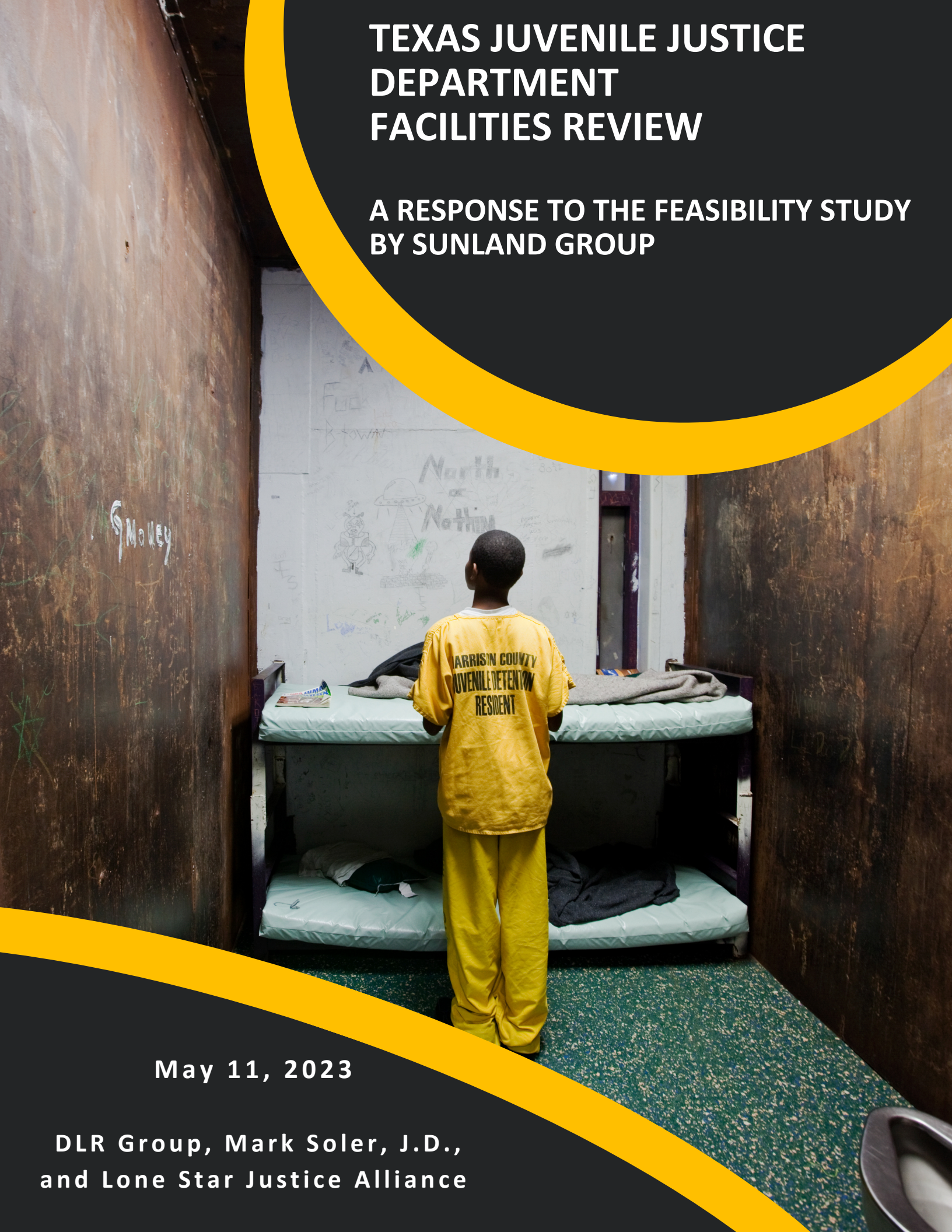
TEXAS JUVENILE JUSTICE DEPARTMENT FACILITIES REVIEW

A RESPONSE TO THE FEASIBILITY STUDY BY SUNLAND GROUP



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and Lone Star Justice Alliance

TJJD Facilities Review

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Report prepared by DLR Group, a nationally recognized integrated architecture firm **and Mark Soler, J.D**., former Executive Director of The Center for Children's Law and Policy.
Contributions from Lone Star Justice Alliance, a Texas-based nonprofit legal organization.

DLRGROUP ARCHITECTURE ENGINEERING PLANNING INTERIORS

LONE STAR JUSTICE ALLIANCE

Response to "Feasibility Study" to Build Three New TJJD Facilities

Introduction and Background[1]

This paper responds to the feasibility study by Sunland Group regarding the Texas Juvenile Justice Department's plan to build three new secure state juvenile residential facilities. TJJD has requested two options for new facilities:

- **Option 1:** Two 48-56 bed state commitment facilities and one 40-bed mental health facility strategically located throughout the State.
- **Option 2:** Two 100-bed state commitment facilities and one 40-bed mental health facility strategically located throughout the State.

The Sunland Group's study contains a number of valuable suggestions, particularly on the importance of building facilities that feel "less like a prison and more like a place where the youth can feel safe, educated, and rehabilitated."[2] The study notes that TJJD has cited with approval the Oregon Youth Authority Maclaren Campus project, and provides pictures comparing the Maclaren facility as an example of human scale with the Los Angeles Twin Towers Correctional Facility as an example of a "dehumanizing facility." In addition, the study calls for six-bed units, which makes it possible to provide more intensive supervision than eight- or ten-bed units.

However, the first step in designing new secure juvenile residential facilities[3] is **to develop responsible criteria for the use of secure confinement and an accurate assessment of the size and needs of the population in need of secure confinement**. Without such an analysis, the size of any new facilities can be a guessing game or a straight-line projection from past population trends. Also, the analysis makes it possible to identify youth currently held in secure facilities who could be released to community-based programs and services, thereby reducing the need for incarceration beds. This issue is not covered in the Sunland study. Consequently, this report will first address the need for secure confinement of young people in Texas and the implications for the size of any new secure facilities.

Equally important is the issue of where any new facilities should be located. Facilities should be close enough to population centers that family and friends can visit on a regular basis. **Family**

[1] This paper was written by DLR Group, a national employee-owned integrated design firm providing architecture, engineering, planning, and interior design, and Mark Soler, former executive director of the Center for Children's Law and Policy, a public interest law and policy organization based in Washington, DC.

[2] Sunland Group. (2022). Texas Juvenile Justice Department: Feasibility Study for Three New Facilities, 21.

[3] In this report, secure state juvenile facilities operated by TJJD will be referred to as "commitment facilities" or "secure state facilities." "Detention facilities" will refer to pre-adjudication, mostly short-term confinement facilities which are usually operated by county government. This report focuses primarily on commitment facilities.

support is often critical to the rehabilitation and eventual reintegration of young people back into their homes and communities. In a large state like Texas, however, with multiple population centers, effective siting of new facilities is a challenge. The Sunland report discussed the issue of location. This report will provide further analysis and more specific recommendations for locations of any new TJJD secure facilities.

The Needs of Young People in the Texas Juvenile Justice Department

A. Dangers of Incarceration

This is a critical first issue. Secure confinement of young people has harmful consequences and should only be used for youth adjudicated for the most serious offenses. The dangers of incarceration include[4]:

- **Increasing recidivism**. Youth who experience secure confinement are more likely to recidivate than comparable youth who are supervised in community-based programs and services. Incarceration does not deter most youth from further offending.
- **Creating schools for crime**. Locking young people up puts them in close contact with other youth who have committed delinquent offenses. They "learn" from other delinquent youth. This is especially concerning for youth locked up for non-violent offenses (which is the majority of youth incarcerated by TJJD), who can learn violent behavior from their peers.
- **Preventing youth from "aging out of delinquency."** Many young people commit delinquent acts during adolescence. Most of them leave delinquent behavior behind as they get older. Incarceration interrupts the normal cycle of adolescent growth and sets youth on the wrong path to the future.
- **Making youth with mental health problems worse.** The physical environment in many secure juvenile facilities is often overcrowded, chaotic, and violent. The depressing environment and rigid behavior restrictions exacerbate the mental health problems of adolescents. They increase the likelihood of depression, suicide, and other self-harming behaviors.
- **Interrupting education.** Incarceration interrupts the educational curriculum. Few facilities are able to closely follow the state-approved educational curriculum, so youth get further and further behind. Also, incarcerated youth are less likely to return to school after release and more likely to drop out of school within a year.

[4] Holman, B., & Ziedenberg, J. (2006). The Dangers of Detention: The Impact of Incarcerating Youth in Detention and Other Secure Facilities (Justice Policy Institute), 4. https://justicepolicy.org/wp-content/uploads/2022/02/06-11_rep_dangersofdetention_jj.pdf.

- **Making employment more difficult.** Due to the interruption of education and the negative behaviors learned in secure facilities, incarcerated youth are less employable and more likely to earn less than peers who are not incarcerated.

For these reasons, incarceration should be reserved for youth adjudicated for the most serious offenses.

B. Commitment of Youth in Texas

> "IN TOTAL, 62% OF YOUTH COMMITTED TO TJJD IN 2021 WERE NOT COMMITTED FOR VIOLENT FELONIES."

In Texas, the majority of youth committed to TJJD are ***not*** committed for violent crimes. TJJD reports that in 2021 there were a total of 562 commitments. Of those, 38%, or 213, were commitments for violent felonies; 19%, or 108, were commitments for other felonies; and 43%, or 241, were commitments for violations of probation.[5] In total, 62% of youth committed to TJJD in 2021 were not committed for violent felonies.

The number of youth committed for violations of probation is noteworthy. Violations of probation occur when an individual under a court order violates that order. **Many violations are "technical," i.e., they disobey the terms of the order but would not be serious offenses by themselves**. Examples are failing to meet regularly with probation officers, testing positive for marijuana, and failing to attend school every day. Probation violations generally are not for serious new offenses because that behavior would be charged as a new offense.

It is, of course, important for individuals to obey court orders, and those who disobey such orders should be held accountable. However, holding youth accountable for probation violations does not necessarily mean that the youth should be locked up in a state facility, away from family, school, and community. Indeed, many youth may be locked up for probation violations when their original offense was not a serious crime that would, in and of itself, warrant incarceration.

Some jurisdictions have developed "graduated sanctions" programs that take into account (a) the seriousness of a specific probation violation and (b) the risk level assigned to the youth (often based on the most serious original charge).[6] The more serious the specific violation and/or risk

[5] Texas Juvenile Justice Department. (2022). The State of Juvenile Probation Activity in Texas: Statistical and Other Data on the Juvenile Justice System in Texas for Calendar Year 2021, 12.

[6] In 2003, the Texas Legislature added Chapter 59, Texas Family Code, creating a Progressive Sanctions Model to ensure that juveniles face uniform and consistent consequences and punishments that correspond to the

level, the more consequential the sanction. The less serious the violation and/or lower risk level, the less consequential the sanction. Low-level sanctions may include writing an apology to a probation officer or performing community service on a weekend. The highest-level sanction is temporary confinement, though usually in a county juvenile pre-trial detention facility rather than a state institution.

"…previous state-ordered programs and services failed to prevent more than three-fifths of the youth committed in 2021 from returning to lockup. "

A more effective approach is to develop "graduated responses" to probation violations which provide incentives for good behavior as well as sanctions for violations. Research has demonstrated that combining positive incentives with negative sanctions is much more likely to reduce the unwanted behavior than either sanctions alone or increasing the severity of the sanctions. Using graduated responses, counties in New Jersey, Missouri, Louisiana, California and Minnesota have reduced their probation violations and their use of incarceration as a sanction by more than 50%.[7]

The data and research indicate that at least some youth committed to TJJD for probation violations, and perhaps most, do not require incarceration in state secure facilities. This would be consistent with a national trend to reduce the ineffective and punitive aspects of probation by diverting youth to community-based services and reserving probation for high-risk youth who can benefit from well-trained case managers with small caseloads.[8]

Data from TJJD also indicate that the juvenile justice system has had limited effectiveness in turning around the lives of young people in its custody who are most in need. According to TJJD profile data on youth commitments, in 2021, of 569 youth admitted to locked state facilities, 351, or just over 61%, had a prior court-ordered out-of-home placement.[9] That means that the previous state-ordered programs and services failed to prevent more than three-fifths of the youth committed in 2021 from returning to lockup. Further, in 2021, 64% (367) of the youth committed were on probation at the time of commitment.[10] Thus, for almost two-thirds of youth

seriousness of the current offense, prior delinquent history, special treatment or training needs, and effectiveness of prior interventions.

[7] Center for Children's Law and Policy. (2016). Graduated Responses Toolkit: New Resources and Insights to Help Youth Succeed on Probation. Washington, DC. https://cclp.org/wp-content/uploads/2016/06/Graduated-Responses-Toolkit.pdf.
[8] Annie E. Casey Foundation. (2018). Transforming Juvenile Probation: A Vision for Getting It Right.
[9] TJJD Admission Profile FY 2013-2022, Commitment and Admission Data, https://www.tjjd.texas.gov/index.php/doc-library/category/699-commitment-and-admission-data.
[10] *Id*.

committed, probation services were insufficient to prevent them from getting in trouble again. There must be a better way, and there is.

"[E]VEN BEFORE THE COVID-19 PANDEMIC, LBB PROJECTIONS WERE MORE THAN 25% HIGHER THAN

C. Actual vs Projected Average Daily Population (ADP)

In 2022, the Legislative Budget Board (LBB) released its projections for Texas' correctional population and estimated that the number of youths within the state residential facilities would increase by over 21% in the next few years. These population projections have been used as the basis for Texas' need to build new state secure facilities for youth. However, these population projections have consistently overestimated the number of youths committed to TJJD's state secure facilities. As seen in figure 1, the projected average daily population has been significantly higher than the actual average daily population (ADP) within TJJD's state facilities for years.[11] In fact, even before the COVID-19 pandemic, LBB projections were more than 25% higher than actual ADP. This consistent overestimation of TJJD's youth population underscores our concern that taxpayer money will be invested in unnecessary bed space that will not be seen for years to come.

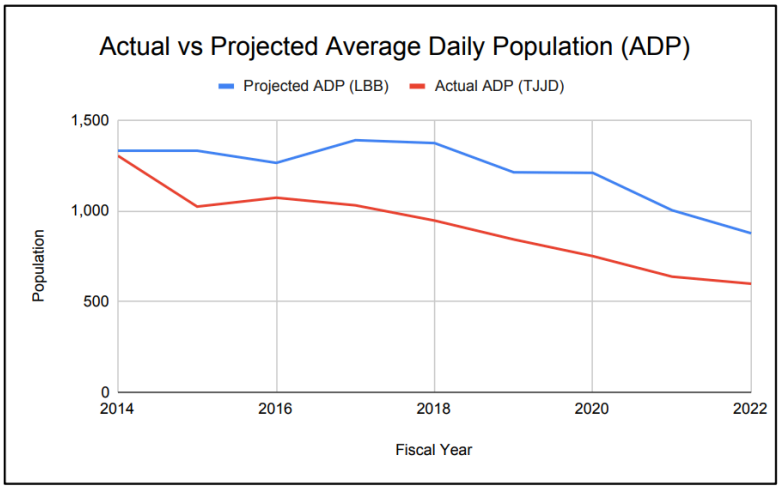

Figure 1. Actual vs. Projected Average Daily Population of youth in TJJD's secure facilities.

[11] Legislative Budget Board of Texas, Adult and Juvenile Correctional Population Projections Fiscal Years 2022 to 2027, (July 2022); See also Texas Appleseed, Rightsizing the Justice System: Testimony to the Senate Finance Committee on Article V, (February 2023) available at https://www.texasappleseed.org/sites/default/files/2.9.23%20Sen%20Finance%20testimony%20(FINAL).pdf available at https://www.lbb.texas.gov/Public_Safety_Criminal_Justice.aspx

D. Youth Adjudicated for Violent Felonies

In 2011, juvenile justice researcher Richard Mendel summarized the problems with large juvenile facilities with six words: dangerous, ineffective, unnecessary, obsolete, wasteful, and inadequate.[12] Those words are relevant today to TJJD's secure juvenile facilities. The abuses of young people in TJJD programs have been widely-reported.

For those youth who, by their behavior, have demonstrated a serious risk to themselves, their families, and their communities, and who need to be incarcerated for some period of time to protect themselves and others, the most effective jurisdictions have held them in small, secure, staff-intensive facilities with extensive support services and regular contact with families. In the early 1970s, Massachusetts led the way in closing its large and dangerous state facilities and developing the country's first statewide network of small community-based programs and small secure facilities. Missouri closed its two training schools in the 1980s and then developed a regional network of small, intensive facilities, none with more than 40 beds. In 1993, Ohio created RECLAIM Ohio, which provided financial incentives to counties to keep youth in their home communities rather than committing them to state facilities. Commitment rates dropped by more than a third. In 2004, Illinois developed a similar program, called Redeploy Illinois. In the first three years, the pilot counties saw a drop in commitments of 55%. In 1996, Wayne County, Michigan, took responsibility from the Michigan Department of Human Services for youth in the juvenile justice system, and created a continuum of community-based services, close to youth's families. By 2014, the county had, among other achievements, reduced the number of youth in state facilities from 700 to 2. In 2012, the New York State Legislature created "Close to Home," an initiative that would successfully move New York City youth out of large, dangerous, and distant state facilities and place them in small secure and non-secure programs in the various boroughs of New York City, close to their homes.[13] In 2017, Utah enacted juvenile justice reforms and developed a network of small secure and non-secure programs in the state, cutting the incarcerated population by 46%.[14] Texas policymakers implemented juvenile justice reforms between 2007 and 2012 that resulted

[12] Richard Mendel. (2011). No Place for Kids: The Case for Reducing Juvenile Incarceration. Annie E. Casey Foundation. https://assets.aecf.org/m/resourcedoc/aecf-NoPlaceForKidsFullReport-2011.pdf.

[13] Jason Szanyi and Mark Soler. (2018). Implementation of New York's Close to Home Initiative: A New Model for Youth Justice. Center for Children's Law and Policy. https://cclp.org/wp-content/uploads/2018/02/Close-to-Home-Implementation-Report-Final.pdf.

[14] Fox 13 Salt Lake City, "Data shows Utah's juvenile justice reform is working," (Jan. 21, 2021), https://www.fox13now.com/news/local-news/data-shows-utahs-juvenile-justice-reform-is-working.

in a 66% reduction in youth in state secure juvenile facilities and the closing of 8 state-run correctional facilities.[15]

These examples demonstrate that any new state secure facilities in Texas should be small and staffed with well-trained professionals, similar to those in a growing number of states. The emphasis should be on treatment, rehabilitation, and support, not on discipline and punishment. Under no circumstances should Texas build new 100-bed facilities.

E. Youth Not Adjudicated for Violent Felonies

For other offenses, including non-violent offenses and violations of probation, many other states provide effective supervision and rehabilitation without incarceration. These states have developed a broad continuum of community-based programs and services, including staff-secure programs, designed to meet the varying needs of young people who get in trouble. These programs and services include[16]:

- **Diversion programs**, which divert youth out of the formal juvenile justice system and into community-based programming;
- **Deflection programs**, which are diversion programs led by police, who issue citations or refer youth to case management, restorative justice, or other programs[17];
- **Alternative education programs**, which provide alternative educational settings for disruptive or suspended students to prevent them from getting into more trouble[18];
- **Positive Behavioral Interventions and Supports (PBIS)**, a national schoolwide prevention program which tracks behavior closely and utilizes positive reinforcements to reduce problem behaviors that may lead to school discipline, suspension, and involvement with the juvenile justice system[19]
- **Restorative justice programs**, which bring together young people and victims of their crimes to talk together about the harm to the victims, the youth, the families, and the community;
- **Intensive supervision programs in the community**, which provide close supervision and support to youth by individual staff (including "credible messengers") in order to safely maintain youth in their communities and build their skills and positive connections;

[15] Tony Fabelo, et. al. Closer to Home: An Analysis of the State and Local Impact of the Texas Juvenile Justice Reforms. (2015). The Council of State Governments Justice Center and Public Policy Research Institute, https://csgjusticecenter.org/wp-content/uploads/2020/01/texas-JJ-reform-closer-to-home.pdf.
[16] Center for Children's Law and Policy et al. (2020). *Maine Juvenile Justice System Assessment.*
[17] Marc Hayden and Steven Greenhut. (2022). How Juvenile Justice "Deflection" Programs Reduce Crime and Save Money. R Street Institute. https://www.rstreet.org/wp-content/uploads/2022/09/Final-Short-No.-116.pdf.
[18] E.g., the Rochester Resilience Project, designed to prevent mental health problems and substance abuse by teaching young children social-emotional and behavioral skills, https://crimesolutions.ojp.gov/ratedprograms/371#pd.
[19] PBIS, https://www.pbis.org.

- **Mentoring, Big Brothers, and similar programs**, which provide caring adults to help youth navigate adolescence through frequent contact;
- **Evening reporting centers**, which provide structured activities, supervision, help with homework, and snacks immediately after school until the youth return home in the early evening, so that youth are always under adult supervision;
- **Day reporting centers**, which provide supervision during the entire day, including school services;
- **Wraparound services**, which provide a variety of services attuned to the individual needs of the youth and the family while allowing the youth to live at home;
- **Family-based treatment interventions** like Multisystemic Therapy (MST) and Functional Family Therapy (FFT), which provide family-focused support services 24/7 through case managers with very small caseloads and reliable availability;
- **Shelter care**, which provides short-term places to stay for youth who need to temporarily be apart from their families;
- **Emergency foster care**, which provides temporary housing in a home with a family;
- **Group homes**, which provide short- and intermediate-term housing for youth who cannot return to their homes;
- **Other types of transitional housing,** such as Transitional Living Programs, which provide temporary housing and supports for homeless youth;
- **Residential programs** such as Boys Town[20], which are longer-term alternative treatment programs that focus on teaching, interpersonal relationships, and connections with family members;
- **Staff-secure transitional housing**, which provides close supervision by trained staff in home-like settings;
- **Staff-secure residential and treatment programs**, which provide treatment programs in settings that are unlocked but provide security through close staff supervision;
- **Community-based mental health programs**, which provide mental health services for youth who do not need locked settings;
- **Community-based substance use disorder programs**, which provide for services for youth with alcohol or drug problems;
- **Mobile crisis teams**, which travel to locations and provide on-the-spot crisis-intervention and behavioral health services;

Improving the lives, health, and wellbeing of youth and their families requires collaboration and cooperation between the juvenile justice system and other human and social service agencies, including formalizing partnerships with education, health, mental health, child welfare, and

[20] Boys Town has been helping troubled children since 1917, https://www.boystown.org/about/Pages/default.aspx?s_src=google_grants&s_subsrc=cpc&gad=1&gclid=EAIaIQobChMImpW5vovk_gIVN_TjBx2ffgAYEAAYASABEgIycvD_BwE.

employment agencies. Throughout these efforts, **youth and their families need to be given the chance to be involved in the decisions that affect them by sharing their perspectives and experiences**. The focus should be on positive youth development, which builds on youth's strengths rather than their shortcomings.[21]

F. Need for Mental Health Services

Of particular concern In Texas is the number of youth with serious mental health problems in state secure facilities. The TJJD profile data report the horrendous histories and enormous specialized treatment needs of committed youth. One set of data pertain to the Adverse Childhood Experiences (ACEs) committed youth experienced prior to age 18. Assessing ACEs is a primary way to determine the significance of abuse, neglect, trauma, and prolonged stress in children's lives. ACEs can include emotional, physical, or sexual abuse; emotional or physical neglect; having a family member attempt or die by suicide; or growing up in a family with family violence, substance abuse, mental illness, incarceration of family members, or separation or divorce by parents.

ACEs can have serious long-lasting negative effects on young people. The adverse experiences can increase the risks of physical injury, sexually transmitted infections, maternal and child health problems (including teen pregnancy), involvement in sex trafficking, and range of chronic diseases and leading causes of death including cancer, diabetes, heart disease, and suicide. Prolonged or extended stress ("toxic stress") can disturb young people's brain development, immune systems, and stress-response systems, which in turn can affect youth's attention, learning, and decision-making. Young people growing up with toxic stress may have difficulty forming healthy and stable relationships.[22] Having a small number of ACEs is relatively common: about 61% of adults surveyed in 25 states reported that they had experienced at least one type of ACE by age 18.[23] Having four or more ACEs is associated with severe risk. For example, people who experience four or more ACEs are 12 times as likely to experience alcoholism, drug use, depression, and suicide attempts.[24]

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[21] Butts, Jeffrey A., Gorden Bazemore, & Aundra Saa Meroe (2020). Positive Youth Justice—Framing Justice Interventions Using the Concepts of Positive Youth Development. Washington, DC: Coalition for Juvenile Justice, http://www.juvjustice.org/sites/default/files/resource-files/Positive%20Youth%20Justice.pdf.

[22] Centers for Disease Control and Prevention. (n.d.). Fact Facts: Preventing Adverse Childhood Experiences, https://www.cdc.gov/violenceprevention/aces/fastfact.html#:~:text=Toxic%20stress%20from%20ACEs%20can,forming%20healthy%20and%20stable%20relationships.

[23] *Id*.

[24] Felitti VJ, Anda RF, Nordenberg D, et al. Relationship of childhood abuse and household dysfunction to many of the leading causes of death in adults. The adverse childhood experiences (ACE) study. *Am J Prev Med*. 1998;14(4):245-258. doi: 10.1016/S0749-3797(98)00017-8

OF 569 YOUTH ADMITTED TO TJJD FACILITIES IN 2021, 42% HAD 4 OR MORE ACES, 15% HAD 6 OR 7 ACES, AND ALMOST 8% HAD 8 TO 10 ACES.

Of the 569 youth admitted to TJJD facilities in 2021, 42% (240) had four or more ACEs. Almost 14% (74), had 6 or 7 ACEs, and almost 8% (41) had 8 to 10 ACEs.[25] TJJD also reports on the "specialized treatment needs" of committed youth. According to TJJD, in 2021, 100% of the committed youth had a high or moderate specialized mental health treatment need, with 19 youth listed as "high need" and 441 listed as "moderate need." Further, 93% of the youth had a need for substance abuse treatment, with 296 (52% of the total) having a high need. More than 63% (398) were listed as needing sexual behavior treatment, with 46 (9%) having a high need. More than 70% of the committed youth (417) had three or more high or moderate specialized treatment needs.[26]

TJJD also reports that more than 90% of committed youth had both reading and math achievement below grade level: the median number of years below in reading was 5 years, the median number of years below in math was 6 years.

G. Conclusion

The data and the research demonstrate that TJJD does not need more lockup capacity. Instead of building more large and dangerous state facilities, TJJD should adopt the approach of many other states and reduce the number of young people in secure confinement while developing a full continuum of community-based programs and services. TJJD should also take a close look at the cases in which youth were committed for non-violent offenses and for violations of probation. Many of those youth, perhaps most, could be supervised more effectively, less expensively, and closer to home than in TJJD facilities.

Instead of building more large and dangerous state facilities, TJJD should reduce the number of young people in secure confinement while developing a full continuum of community-based programs and services.

What TJJD needs, and what the young people of Texas need, is more mental health facilities and community-based mental health programs. The TJJD data show a committed population with a significant number of Adverse Childhood Experiences and other specialized treatment needs. TJJD confirms that **every single one** of the youth

[25] Texas Juvenile Justice Department. (2022). The State of Juvenile Probation Activity in Texas: Statistical and Other Data on the Juvenile Justice System in Texas for Calendar Year 2021, 12.
[26] *Id*.

committed in 2021 had high or moderate special treatment needs. At least two of the new facilities that TJJD builds should be treatment facilities.

Location of New Secure Juvenile Facilities in Texas

To minimize the distances youth are detained from their homes, the Legislature requested the "facilities to be located close to larger populated counties which often contribute the most youth detainees." In addition to helping to keep youth closer to their families and other community support systems, TJJD also expects that operational efficiencies and staff recruitment opportunities will also increase.
Based on a state-wide site analysis, the following locations have been identified as "the most advantageous project locations" for the new juvenile justice facilities:

- New Juvenile Mental Health Facility: 1a. Dallas, Dallas County; 1b. Fort Worth, Tarrant County; 2. San Antonio, Bexar County; 3. Waco, McLennan County and 4. Houston, Harris County.
- New Juvenile Detention Centers: 1. Abilene, Taylor County; 2. Wichita Falls, Wichita County; 3. Beaumont, Jefferson County; 4. Laredo, Webb County; 5. Odessa, Ector County, and 6. Midland, Midland County.

A. Why Is the Location of the Suggested Facilities Important?

The importance of locating youth in facilities close to where they are from cannot be overstated. **Keeping youths closer to their families is critical to improving outcomes for youth.** Studies of successful youth who live in high-risk environments indicate the critical importance of strong bonds with caregivers or other adults in preventing problem behaviors. Additionally, frequent family visits and enhanced family connections are associated with behavior improvements, as well as better school attendance and performance.

Critical to keeping families engaged (or re-engaged in some instances) is the need to **locate youth commitment facilities in close proximity to the youths' parents but also to other prosocial supports (other supportive and extended family members, mentors, schools and civic organizations, etc.)**. All of this to ensure ongoing connection to positive social influences during the out-of-home placement period, but also to give caregivers the ability to participate in the youth's rehabilitation and transition plan, which is known to increase the likelihood of success for youth once they are released from custody.

B. New Juvenile Commitment Facilities

The DLR Group team performed a review and analysis of available youth data for the historical period of FY13-22. This data was used to assess whether the siting of the new facilities took into

consideration counties generating the largest number of state commitments annually, as an indicator of "where the youth in custody are/come from." Historically, the highest annual average of youth committed to TJJD's custody comes from the following ten counties (listed in order of more to less annual new commitments to TJJD). Together, these ten counties originate about 47% of all new admissions to TJJD[27]:

- Harris
- Tarrant
- Dallas
- Bexar
- Montgomery
- El Paso
- Denton
- McLennan
- Galveston
- Bowie

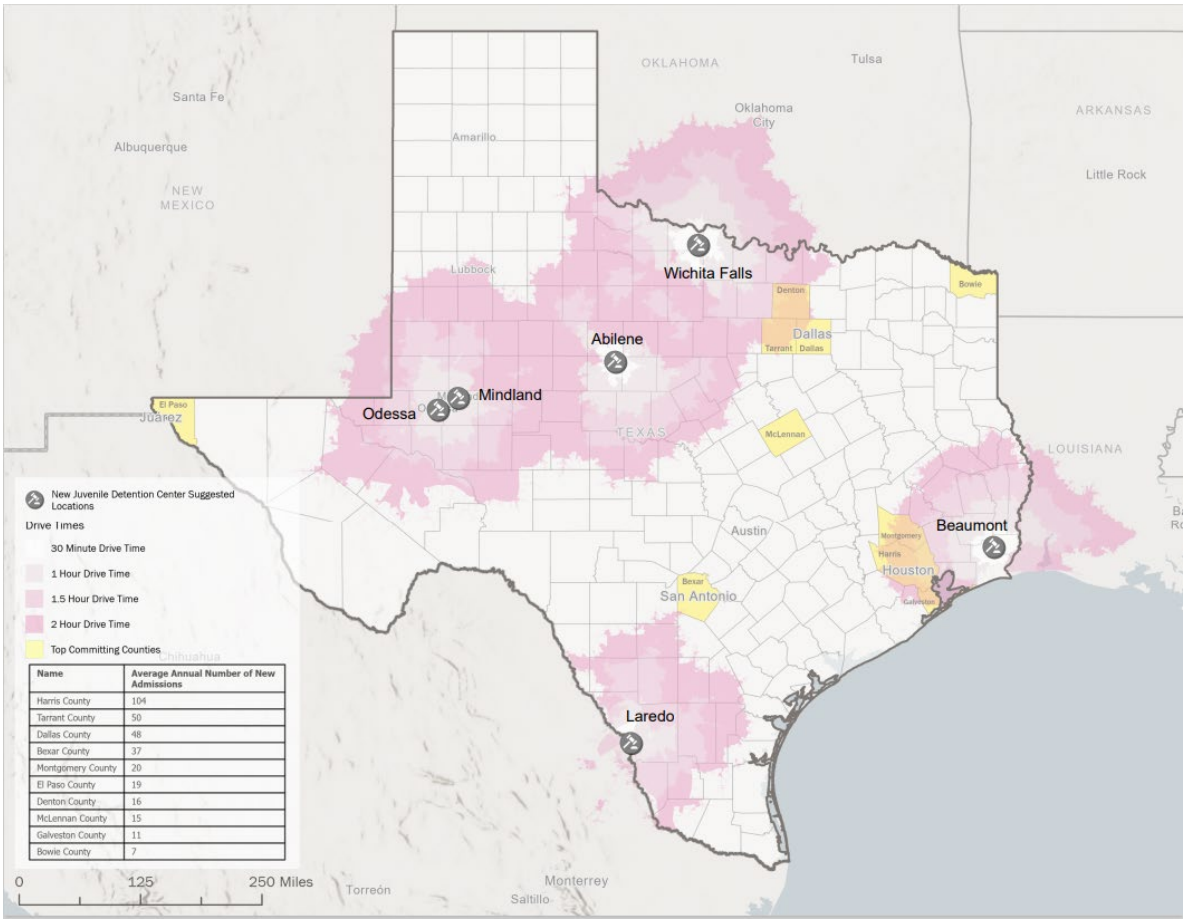
For ease of access and proximity to home community and program providers, the "Feasibility Study" references the following cities for the potential siting of the new juvenile facilities, as "areas where most of the youth in custody are coming from": Abilene (Taylor County), Wichita Falls (Wichita County), Beaumont (Jefferson County), Laredo (Webb County) and Odessa (Ector County) and Midland (Midland County). **None of these suggested cities is in one of the top ten counties committing the higher counts of youth to TJJD custody annually.**

Secondly, DLR Group performed a mapping exercise overlapping youth data with the proposed locations for the new facilities, with a focus on assessing the potential impact on youth and their families of siting the new facilities at any of the suggested locations. For each of the ten counties listed above, the county seat was used as a frame of reference to calculate driving distance thresholds.

Figure 1, shown below, provides a geographical depiction of the travel times between the location of residence (top ten counties indicated in yellow) and the suggested location for the new juvenile centers. **Taken collectively, the travel time analysis indicates that almost 100% of committed youth from the top ten counties will be sent over two hours of travel time from their homes**. As shown on the map below, building the new juvenile facilities on any of the suggested locations could greatly impact youth and their families in terms of driving distance. Families would have to drive more than 2 hours from the counties where most of the kids come from to the suggested locations for the new juvenile facilities.

[27] Source of data: TJJD Commitment and Admission Profile data downloaded on 03/21/2023 from TJJD website

Figure 1. Mapping of Client home locations and Travel time

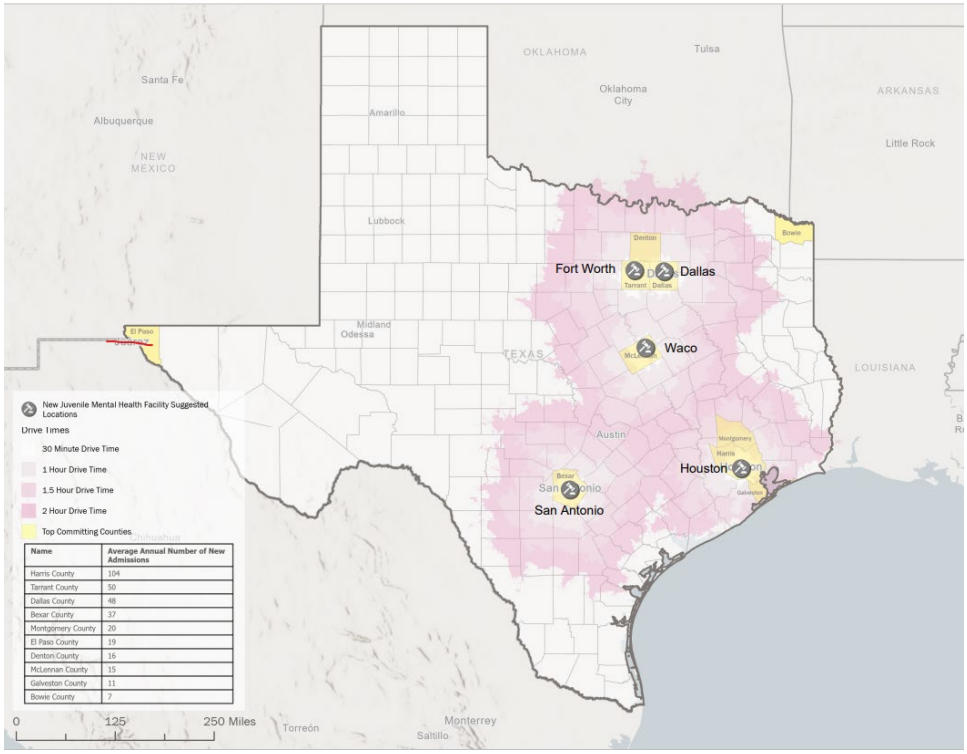


Name	Average Annual Number of New Admissions
Harris County	104
Tarrant County	50
Dallas County	48
Bexar County	37
Montgomery County	20
El Paso County	19
Denton County	16
McLennan County	15
Galveston County	11
Bowie County	7

C. New Juvenile Mental Health Facility

A similar data and mapping analysis was conducted for the recommended location of the proposed new Juvenile Mental Health Center: Houston, Harris County; Dallas, Dallas County, Fort Worth, Tarrant County; San Antonio, Bexar County and Waco (McLennan). Three of the suggested locations are in counties generating most of the youth commitments to TTJD, which would facilitate the connection to the families and communities where the youth come from. However, when this information is overlapped with available data on Mental Health Professional Shortage Areas (MHPSAs), **the six proposed locations are MHPSAs.** The official list can be obtained from the HRSA website: https://data.hrsa.gov/tools/shortage-area/hpsa-find.

Based on this analysis, only Houston and Dallas would be partially suited as locations for the new mental health facility. At both counties, part of the county is shortage area.



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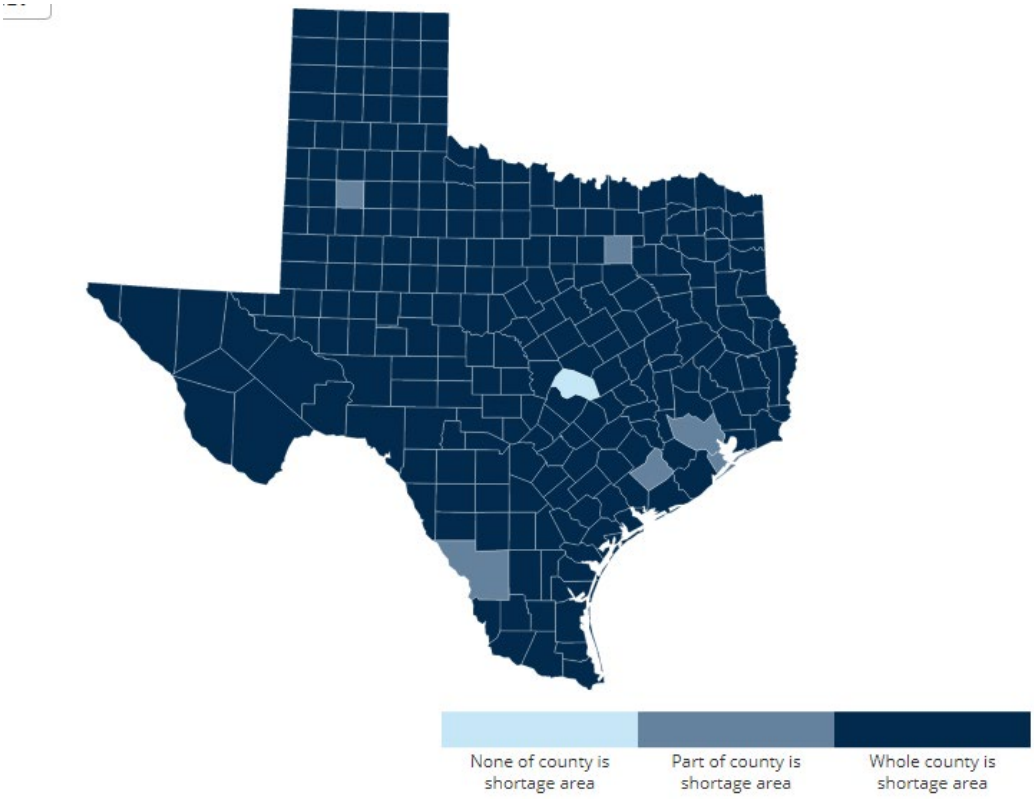
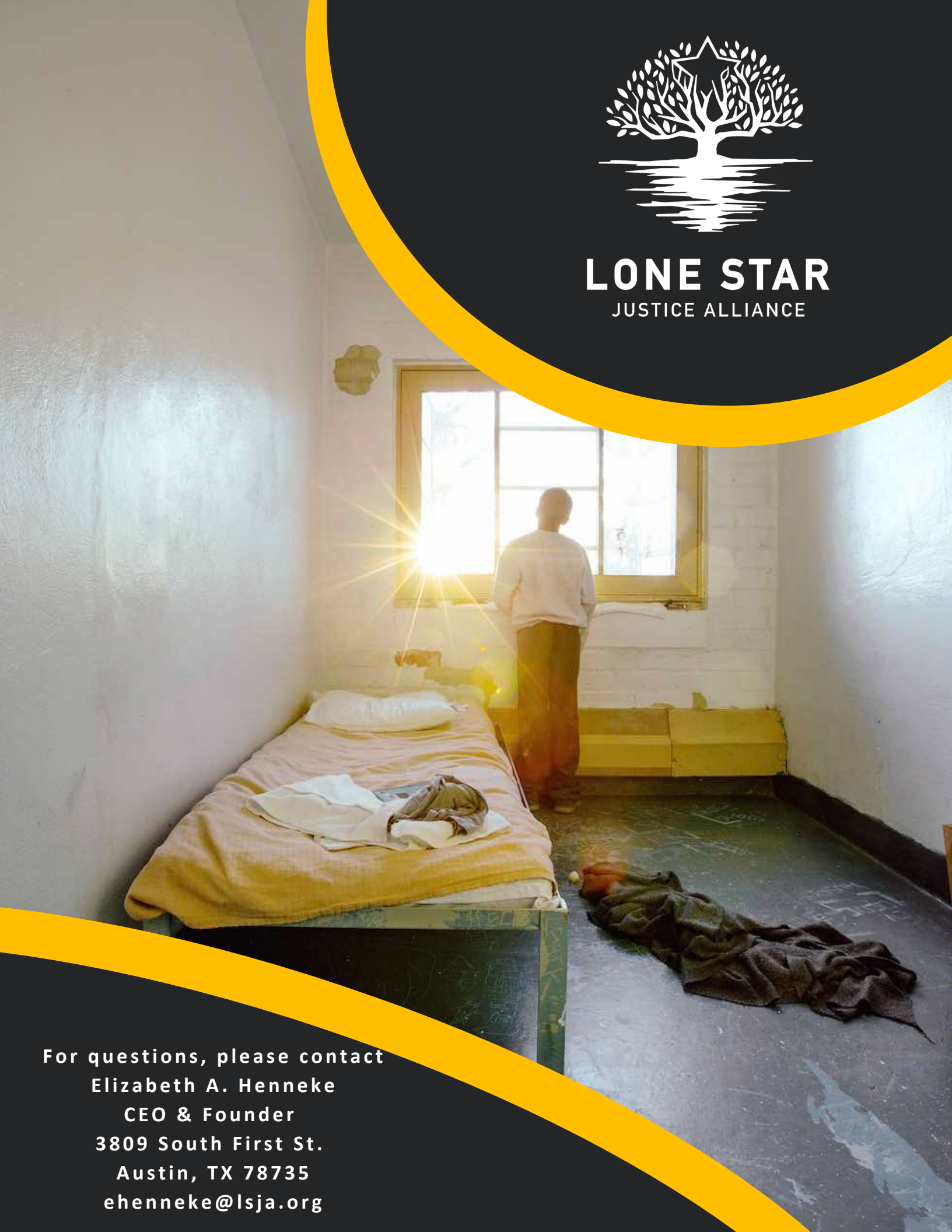
Galveston County	11
Bowie County	7





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