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NOVEMBER 2021

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

CITY OF CHICAGO
OFFICE OF INSPECTOR GENERAL



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NOVEMBER 18, 2021

**TO THE MAYOR, CITY COUNCIL, CITY CLERK, CITY TREASURER,
AND COMMUNITY MEMBERS OF THE CITY OF CHICAGO:**

The City of Chicago Office of Inspector General (OIG) has completed a follow-up to its February 2020 audit of the Chicago Police Department (CPD) and Department of Family and Support Services' (DFSS) administration of the Juvenile Intervention and Support Center (JISC). Based on the Departments' responses, OIG concludes that CPD and DFSS have fully implemented 12 of the 24 corrective actions related to the audit findings, substantially implemented 3, partially implemented 6, and not implemented 3.

The purpose of the 2020 audit was to determine whether JISC was designed according to best practices for law enforcement-based youth diversion and whether its administration of diversion programming was consistent with its goals, such as reducing youth recidivism. The audit concluded that although JISC had been in operation since 2006, the City still did not know whether the program met its goal of reducing recidivism. This uncertainty was due to poor recordkeeping and a lack of collaboration among the JISC program partners. Additionally, components of JISC's design did not align with best practices for youth diversion programs and ran the risk of retraumatizing youth or increasing their likelihood of reoffending.

Based on the results of the audit, OIG recommended that CPD and DFSS improve their record-keeping procedures and collaboration efforts. We stated that the departments should create accountability mechanisms for JISC's case management contractor and establish partnerships with external agencies. We also recommended that CPD and DFSS engage with community organizations, subject-matter experts, and criminal justice system stakeholders to align JISC's design with best practices for diversion programs and to provide a more trauma-informed experience for youth. Finally, we recommended that CPD 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. In their responses to the audit, CPD and DFSS described corrective actions they would take. The departments stated, however, that they would not enact some of the recommended corrective actions because the City planned to replace JISC with a new diversion model in 2022.

In April 2021, OIG inquired about corrective actions taken by CPD and DFSS in response to the audit. Based on the departments' follow-up responses, OIG concludes that CPD, DFSS, and the Office of the Mayor have implemented corrective actions related to program goals and responsibilities, performance review procedures, training, and adjustments to the diversion process. Specifically, the City has,

- defined on-site protocols with other JISC stakeholders, outlining shared goals, individual roles and responsibilities, and procedures for reporting and monitoring;
- contracted with a new case management service provider which uses a system with data accuracy controls and outcome tracking and reporting mechanisms;
- included a youth case management referral range based on historical referral rates in the contract;
- contracted with the University of Chicago Crime Lab to conduct recidivism and outcome analyses;
- updated a directive and related instructions to ensure that JISC risk screens are sent to CPD's Youth Investigations Division;
- provided written guidance regarding record retention requirements to all JISC personnel;
- provided training for JISC staff on topics related to youth diversion;
- adjusted the case management agency's on-site hours based on youth arrest data;
- implemented procedures for transferring cases between CPD and the case management agency, including a reconciliation process to ensure referrals are not lost;
- formed a Youth Diversion Advisory Council to monitor the JISC program and reforms;
- engaged with community stakeholders via interviews and workshops conducted by third parties;
- implemented a process for offering youth services without the threat of prosecution;
- informed field officers in JISC districts that they must bring eligible arrestees to JISC;
- developed informational materials about diversion opportunities and posted them at the JISC facility and JISC district stations; and
- contractually revised needs assessment procedures to avoid the risk of net widening.

Once fully implemented, OIG believes the corrective actions may reasonably be expected to resolve the core findings noted in the audit. We urge the City to fully implement corrective actions related to our recommendations, to include,

- notifying the Local Records Commission of CPD's failure to retain JISC risk screens;
- adding input controls to its system to ensure that detectives complete all youth screening fields;
- avoiding handcuffing youth to stationary objects unless necessary;
- recording and tracking the practice of handcuffing youth in CPD's database;
- working with the relevant unions to revise its selection process, allowing officers skilled at working with youth to be selected for JISC positions;
- utilizing an empirically validated risk screening tool;
- periodically reviewing processed JISC arrests and dispositions by associated personnel to identify patterns in diversion and override decisions;
- ensuring that supervisors review and approve diversion decisions in real time; and
- offering youth processed at district stations the same diversion opportunities as JISC-processed youth.

Below, we summarize our 4 audit findings and 24 recommendations, as well as the City's response to our follow-up.

We thank the staff and leadership of CPD, DFSS, and the Office of the Mayor for their cooperation during the audit and responsiveness to our follow-up inquiries.

Respectfully,

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

William Marback
Interim Inspector General
City of Chicago

FOLLOW UP-RESULTS

In April 2021, OIG followed up on its February 2020 audit of the Chicago Police Department (CPD) and the Department of Family and Support Services' (DFSS) administration of the Juvenile Intervention and Support Center (JISC).¹ CPD and DFSS responded by describing the corrective actions they have taken and provided supporting documentation. Below, we summarize OIG's four findings, the associated recommendations, and the status of CPD and DFSS' corrective actions. Our follow-up did not test implementation of the new procedures; thus, we make no determination as to their effectiveness, which would require a new audit with full testing.

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.

OIG Recommendation 1:

OIG recommended that CPD and DFSS 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. OIG also recommended that CPD and DFSS publish the results of any such assessment to ensure transparency and accountability. OIG noted that establishing a governing or advisory board over the entire JISC program may assist in this effort.

Status of Corrective Action: **Fully Implemented**

JISC stakeholders signed an on-site protocol which outlines shared goals, each entity's roles and responsibilities, a performance management structure, and data sharing expectations. JISC contracts and protocols, data reports, program assessments, and community engagement documents are available on a public-facing JISC reform website at <https://www.chicago.gov/city/en/sites/public-safety-and-violence-reduction/home/jisc-reform.html>.

¹ 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," February 25, 2020, <https://igchicago.org/2020/02/25/audit-of-the-chicago-police-department-and-department-of-family-and-support-services-administration-of-the-juvenile-intervention-and-support-center/>.

OIG Recommendation 2:

OIG recommended that DFSS ensure that the case management agency records program tracking and deliverables in Cityspan per its contract and stops using the master log. OIG also recommended that DFSS 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.

Status of Corrective Action: Substantially Implemented

DFSS contracted with Lawndale Christian Legal Center (LCLC) for case management, replacing SGA Youth & Family Services. The contract with LCLC states that LCLC must accurately collect and record relevant program data, as well as metrics outlined in the monthly JISC report.

LCLC uses the CiviCore database to track and record program data. The system has input controls to ensure data accuracy and completeness. Additionally, LCLC has an outcome tracking and reporting mechanisms policy that describes the specific procedures LCLC will follow in relation to program data. LCLC is required under its contract to compile monthly reports of program data and share those reports with the Office of the Mayor and DFSS for review. Those monthly reports contain guidance on case and closure terminology, and are publicly available on the JISC reform website (see link above). The Office of the Mayor stated that the monthly reports are created by manually pulling information from CiviCore and entering it into the template for the report, which is a Microsoft Excel workbook.

The written data guidance and layers of review show an intent to capture quality data. However, by manually populating its data reports, LCLC risks duplicating the inaccurate and inconsistent data issues identified in OIG's audit.

OIG Recommendation 3:

OIG recommended that DFSS 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).

Status of Corrective Action: Fully Implemented

The 2021 contract with LCLC includes an estimated referral range of 324 to 432 youth. DFSS set that range based on the number of youth referred to JISC in 2019 and 2020. DFSS acknowledged that COVID-19 decreased the number of youth arrests last year, and the contract expects that the number of arrests in 2021 will be higher than in 2020, but likely less than in 2019.

The estimated range considers the target caseload for case managers and case plan length. If there are additional youth eligible for diversion beyond LCLC's anticipated caseload, they will be referred to other case management services and LCLC will remain in contact to monitor their progress.

OIG Recommendation 4:

OIG recommended that DFSS 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.

Status of Corrective Action: Fully Implemented

CPD contracted with the University of Chicago Crime Lab to review recidivism rates for youth who interact with JISC. The contract states that the Crime Lab will perform the review annually, track the number and characteristics of youth served and how often those youth use the programs offered. Outcome measures will include the recidivism rate of youth enrolled in diversion programs, the post-intervention arrest rate of youth engaged in mentoring programs, and post-intervention school discipline rates.

OIG Recommendation 5:

OIG recommended that DFSS 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, we recommended DFSS send them back to the agency for correction. OIG also recommended that DFSS 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.

Status of Corrective Action: Fully Implemented

The JISC on-site protocol includes procedures for performance report review. LCLC provides monthly data reports to the Office of the Mayor and DFSS. LCLC is also required to attend monthly performance management sessions with representatives from DFSS and the Office of the Mayor. These sessions include reviewing reports and determining whether any operational changes are necessary. The Office of the Mayor stated that with these procedures it has identified several trends that informed program decisions. For example, it discovered that detectives were seeking advice from the Juvenile Temporary Detention Center (JTDC) prior to determining if a youth should be sent to court or detained. Clarification on this policy resulted in CPD diverting more youth—rather than sending them to court—once detectives began to make diversion decisions without calling JTDC.

FINDING 2:

CPD violated the Local Records Act by destroying youth screening records without Local Record Commission approval.

OIG Recommendation 6:

OIG recommended CPD notify the Local Records Commission of its failure to retain JISC risk screens.

Status of Corrective Action: Not Implemented

CPD has not notified the Local Records Commission of its failure to retain JISC risk screens. CPD located 130 of the 267 missing risk screens identified by OIG's audit. However, the Department still cannot locate the other 137 risk screens. Therefore, we still urge CPD to notify the Local Records Commission of its failure to retain JISC risk screens.

OIG Recommendation 7:

OIG recommended that CPD implement and enforce a written policy for collecting and retaining risk screens and sending them to the Youth Investigations Division (YID) at CPD Headquarters for storage.

Status of Corrective Action: Substantially Implemented

CPD updated its arrest package assembly instructions to include the JISC risk screen in arrest packages sent to CPD headquarters. CPD also updated Special Order S06-04-06 to state that detectives are responsible for including the JISC risk screen in all arrest packages sent to

YID. However, CPD stated that the updated version of S06-04-06 is not currently in effect, but has been submitted for review as required by the consent decree between the City of Chicago and State of Illinois.² CPD will review feedback from the consent decree's Independent Monitoring Team and the Illinois Attorney General, and make any necessary adjustments to the draft before it is made effective.

OIG Recommendation 8:

OIG recommended that CPD 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.

Status of Corrective Action: Fully Implemented

CPD shared written guidance with all JISC personnel regarding record retention requirements. This guidance reminds JISC personnel that the risk screen is a component of a juvenile's arrest record and is a public record under the Illinois Local Records Act. It instructs that only the Local Records Commission can approve the destruction of public records. It also requires JISC personnel to retain risk screens and associated documentation, and to secure approval from the Local Records Commission before destroying any records. By its terms, the guidance is to be read to personnel at seven consecutive roll calls. In addition, as mentioned above, the arrest report assembly instructions make it clear that the risk screen must be included in the arrest package sent to CPD headquarters for filing.

OIG Recommendation 9:

OIG recommended that CPD ensure that all timestamped JISC entry and exit fields are accurately completed in the Citizen and Law Enforcement Analysis and Reporting (CLEAR) database. To this end, we recommended that the Department create input controls in the system, such as required text fields. If CPD chose to use a validated risk screening tool in electronic format, OIG recommended that the tool likewise include input controls to ensure that all fields are entered completely and accurately. OIG also recommended that CPD 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, OIG recommended that the Department communicate to its

² Consent Decree, State of Illinois v. City of Chicago, No. 17-cv-6260 (N.D. Ill., Jan. 31, 2019), <http://chicagopoliceconsentdecree.org/wp-content/uploads/2019/02/FINAL-CONSENT-DECREE-SIGNED-BY-JUDGE-DOW.pdf>.

processing detectives the importance of having comprehensive electronic JISC data available for performance assessments.

Status of Corrective Action: Partially Implemented

CPD updated CLEAR in November 2020 to align with the JISC risk screen fields and added input controls to make particular fields mandatory. However, CPD acknowledged that not all fields are mandatory; this may result in important entry, exit, or screening information being left out of CLEAR. For example, CLEAR requires detectives to select a recommended case disposition, but it does not require them to input factors in a youth's case that led to that decision, such as whether a youth has an extensive arrest history.

CPD did not implement any written policies to ensure that JISC-related data is entered into CLEAR completely and accurately. CPD stated that supervisors are required to review and approve CLEAR reports for accuracy and correctness, and communicated the importance of having complete and accurate program data to JISC supervisors in emails shared with OIG. These emails also show that users are not consistently entering and approving case dispositions where required, and that supervisors are not reviewing this data on a regular basis. OIG urges CPD to implement written policies to ensure that the necessary information is entered in the CLEAR database, and to perform regular reviews of the JISC CLEAR data.

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 Recommendation 10:

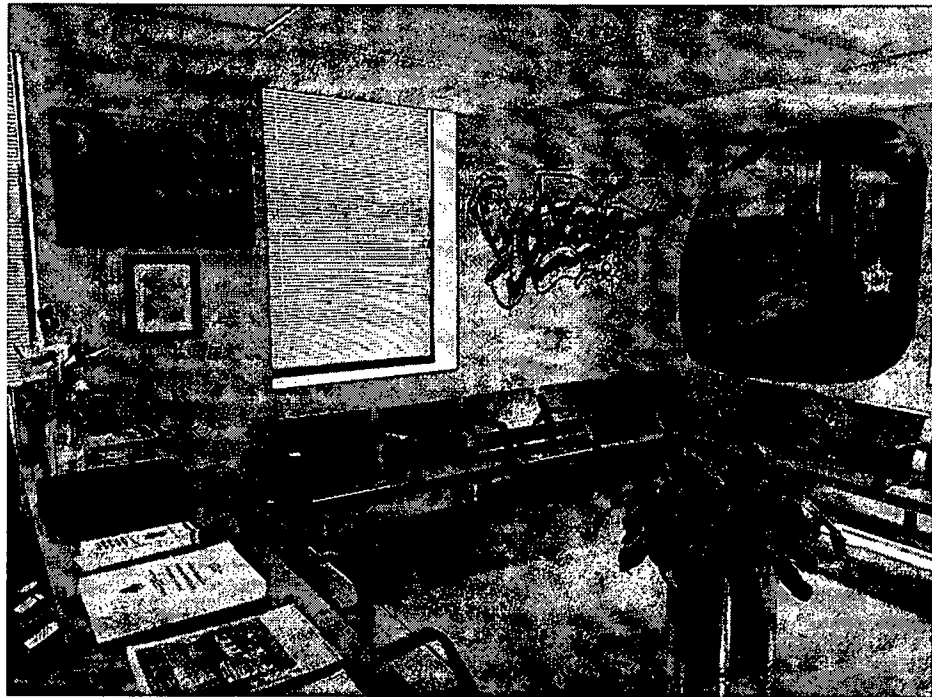
OIG recommended that CPD, working with DFSS and the case management agency, take steps to develop the JISC facility into something more like the diversion and services center originally envisioned for the program, and less like a typical police station or lockup. This might include aesthetic changes (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. We also recommended that CPD consult with community organizations and subject-matter experts to make JISC a trauma-informed facility.

Status of Corrective Action: **Partially Implemented**

OIG visited the JISC facility and observed the changes CPD made following the audit. CPD stated that because JISC would be closing soon in favor of a new diversion model, the Department would not be making all the initially planned upgrades.

As shown in Figure 1, CPD added positive messaging and artwork throughout the first and second floors. After School Matters and Walls of Hope provided murals, and JISC personnel donated pieces of artwork.

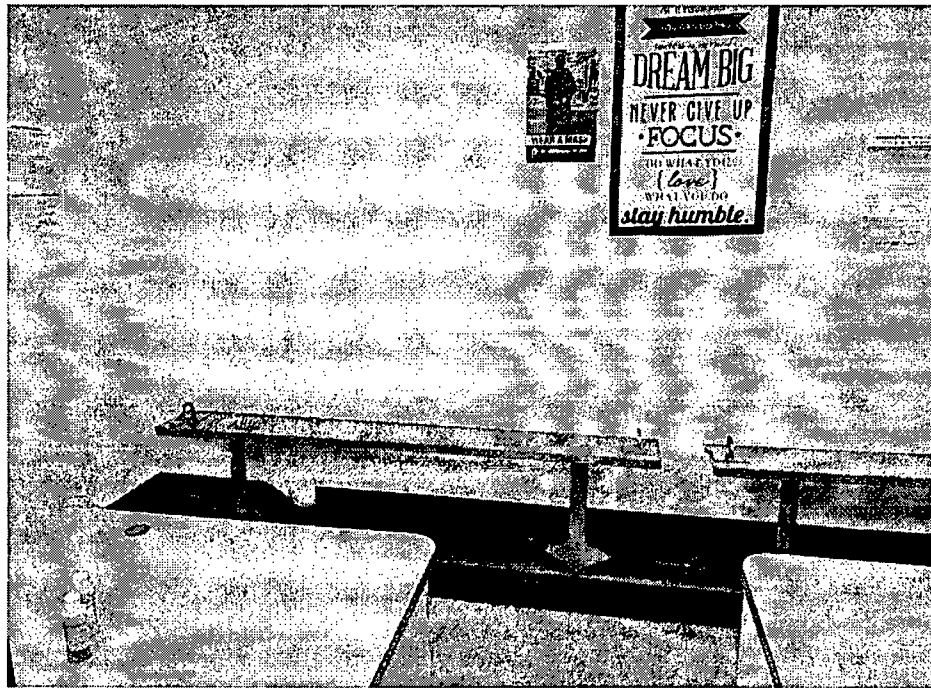
FIGURE 1: Staff and program partners added artwork throughout the JISC facility



Source: OIG photo taken July 14, 2021.

The arrest processing areas received new computers and two additional workstations to speed up processing. CPD also removed the restraint benches with handcuffing rails from these areas, replacing them with similar restraint benches that feature two handcuffing rings. This is shown in Figure 2.

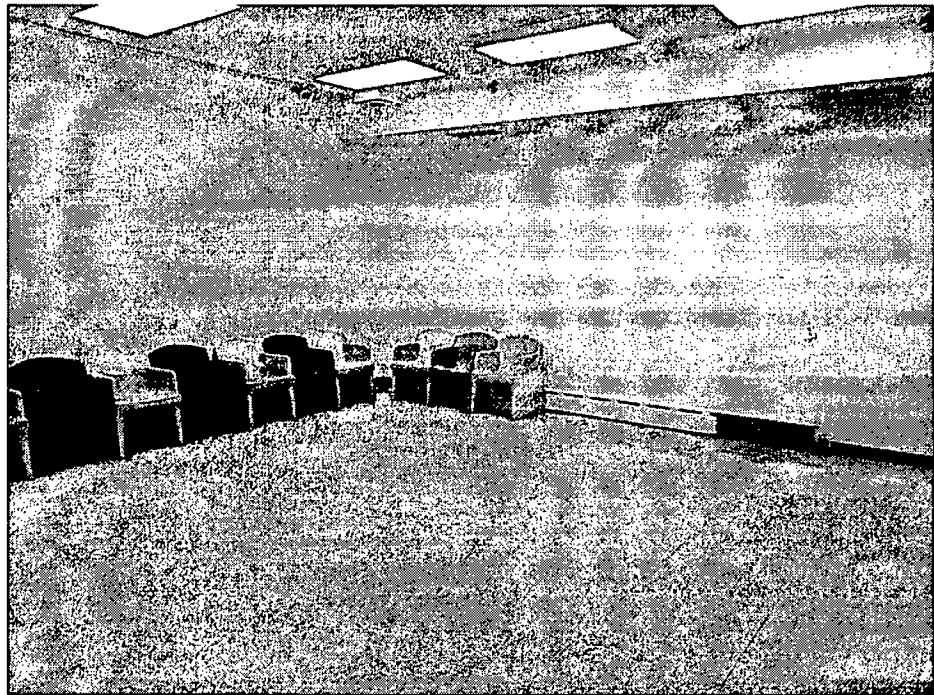
FIGURE 2: JISC's arrest processing areas still feature restraint benches for handcuffing youth



Source: OIG photo taken July 14, 2021.

CPD removed the restraint benches entirely from the secure holding rooms. These rooms now feature only plastic seating, shown in Figure 3.

FIGURE 3: CPD removed restraint benches from the secure holding rooms



Source: OIG photo taken July 14, 2021.

LCLC now has a dedicated room on the second floor for meeting privately with youth. CPD remodeled another room on the first floor for service providers to use when on-site.

The Office of the Mayor stated that it also met with several experts and trauma-informed youth centers, including the Chicago Children's Advocacy Center, Marillac Saint Vincent Family Services, and the Erickson Institute. These groups made several suggestions. Due to limited funding and the plan to close the current JISC facility in 2022, the City determined it would not pursue these suggestions further, but would implement them at future youth diversion centers.

OIG Recommendation 11:

OIG recommended that CPD 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. OIG also recommended that CPD 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, OIG recommended that CPD develop alternative security features that lessen the risk of retraumatizing the youth.

Status of Corrective Action: Not Implemented

CPD drafted a revised Special Order S06-04-06 to reflect that handcuffing is discouraged unless necessary for safety reasons. This draft Special Order is going through the review process required by the consent decree and therefore is not yet effective. CPD stated that it was unable to develop a technical solution to track the practice of handcuffing youth to stationary objects at JISC; therefore, the Department is not currently engaged in such tracking.

As noted under Recommendation 10, CPD removed restraint benches with handcuffing rails from the arrest processing areas and secure waiting room, but the arrest processing areas now feature similar benches with handcuffing rings. The new benches are functionally the same as the prior benches and are not the sort of alternative security feature contemplated by OIG's recommendation.

CPD has posted notices on the walls throughout the facility that remind officers of paragraph 36 of the consent decree, which provides guidance on handcuffing youth. However, without tracking the practice of handcuffing youth to stationary objects at JISC, CPD cannot determine whether officers are following this guidance. OIG maintains that CPD should track and review the practice of handcuffing youth to stationary objects at JISC.

OIG Recommendation 12:

OIG recommended that CPD 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. OIG recommended that, to the extent selection is governed by collective bargaining agreements, CPD and the City work with the relevant unions to develop a process that aligns with this principle.

Status of Corrective Action: Partially Implemented

CPD developed a list of preferred qualifications and qualities for applicants of future JISC vacancies. These state that JISC lieutenants and sergeants "should have an education in Psychology, Education, Youth Development, or other subject that aligns with the work done at the JISC." Beyond this, they state that JISC staff should communicate effectively, demonstrate

integrity, and promote continuous training on diversion and youth wellness.

CPD also developed a list of interview questions to help with the selection of qualified lieutenant candidates. However, CPD is bound by collective bargaining agreement requirements that apply to the selection of JISC personnel. When there are openings, a notice is posted and detectives bid for JISC positions based on seniority. Therefore, CPD cannot choose an officer with relevant experience working with youth to work at JISC unless the officer also has the seniority needed to prevail in a bid for a particular position.

OIG Recommendation 13:

OIG recommended that CPD, in consultation with DFSS and subject matter experts in the field of juvenile risk assessment, 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. We also recommended that the new tool conform to best practices, including validation through independent studies and incorporation of evidence-based risk factors.

OIG recommended that the protocols for using this tool 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. We further recommended that protocols provide clear guidance on whether or not screens should be conducted face-to-face with youth and provide a script for any in-person screening interactions. OIG also recommended that CPD properly train processing detectives on the screening procedures.

Finally, OIG recommended that, in assessing their options in this area, CPD and DFSS 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.

Status of Corrective Action: Partially Implemented

CPD still does not use an empirically validated risk screening tool. The Department elected not to implement a new risk screen because the City intends to close JISC in 2022 and replace it with a new program. The City plans to utilize a validated tool in its new youth diversion model to determine diversion eligibility.

CPD also has not implemented a new policy or any major changes to its risk screen, although the tool has been updated to reflect LCLC as the on-site case manager. CPD has not developed a written protocol on how to properly use the risk screen and when to override its diversion recommendations. Detectives at JISC do not fill out risk screens in person with detained youth; instead, they rely on administrative data providing arrest history.

However, there have been some changes to the risk screening process. According to the JISC on-site operations protocol, when a youth arrives at the Center, they are given the opportunity to speak with LCLC before a diversion decision is made. Youth who choose this opportunity meet privately with LCLC to discuss the limited legal representation the agency offers and to gather information for presentation to CPD in seeking diversion. CPD then discuss the youth's cases with LCLC before making final diversion decisions.

OIG maintains that CPD should utilize an empirically validated risk screening tool to guide its diversion decisions and develop a written protocol for its use.

OIG Recommendation 14:

OIG recommended that CPD provide training to its JISC staff on youth development, cultural competence, trauma-informed youth policing, and the program's vision and goals.

Status of Corrective Action: Fully Implemented

Since the audit, JISC staff received training on the following topics:

- understanding trauma;
- youth development;
- human trafficking; and
- LCLC's mission, goals, and services provided at JISC.

The Office of the Mayor stated that this effort is ongoing. CPD is working with the Erickson Institute to determine if detectives are offering diversion opportunities more frequently after training.

OIG Recommendation 15:

OIG recommended that CPD and DFSS analyze program data to determine which times of the week have the most JISC arrests. OIG recommended that DFSS 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. OIG also recommended that CPD and DFSS repeat this analysis on a regular basis and that DFSS include language in the forthcoming JISC case management contract providing for appropriate staffing at peak hours.

Status of Corrective Action: Fully Implemented

LCLC's contract with DFSS states that LCLC must regularly assess staffing schedules so that case managers are present at the times when the most youth arrive at JISC. According to the contract, the on-site hours will typically be 2:00 p.m. to 10:00 p.m., Monday through Friday, based on an analysis of the timing of youth arrivals at JISC. This schedule may change based on updated data. During these hours, one full-time attorney and a case manager are onsite.

OIG Recommendation 16:

OIG recommended that CPD and DFSS agree on and implement a case transfer procedure that ensures overflow referrals are not lost between CPD and the case management agency.

Status of Corrective Action: Fully Implemented

CPD and LCLC implemented case transfer procedures for both when LCLC is present at JISC and when it is not. The Office of the Mayor stated that it reconciles the case referrals CPD made with the cases LCLC received on a monthly basis. The Office of the Mayor ensures LCLC and CPD's information matches and intervenes if it finds discrepancies.

OIG Recommendation 17:

OIG recommended that CPD and DFSS 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. OIG also recommended that these discussions include Cook County Juvenile Probation, the Cook County State's Attorney's Office, the Public Defender's Office, Chicago Public Schools, and the Illinois Department of Children and Family Services, among others.

Status of Corrective Action: Fully Implemented

The Office of the Mayor stated that it formed a Youth Diversion Advisory Council with several stakeholders to monitor the JISC program and reforms made to it. The Advisory Council will also advise on a new youth

deflection and diversion model to replace JISC. The following organizations have participated in the Advisory Council:

- Alliance of Local Service Organizations (ALSO)
- Bluhm Legal Clinic, Northwestern University Pritzker School of Law
- Broader Urban Involvement & Leadership Development (BUILD)
- City of Chicago Office of the Mayor
- Chicago Department of Family & Support Services
- Chicago Department of Law
- Chicago Department of Public Health
- Chicago Police Department
- Chicago Public Schools
- Center for Conflict Resolution
- Circuit Court of Cook County Chief Judge's Office
- Circuit Court of Cook County Juvenile Justice Division
- Cook County Justice Advisory Council
- Cook County Juvenile Probation Department
- Cook County Juvenile Temporary Detention Center
- Cook County Juvenile Temporary Detention Center Foundation
- Cook County Public Defender's Office
- Cook County State's Attorney's Office
- Grand Victoria Foundation
- Illinois Department of Children & Family Services
- Illinois Justice Project
- Illinois Juvenile Justice Commission
- Individuals with lived experience
- Juvenile Justice Initiative
- Lawndale Christian Legal Center
- Metropolitan Family Services
- New Life Centers
- University of Chicago Crime Lab

These entities do not have a physical presence at JISC, although the Public Defender's Office provides attorneys via phone to represent youth during times that LCLC is not on-site.

The Advisory Council has convened seven times, receiving program updates and data reports from the Office of the Mayor. The Mayor's Office plans to continue convening this group on an as-needed basis while designing and implementing the City's new model for youth diversion and deflection.

OIG Recommendation 18:

OIG recommended that CPD and DFSS 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.

Status of Corrective Action: Fully Implemented

The City has taken several steps to engage with community stakeholders about JISC. The Office of the Mayor collaborated with the Civic Consulting Alliance (CCA) to interview local stakeholders and community organizations, as well as peer organizations from around the country, about JISC and youth diversion. CCA compiled its meeting notes and shared them with the Office of the Mayor.

The Office of the Mayor also facilitated community engagement with help from the design firm ChiByDesign. Together, they hosted workshops with organizational leaders, parents, and youth to identify the needs of young people impacted by the justice system. ChiByDesign's summary report is available on the JISC reform website.³

CPD also established new partnerships with community-based organizations in order to provide community access to a variety of walk-in services at the JISC facility. These organizations, which regularly rotate through JISC, have included Hartgrove Hospital, Youth Outreach Services, and the Family Resource Center on Disabilities.

FINDING 4:

While JISC diverts many youth from court, it produces inconsistent and inequitable results for the youth it serves.

OIG Recommendation 19:

OIG recommended that CPD 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. OIG recommended that CPD then periodically review processed JISC arrests and dispositions—including overrides—by associated personnel to identify patterns.

³ Christopher Rudd, Jessica Nelson, Surbhi Kalra, Tommie Collins, "Reimagining Youth Diversion Through Holistic Approaches," ChiByDesign, 2021, accessed August 26, 2021, https://www.chicago.gov/content/dam/city/sites/public-safety-and-violenc-reduction/pdfs/YouthDiversion_CommunityEngagement_Report_20210402.pdf.

Status of Corrective Action: **Partially Implemented**

CPD updated CLEAR to record the identities of the JISC detective that processes each youth and the JISC supervisor that approves the disposition. CPD stated that it is using a SharePoint form to track final dispositions and approvals, but emails shared with OIG show that the form is not consistently filled out correctly. While the JISC commanding officer reviews the information in SharePoint and will question individual users, CPD has not conducted an analysis to identify patterns. The Department plans to undertake such analysis in the future. OIG maintains that CPD should periodically review JISC arrests and dispositions by its personnel to identify patterns in diversion and override decisions.

OIG Recommendation 20:

OIG recommended that JISC watch coordinators review all case dispositions in real time, before cases are disposed of and youth leave the JISC facility. OIG also recommended that these reviews consider processing detectives' documented reasons for overriding the risk screen's recommended dispositions and reject any inappropriate overrides.

Status of Corrective Action: **Not Implemented**

During the audit, CPD asserted that JISC watch coordinators reviewed all case diversion decisions before youth left the JISC facility; however, JISC staff and OIG's own observation confirmed this did not always occur. Review comments from YID leadership show that the manner in which JISC supervisors review and approve case dispositions remains flawed. CPD has not provided additional training to JISC supervisors on the review process to ensure prompt completion. OIG maintains that JISC watch coordinators should review all case dispositions in real time—i.e., before cases are disposed of and youth leave the JISC facility.

OIG Recommendation 21:

OIG recommended that, in keeping with JISC's intended design as a social services-driven intervention center, CPD implement a process for offering youth social services without prosecution as a consequence if the services are not completed. This would 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.

Status of Corrective Action: Fully Implemented

The Office of the Mayor stated that current practice is for LCLC to provide services without the threat of prosecution if they are not completed, and that CPD's JISC field team no longer conducts home visits to youth who do not comply with their service plans. The case management contract states that LCLC will conduct "relentless follow up and engagement" with unresponsive clients. LCLC is required to make at least five contact attempts before closing a youth's case, including at least one home visit.

Additionally, CPD has established partnerships with community-based organizations to provide walk-in services and support to community members at JISC. These organizations are available according to a regular monthly schedule, and an arrest is not required to access the services they offer youth and families.

OIG Recommendation 22:

OIG recommended that CPD make clear to all field officers that they are required to bring eligible arrestees to JISC for processing per Special Order S06-04-06. In addition, OIG recommended that when a JISC-eligible arrestee is not processed at JISC, CPD officers clearly document why they were not and offer the youth the same diversion opportunities as JISC-processed youth. To this end, we recommended that CPD consider developing a virtual JISC disposition process for use at other CPD stations.

Status of Corrective Action: Partially Implemented

CPD sent out an administrative message to all JISC districts instructing officers to bring youth to JISC for processing. If JISC-eligible youth are brought to other facilities for processing, it is recorded in the youth's arrest report. This practice, however, is not currently tracked on an aggregate level. Therefore, CPD cannot determine whether all youth entitled to the chance of diversion through JISC are given that opportunity.

CPD opted to not develop a virtual JISC process to offer diversion to youth processed in district stations. The Department stated that the diversion model currently in development will be implemented city wide and open to all young people.

OIG Recommendation 23:

OIG recommended that CPD 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 for diversion through the program. OIG recommended that, at a minimum, posters describing what JISC means for juvenile arrestees be displayed at CPD stations in places visible to such arrestees during processing.

Status of Corrective Action: Substantially Implemented

CPD produced a variety of communication materials to inform the community about diversion opportunities. These materials are posted at the JISC facility and district stations within the JISC catchment area. CPD also shares information regarding JISC on a dedicated "Team JISC" Facebook page,⁴ on CPD's official Facebook page,⁵ and via CPD's Twitter feed.⁶

The Office of the Mayor stated that COVID-19 prevented community meetings during much of 2020, but that virtual Chicago Alternative Policing Strategy (CAPS) meetings in 2021 would feature JISC personnel providing information on the program. JISC has also participated in community listening tours and panels with other local agencies on the topic of juvenile justice.

OIG Recommendation 24:

OIG recommended that SGA revise its JISC policies to reflect that low-needs and no-needs areas identified by the Youth Assessment and Screening Instrument should not be serviced. OIG also recommended that if the assessment reveals that a youth has no areas of medium or high need, SGA pursue alternative means of case management. Finally, we recommended that the agency ensure that its case managers are aware of and adhere to the revised policy.

Status of Corrective Action: Fully Implemented

The case management contract specifies that LCLC must use a validated needs assessment tool. In order to avoid net widening, if that assessment shows no need, LCLC should not engage the youth in services. The Office of the Mayor stated that LCLC's contract is not dependent on the number of youth served, so there is no financial incentive to expand the number of youth receiving services.

⁴ Juvenile Intervention Support Center, "Team JISC Facebook Page," Facebook, October 29, 2021, <https://www.facebook.com/pages/category/Youth-Organization/Team-JISC-108150910799534/>.

⁵ Chicago Police Department, "Chicago Police Department Facebook Page," Facebook, October 29, 2021, <https://www.facebook.com/ChicagoPoliceDepartment/>.

⁶ Chicago Police Department, "Chicago Police Department Twitter Page," Twitter, October 29, 2021, https://twitter.com/Chicago_Police.

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