS THEM BASED ON SENIORITY RATHER THAN SKILLS OR EXPERIENCE WORKING WITH YOUTH[46]

Juvenile diversion literature recommends that program staff be trained in trauma-informed approaches, cultural competence, and youth-specific developmental issues.[47] OIG found that CPD does not provide specialized training for JISC processing

[46] A 2018 OIG review of CPD's management of School Resource Officers (SRO) similarly found that CPD had no policies or procedures governing SRO recruitment or training. A June 2019 follow-up report found that these policies and procedures, as well as SRO hiring guidelines, were pending implementation. See the original and follow-up reports at https://igchicago.org/2019/06/13/review-of-the-chicago-police-departments-management-of-school-resource-officers-follow-up-inquiry/

[47] International Association of Chiefs of Police (IACP), *Practices in Modern Policing: Police-Youth Engagement* (Alexandria, VA: IACP, 2018), accessed October 15, 2019, https://www.theiacp.org/sites/default/files/2018-09/c121613800_Police-Youth-Engage-Modern-Policing_v9_NoCOPS_508.pdf; Center for Children's Law and Policy, *Racial and Ethnic Disparities Reduction Practice Manual* (Washington, D.C.: Center for Children's Law and Policy, 2015), accessed

detectives or detention aides, despite the fact that these positions have daily interactions with youth in custody. Staff bid for the positions based on seniority; there is no system for selecting the candidates with the greatest aptitude for working with youth.

OIG interviewed several JISC processing detectives and detention aides. They generally expressed the belief that specialized training would benefit them in their roles. Without sufficient training and experience, staff risk engaging in negative or potentially harmful interactions with youth; for example, staff may misinterpret symptoms of trauma as signs that a youth is being willfully uncooperative

3. NEITHER CPD'S PREVIOUS NOR ITS CURRENT YOUTH RISK SCREEN MEETS BEST PRACTICES

Best practices for juvenile diversion programs recommend using risk screening and assessment instruments that are empirically validated, short, easy to score, and include protocols to promote consistent results between different users.[48] Neither the Detention and Risk Screen JISC used prior to June 2018 nor the program's current screen have been validated. The screen used before June 2018 lacked written instructions to standardize its use; the current screen offers more instruction, but is far more complex.[49] Using risk screens that are too complex or lack clear written protocols leads to lower replicability and more variation between raters. Screening tools that have not been validated increase the possibility of inappropriate court referral decisions for low-risk youth, and could result in threats to public safety if high-risk youth are inappropriately diverted. Relatedly, youth whose service needs are misidentified by a diversion program may end up co-mingled with higher-risk youth at unnecessary service programs, increasing the risk they will reoffend.

October 15, 2019, http://www.cclp.org/wp-content/uploads/2016/06/Chapter_3_Reducing-Racial-and-Ethnic_Disparities-at-Arrest.pdf, Judicial Council of California Administrative Office of the Courts (AOC) and the Center for Families, Children & the Courts, "AOC Briefing Screenings an Assessments Used in the Juvenile Justice System" (San Francisco Judicial Council of California, 2011), accessed October 15, 2019, http://www.courts.ca.gov/documents/AOCBrief_AssessOnline.pdf, IACP, 2014, Models for Change, 2011, National Center for Mental Health and Juvenile Justice, 2015, and Nebraska Commission on Law Enforcement and Juvenile Justice, 2015

[48] Louisiana District Attorneys Association, *Juvenile Diversion Toolkit* (Models for Change, 2012), accessed October 15, 2019, http://www.modelsforchange.net/publications/553/Juvenile_Diversion_Toolkit.pdf, Jason Smith and Michelle Weemhoff, *Restoring Kids, Transforming Communities* (Lansing Michigan Council on Crime and Delinquency, 2017), accessed October 15, 2019, https://docs.wixstatic.com/ugd/03cb01_858536c9c6ae4e68b3c1985ea9655fac.pdf, Mark A Greenwald, "Enhancing Programming Effectiveness through Data- and Outcome-Driven Reform" (Florida Department of Juvenile Justice (FDJJ), 2014), accessed October 15, 2019, http://www.dj.state.fl.us/docs/car-reports/2013-14_car)_enhancing_effective_programming-(final).pdf?sfvrsn=2, Mulvey et al, 2008, Models for Change, 2011, Models for Change, 2012, Seigle et al, 2014, and Hoffman, 2015

[49] See Appendices A and B for blank copies of those screens

CPD developed these tools in-house and has not submitted them for validity assessments by independent researchers. CPD stated that the screen in use prior to June 2018 was developed with DFSS and IDT to expand the number of referrals to case management, and considers Illinois law, the history of Cook County's juvenile justice system, and "unique local conditions" in Chicago. Similarly, the screen currently in use was developed by CPD in consultation with SGA, and is intended to elicit evidence of service needs to encourage more service referrals.

We note here the difference between the concepts of *risk screening* and *needs assessment* in juvenile diversion. Risk screens are typically brief questionnaires, requiring no more than 10 to 15 minutes to complete, and are used at intake to make initial decisions about each youth who encounters the program, such as their eligibility to participate. They may consider the youth's prior history and the severity of their current offense, as both versions of the JISC screen do, and should be limited to evidence-based risk factors. These screens may help determine a youth's risk of reoffending and may identify the smaller subgroup of youth who would benefit from a needs assessment. Needs assessments differ from risk screens; they are more comprehensive and typically administered later in the juvenile justice process to a smaller group of youth, in part to determine which social services or other interventions would benefit those youth. Risk screens help determine which youth to divert from further involvement in the justice system, then needs assessments determine the appropriate treatments for youth who have qualified for diversion.

CPD's Juvenile Detention and Risk screen confused the concepts of risk screening and needs assessment by taking perceived service needs into account when determining risk. Several CPD staff described a desire to send some youth to services, who are otherwise low-risk and eligible to be diverted from case management and the possibility of prosecution entirely, based on service needs the processing detectives perceived when screening the youth for risk. The 2018 revision of CPD's screen inserts this approach into the risk screen itself. This is troubling in part because CPD's screens have not been validated to predict risk of reoffending or service needs. Conversely, the YASI assessment, which SGA already administers to the referred youth with which it meets, is a validated tool to determine service needs.

Youth who do not complete the JISC service program may face prosecution

This approach is also problematic because the possibility of prosecution underpins service referrals within the JISC program. Youth referred to SGA for services are required to fully participate in those services or they may be prosecuted. According to processing detectives, CPD cannot refer a youth to services through JISC without their consent to this condition. Therefore, when youth who would otherwise have been entirely diverted from both court and case

management are instead sent to SGA for services under this mandate, they are actually moved further into the criminal justice system.

4. AT LEAST 60% OF CPD YOUTH REFERRALS TO SGA WERE NOT MADE IN PERSON

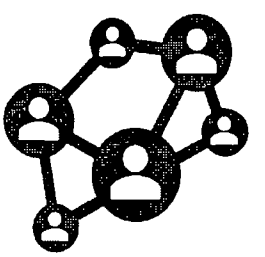
Both CPD and SGA recognize the concept of a "warm handoff," where youth referred to SGA are personally introduced to their case manager by the processing detective on the day they are processed, as a crucial component of JISC that builds trust and supports engagement in treatment. We found, however, that at least 60% of referrals over a 17-month period were not made in person. Instead, the processing detective transferred paperwork from CPD to SGA when a case manager was either not available or some other barrier prevented the handoff. SGA calls these "overflow" referrals. 71% of the overflow referrals within the scope of this audit—43% of all referrals—occurred outside of SGA's regular business hours, when no case managers were present at the JISC facility.

JISC youth referred by warm handoff were twice as likely to receive a YASI needs assessment and a service plan, and three times as likely to receive this assessment within 30 days of arrest. Over half of the JISC youth referred by overflow did not receive a needs assessment at all. During overflow referrals, some cases were lost in the transfer of records from CPD to SGA. These youth were likely never contacted by SGA, which means they would not have received the opportunity to participate in social services.

SGA reported that its business hours were Monday through Friday 9:00 am to midnight and Saturday 2:00 pm to 10:00 pm. SGA was not present at the JISC facility on Sundays. IDT's 2015 review of JISC found similar results in this area, ultimately recommending that SGA expand its on-site hours to meet demand.

5. JISC DOES NOT ENGAGE ALL RELEVANT STAKEHOLDERS OR EMPLOY A MULTIDISCIPLINARY APPROACH TO DIVERSION

CPD's directive promotes a multi-disciplinary approach and interagency partnerships, but JISC does not engage other stakeholders or agencies



CPD and DFSS envisioned JISC as a collaborative program with many partner agencies, consistent with best practice literature.[50] CPD and DFSS have each recognized that collaboration between partners is important to the success of any juvenile diversion program, as is working with community stakeholders. CPD's Special Order

[50] IACP, 2014, Models for Change, 2011, Seigle et al. 2014, Hoffman, 2015, Illinois Mental Health Opportunities for Youth Diversion Task Force, 2018, and OJJDP, 2000

S06-04-06 states, "The Department seeks to enhance the effectiveness of its juvenile delinquency intervention and prevention efforts through the use of a multi-disciplinary approach and expanded interagency partnerships with other juvenile justice agencies, as well as key agencies with the social service, health care, and education systems."[51]

Today JISC is a sole partnership between CPD and DFSS. While SGA is co-located at the JISC facility, its functions are separate from CPD's, which is, in practice, the lead agency. SGA makes its first appearance in the process only after CPD officers complete the arrest processing and screening stages, and then only if the officers choose to refer the youth to SGA. For their part, processing detectives have little involvement with SGA, and not all of them are aware of the agency's role at JISC.

Other key juvenile justice agencies, moreover, have no presence at JISC and little information on the program. The Cook County State's Attorney's Office, Chicago Public Schools, and Cook County Juvenile Probation were slated to have representation at the JISC facility when the program was launched in 2006, but this either did not happen or they are no longer on premises. The Cook County Public Defender's Office also lacks any presence at the JISC facility, and has expressed frustration with the lack of program information JISC shares with stakeholders.

JISC has no charter, no memorandum of understanding, and no governing board directing operations. Instead, the partner agencies operate independently of one another and share little information. As a result, JISC has no shared goals or accountability standards, and lacks the ability to undertake meaningful performance measurement or other self-evaluation activities.

JISC's lack of a multidisciplinary approach also means that it cannot pool resources with other agencies. The program may consequently miss out on cross-agency efficiencies, as well as additional service and intervention opportunities. This sort of fragmented service delivery wastes scarce public resources. Moreover, by not engaging with the relevant community stakeholders, JISC contributes to the apparent lack of trust between entities whose missions could, and should, provide a basis for significant cooperation and collaboration.

RECOMMENDATIONS

10. CPD, working with DFSS and the case management agency, should take steps to develop the JISC facility into something more like the diversion and services

[51] Chicago Police Department Directives System, "Juvenile Intervention and Support Center (S06-04-06)" (issued September 2017), accessed September 18, 2019, http://directives.chicagopolice.org/directives/

center originally envisioned for the program, and less like a typical police station or lockup. This might include aesthetic changes (for example, featuring youth-created art or a community mural), the transformation of arrest processing into a social service-driven intervention that involves case managers early in the process and keeps youth informed of their status, and more direct services offered on site. CPD should also consult with community organizations and subject-matter experts to make JISC a trauma-informed facility.

11. CPD should inform officers how to properly and consistently interpret Special Order S06-04-06 to avoid handcuffing youth to stationary objects unless necessary. When a youth is handcuffed to restrict their mobility, the use of the tactic should be recorded and timestamped in CLEAR, with a description of the basis for the decision to use handcuffs. CPD should periodically review this data to determine how often youth at the JISC facility are being handcuffed and for how long. Insofar as handcuffing youth to stationary objects is being used to prevent escape from JISC's arrest processing area, CPD should develop alternative security features that lessen the risk of retraumatizing the youth.

12. CPD should revise its selection process to allow officers skilled at working with youth to apply for JISC positions. Selection for these positions should be based on merit, not on seniority. To the extent selection is governed by collective bargaining agreements, CPD and the City should work with the relevant unions to develop a process that aligns with this principle.

13. CPD, in consultation with DFSS and subject matter experts in the field of juvenile risk assessment, should replace the current JISC risk screen with an empirically validated risk screening tool that is easy to score and has clear written protocols for its use. The new tool should conform to best practices, including validation through independent studies and incorporation of evidence-based risk factors.

    The protocols for using this tool should make clear that overrides are unfavorable and must be supported by well-documented rationales, and that the program favors diversion to home or services whenever possible. Protocols should provide clear guidance on whether or not screens should be conducted face-to-face with the youth, and provide a script for any in-person screening interactions. CPD should properly train processing detectives on the screening procedures.

    In assessing their options in this area, CPD and DFSS should also consider an alternative means of conducting the risk screen to encourage the use of diversion, such as having processing detectives and case managers perform the screen together in a manner compliant with the Juvenile Court Act.

14. CPD should provide training to its JISC staff on youth development, cultural competence, trauma-informed youth policing, and the program's vision and goals.
15. CPD and DFSS should analyze program data to determine which times of the week have the most JISC arrests DFSS should then ensure that the case management agency) adjusts its hours to ensure that case managers are present at the JISC facility at these times, as a means of minimizing overflow referrals. CPD and DFSS should repeat this analysis on a regular basis. Also, DFSS should include language in the forthcoming JISC case management contract providing for appropriate staffing at peak hours.
16. CPD and DFSS should agree on and implement a case-transfer procedure that ensures overflow referrals are not lost between CPD and the case management agency.
17. CPD and DFSS should engage with other stakeholder agencies in the juvenile justice field, and reassess the value of arranging for such agencies to have a physical or virtual presence at the JISC facility. These discussions should include Cook County Juvenile Probation, the State's Attorney's Office, the Public Defender's Office, Chicago Public Schools, and the Illinois Department of Children and Family Services, among others.
18. CPD and DFSS should engage with community stakeholders and families to ensure accountability for JISC, and to confirm that the program is meeting the needs of the communities it serves. This engagement could take the form of agency partnerships and/or community-meetings, among other tactics.

MANAGEMENT RESPONSE

10. CPD Response: *"CPD has already taken several steps in line with this recommendation, such as presenting artwork in the first and second floor hallways donated by youth artists from the After School Matters Program, creating a joint collaborative mural with staff from SGA, CPD, and youth from the 'Walls of Hope' After School Matters program, as well as flower boxes created by a JISC officer that are now on display in the JISC waiting area. See photos attached 'Item 10 – JISC Artwork.' [Sample photos provided below.]*



"CPD plans to continue its work to make the JISC a more welcoming and family-friendly environment. In coordination with relevant City agencies, CPD plans to redesign the front desk at the JISC so that it does not look like a traditional police station. Rather, CPD hopes to build out the entrance to mirror a community resource center, with service-oriented designs and information front of mind to those who enter.

"CPD is also working to build out a room at the JISC designated for partner agencies to provide direct services to families who have had JISC contact or who live within JISC service areas. CPD will produce a monthly calendar where eligible family members can receive direct contact and consultation with service providers.

"All JISC Detectives will receive refresher training in restorative justice and trauma-informed strategies when interacting with youth.

"As discussed in greater detail below in Item #11, CPD is also evaluating material design changes to its arrest processing room that will diminish the use of youth restraints.

"Finally, CPD would point out that the aesthetic issues at the JISC go well beyond community artwork and trauma-informed design. In fact, these are much easier issues for CPD to address than some of the underlying problems with the facility itself, that include ongoing flooding and leaks, damage and deterioration, and even sewage overflows. CPD hopes that during its overhaul of personnel and practices at the JISC, additional attention can be paid to recognize the facility as deserving of upgrades and repair to make it truly welcoming for all community members and partner agencies."

DFSS Response: *"In our July 18, 2019 memo to the Mayor's Office which was included in the OIG Audit, DFSS advocated for the creation of the advisory council to 1) address the status of arrest level diversion in the City of Chicago, 2) review best practices around municipal diversion for youth and juvenile assessment centers, and 3) develop a city wide strategy around diversion and intervention for youth arrested in Chicago and how resources from the City, County and State could be leveraged.*

"On 11/14/2019 the Mayor's Office and Deputy Mayor Susan Lee convened the JISC /Youth Diversion Advisory Council to discuss these matters and others with a broadly represented group of city, state and County government agencies, advocates, and those with lived experience. Additional subsequent meetings have been called (12/5/2019 (focus on DFSS and CPD priorities and proposed changes), 1/13/2020 (CPD JISC Improvement) and 1/15/2020 (City Priorities for Youth) and discussions continue there focused on how the City will systemically address issues regarding both the JISC and juvenile diversion in general. As a result of this reflective process, stakeholders will develop recommendations to the City and CPD around JISC facility and process improvements and to the City and DFSS for youth diversion models and intended populations.

11. CPD Response: *"As required under the consent decree, JISC command staff is currently in consultation with CPD Research & Development and Legal Affairs on revisions to its policy on restraint of youth arrestees at the JISC, with the goal of developing a workable standard for officers that will ultimately make it less likely that a youth arrestee is placed into handcuffs or restrained. Final policy approval will be subject to review and input from the monitoring team and parties to the consent decree.*

"CPD is also working to redesign its arrest processing room to make it less likely that handcuffs will be used to restrain a youth or child. CPD is removing the bars from the bench that are currently used to restrain youth in handcuffs. Further, CPD is removing the bench and bars entirely from the JISC's secure waiting area

"Finally, CPD plans to align personnel resources in order to properly assist with the security of youth being processed at the JISC, and to appropriately track data metrics on the use of handcuffs or restraints during processing. These decisions will require input and approval from the parties to the consent decree."

12. CPD Response: *"Under the directive of the Superintendent, CPD has currently disbanded the merit selection process. Placement of JISC detectives and officers is subject to CPD's collective bargaining agreements, and CPD has been actively recruiting personnel who have the ideal qualifications and temperament to effectively work in the JISC environment. While maintaining its obligations to its union organizations, CPD will be actively recruiting candidates with the appropriate characteristics to succeed at the JISC, such as previous experience with youth, trauma-informed training, community engagement experience, applicable education background, and prior experience or training in education, psychology, or social services. Most importantly, CPD will continue actively recruiting personnel who understand*

the JISC's mission and commitment to producing the best possible long-term outcome for each child and youth that comes into the center."

OIG Reply: Our recommendation did not refer to CPD's merit selection process, but rather to the need to select JISC staff according to their skills and aptitudes for working with youth. We clarified this with CPD, but the Department declined to modify its response.

13. CPD Response: *"CPD has only recently implemented its latest risk screening instrument in 2018. CPD will of course work with DFSS and other partners to take any evidence-based risk factors into account, and ensure that the risk screening instrument is validated through third-party evaluation. CPD will train its personnel accordingly on any future changes made to the risk screening instrument, including emphasizing that the intention of the tool is to provide appropriate services to youth in lieu of traditional court intervention and prosecution. CPD would note that an override is not always a discretionary decision based upon the detective conducting the screening. There are several common scenarios where an override may be necessary and outside of the detective's control, such as:*
    - *The child does not have a parent or guardian present to accept services;*
    - *The child's parent or guardian refuses services;*
    - *The child's parent or guardian requests court intervention;*
    - *The child is on electronic monitoring for a prior offense; or*
    - *The child has an outstanding juvenile arrest warrant, requiring appearance in court.*

    "CPD remains open and willing to strengthen its partnership and involvement with DFSS at the JISC, including working with case managers to provide input during the risk screening process. CPD notes that this would require a case manager to be available 24 hours a day, seven days per week. CPD has advocated and maintains that having a case manager available at all hours would substantially improve the JISC process and outcomes for children and youth in our care."

14. CPD Response: *"CPD expressed its desire to embolden training for JISC personnel during the Inspector General's audit. CPD has since trained its JISC field team on recognizing and interacting with victims of human trafficking and domestic violence. CPD has already set up classes beginning next month for all JISC detectives on restorative justice practices. CPD plans to require additional training for staff on trauma and human trafficking in association with the Children's Advocacy Center and Cook County Adult Probation's*

Human Trafficking Unit. JISC command staff continues to hold regularly scheduled training to discuss the JISC's programming goals."

15. CPD Response: *"While a staffing assessment is appropriate to ensure that all parties to the JISC are maximizing resources, CPD continues to advocate that families and children that come into the JISC need support at all of hours of the day, every day. CPD maintains that at least one case manager should be present to facilitate service intervention 24 hours a day. However, CPD stands willing to analyze peak times for case referrals but notes that due to the unpredictable nature of the JISC and many factors involved in managing caseloads, resources should be aligned to keep the option for family and social service intervention available at all times."*

    DFSS Response: *"DFSS performed a review and analysis on this matter in 2018 and again in summer 2019 and determined the low referral rates from CPD did not warrant a change in the case management agency's scheduled hours of on-site operation. The case management agency currently operates Mondays-Fridays 10am-midnight and Saturdays 8am-4pm. Per our review of recent program data it was determined over 50% of CPD referrals occurred after hours despite youth arriving at the facility during the case management agency's staffed hours. DFSS believes this delay negatively impacted overflow referrals. DFSS has discussed this matter with the CPD JISC management team and they have committed to reviewing the data and making any necessary policy/processes changes to facilitate, as much as possible, referrals during the case management agency's operating hours.*

    "DFSS will perform regular analysis to determine if any new shifts in staffing are warranted as a result of need and access to youth and families."

16. CPD Response: *"As discussed in Item #15, CPD maintains that keeping a case manager available at all hours of the day will prevent any case overflow referrals. CPD has experienced a much higher probability of a child entering into a service program where a case manager is present on-site for a direct consultation. If the JISC partners agree that this is the primary purpose of the center, resources should be made available to make this a reality for all youth and families that come into the JISC."*

    DFSS Response: *"The current process for case-transfer is that CPD will complete an overflow form if a case management agency case manager is not present at the time. This occurs during the facility's off hours (usually past midnight).*

    "After the case management agency receives the overflow form (usually a physical copy and email a copy), the case management agency reaches out to schedule an intake as soon as possible and process from there.

"The case management agency will document all referrals via email."

17. CPD Response: *"CPD wholeheartedly agrees and has maintained its commitment to the original JISC mission, which included a multi-disciplinary team approach to services and methods of intervention. As discussed in Item #10 above, CPD ultimately envisions the JISC being used as a community resource center, with information and access to local providers and government agencies Upon obtaining agreements from relevant partners, CPD plans to allow members of the community to come in to the JISC regularly to learn about service opportunities for children and families. CPD is working to redesign its building and creating necessary space to accomplish this goal. CPD is already in consultation with partner agencies and is confident that they will participate in this important outreach initiative, and most importantly, utilize the JISC for its intended purpose."*

    DFSS Response: *"In our July 18, 2019 memo to the Mayor's Office which was included in the OIG Audit, DFSS advocated for the creation of the advisory council to 1) address the status of arrest level diversion in the City of Chicago; 2) review best practices around municipal diversion for youth and juvenile assessment centers and 3) develop a city wide strategy around diversion and intervention for youth arrested in Chicago and how resources from the City, County and State could be leveraged.*

    "On 11/14/2019 the Mayor's Office and Deputy Mayor Susan Lee convened the JISC Advisory Council to discuss these matters and others with a broadly represented group of city, state and County government agencies, advocates, and those with lived experience. Additional subsequent meetings have been called (12/5/2019 (focus on DFSS and CPD priorities and proposed changes), 1/13/2020 (CPD JISC Improvement) and 1/15/2020 (City Priorities for Youth) and discussions continue there focused on how the City will systemically address issues regarding both the JISC and juvenile diversion in general. As a result, DFSS defers to the Mayor's Office for next steps that will be determined at the end of this reflective process."

18. CPD Response: *"CPD believes that the aforementioned JISC / Youth Diversion Advisory Council could serve as the appropriate medium to convene communities and families to examine JISC metrics and program goals. In addition to the work being done through CPD's Office of Community Policing to forge stronger relationships with community stakeholders across all spectrums, CPD will work with partners at the Mayor's Office and JISC Diversion Advisory Council to receive input and feedback on the community's expectations in order to improve the lives of youth who contact the JISC. Finally, CPD's reform management protocol under the consent decree also calls for partnerships with community-based organizations to engage with*

youth that have been arrested or are justice-involved. See Illinois v. Chicago, 17-cv-6260, P27."

DFSS Response: *"For the approximately 25% of youth who are referred to DFSS' case management agency, DFSS has already discussed a closer relationship with our current funded youth delegates for referrals and services. Because of the location (10 districts) and threat of violence, it is unlikely that DFSS could encourage youth and their families to engage in services inside the JISC only but to utilize services that are delivered in their community.*

"In addition, we have engaged in conversations with the Center on Conflict Resolution for an expansions of services specifically around family engagement; begun conversation with the Illinois Department of Human Services youth Service Bureau around their crisis intervention dollars (CCBYS) https://www.dhs.state.il.us/page.aspx?item=30768.

"The case management agency has also reached out to certain providers that work exclusively with female young adults which was identified as a need for services. Additionally in December 2019, DFSS made introduction emails to other delegate agencies to encourage partnership between them and the JISC case management agency to foster added referral sites for JISC youth."

FINDING 4: WHILE JISC DIVERTS MANY YOUTH FROM COURT, IT PRODUCES INCONSISTENT AND INEQUITABLE RESULTS FOR THE YOUTH IT SERVES.

OIG found that the existence of JISC is probably not leading officers to arrest more juveniles than they otherwise would, and that the vast majority of eligible arrestees were brought to JISC for processing. However, we also found inequities in the process for determining which JISC arrestees were diverted from further involvement in the justice system, and that, in some cases, SGA recommended unwarranted social service treatments.

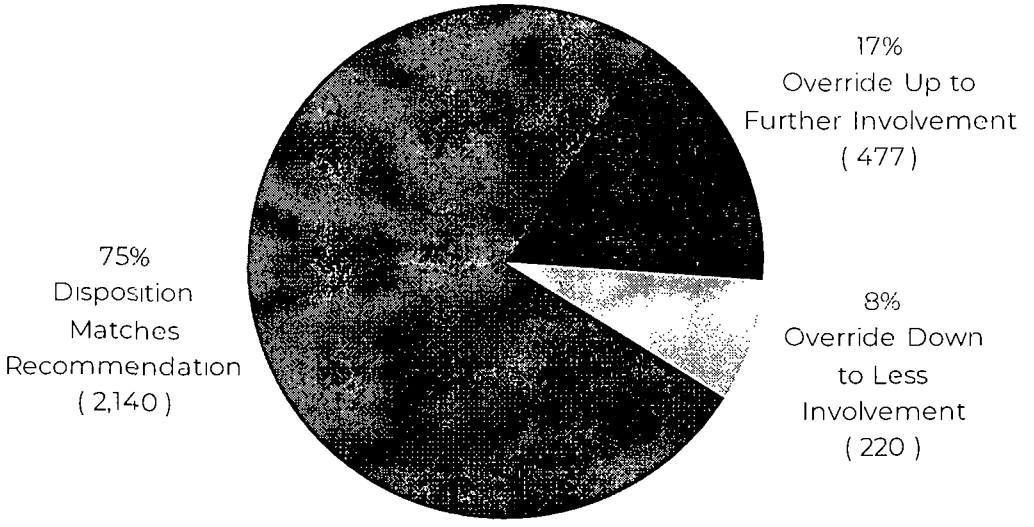
1. CPD PROCESSING DETECTIVES OVERRODE 25% OF DISPOSITIONS RECOMMENDED BY THE RISK SCREEN, AND OVERRIDES WERE TWICE AS LIKELY TO BE "UP" TO FURTHER INVOLVEMENT IN THE JUSTICE SYSTEM THAN "DOWN" TO LESS INVOLVEMENT.[52]

Best practices for juvenile diversion programs agree that risk screens determining program eligibility should be prescriptive and that overrides should be rare and narrowly defined. The Models for Change Risk Assessment Guidebook, for example, recommends that diversion agencies re-examine their policies and procedures if the override rate exceeds 5 to 10% of cases.[53] While some user discretion over the screen is needed to account for unusual cases, an excess of discretion may allow inappropriate decisions regarding who is diverted and who is sent further into the justice system, especially when that discretion is exercised by officers who lack specialized training.

As Figure 12 illustrates, processing detectives overrode the JISC Detention and Risk Screen's disposition recommendations in 25% of cases, typically sending these youth further into the JISC process than the tool recommended.

[52] CPD raised a concern that juvenile arrest record expungements could have distorted the data supporting this finding. OIG pursued this possibility as part of our data reliability assessment and found it unlikely that expungements had an impact on this finding or led us to the wrong conclusion. We describe our data reliability assessment methodology in section IV.C.2 of this report.
[53] Models for Change 2012, 39.

FIGURE 12: OVERRIDES WERE TWICE AS LIKELY TO BE "UP" TO FURTHER INVOLVEMENT IN THE JUSTICE SYSTEM THAN "DOWN" TO LESS INVOLVEMENT IN THE JUSTICE SYSTEM[54]



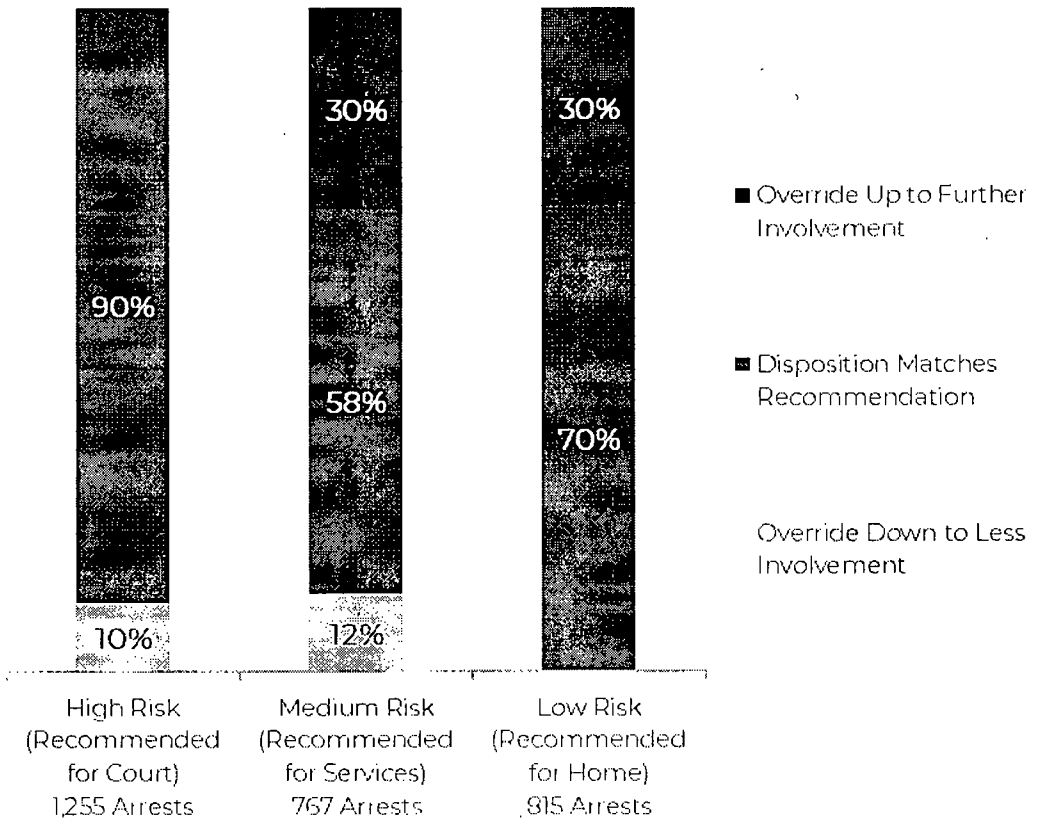
Source OIG visualization of CPD CLEAR data

The JISC Detention and Risk Screen bases a youth's risk level on their prior arrest history and the severity of the current charge. In the year we analyzed, high-risk youth comprised 44% of JISC-processed arrests, while medium-risk youth comprised 27% and low-risk youth 29%.[55] In terms of actual dispositions over the same period, 51% of JISC-processed arrests were referred to court, 23% were referred to SGA for case management services, and 26% were sent home without further intervention. JISC processing detectives overrode recommended dispositions for medium-risk youth 42% of the time (the majority overridden up), as shown in Figure 13. These youth are the target group for JISC's case management services, yet their risk screen recommendations were overridden most frequently.

[54] OIG obtained these results from a total population of 3,292 arrests that were both processed at JISC and contained only JISC-eligible charges. The figures do not include arrests with undetermined dispositions (9, or 0.3% of the total), nor arrests that were not booked (8, 0.3%). They also do not include arrests that include charges of unknown severity (438, or 13.3% of all JISC-processed arrests), the vast majority of which (97.0%) were for outstanding warrants.

[55] "High-risk" youth have five or more previous arrests, were arrested for a felony offense, or both. "Medium-risk" youth have one to four prior arrests and were arrested for a non-felony offense. "Low-risk" youth have no prior arrests and were arrested for a non-felony offense.

FIGURE 13: JISC PROCESSING DETECTIVES FREQUENTLY OVERRODE SERVICE INTERVENTION RECOMMENDATIONS INVOLVING MEDIUM-RISK YOUTH



Source: OIG visualization of CPD CLEAR data

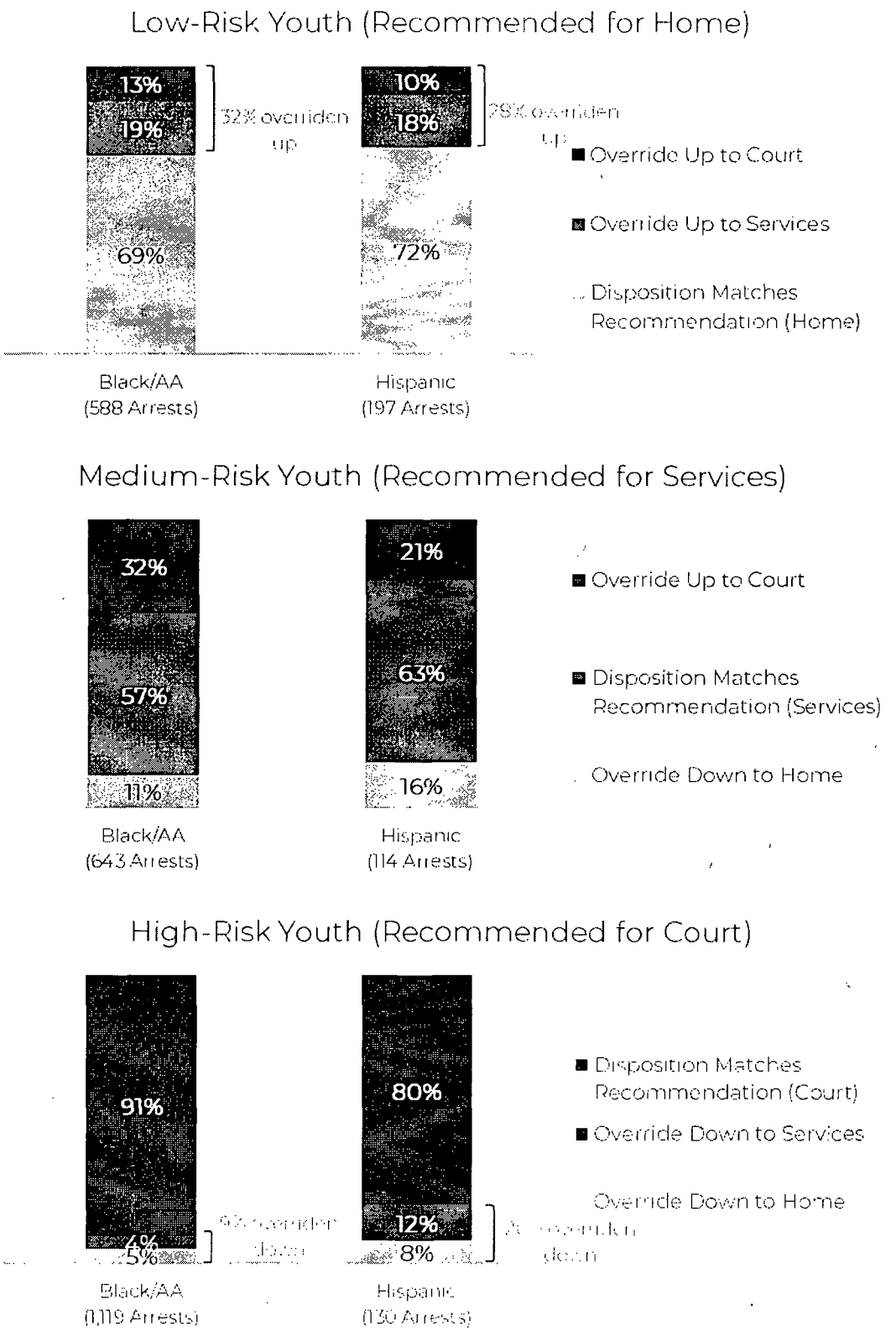
OIG examined demographic factors by comparing the dispositions for JISC-processed youth of the same risk levels.[56] Figure 14 shows that African American youth processed at JISC were more likely to be overridden up to further involvement in the justice system, and less likely to be overridden down to less involvement, than Hispanic youth in the same risk category. While we attempted to include White, Asian/Pacific Islander, and youth of unknown races in this comparison, we found that

[56] These risk levels were identified by the JISC Detention and Risk Screen which, as we have noted, is not an empirically validated tool. The tool automatically assigns a risk level based on a youth's number of prior arrests and the severity of their current charge. The screen provides that high-risk youth are to be referred to court and may or may not be detained; that medium-risk youth are to be referred to SGA for services, and that low-risk youth are to be released to their guardians ("sent home") without further obligations. To categorize the youth in our population for this analysis, we grouped them based on the underlying risk factors recorded in CLEAR for each youth, not based on the screen itself. This allowed us to make an apples-to-apples comparison of the JISC case disposition/override results for youth with similar numbers of prior arrests who were being processed for charges of similar severities.

the total numbers of JISC-processed arrests in these categories (41, 2, and 3 arrests respectively) prevented a valid comparison to the larger numbers of African American and Hispanic arrestees. The larger numbers of African American and Hispanic arrestees are likely due to the location of the JISC catchment area, which covers mostly African American and Hispanic communities.[57]

[57] See Figure 3 in the Background section

FIGURE 14: OVERRIDES OF SCREEN RECOMMENDATIONS BY RACE[58]

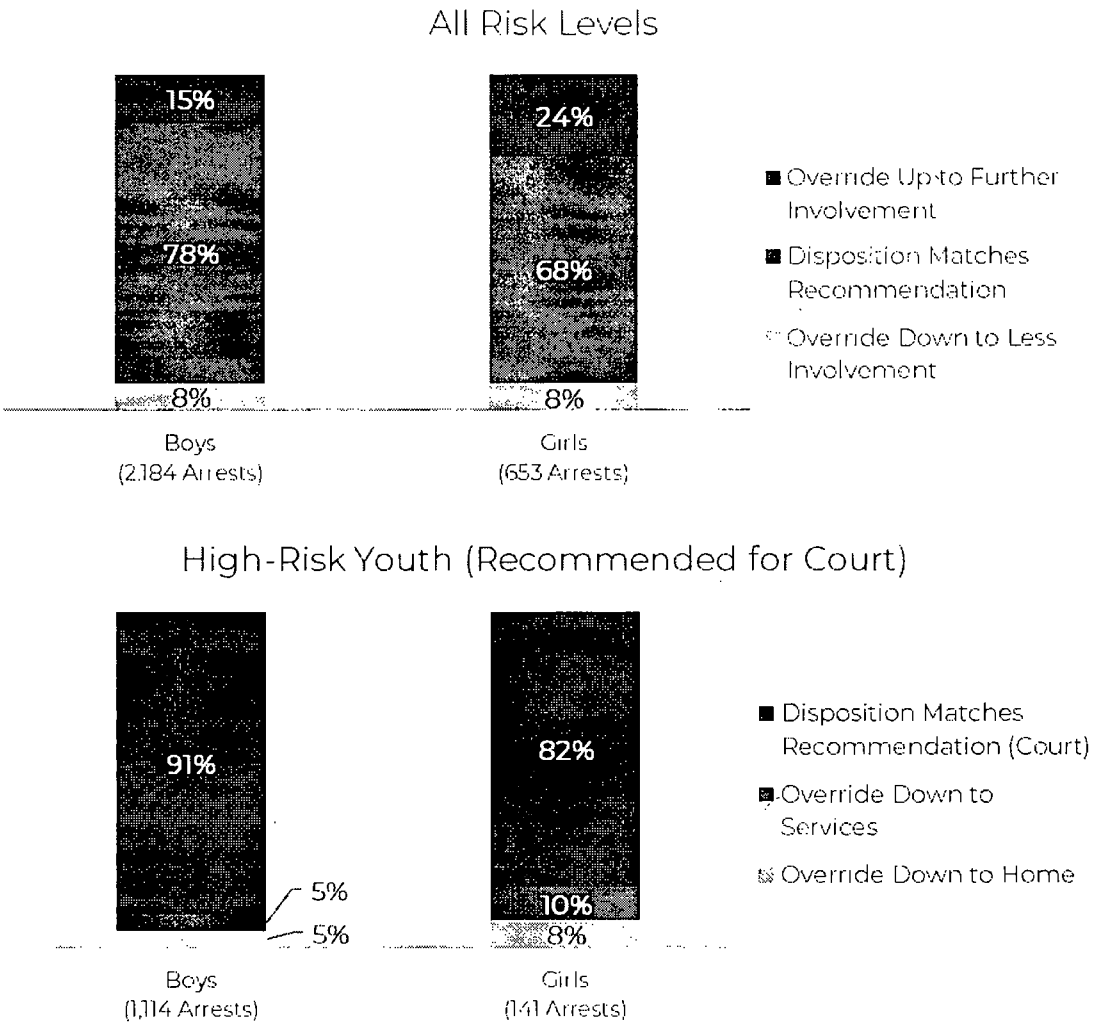


Source: OIG visualization of CPD CLEAR data

Figure 15 shows that, overall, girls were more likely than boys to be overridden up to further involvement. However, high-risk girls were more likely to be diverted from court than high-risk boys. CPD stated that girls more often experience domestic violence and similar family issues, which may lead processing detectives to refer a larger percentage to social services.

[58] CLEAR uses the codes "API" (Asian/Pacific Islander), "BLK" (Black non-Hispanic/African American), "WBH" (Black Hispanic), "WHI" (White non-Hispanic), "WWH" (White Hispanic), and "U" (Unknown) to record arrestees' races. CLEAR race data is limited in that it does not include all race identities nor an option for people of more than one race, and in some cases the arresting officer records race based on their own determination rather than self-identification by the subject. We grouped the youth in our analysis such that "Black/AA" contains those youth listed as "BLK" in CLEAR, "White" contains those listed as "WHI", and Hispanic includes those listed as either "WBH" or "WWH". These results do not include JISC arrestees that were not booked or whose ultimate disposition could not be determined (17, or 0.6% of the total). They also do not include arrests that include charges of unknown severity (438, or 13.3% of all JISC-processed arrests), the vast majority of which (97.0%) were for outstanding warrants. Due to rounding, percentages may not add up to 100.

FIGURE 15: GIRLS IN THE HIGH-RISK CATEGORY WERE DIVERTED FROM COURT MORE OFTEN THAN BOYS[59]



Source: OIG visualization of CPD CLEAR data

In the year of data OIG analyzed, processing detectives overrode the risk-screen recommendation and sent a juvenile further into the criminal justice system in 477 cases—17% of the total. Studies have shown that youth sent further into the criminal justice system than called for by the risk they pose are more likely to reoffend.[60]

[59] These results do not include arrests with undetermined dispositions (9, or 0.3% of the total), nor arrests that were not booked (8, 0.3%). They also do not include arrests that include charges of unknown severity (458, or 13.3% of all JISC-processed arrests), the vast majority of which (97.0%) were for outstanding warrants. Due to rounding, percentages may not add up to 100.

[60] Florida Department of Juvenile Justice (FDJJ), "Structured Decision Making and the Disposition Matrix" (FDJJ, 2012), accessed October 18, 2019, http://www.dj.state.fl.us/research/latest-initiatives/juvenile-justice-system-improvement-project-(jjsip)/structured-decision-making-and-the-disposition-matrix, Wilson and Hoge, 2013, National Institute of Justice Practice Profile: Models for Change, 2012, and Seigle et al, 2014.

Moreover, to the extent that overrides have disproportionate relationships with race and gender in some categories, they may raise concerns about possible inequities in the program, particularly in its treatment of African American youth.

CPD gives JISC processing detectives wide latitude to determine case dispositions; in many cases they can freely override the dispositions recommended by the screening tool. In other cases their diversion options may be more limited. For example, fewer release options may be available when processing youth in the care of the State. Some processing detectives stated that at times they make screening decisions based on their perceptions of a youth's attitude, from their own "gut," or based on other subjective feelings about the youth they are screening, rather than evidence-based risk factors. Watch coordinators must approve the dispositions, but in practice they rarely reject them, and, in some cases, they do not review them before youth are released from the JISC facility.

Processing detectives also noted that consent from both the youth and their guardian is needed to make a case management referral to SGA. When this consent is withheld, processing detectives may elect to refer the youth to court, to impose some measure of accountability, rather than follow the risk screen recommendation and divert the youth from possible prosecution. Because court referrals stemming from refused referrals to SGA are not consistently recorded in CLEAR, OIG could not determine the number of arrests that fell into this category.

2. THE JISC PROGRAM DID NOT INCREASE THE NUMBER OF ARRESTS FOR STATUS OFFENSES OR SCHOOL-RELATED INCIDENTS AND DIVERTED MANY YOUTH FROM COURT, BUT IT ALSO SENT CERTAIN CATEGORIES OF ARRESTEES FURTHER INTO THE JUSTICE SYSTEM AT THE POINT OF PROCESSING.

Juvenile diversion best practices caution against a phenomenon known as "net widening"—i.e., causing more youth to become involved in the criminal justice system than would have without the program.[61] To assess JISC on this front, OIG compared the numbers of arrests for status offenses and arrests occurring at schools inside and outside the JISC catchment area.[62]

Arrests for status offenses were very rare overall—only 22 out of 8,081 total juvenile arrests, or 0.3%—and there is no evidence they occurred more frequently within JISC

[61] Office of Juvenile Justice and Delinquency Prevention (OJJDP), "Juvenile Justice Bulletin The Community Assessment Center Concept" (OJJDP, March 2000), accessed October 18, 2019, https://www.ncjrs.gov/pdffiles1/ojjdp/178942.pdf. Models for Change, 2011. Hoffman, 2015, and OJJDP, 2017

[62] Status offenses are those chargeable against juveniles but not adults. Examples include possession of alcohol by a minor and curfew violations. We provide further detail on this analysis below in the Methodology section

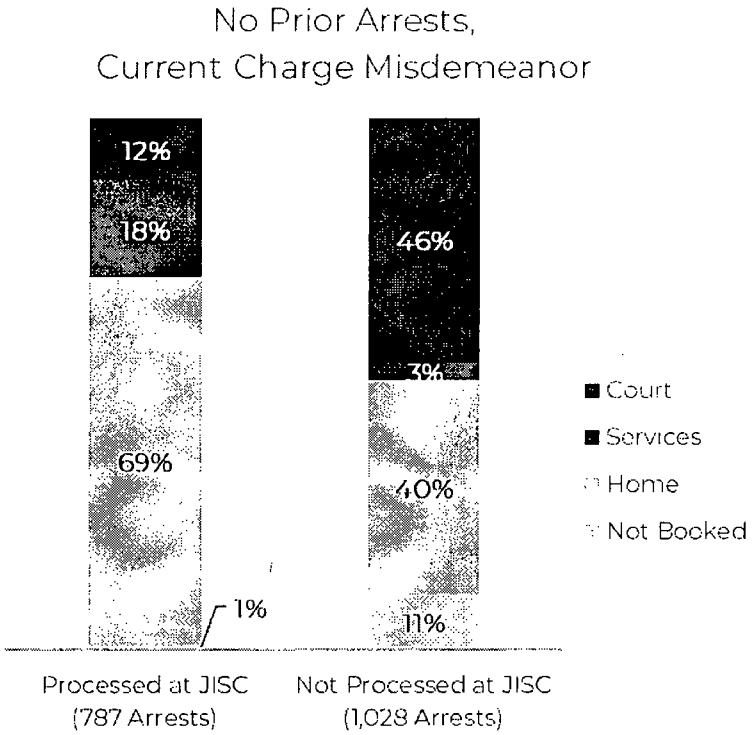
districts than outside of them.[63] Arrests at schools were slightly more common outside of JISC districts (22% of juvenile arrests) than within (17%). Taken together, these figures suggest that it is unlikely the existence of JISC is causing officers to arrest more youth.

Looking broadly at case dispositions, we see that JISC does indeed divert many youth identified as low and medium-risk from court, compared to similar youth processed outside of JISC. Yet counterintuitively, some youth appear to have been sent further into the criminal justice system through JISC than comparable youth processed elsewhere.

At JISC, dispositions for low-risk youth—those with no prior arrests who were processed for a misdemeanor arrest—tended to favor complete diversion from the justice system (69% versus 40% when processed elsewhere), and a smaller portion of this category of youth were referred to court (12% versus 46%). These results are shown in Figure 16. Note that 11% of low-risk youth processed outside of JISC were not booked at all. According to CPD, the reason for this is not clear.

[63] The 8,081 figure varies slightly from the 7,786 juvenile arrests reported in the report background because it contains arrests that were not booked. We include unbooked arrestees here because this part of our analysis concerns the decision in the field whether to arrest a youth. Whether the arrest was later booked as part of processing is immaterial to this initial decision.

FIGURE 16: COMPARED TO NON-JISC CPD OPERATIONS, JISC DIVERTS A GREATER PORTION OF LOW-RISK YOUTH[64]

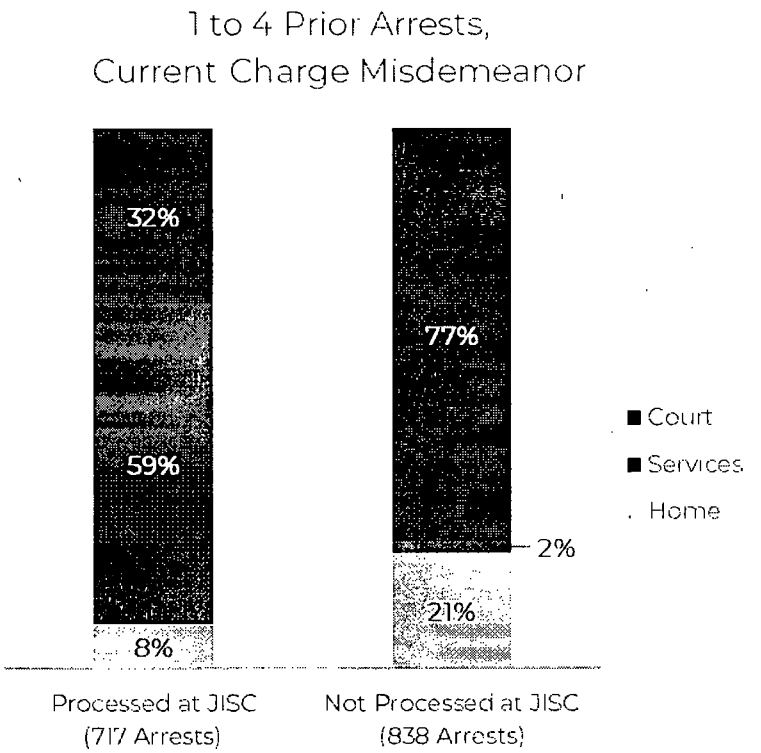


Source: OIG visualization of CPD CLEAR data

The JISC Detention and Risk Screen provides that medium-risk youth—those who have one to four prior arrests and are currently being processed for misdemeanors—are the best candidates for case management services. A smaller portion of medium-risk youth processed at JISC were referred to court compared to those processed elsewhere (32% versus 77%). By the same token, however, a smaller portion of medium-risk JISC arrestees were sent home (8% at JISC versus 21% elsewhere). This suggests that while JISC generally diverted more medium-risk youth from possible prosecution, it referred some youth to case management who likely would have been diverted from the system entirely and sent home had they been processed outside of JISC. Note, too, that a case management referral requires the arrestee to complete the service program or face possible prosecution. The bottom line is that youth in this category who were processed at JISC remained in the system in one way or another at higher rates than non-JISC juvenile arrestees. These numbers are shown in Figure 17.

[64] These results do not include arrests with undetermined dispositions (13, 0.7% of total) or for which JISC processing was uncertain (19, 1.0%). These percentages also vary slightly from the chart in Figure 13 because they exclude arrests for Business, Local, or Petty Offenses that are not misdemeanors (78 arrests). Due to rounding, percentages may not add up to 100.

FIGURE 17: THE YOUTH JISC'S RISK SCREEN TARGETS FOR SERVICES RECEIVE MIXED DISPOSITIONS, BUT FEWER GO TO COURT THAN OUTSIDE OF JISC[65]

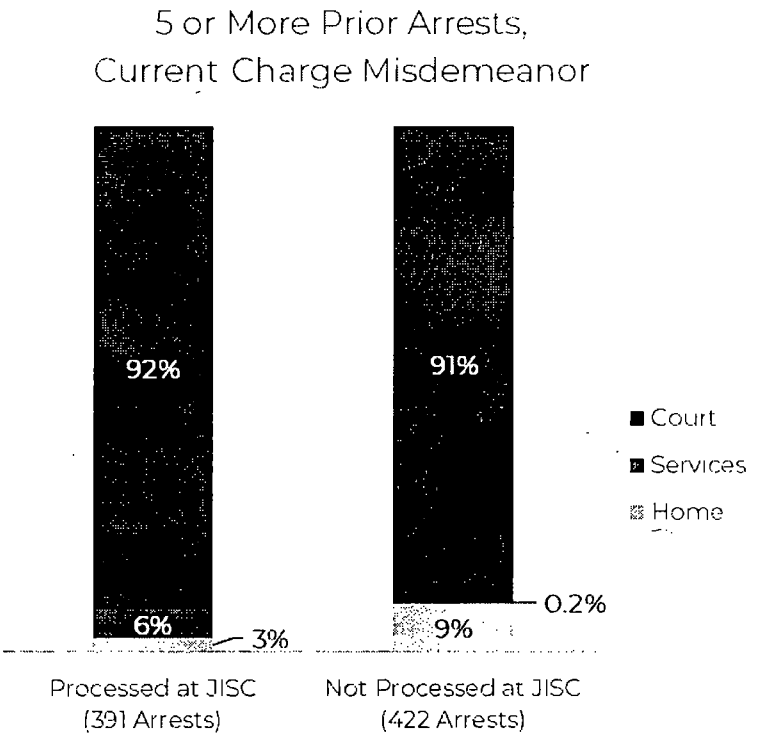


Source: OIG visualization of CPD CLEAR data

Figure 18 shows that youth with five or more prior arrests were diverted from court in similar numbers whether processed at JISC or elsewhere, though at JISC some of them were sent to services rather than diverted entirely. Again, these youth must complete the prescribed services or face the possibility of prosecution.

[65] These results do not include arrests with undetermined dispositions (17, 1.1% of total) or for which JISC processing was uncertain (2, 0.1%). These percentages also vary slightly from the chart in Figure 13 because they exclude 83 arrests for Business, Local, or Petty Offenses that are not misdemeanors. Due to rounding, percentages may not add up to 100.

FIGURE 18: CPD REFERS THE VAST MAJORITY OF JUVENILE ARRESTEES WITH 5 OR MORE PRIOR ARRESTS TO COURT; THOSE DIVERTED AT JISC ARE USUALLY REFERRED TO SERVICES[66]

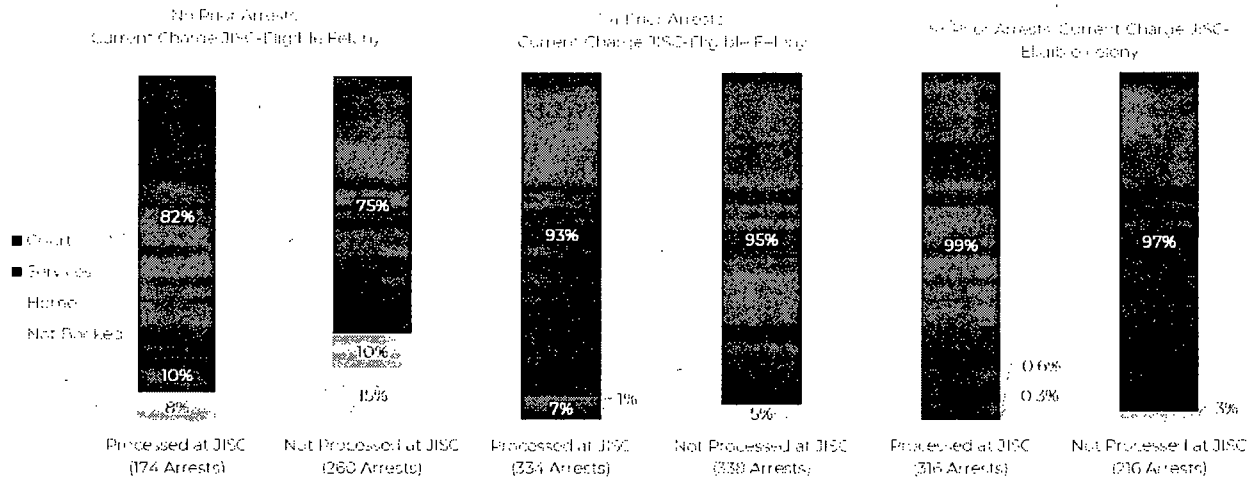


Source: OIG visualization of CPD CLEAR data

Youth arrested for JISC-eligible felonies—excluding, e.g., homicide, possession of a firearm, and sex offenses—were most frequently sent to court, regardless of their number of prior arrests or where they were processed. JISC did not divert large numbers of these youth compared to those processed elsewhere. Notably, however, outside of JISC, CPD booked only 85% of felony arrestees with no prior arrests, while JISC booked 100% of such arrestees. Here again, CPD is not certain why this discrepancy exists. Figure 19 shows the case dispositions for youth felony arrestees.

[66] These results do not include arrests with undetermined dispositions (6, 0.7% of total) or for which JISC processing was uncertain (1, 0.1%). These percentages also vary slightly from the chart in Figure 13 because they exclude arrests for Business, Local, or Petty Offenses that are not misdemeanors (54 arrests). Due to rounding, percentages may not add up to 100.

FIGURE 19. COMPARABLE PERCENTAGES OF YOUTH ARRESTED FOR FELONIES ARE SENT TO COURT, REGARDLESS OF WHERE THEY ARE PROCESSED[67]



Source: OIG visualization of CPD CLEAR data

As mentioned, JISC case management referrals come with a mandate to complete the prescribed program or face potential prosecution. Absent a means of connecting arrestees to services without imposing this mandate, JISC may actually send a youth further into the justice system than warranted by the risk they pose through the well-meaning act of connecting them with social services. Ultimately, this could increase their likelihood of reoffending.

Several CPD members described the value they perceived in SGA's services and their desire to connect youth with the agency, rather than allowing them to leave JISC with no measure of accountability. Currently, however, JISC cannot connect youth to services without a Conditions of Station Adjustment mandate. As a result, a low-risk juvenile arrestee who CPD believes would benefit from services faces the same mandate to complete services as higher-risk youth. As discussed above, processing detectives have wide latitude to override recommended case dispositions to make these referrals, and watch coordinators do not always review these dispositions for approval before an arrestee leaves JISC.

[67] These results do not include arrests with undetermined dispositions (28.17% of total) or for which JISC processing was uncertain (18.37%). Due to rounding, percentages may not add up to 100.

3. 89.9% OF JISC-ELIGIBLE YOUTH ARRESTEES WERE PROCESSED AT THE JISC FACILITY, PER CPD DIRECTIVE

CPD Special Order S06-04-06 requires processing all eligible juvenile arrests within the JISC-served police districts at the JISC facility. When a JISC-eligible arrestee is processed elsewhere, they are not offered diversion through JISC case management, they may never be made aware that they were eligible to be offered diversion through JISC, and they are more likely to be referred for possible prosecution. OIG determined that CPD processed 89.9% of JISC-eligible arrests at the JISC facility.

The fact that at least 8.8%, and possibly as many as 10.1%, of JISC-eligible arrestees were processed elsewhere may be attributable to a variety of explanations.[68] Special Order S06-04-06 states that certain arrests will be processed first at the arresting officer's unit facility and then transferred to JISC for further processing. This is required, for example, when a youth is arrested with an adult, or when CPD amends a youth's charges from JISC-ineligible to JISC-eligible offenses. According to CPD, because such youth are already in time-limited secure custody, rather than spend additional time transporting them to the JISC facility, the Department may decide to finish processing the arrest and release them.

A JISC supervising lieutenant also stated that CPD officers may process youth at their unit stations simply out of habit, or because they feel more comfortable processing arrests there. This highlights the need for further training on the requirement to process all eligible offenses at JISC. In some cases, where the severity of the offense is on the borderline, an officer may be unsure where to process a juvenile arrest. For example, charges involving "great bodily harm" are ineligible for JISC processing, but the definition of that term is left to the interpretation of arresting officer.

4. SGA INCLUDED LOW OR NO-RISK TREATMENT AREAS IN 34.7% OF ITS CASE MANAGEMENT PLANS.

SGA strives to administer the YASI needs assessment to each arrestee referred for case management through JISC. This tool identifies a youth's particular service need areas, such as school assistance, family mediation, or alcohol/drug abuse counseling. SGA uses YASI to develop individualized plans by assigning risk levels to service need areas, then choosing which to set as treatment priorities. The case manager refers each youth to programs and services that address their prioritized needs.

SGA required its case managers to select a minimum of one and a maximum of three priority service areas for each youth receiving a YASI, even if these did not match their actual needs. 34.7% of the JISC treatment plans SGA developed—representing 270

[68] OIG could not conclusively determine from the data whether the remaining 1.2% of arrests were processed at JISC or elsewhere.

youth cases—contained priority areas that the YASI assessment identified as low-risk or no-risk. As a result, the plans overprescribed services in these areas (though it is unknown what percentage of the youth actually received these services). Sorted by gender, 54% of girls' treatment plans were overprescribed in this manner, compared to 28% of boys' plans. SGA has acknowledged that sending low-needs youth to unnecessary services may do more harm than good and could ultimately increase the risk of recidivism.

RECOMMENDATIONS

19. CPD should configure CLEAR so that the JISC processing detective who processes each youth and the watch coordinator who approves the disposition are identified in a youth's electronic record. CPD should then periodically review processed JISC arrests and dispositions—including overrides—by associated personnel to identify patterns.
20. JISC watch coordinators should review all case dispositions in real time, before cases are disposed of and youth leave the JISC facility. These reviews should consider processing detectives' documented reasons for overriding the risk screen's recommended dispositions and should reject any inappropriate overrides.
21. In keeping with JISC's intended design as a social services-driven intervention center, CPD should implement a process for offering youth social services without prosecution as a consequence if the services are not completed. This will allow youth who would normally be entirely diverted from the justice system (i.e., "sent home with nothing") the opportunity to connect with a case manager if they or their guardians feel it would benefit them, without sending that youth further into the justice system process as a condition for doing so.
22. CPD should make clear to all field officers that they are required to bring eligible arrestees to JISC for processing per Special Order S06-04-06. When a JISC-eligible arrestee is not processed at JISC, CPD officers should clearly document why they were not, and the Department should offer the youth the same diversion opportunities as JISC-processed youth. To this end, CPD should consider developing a virtual JISC disposition process for use at other CPD stations.
23. CPD should share information on Special Order S06-04-06 with the public, especially those living in the JISC catchment area, so that youth arrested for JISC-eligible offenses are aware of the potential opportunity of diversion through the program. At a minimum, posters describing what JISC means for juvenile arrestees should be displayed at CPD stations in places visible to such arrestees during processing.

24. SGA should revise its JISC policies to reflect that low-needs and no-needs areas identified by the YASI needs assessment should not be serviced. If the assessment reveals that a youth has no areas of medium or high need, SGA should pursue alternative means of case management. The agency should ensure that its case managers are aware of and adhere to the revised policy.

MANAGEMENT RESPONSE

19. CPD Response: *"CPD notes that this is already in practice at the JISC. The processing JISC detective is already identified electronically in CLEAR, and the JISC watch coordinator reviews all arrests and submissions for approval, including overrides. JISC command staff reviews processing forms and overrides as well for patterns that are inconsistent with the mission of the JISC."*

20. CPD Response: *"JISC watch coordinators do review cases in real time, and are trained to review the case before the youth leave the JISC Facility. During their review, JISC watch coordinators can reject the override of a detective that is inconsistent with the JISC policies. As discussed previously, many times the override is not actually discretionary, but is due to barriers to service intervention that require an override that the detective cannot control. CPD does plan to provide refresher training for supervisors to emphasize this practice, and to emphasize the JISC mission to process youth in accordance with their risk screening assessment with a preference for services in lieu of prosecution where the interests of public safety allow."*

    OIG Reply: As a matter of policy, watch coordinators are instructed to review JISC cases and disposition decisions—including overrides—in real time. However, several JISC staff confirmed that this was often not done in practice, and OIG even observed a case in a watch coordinator's work queue in which the youth had been discharged before the disposition was reviewed. The difference between policy and actual practice is at the heart of this finding and recommendation.

21. CPD Response: *"As discussed previously, CPD strongly recommends that a case manager be present on-site at all hours in order to engage children and families in need of services at the first point of contact. CPD believes that the JISC should ultimately serve as a point of contact for services for any family in a JISC-eligible service area that feels their youth or child could benefit. As such, even if a risk screening would otherwise allow JISC staff to divert a child entirely, CPD agrees that if the family would like to engage further in services they should have that option. CPD will continue to provide refresher training on the JISC goals and mission to its assigned personnel. Finally, JISC command staff has been coordinating with districts to identify alternative*

options for service referrals in these circumstances, where the youth may be ineligible for a traditional referral to the existing case management agency. CPD agrees that there are circumstances where the option to connect a low-risk youth or child to a case manager without the consequence of prosecution could yield substantial benefits. CPD will explore creating such a path to services with its case management agency partners and the JISC Advisory Council.

"Additionally, CPD does recognize that there are situations where a youth can benefit from having conditions attached to a service referral. The JISC is a social service intervention center, and in some circumstances the likelihood of long-term success of social service intervention for a particular individual may improve where conditions are attached to a services plan. To this end, CPD has advocated for a restorative justice municipal court call for youth in JISC service areas as an additional path to incentivize completion of referred programming, without requiring the youth be subject to formal criminal prosecution. In other words, there is no consequence of prosecution associated with this proposal, but the sole purpose is to re-engage with youth who did not take advantage of the case manager's services plan. Particularly for youth committing ordinance violations or misdemeanor offenses who are not eligible for a formal referral but are at risk of escalating criminal behavior, CPD believes services attached to a restorative justice municipal court date could be a useful tool to engage children who may not follow through with a service referral without conditions. The goal would be to reduce the likelihood that the child commits a criminal offense by engaging him or her in services at an earlier stage, and ensuring that the youth and family follow through with the proper type of intervention and support that is needed to address the behavior."

22. CPD Response: *"CPD has committed to work with the Education & Training Division to create a streaming video training module for Department members outlining the JISC process and Special Order S06-04-06. Additionally, refresher training of JISC personnel will help to remind them to inform officers in the field when they make a notification of arrest to bring the youth to the JISC if in an eligible service area. Finally, CPD agrees that the arresting officers should document when a JISC-eligible youth is processed at a different station or facility, and should use the JISC risk screening instrument in these instances. Youth Investigations Division will work with Research & Development to revise CPD's orders accordingly.*

"CPD will examine the feasibility of developing a virtual JISC processing platform for arrests of JISC-eligible youth outside of the center."

23 CPD Response: *"CPD's JISC personnel will engage in a community awareness campaign, including establishing a social media site, posters, informational*

materials, community and beat meeting attendance, and other engagement opportunities that provide an opportunity to educate the public about the potential for court diversion and service intervention at the JISC."

24. CPD Response: *"SGA Additionally, CPD is compiling a list of services for families that may have other needs that are not apparent in the YASI needs assessment, and will be prepared to help these families in any way possible."*

    DFSS Response: *"DFSS will create a policy that allows the current case management agency to defer services for youth that are considered low needs and no needs. Currently, those youth are mostly referred to the Center for Conflict Resolution for mediation services."*

IV. OBJECTIVES, SCOPE, AND METHODOLOGY

A. OBJECTIVES

The objectives of the audit were to determine if JISC is designed according to best practices for law enforcement-based youth diversion, and if JISC's implementation of diversion programming is consistent with its goal of reducing youth recidivism.

B. SCOPE

The audit's scope includes an assessment of the effectiveness of the JISC program's design and implementation in achieving its stated goal of reducing youth recidivism. This includes program components administered by CPD, DFSS, and DFSS' contracted case management agency, SGA Youth & Family Services. For performance-based assessments, OIG analyzed records of juvenile arrests within the City of Chicago with arrest dates from June 1, 2017 through May 31, 2018. For design assessments, OIG reviewed JISC program documentation in use during the same period. Our assessment of SGA data quality also included arrest cases referred to SGA during 2016 and 2017. We conducted interviews in 2018 and 2019, and considered both current and recent program practice. To the extent the JISC facility itself was relevant to our review, we relied on evidence gathered on our visits there during audit fieldwork in 2018 and 2019. Where updates to JISC program practice were made during the audit period, OIG also attempted to review the updated documentation and procedures.

The audit's scope does not include the activities of arresting officers within JISC districts, the relationship of school resource officers to JISC or youth arrests, financial risk associated with JISC's CPD or DFSS budgets, performance assessments of personnel working at JISC, the impact of JISC on the efficiency of CPD or DFSS' operations, or efficiency of JISC itself.

C. METHODOLOGY

1. AUDIT FIELDWORK

To develop standards for comparison based on best practices for juvenile justice diversion programs, OIG interviewed individuals from 12 juvenile justice agencies not directly affiliated with JISC. These included government agencies whose work intersects with the juvenile justice system, as well as advocates, researchers, and subject matter experts in and outside Chicago. OIG also consulted literature from 20 agencies describing recent research on the topic and identifying best practices. These included consortia of juvenile justice and diversion professionals, research institutions, and other jurisdictions employing juvenile diversion programs. We identified those

program elements that were consistent across multiple sources as suitable best practices criteria. We enlisted the help of attorneys from OIG's Legal section to interpret legal criteria, such as the Juvenile Court Act and Local Records Act.

To assess JISC's program design, we visited the JISC facility multiple times and interviewed processing detectives, detention aides, case management staff, and program management at CPD, DFSS, and SGA. In order to gain a holistic perspective, we also interviewed 12 youth and young adults who had been previously arrested and processed at the JISC facility, as well as public sector agencies, advocacy groups, and researchers who have encountered JISC or similar populations of youth. We reviewed JISC's operations, operational documents, and data systems to determine the extent to which the program adhered to best practices.

To assess SGA's development of youth treatment plans against their identified needs, we reviewed all YASI assessment results and associated case plans for JISC youth recorded into SGA's Orbis database from the beginning of 2016 to September 2018. We compared each youth's scores and associated risk levels in several treatment areas (as identified by the YASI) against the treatment priorities the case manager had identified for that youth.

To determine whether all JISC-eligible arrests were processed at JISC per policy, we first exported a list of all juvenile arrests citywide from June 1, 2017 through May 31, 2018. We then filtered out arrests that occurred outside the JISC service area, and removed all arrests containing charges that were not eligible for JISC. The determination of which charges were JISC-eligible was made in consultation with attorneys from OIG's Legal section using the exceptions in CPD's JISC directive.[69] We then determined which juvenile arrests were processed at JISC by identifying arrests that had some combination of JISC listed as the arrest's holding facility, JISC processing mentioned in the arrest narrative, or a recorded JISC entry time. We relied on this two-factor system to identify JISC-processed arrests after CPD management alerted us that, taken alone, the JISC entry fields and holding facilities listed in CLEAR were not wholly reliable indicators of JISC processing.

To determine whether the presence of JISC was associated with officers arresting more youth than they otherwise would have, the lack of pertinent, reliable data forced us to rely on proxy factors. Using the list of total juvenile arrests cited above, we compared the percentages of overall juvenile arrests made for school-related offenses and for status offenses within the JISC catchment area and outside of it. If the availability of JISC was correlated with a higher share of arrests for status offenses and at schools, this would suggest net widening, based on the premise that officers may

[69] Chicago Police Department Directives System, "Juvenile Intervention and Support Center (S06-04-06)" (issued September 2017), accessed September 18, 2019, http://directives.chicagopolice.org/directives/

be reluctant to arrest juveniles for such offenses generally but more willing if they knew an alternative to prosecution was available. We consulted with CPD JISC management and the OIG Legal section to identify status offenses and school-related arrests, using a two-factor verification system to identify school-related arrests in the CLEAR data after CPD alerted us that, taken by itself, the school incident field was not sufficiently reliable.

To determine whether the availability of JISC services was associated with sending youth further into the criminal justice system through a mandate to complete services, we used the same list of citywide juvenile arrests. For each arrestee, we made note of the severity of their current charges and the number of arrests in their history at the time, which allowed us to sort youth by their recidivism risk level according to the youth risk screening tool used by CPD. This allowed us to compare groups of youth whose arrests were processed at JISC to groups of similar youth who were processed at other CPD facilities. We compared the arrest dispositions between like groups to analyze which groups of JISC-processed youth were diverted from further involvement in the justice system compared to peers of similar risk levels, and which groups may have been sent further into the justice system.

To determine which risk screen disposition recommendations were overridden by processing detectives at JISC, we used the same list of arrests but considered only those processed at JISC. We intended to select a sample of these arrests to review their actual screening forms; however, we found that CPD did not maintain most of these records as required by law. Instead, we recreated the risk screen's recommendation for each youth based on the severity of their current charges and their number of prior arrests at the time of their current arrest. We compared the dispositions recommended by the risk screen for each risk level against the actual disposition that each youth received, as recorded in CLEAR, to see when the processing detective overrode the recommended disposition. Finally, we further analyzed the overrides for patterns by race and gender.

2. DATA RELIABILITY ASSESSMENTS

To determine the reliability of computer-processed data used in our fieldwork, we followed the guidance issued by the Government Accountability Office.[79] Our procedures included interviewing users of the systems from which we drew the data, receiving live walk-throughs of the applications, reviewing available written guidance and controls over data entered into the systems, performing logic tests on data

[79] United States Government Accountability Office (GAO), *Assessing the Reliability of Computer-Processed Data (GAO-09-680G)* (Washington, D.C.: GAO, 2009), accessed September 18, 2019. https://www.gao.gov/assets/80/77213.pdf

exported from these systems, and tracing a nonrepresentative sample of data to source documents where possible.

We found the data in CPD's CLEAR arrest database to be sufficiently reliable for the purpose of testing arrest dispositions. For a very small portion of our total population of booked juvenile arrests (60 out of 7,786, or less than 1%), we could not determine from the data whether the arrest was processed at JISC. We excluded these undetermined arrests from our analyses; however, they form such a small portion of the total as to not distort the audit's findings or risk arriving at the wrong conclusion. In examining arrest dispositions, we found that 104 of the 6,954 total juvenile arrests citywide for which all charges were JISC-eligible (1.5%) had unclear dispositions; we likewise removed these from our analyses, understanding that the portion of the total was small enough not to distort the results.

CPD also raised the concern that arrest expungements may have distorted the juvenile arrest data. We addressed this by comparing the 3,356 total JISC-processed booked arrests we identified in our analyzed time period to regular JISC processing reports produced by CPD every month during the same period, which reported 3,439 arrests. The difference—83 arrests, or 2.4% of CPD's reported total—represents the maximum possible distortion of the number of arrests due to expungements occurring between CPD's contemporaneous reports and our pull of the arrest data in March 2019. This is a small enough portion as to not significantly affect the audit's findings or overall conclusions.

It is also possible that some of the arrests in youths' histories—but not the current JISC arrest—had been expunged by the time of our analysis, which could potentially distort the risk levels as defined by the JISC Detention and Risk Screen. The expansion of expungements underlying this possibility became effective January 1, 2018 under Public Act 100-0285, which states,

> The Department of State Police and all law enforcement agencies within the State shall automatically expunge, on or before January 1 of each year, all law enforcement records relating to events occurring before an individual's 18th birthday if:
>
> (1) one year or more has elapsed since the date of the arrest or law enforcement interaction documented in the records;
>
> (2) no petition for delinquency or criminal charges were filed with the clerk of the circuit court relating to the arrest or law enforcement interaction documented in the records; and

(3) 6 months have elapsed without an additional subsequent arrest or filing of a petition for delinquency or criminal charges whether related or not to the arrest or law enforcement interaction documented in the records.[71]

Given the recency of the Act's effective date and the parameters above, instances in which some of a youth's historical arrest records have been expunged but not others—so that the youth still would have appeared as an arrestee in our analysis population—would likely have been rare at the time we pulled the arrest data for our analysis (March 2019). These would not likely have skewed our results or led to the wrong conclusion. Beyond this, these automatic expungements would have affected all arrestees the same way, so that our comparisons would still be valid.

We found the data in the Orbis database used by SGA to be sufficiently reliable to test youth service needs identified by the YASI needs assessment against its case treatment plans. We identified some records in our data export that were outside of our time and program scope but were able to remove these prior to analysis.

We found the data in the Cityspan database used by SGA to be insufficiently reliable to assess service administration and program completions. Because the database was organized at the level of youth as individuals—not their unique arrests—it would have required significant assumptions as to which arrest led to treatment and successful or unsuccessful closure for each "case." Moreover, closure information logged in Cityspan frequently contradicted itself, contradicted case notes elsewhere in the system, or was unexplained. These significant problems mean that using this data would likely have led to an inaccurate conclusion.

We likewise found the data in SGA's "master log" to be insufficiently reliable to assess service administration and program completions, for many of the same reasons as the Cityspan data. In addition, the master log exists in multiple versions, some of which are inconsistent with each other in terms of case closure details and terminology. We were also unable to trace a clean sample of data from the latest version of the master log to SGA's paper files, which are ostensibly a source of that data. These significant problems led us to conclude that using master log data to assess program completions would likely have led to an inaccurate conclusion.

D. STANDARDS

We conducted this audit in accordance with generally accepted Government Auditing Standards issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our

[71] Public Act 100-285, included in 705 ILCS 405/5-915

audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

E. AUTHORITY AND ROLE

The authority to perform this audit is established in the City of Chicago Municipal Code § 2-56-030 which states that OIG has the power and duty to review the programs of City government in order to identify any inefficiencies, waste, and potential for misconduct, and to promote economy, efficiency, effectiveness, and integrity in the administration of City programs and operations.

The role of OIG is to review City operations and make recommendations for improvement.

City management is responsible for establishing and maintaining processes to ensure that City programs operate economically, efficiently, effectively, and with integrity.

APPENDIX A: CPD DETENTION AND RISK SCREEN, 2014 - MAY 2018

JISC Detention and Risk Screen

ARREST INFORMATION

IR #: _____ Youth Name: _____ Detective Star#: _____

CB #: _____ Date of Birth: _____ Date/Time: _____

A. DETENTION SCREEN

Current Arrest Charge:

☐ Misdemeanor: _____ ☐ Felony: _____

☐ MCC: _____

☐ Warrant: _____

Most serious current offense scores 12 points or higher: YES / NO

1. Arrest for a Juvenile Warrant: YES / NO
2. Juvenile has extensive history that may result in detainment: YES / NO

If answered yes for any question, contact Detention Screening (312-433-7142)

Detention Screening Score: _____

Detention Screening Recommendation:

☐ Secure Detention

☐ Non-Secure Detention (CIRCLE ONE)-> Suara – Home - Shelter Warrant

B. RECIDIVISM RISK SCREEN

Prior informal adjustments: _____ Prior formal adjustments: _____ Prior arrests: _____

Referral Decision (check box)

☐ Felony arrest → 21-day court referral

☐ 0 Prior Arrests → Release to Parents/Guardians

- 1-4 Prior Arrests → Refer to Case Management
  - ☐ Informal Adjustment (SGA)
  - ☐ Formal Adjustment → Complete Peer Jury Box
- 5+ prior arrests or 4 Formal Adjustments Within Three Years
  - ☐ 21-day Court Referral
  - ☐ Non-Secure Detention

Peer Jury Candidate
☐ 2rd arrest
☐ Non-violent arrest
☐ No gang affiliation

SGA Team Members Name: _____

Alternative referral (circle one): Court Detention Case Mgmt Release to Parent/Guard

If yes, give reason: _____

Supervisor Approval/ Star #: _____

JISC --DRS (Rev 3/18)

APPENDIX B: CPD DETENTION AND RISK SCREEN, JULY 2018 - PRESENT

JISC ARREST DISPOSITION SCREENING INSTRUMENT
YOUTH INVESTIGATIONS DIVISION – CHICAGO POLICE DEPARTMENT

STEP 1: Juvenile Arrest Information

Youth: _____ _____
Last Name First Name

_____ _____ _____
DOB (DD-MMM-YYYY) IR# CB#

_____ _____
Arrest Date (DD-MMM-YYYY) Processing Detective (Name/Star#)

Current Charges:

☐ Warrant: _____ ☐ Felony: _____

☐ Misdemeanor: _____ ☐ MCC: _____

1. **Current arrest includes a Juvenile Arrest Warrant:** ☐ Yes ☐ No
2. **Most serious current charge scores 10 points or higher:** ☐ Yes ☐ No
3. **Youth currently on Electronic Monitoring,** and current highest charge is not an MCC violation: ☐ Yes ☐ No
4. **Youth has extensive arrest history,** and current highest charge is not an MCC violation: ☐ Yes ☐ No
5. **Circumstances suggest youth poses an immediate safety threat to others.** ☐ Yes ☐ No

If any of the answers are "Yes," contact Detention Intake Screening at (312) 433-7142, and complete Part A. Then go to Step 3 If all answers are "No", complete Part B. Then go to Step 2.

STEP 2: Referral Options Decision Factors

Decision Category (Check Only One, The Most Serious Risk)		Risk Level
☐ **Felony arrest** (Not screened for detention)	⇨	High
☐ **Zero prior arrests** with Part-C risk factors (Arrest not CTTV)	⇨	Medium
☐ **Zero prior arrests** with Part-C risk factors & CTTV arrest	⇨	Med+ CTTV
☐ **Zero prior arrests** without Part-C risk factors & not CTTV	⇨	Low
☐ **Zero prior arrests** without Part-C risk, but arrest for CTTV	⇨	Low+ CTTV
1 to 4 prior arrests:		
☐ Second arrest (Peer Jury Candidate, Complete Part D)	⇨	Medium
☐ Current arrest domestic related, but not requiring a referral to court (Include Family Mediation form)	⇨	Medium
☐ Current arrest for CTTV (Workshop Review, Complete Part E)	⇨	See Part E
☐ 2 to 4 prior arrests, current not domestic or CTTV	⇨	Medium
5+ prior arrests or 4+ Formal Adjustments within 3 years:		
☐ 21-Day court referral	⇨	High
☐ Current arrest minor and family requesting services	⇨	Medium
☐ Current arrest MCC & family not requesting services	⇨	Exception

STEP 3: Final Arrest Disposition Recommendation

Risk Level	Arrest Disposition
☐ Low	Station Adjust, Release to Parent/Responsible Adult
☐ Low+ CTTV	Station Adjust, CTTV Workshop without SGA Referral
☐ Medium	Station Adjust, SGA Referral (Includes Part D - Peer Jury Candidates)
☐ Med+ CTTV	Station Adjust, CTTV Workshop and SGA Referral
☐ High	Referred to Court (Includes detained youth see Part A)
☐ Alt/Exception	Alternate Disposition (Used when disposition varies from screened risk, i.e. the youth screened as "Medium Risk" but parent refused SGA and youth referred to court SPECIFY Below.)

Alt Disp: _____ **Reason:** _____

CPD-23.419 (Rev. 7/18)

PART A: Detention Screening

Screener: _____

Screening Score: _____

Detention Screening Outcome:

☐ Secure, Detained at JTDC
☐ Non-Secure, Suara
☐ Non-Secure, Home Confinement
☐ Non-Secure, Other _____
☐ **NOT** Detained, 21-Day referral.

When completed, go to Step 3, select "High".

PART B: Recidivism Risk Screening

Prior Informal Adjustments: _____

Prior Formal Adjustments: _____

Total Number Prior Arrests: _____

If youth has NO prior arrests, also complete Part C prior to going to Step 2.

If prior arrests, go to Step 2.

PART C: Additional Risk Screening

☐ Youth or family indicate conflict at home involving the youth.
☐ Current arrest domestic-related.
☐ Current arrest involves non-family, adult co-offenders.
☐ Youth a violent crime victim in prior 6 months.
☐ Youth a reported missing or runaway in prior 6 months.
☐ No Part C Risk Factors

When completed, go to Step 2

PART D: Peer Jury Review

☐ Current arrest non-violent offense
☐ No gang affiliation
☐ Violent offense and/or gang affil.

PART E: CTTV Workshop Review

☐ Not previously referred, *in Step 3 select "Med+ CTTV" Risk Level.*
☐ Previously referred, *in Step 3 select "Medium" Risk Level.*

Submitted by:

_____
Processing Detective (Signature/Star#)

Approved by:

_____
JISC Watch Coordinator (Signature/Star#)

APPENDIX C: DFSS JULY 2019 JISC MEMO

DEPARTMENT OF FAMILY AND SUPPORT SERVICES
CITY OF CHICAGO

MEMORANDUM

To: Susan Lee, Deputy Mayor Public Safety

From: Lisa Morrison Butler, Commissioner
Angela R. Rudolph, Deputy Commissioner-Youth Services Division

Date: July 18, 2019

Re: Juvenile Intervention Support Center Advisory Council

The JISC is a police station where juveniles who are arrested in CPD districts 1, 2, 3, 7, 8, 9, 10, 11 12, and 15, are processed. The program serves youth between the ages of 10-16 years who have been charged, and 17-year-old youth who have been charged with misdemeanors only. Since the JISC's opening in 2006 it has encountered challenges around its implementation, funding and focus impacting its ability to fulfill the intent and focus identified by its original charge and those who collaborated on its initial development.

This memo recommends the Mayor's Office, DFSS and CPD co-convene an Advisory Council (co-chaired by Deputy Mayor Susan Lee, Commissioner Lisa Morrison Butler and Superintendent Eddie Johnson) to:

1. Discuss the status of arrest level diversion in the City of Chicago;
2. Review best practices around municipal diversion for youth and juvenile assessment centers;
3. Develop a city-wide strategy around diversion and intervention for youth arrested in Chicago, focused on identifying, creating and utilizing supportive services focused on justice involved youth and creating a City, County, State collaboration where resources can be brought to bear focused on decreasing youth arrests and justice involvement. (See attached for a draft list of recommended participants).

JISC Background

Through the leadership of juvenile justice reform advocates in Chicago, the Juvenile Intervention Support Center (JISC) opened its doors in March 2006. Advocates and City of Chicago officials

DRAFT/DELIBERATIVE PROCESS

researched the concept of juvenile assessment centers and visited programs around the country, including the original centers in Florida for over three year prior to JISC's launch with all parties focused on designing a process that would ensure an effective response for youth touched by the justice system and keeping as many youth as appropriate from becoming further ensnared in the justice system. c

Challenges

We believe, since its opening, the JISC has encountered challenges around a) its funding of services for referred youth, b) lack of clarity over the governance, management and staffing of the Center and c) sustained involvement and support from the cross-sector partners originally engaged in the JISC's development.

A. Funding

The JISC has experienced several difficulties due to funding issues. In 1999, city officials saw an opportunity to launch a new screening and referral program using money available through the Juvenile Accountability Block Grant (JABG) administered by the U.S. department of Justice. the funding was to be awarded to the State of Illinois and passed on to the city through the interagency Chicago's Juvenile Crime Enforcement Coalition (the authorizing body for the city's JABG funds) and the CPD. Yet, when the JISC was very close to opening, the CYS/DFSS team were informed much of the federal funding awarded to the city for the initiative had already been spent to renovate the JISC's location site, the program's security arrangements were already finalized and there were little funds left to cover the cost of staffing and services for referred youth. Over time the costs associated with youth referred for services were shifted to the oversight and budget of CYS/DFSS but the amount provided was limited and only focused on the smaller number of youth referred and not the total number of youth served by the JISC.

B. Governance, management and staffing

The JISC structure was complicated from the very beginning. The federal grant that launched the center specifically authorized Chicago's Juvenile Crime Enforcement Coalition (JCEC) to exercise oversight and its members assumed a supervisory role over JISC operations. Yet, there was also a separate JISC oversight board as well as a board of directors. The Executive Director was answerable to all three bodies, creating redundancy and confusion. The JISC Executive Director was also charged with acting as bridge between two completely different units of city government (CPD and CYS/DFSS) organizations with two completely different missions and cultures. Compounding these difficulties was the fact that the JISC had become operational before the two units had an opportunity to come together to form a shared vision for it. CPD opened the police and intake components before CYS/DFSS had the service provision components in place. In addition, both departments were authorized to commit JISC funds and resources, but they were not organized to do this in a collaborative manner. The lack of coordination led to difficult interactions between both departments and the JISC director and other JISC staff.

C. Engagement and support from JISC's founding partners

Forming effective partnerships has always a critical challenge for the JISC. The JISC was designed as a multiagency partnership, the Chicago Police department, the Department of Family & Support Services, the Chicago Public schools, the Department of Children and Family Services, the

Cook County State's Attorney's Office, and the Cook County Department of Juvenile Probation. However, the degree of involvement of these partners has varied over the JISC's operational term. Some agencies were more central in the design and development of the JISC than others. For example, CPD staff prepared the federal grant proposal that was the initial center funding for the JISC. As a result, CPD has always had a leading role in the development of the center. The original proposal that funded the JISC named the Chicago Department of Human Services as the lead service provider however soon after the grant was awarded, most city programs for children and youth were combined to form a new agency, the Department of Children and Youth Services (CYS). The new agency accepted responsibility for the social services component at the JISC, and the first executive director of the JISC was a CYS employee and by the time the JISC opened its doors in 2006, CPD and CYS were viewed as the principal partners but they still regularly butted heads around the direction and focus of the JISC and the process and staff within the JISC site.

The Chicago Public Schools (CPS) and the Department of Children & Family Services (DCFS) were both participants early in the JISC's development and committed to staffing the JISC during it operational hours to support youth who were processed to either connect/reconnect to school or support the unique needs of dually-involved youth to connect to guardians or services if they were arrested. Unfortunately, neither of these partnerships were ever fully implemented. An integral part of the support and engagement of the JISC's founding partners centered on the ability to share data with JISC case managers and provide a well-rounded picture of the needs, strengths and backgrounds of JISC youth but a fully agreed upon and implemented data agreement was never realized to a degree that any of the parties ever felt any comfort with. CPS attended planning/oversight meetings after the JISC opened sporadically and never staffed the JISC as was expected. DCFS' role was never implemented and never staffed the JISC as requested. Both agencies have haphazardly participated in JISC partner meetings mostly as informational partners and not active participants.

Closing

The JISC, as it is currently structured, is not and will not fully serve the needs of the youth it touches. Referral services provide by DFSS only serves less than 20% of the youth who are touched by the JISC. So, most of the youth touched by the JISC are getting nothing by way of an intervention. Additionally, multiple evaluations and reviews of the JISC since its inception have indicated there is little to no difference between a youth who is serviced by the JISC and one who is not. Since 2017, DFSS has spent **$921,597.90** for JISC services and the CPD 2019 appropriation for the JISC was **$4,459,094**.

Given the amount of resources expended for the JISC, we believe it is imperative the City enters a reflective period with engaged partners focused on how to better serve justice involved youth in Chicago beginning at the arrest level.

MISSION

The City of Chicago Office of Inspector General (OIG) is an independent, nonpartisan oversight agency whose mission is to promote economy, efficiency, effectiveness, and integrity in the administration of programs and operations of City government. OIG achieves this mission through,

- administrative and criminal investigations by its Investigations Section;
- performance audits of City programs and operations by its Audit and Program Review Section;
- inspections, evaluations and reviews of City police and police accountability programs, operations, and policies by its Public Safety Section; and
- compliance audit and monitoring of City hiring and employment activities by its Hiring Oversight Unit.

From these activities, OIG issues reports of findings and disciplinary and other recommendations,

- to assure that City officials, employees, and vendors are held accountable for violations of laws and policies;
- to improve the efficiency and cost-effectiveness of government operations; and
- to prevent, detect, identify, expose, and eliminate waste, inefficiency, misconduct, fraud, corruption, and abuse of public authority and resources.

AUTHORITY

OIG's authority to produce reports of its findings and recommendations is established in the City of Chicago Municipal Code §§ 2-56-030(d), -035(c), -110, -230, and 240.

Cover image courtesy of OIG.

AUDIT TEAM

SAMUEL DIAZ, PERFORMANCE ANALYST
TALIA PECKERMAN, SENIOR PERFORMANCE ANALYST
BEN SPIES, SENIOR PERFORMANCE ANALYST
COLIN STUART-MORSE, CHIEF PERFORMANCE ANALYST
LISE VALENTINE, DEPUTY INSPECTOR GENERAL

PUBLIC INQUIRIES:
NATALIE A. KURIATA: (773) 478-8417 | NKURIATA@IGCHICAGO.ORG

TO SUGGEST WAYS TO IMPROVE CITY GOVERNMENT, VISIT:
IGCHICAGO.ORG/CONTACT-US/HELP-IMPROVE-CITY-GOVERNMENT

TO REPORT FRAUD, WASTE, AND ABUSE IN CITY PROGRAMS:
CALL OIG'S TOLL-FREE TIP LINE: (866) 448-4754 / TTY: (773) 478-2066

OR VISIT OUR WEBSITE
IGCHICAGO.ORG/CONTACT-US/REPORT-FRAUD-WASTE-ABUSE/

CITY OF CHICAGO
OFFICE OF INSPECTOR GENERAL

JOIN US FOR A COMMUNITY PRESENTATION: THE JUVENILE INTERVENTION SUPPORT CENTER (JISC) AUDIT

WEDNESDAY, FEBRUARY 26
KELLY COLLEGE PREP
4136 S. CALIFORNIA AVE, ROOM 318
4:00-5:30 PM

OUR TEAM WILL DISCUSS:

- THE PARTNERSHIP BETWEEN THE CHICAGO POLICE DEPARTMENT AND THE DEPARTMENT OF FAMILY AND SUPPORT SERVICES, WHICH DIVERTS YOUTH AWAY FROM THE JUVENILE JUSTICE SYSTEM.
- FINDINGS ON JISC RECORD KEEPING, ADHERENCE TO BEST PRACTICES, AND YOUTH CASE RESULTS.

WWW.IGCHICAGO.ORG | OIG TIPLINE: (866) 448-4754
PLEASE RSVP BY FEBRUARY 24 BY EMAILING: MESTRADA@IGCHICAGO.ORG

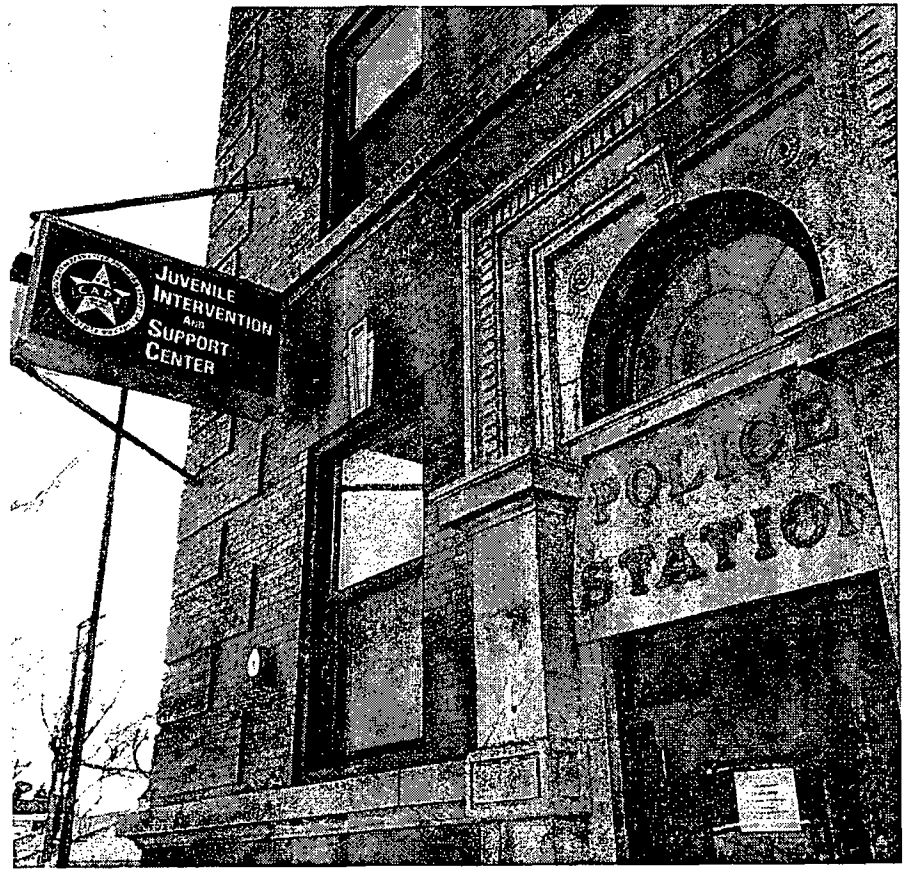
Audit of the Chicago Police Department and Department of Family and Support Services' Administration of the Juvenile Intervention Support Center

CITY OF CHICAGO
OFFICE OF INSPECTOR GENERAL

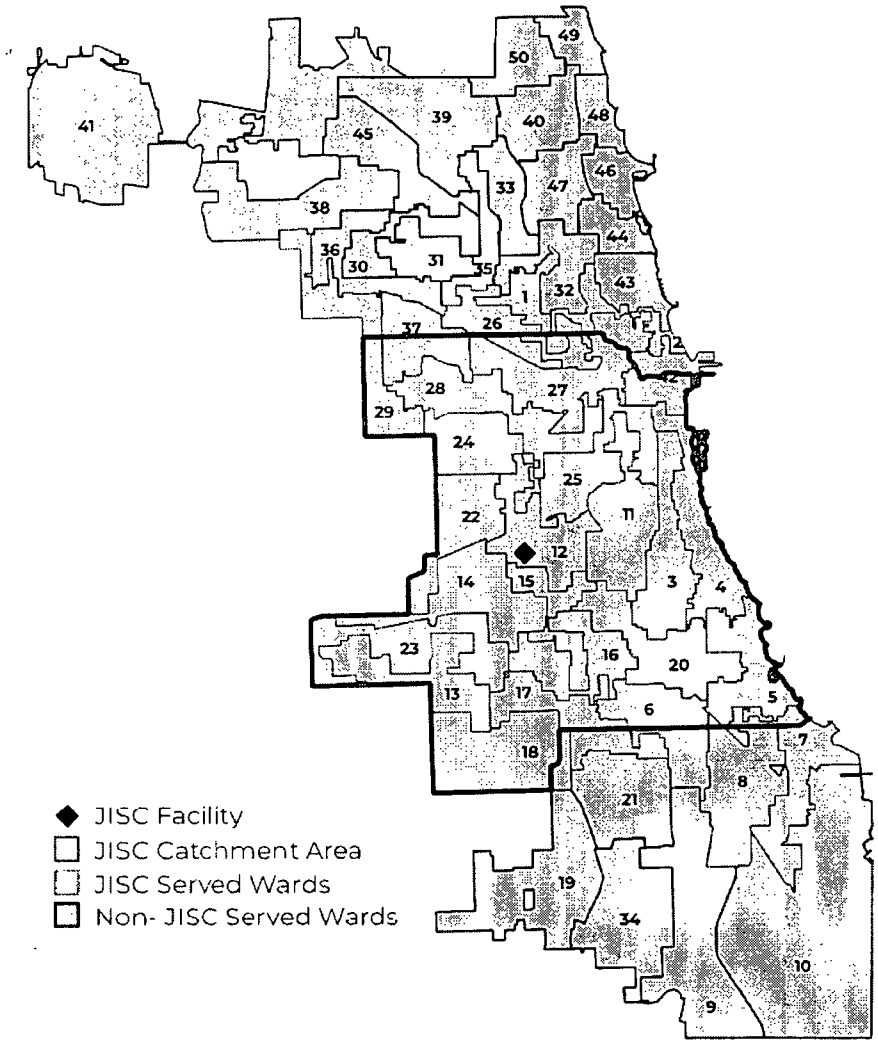
OIG #18-0087

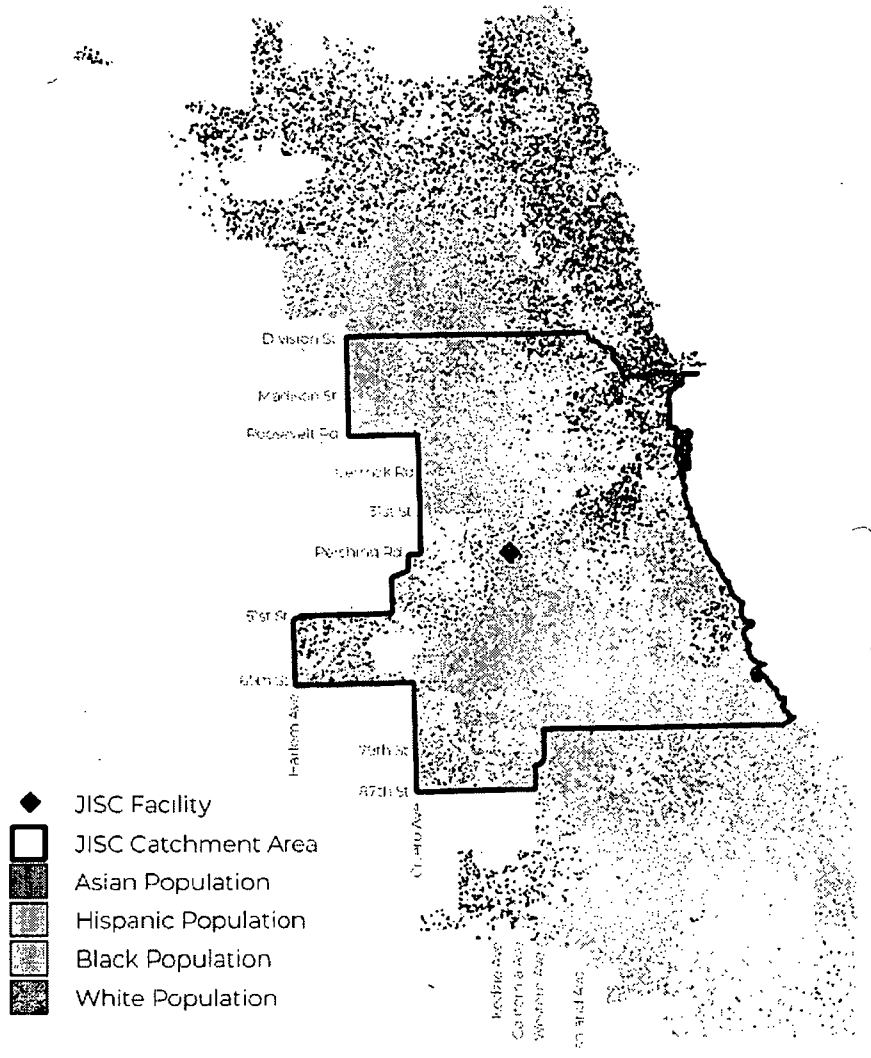
JISC Overview

- Goal: reduce youth rearrests
- Launched 2006
- JISC facility: 3900 S. California
  - Serves 10 CPD districts
- Over 3,000 youth arrests/year
- CPD JISC 2020 appropriation: $4.8 million
- DFSS 2019 JISC contract: $530,000



JISC Catchment Area





JISC Partners

- Processes youth arrests
- Makes diversion decisions

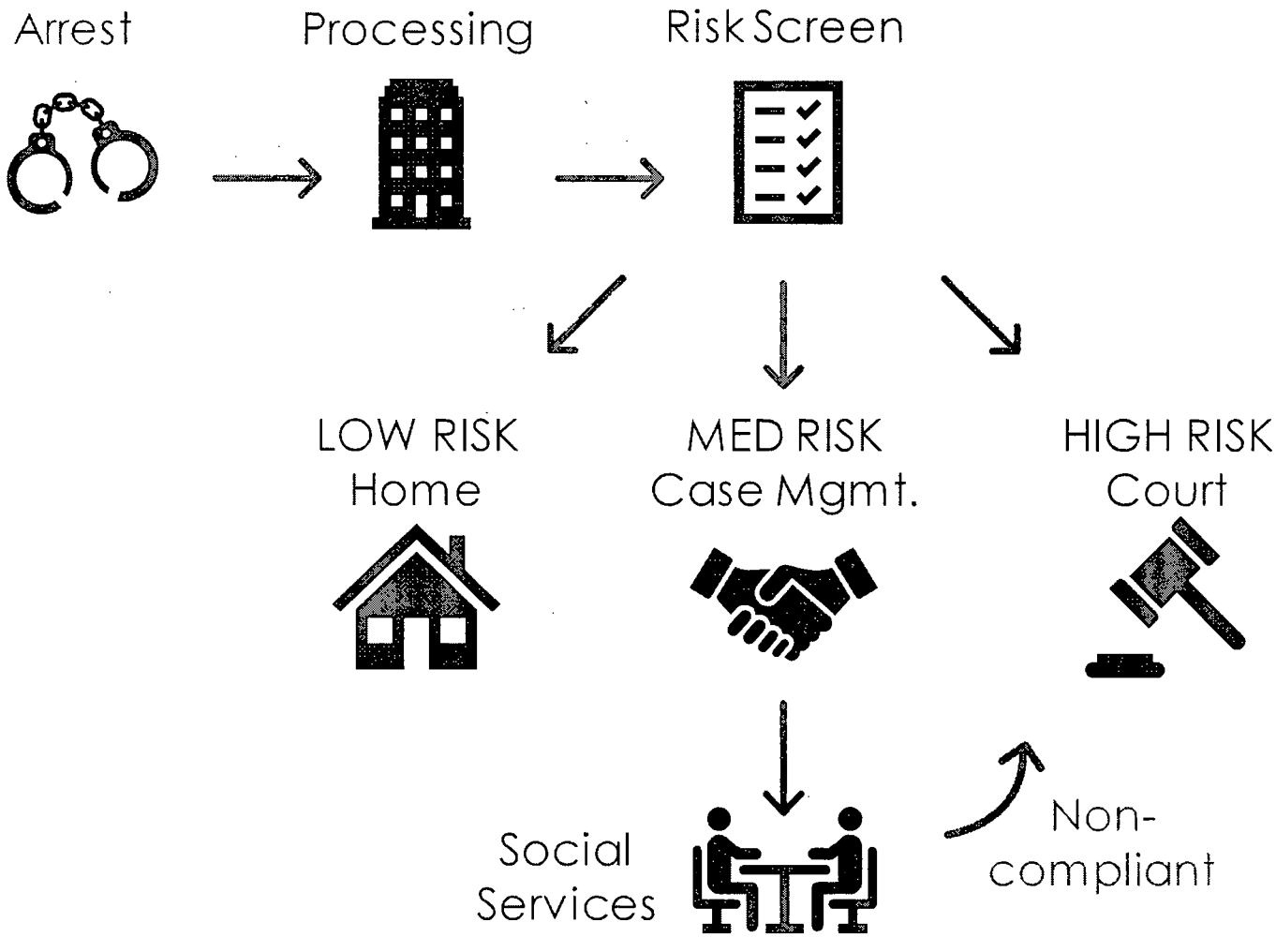
CHICAGO DEPARTMENT OF FAMILY & SUPPORT SERVICES
BUILD • SUPPORT • EMPOWER

- Manages case management contract
- Collects program outputs

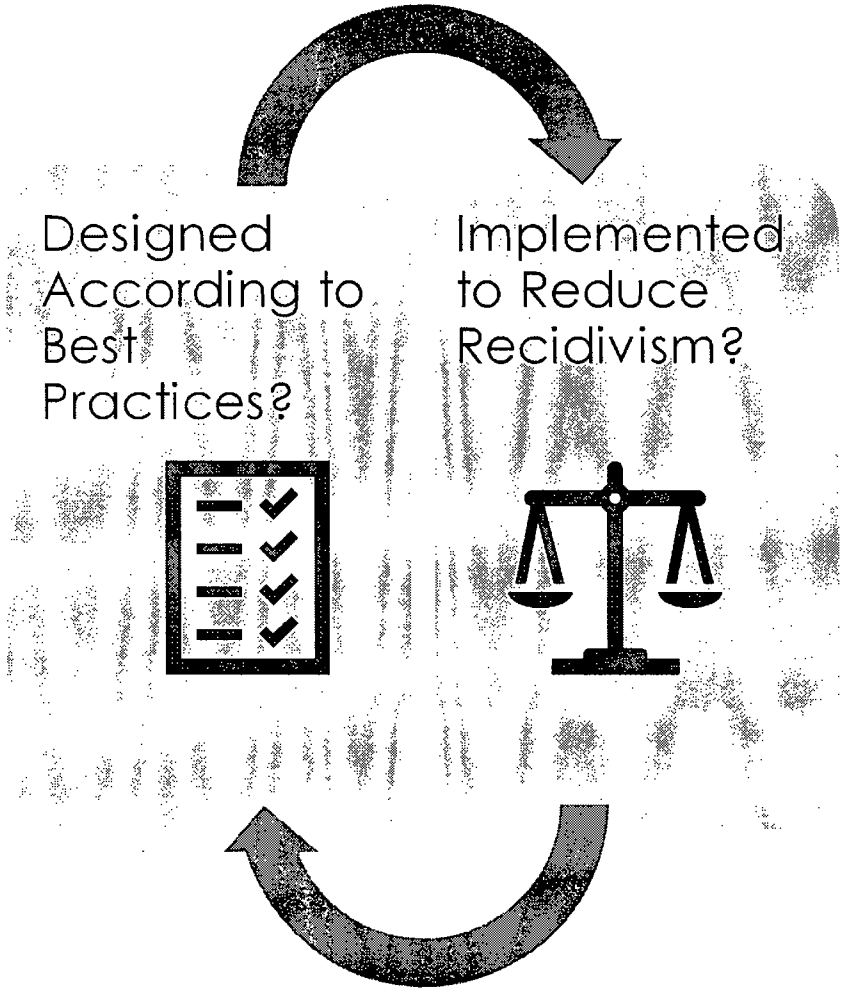
SGA
YOUTH & FAMILY SERVICES

- Contracted case management agency
- Connects youth to services

JISC Process



Audit Objectives



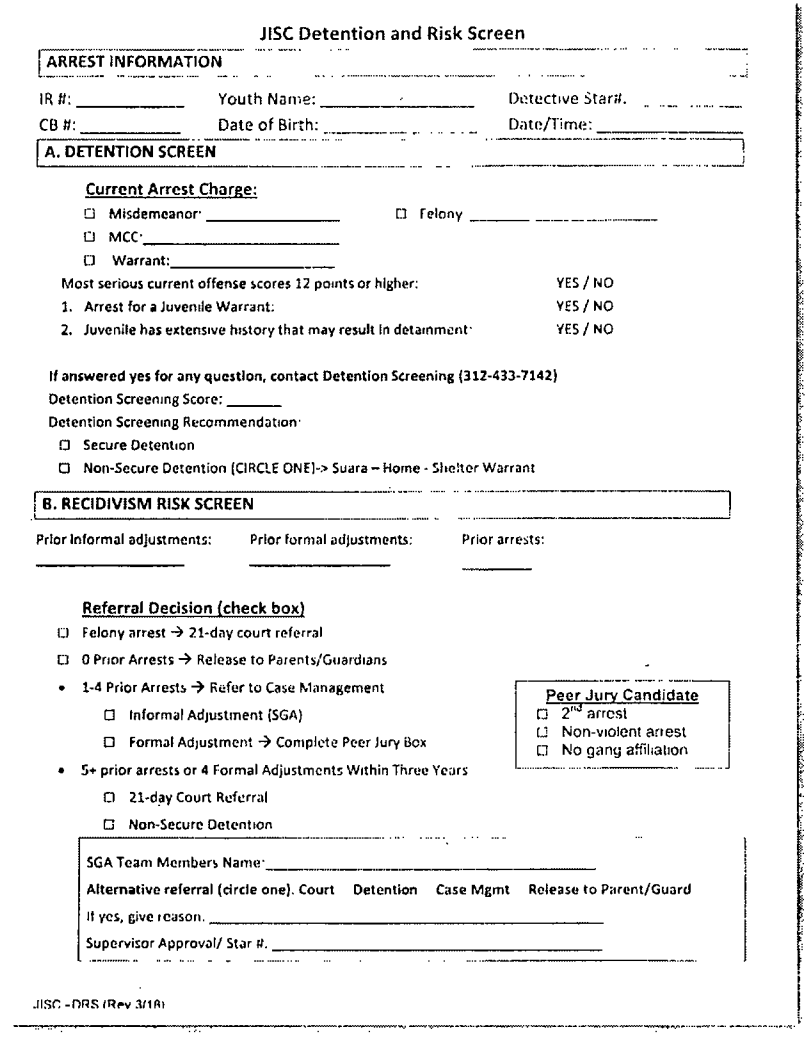
- Little info on program
- DFSS reassessing investment
- Previous reviews
  - Partner disagreements
  - Not transparent
  - Unwelcoming setting
  - Unclear impact

Audit Methodology

- Analyzed CPD arrest data
- Reviewed SGA case mgmt. records
- Conducted JISC facility walkthroughs
- Interviewed JISC management, staff, related agencies, JISC-processed youth, peer jurisdictions, researchers
- Researched best practices
  - Interviewed 12 agencies
  - Consulted literature from over 20 agencies

Audit Findings: Recordkeeping

- SGA did not keep accurate and consistent records
  - Could not assess program completion against recidivism
- CPD destroyed youth screening records
  - Violates Local Records Act



JISC Detention and Risk Screen

ARREST INFORMATION

IR #: _____ Youth Name: _____ Detective Star#. _____

CB #: _____ Date of Birth: _____ Date/Time: _____

A. DETENTION SCREEN

Current Arrest Charge:

☐ Misdemeanor _____ ☐ Felony _____

☐ MCC: _____

☐ Warrant: _____

Most serious current offense scores 12 points or higher: YES / NO

1. Arrest for a Juvenile Warrant: YES / NO
2. Juvenile has extensive history that may result in detainment YES / NO

If answered yes for any question, contact Detention Screening (312-433-7142)

Detention Screening Score: _____

Detention Screening Recommendation:

☐ Secure Detention

☐ Non-Secure Detention (CIRCLE ONE)-> Suara – Home - Shelter Warrant

B. RECIDIVISM RISK SCREEN

Prior Informal adjustments: _____ Prior formal adjustments: _____ Prior arrests: _____

Referral Decision (check box)

☐ Felony arrest → 21-day court referral

☐ 0 Prior Arrests → Release to Parents/Guardians

- 1-4 Prior Arrests → Refer to Case Management
  - ☐ Informal Adjustment (SGA)
  - ☐ Formal Adjustment → Complete Peer Jury Box
- 5+ prior arrests or 4 Formal Adjustments Within Three Years
  - ☐ 21-day Court Referral
  - ☐ Non-Secure Detention

Peer Jury Candidate
☐ 2nd arrest
☐ Non-violent arrest
☐ No gang affiliation

SGA Team Members Name: _____

Alternative referral (circle one). Court Detention Case Mgmt Release to Parent/Guard

If yes, give reason. _____

Supervisor Approval/ Star #. _____

JISC -DRS (Rev 3/18)

Audit Findings: Partnerships

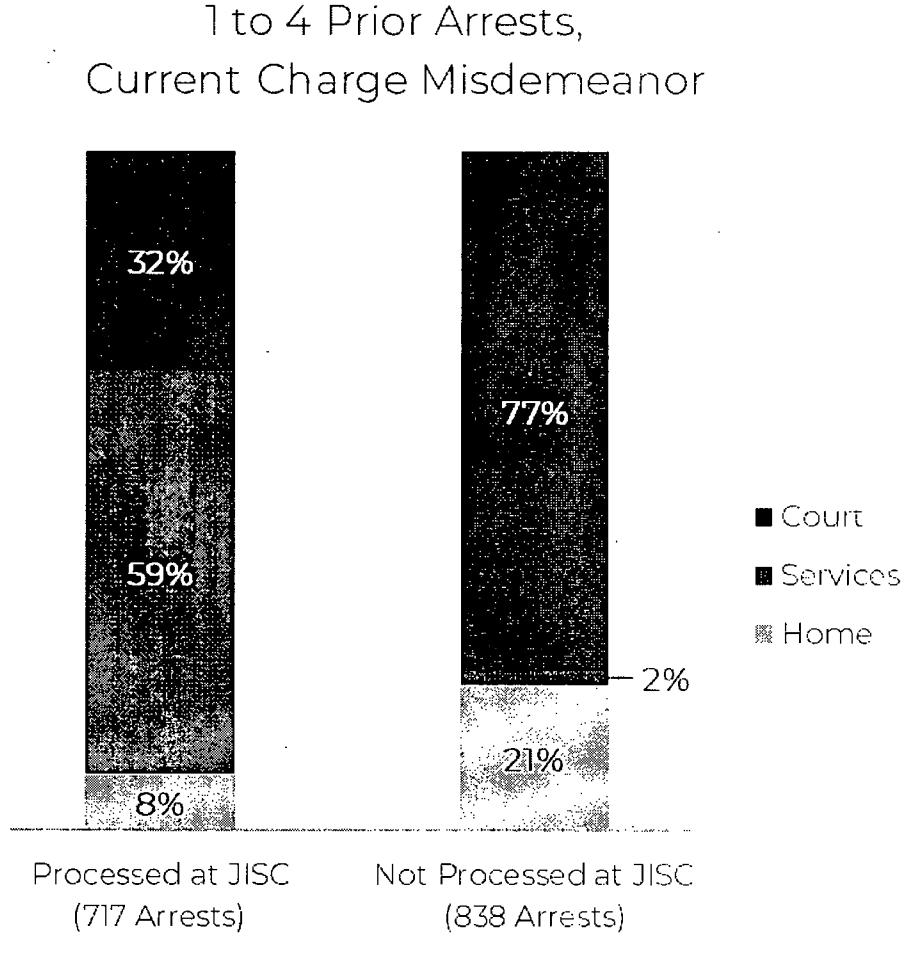
- CPD and DFSS did not collaborate on JISC
  - Ad hoc, referral-based relationship
  - Did not share metrics
  - No recidivism tracking
  - No charter, MOU, governing board
  - Disputes about vision
- Did not engage community stakeholders, relevant public agencies

Audit Findings: Program Design

- Facility did not meet diversion best practices
  - Emphasizes security, detention
  - Risks retraumatizing youth
- CPD staff bid in, no specialized training
- Risk screen not validated

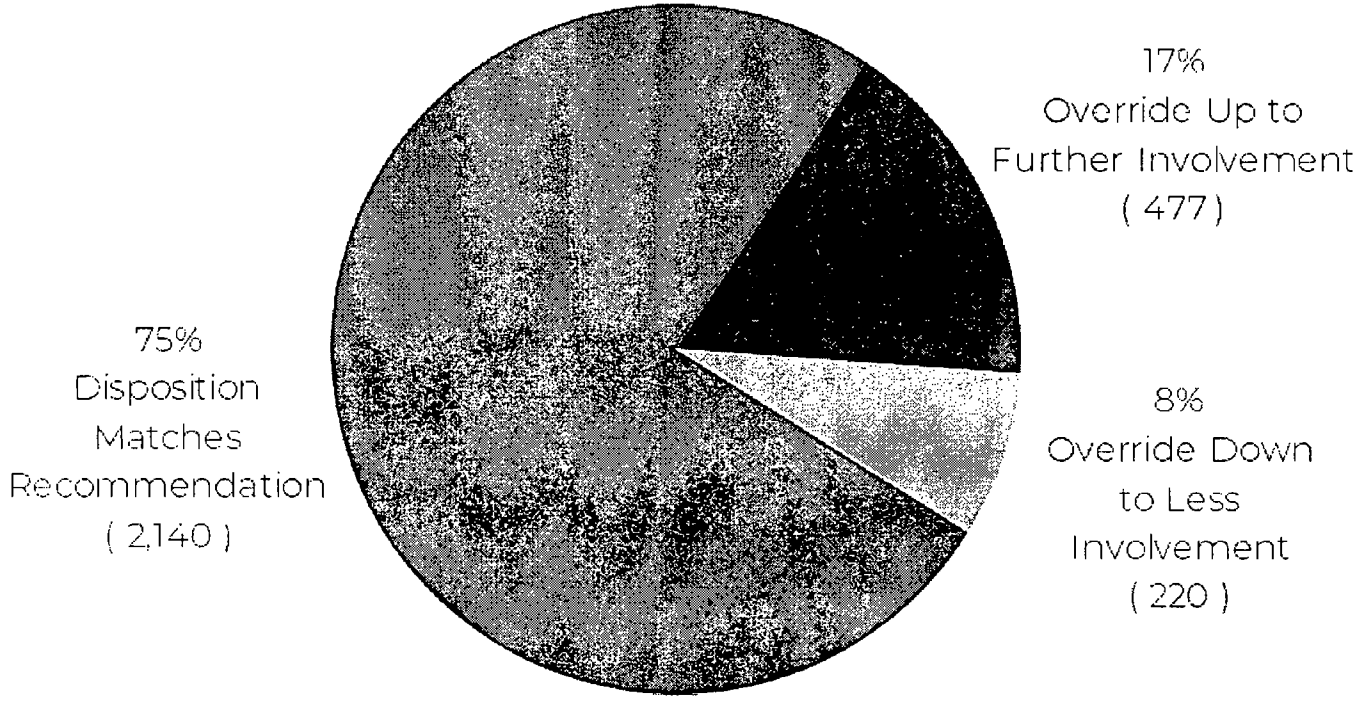
Audit Findings: Diversion Rates

- JISC diverted many youth from court
  - But case mgmt. instead of home for some
  - Most felonies referred to court
- Did not engage in "net widening"



Audit Findings: Overrides

- CPD overrode 25% of screen-recommended dispositions
  - 30% of candidates for case management ("medium risk") are instead overridden up to court
  - Disparate override outcomes by arrestee race, gender



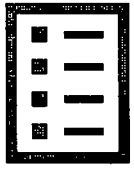
Audit Findings: Other Metrics

Total: 51% JISC arrests sent to court
23% to case management
26% sent home without intervention

~ 90% of JISC-eligible arrests processed at JISC

60% of referrals to case management not made in person

Most after SGA hours, no case manager on site



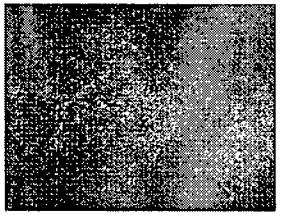
35% of SGA's case treatment plans included low or no-needs areas

Recommendations

- Improve recordkeeping, collaboration
  - More SGA accountability
- Share/Report program outputs, outcomes
- Improve user experience - best practices
  - More welcoming, less security emphasis
  - Select/train staff for working with youth
  - Validate risk screens, monitor overrides

CPD and DFSS Response

- Agreed with nearly all recommendations
  - CPD has not notified Local Records Commission
  - DFSS: overflow referrals due to processing delays
- Current actions
  - Advisory board convened
  - Data sharing w/ Crime Lab
  - Increased training for detectives, field officers
  - New youth art at JISC facility



Thank you for attending!

City of Chicago Office of Inspector General
740 N. Sedgwick St., Suite 200
Chicago, IL 60654

Ben Spies, Senior Performance Analyst bspies@igchicago.org
Sam Diaz, Performance Analyst sdiaz@igchicago.org

Natalie Kuriata, Director of Communications and Outreach
NKuriata@igchicago.org, (773) 478-8417

www.igchicago.org

Report Fraud, Waste & Abuse
(866) 448-4754 / TTY: (773) 478-2066