

MARYLAND YOUTH PRISONS



KEY TAKEAWAYS

Maryland spends more than in 45 other states to incarcerate a single child (\$414,929 per year in Maryland vs. a national average of \$214,000).¹ Maryland's state youth correctional system, run by the Department of Juvenile Services (DJS), is violent², isolated³, costly⁴, and inefficient⁵. On the other hand, there has been a dramatic drop in population at DJS run youth jails and prisons over the last eight months of the COVID-19 pandemic; since March, the average daily population (ADP) of DJS run youth prisons has dropped by 2/3 and the ADP at DJS youth jails has dropped by 1/2.

These two facts present the Juvenile Justice Reform Council with a historic opportunity – and obligation – to close Maryland's youth prisons and build a rehabilitative system that works.

Maryland runs five youth prisons that are all located in remote Western Maryland, far from population centers and young people's families.⁶ Studies consistently show that as many as 70% of the youth in the juvenile criminal legal system have at least one diagnosable mental health issue as well as histories of trauma and victimization.⁷ Even though the population has a high level of need, the Attorney General's Juvenile Justice Monitoring Unit has consistently found Maryland youth prisons do not provide quality youth development programming, do not provide evidence-based treatment, lack qualified staff and mental health professionals trained in trauma informed care, lack basic educational options, fail to provide next generation vocational training, and – perhaps worse yet – they are counterproductive and increase instead of decrease recidivism.⁸

Despite declining numbers and instead of focusing on creating a strength-based, therapeutic milieu, DJS paid the American Correctional Association \$26,100 for corrections certification (not youth centered) and spent millions to convert Savage Mountain to a hardware secure facility. DJS continues to utilize and value traditional punitive correctional approaches proven to be ineffective such as room confinement and the use of force as a behavior management strategy, physically restraining youth.⁹

With more than 300 authorized staff at five aging, remote facilities, all serving a daily average youth population of less than 40 youth, DJS's average annual cost per youth, per year, is the 5th highest in the country.¹⁰ 66% of young people sent to out of home placements are there for non-felony offense.¹¹ In Maryland, 1 in 3 children in placement are sent there for technical violations of probation.¹² For years, the research has overwhelmingly shown that kids with low risk of re-offense often come out of these youth prisons with worse outcomes than if they'd been simply left alone.¹³ Maryland incarcerates



low level, low risk young people at an alarmingly high rate¹⁴ and then provides them minimal programming, based on superficial group interventions that do not work. Thus, young people return worse off than they departed, putting those kids – and our communities – at risk.

Evidence-based alternatives to youth prisons – like Functional Family Therapy, Multisystemic therapy, restorative justice, and multidimensional foster care yield a return on the state’s investment and are proven to reduce recidivism rates by 10, 50, and even 70% when implemented correctly.¹⁵

It is time for Maryland to close its ineffective, outdated, expensive youth prisons. Jurisdictions around the country – from California to Texas to New York to New Hampshire - have done just that.¹⁶ In New York, the governor commissioned a task force much like the JJRC, in 2008, to evaluate the effectiveness of New York State’s juvenile justice system – especially out-of-home placement for youth. At the end of their work, the Task force declared:

New York State’s juvenile justice system has two primary responsibilities: to keep the public safe and to care for and rehabilitate young people. Since the 1980s, this system has relied on a punitive, corrections-based model to meet these responsibilities. On both counts this model has failed.

New York City expanded evidence-based and community-based alternatives to placement and merged the Dept. of Juvenile Justice and the Administration for Children’s Services (ACS). The merger created a Division of Youth and Family Justice which allowed the new agency to “draw on the approaches, services, and relationships ACS had cultivated through its delivery of child welfare services.”

In less than a decade, DYFJ drastically cut the number of youth committed to out of home placement and closed the costly and ineffective youth prisons that operated far from young people’s homes and community. Close to Home now operates two kinds of facilities inside city limits: Non-Secure Placements (NSPs) are small (8-13 bed) home-like facilities that house youth who judges determine are in need of out-of-home placement. Many programs are operated in retrofitted homes and brownstones throughout New York City’s five boroughs; and Limited-Secure Placements (LSPs) are small (6-20 bed) placement facilities that have more restrictive security features than NSPs and are generally reserved for youth who are determined to be higher risk youth. This seemingly radical solution was actually a rational and data-driven approach to the exact problem facing Maryland today.

Maryland is a decade behind, but there is no doubt we should steer the course for the same destination.

WHAT WORKS

- **Keeping Low Level Offenders Out of Youth Prisons**
- **Support Youth in their Homes and Communities** Community-based alternatives to incarceration and nonresidential, community-based services that serve youth and their families in their homes and communities
- **Continuum of Evidence-Informed Placements for Youth that Cannot Safely Remain in their Homes** All facilities that house children involved in the juvenile justice system should be fewer than 24 beds, provide evidence-based, focus on positive youth development, be “home-like” settings, and should be regionally based so that families do not have to travel more than an hour to stay connected to their child.
- **Evidence-Based Programming**
Data-driven, evidence-based programming that is culturally responsive for justice-involved youth increases chances of long-term success and decreased delinquent behavior.
- **Quality educational opportunities and vocational training options**
- **Small, home-like facilities staffed by qualified professionals for young people who cannot be safely maintained in their own homes**

WHAT MARYLAND HAS

- **A system that sends a large number of low-risk youth to prison for low-level offenses.**
- **Large, congregant youth prisons in remote locations that employ ineffective, superficial group interventions.**
- **Policies that endanger youth safety and further traumatize young people.**
- **Corrections-based sanctions that limit connection to family and community.**
- **Staff that lack training and education in youth development.**
- **Schools with limited course offerings and inadequate staff.**
- **Inadequate and uneven community-based out of home placements.**

RECOMMENDATIONS

1. Prohibit youth who are adjudicated delinquent for misdemeanor offenses and violations of probation from being committed for out of home placement.
2. Establish a plan to close DJS run youth prisons and create regional, community-based alternatives to incarceration. Ensure every county has access to nonresidential, community-based services that employ evidence-based, culturally competent programming.
3. Require all DJS run youth facilities and all DJS contracted facilities to employ evidence-based programming, focused on positive youth development.
4. Establish requirements for adequate clinical, mental health, and positive youth development staff who have necessary education, training, and background in education, child development, social work, or equivalent fields.
5. Require access to comprehensive educational programming.
6. Require every DJS facility and contracted program to offer access to Technical and Vocational Education and Training (TVET) with highly qualified teachers and on-the-job training.

[Implementation of New York’s Close to Home Initiative: A New Model for Youth Justice, Center for Children’s Law & Policy, Feb. 2018 \[PDF\]](#)

Describes how NYC’s Close to Home legislation achieved its two fundamental objectives: removing New York City youth from large, dangerous, expensive and ineffective facilities far from their homes; and bringing the great majority of New York City youth home to the city or the immediate area. The ultimate goal: increasing opportunities for parents, caregivers and other relatives to stay connected to their children and play a vital short- and long-term role in their treatment and rehabilitation.

[California SB823 \[PDF\]](#)

Starting July 1, 2021, California will begin to phase out the Division of Juvenile Justice (DJJ) by halting all transfers of youth from California’s counties to the state’s three remaining youth prisons. Once the pipeline of transfers to DJJ is shut, kids who previous would have been sent to the state facilities, will instead remain in local settings closer to their families and communities. In order to provide oversight for this youth justice “realignment,” the law also mandates the creation of the Office of Youth and Community Restoration, a new state entity that will have the job of guiding the various counties in creating a system of care, supervision, healing, and rehabilitative programs for the youth who, in the past, would otherwise have been sent to the soon-to-be-closed state facilities. Finally, the bill creates a Juvenile Justice Realignment Block Grant program to provide the needed funds for the state’s 58 counties in order to finance this reimagined approach to youth justice.

[Colorado HB 1329 \[PDF\]](#)

Bill seeks to improve treatment of confined youth with public reporting on use of force by Division of Youth Corrections staff, local citizen “community boards” with the right to access youth facilities, and a comprehensive study of the Division’s policies and practices with recommendations for bringing them into line with best practices.

[Nevada AB 180 \[PDF\]](#)

A Juvenile Justice Bill of Rights – mandates that detention facilities inform youth and their guardians of a youth’s right to be treated with dignity and respect, to receive healthcare, food, and education, and to be free from abuse. Youth who believe their rights are violated have the right to file a grievance for redress.

[ReDeploy Illinois \[PDF\]](#)

In 2014, Illinois established a program to encourage the deinstitutionalization of juvenile offenders by establishing projects in counties or groups of counties that reallocate State funds from juvenile correctional confinement to local jurisdictions, to establish a continuum



of local, community-based sanctions and treatment alternatives for juvenile offenders who would be incarcerated if those local services and sanctions did not exist. It also offers alternatives to avoid commitment to the Department of Juvenile Justice, to direct child welfare services for minors charged with a criminal offense or adjudicated delinquent. The allotment of funds to counties are based on a formula that rewards local jurisdictions for the establishment or expansion of local alternatives to incarceration, and requires them to pay for utilization of incarceration as a sanction.

[Illinois Public Act 99-0268 \[PDF\]](#)

In 2016, Illinois passed a measure that prevents juvenile misdemeanants from being committed to the Illinois Department of Juvenile Justice.

[Oregon Safety and Savings Act - HB 3078 - 2018 \[PDF\]](#)

Adds \$7 million to \$40 million in grant funds dedicated to diverting and shortening prison sentences for youth and adults. Part of the funding will be directed to Second Look, which will allow some youth who were sentenced as adults to serve the second half of their sentence under supervision in their community. This expansion nearly doubles the number of youth who can access Second Look, broadening the model for further adoption throughout the state.

[Closer to Home: An Analysis of the State and Local Impact of the Texas Juvenile Justice Reforms, Council of State Governments, January 2015 \[PDF\]](#)

A first-of-its-kind study of Texas youth involved with the juvenile justice system shows that juveniles under community-based supervision are far less likely to reoffend than youth with very similar profiles who are confined in state correctional facilities.

[Getting it Right: Realigning Juvenile Corrections in Ohio to Reinvest in What Works, Schubert Center for Child Studies, Case Western Reserve University, January 2015 \[PDF\]](#)

Ohio offers a promising example of juvenile justice system realignment and reinvestment efforts and may serve as a model for others interested in a collaborative approach to policy change and ultimately, better results for those involved in the juvenile justice system. This brief highlights the importance of fiscal realignment and incentive strategies to invest in effective community-based programming as well as the critical need for effective state-local partnerships with juvenile courts and providers, among others, to ensure the best outcomes for young people and communities.

[Impact/Justice, Nothing Good Happens in There: Closing & Repurposing Youth Detention Facilities in California \(July 2019.\) \[PDF\]](#)

[Unbalanced Juvenile Justice Mapping Tool, Burns Institute, 2014 \[PDF\]](#)

To help you better understand racial and ethnic disparities and how juvenile justice is being administered in your county, state, and nationwide, this interactive tool provides

customizable searches to explore detention rates and disparities between youth of color and their white counterparts across the United States.



[Burning Down the House, Nell Bernstein, 2014 \[PDF\]](#)

In a clear-eyed indictment of the juvenile justice system run amok, journalist Nell Bernstein shows that there is no right way to lock up a child. Too many children will never recover from the experience, creating a cycle that leaves the public less safe. The youth describe in their own words their fight to maintain their humanity and protect their individuality in that would deny both.

[Sticker Shock: Calculating the Full Price Tag For Youth Incarceration, Justice Policy Institute, December 2014 \[PDF\]](#)

Thirty-three U.S. states and jurisdictions spend \$100,000 or more annually to incarcerate a young person, and continue to generate outcomes that result in even greater costs. Consequences of incarcerating young people could cost taxpayers \$8 billion to \$21 billion each year.

[The Comeback States: Reducing Juvenile Incarceration in the United States, National Juvenile Justice Network, 2013 \[PDF\]](#)

A quiet revolution to reverse the trend of incarcerating youth has brought together advocates and policymakers across a broad spectrum of ideologies. Youth being incarcerated dropped to nearly 40 percent nationwide, but there's still progress to be made.

[No Place for Kids: The Case for Reducing Juvenile Incarceration, Annie E. Casey Foundation, October 2011 \[PDF\]](#)

Backed with an array of research, the case against America's youth prisons and correctional training schools can be neatly summarized in five words: dangerous, ineffective, unnecessary, wasteful and inadequate. This report highlights successful reform efforts from several states and provides recommendations for how states can reduce juvenile incarceration rates and redesign their juvenile correction systems to better serve young people and the public.

[Bringing Youth Home: A National Movement to Increase Public Safety, Rehabilitate Youth and Save Money, National Juvenile Justice Network, July 2011 \[PDF\]](#)

Due to the squeeze of shrunken budgets, that is more reason than ever to reduce the numbers of incarcerated youth. Ample evidence from many states shows that such population reductions do not have negative consequences, but instead serve as a means to reduce spending while treating youth in a more appropriate and effective way.

[Re-Examining Juvenile Incarceration, The Pew Charitable Trusts, April 2015 \[PDF\]](#)

A growing body of research demonstrates that for many juvenile offenders, lengthy out-of-home placements in secure corrections or other residential facilities fail to produce



better outcomes than alternative sanctions. Seeking to reduce recidivism and achieve better returns on their juvenile justice spending, several states have recently enacted laws that limit which youth can be committed to these facilities and moderates the length of time they can spend there.

[Safely Home, Youth Advocate Programs Policy and Advocacy Center, June 2014 \[PDF\]](#)
Safely Home describes how communities and systems can safely support high-need youth in their homes and communities, focusing on the elements of effective community-based alternatives for high and complex need youth in the juvenile justice system. These youth are not lost causes. With the right supports, they can live safely at home with their families and in their communities, not in isolation.

[Pioneers of Youth Justice Reform: Achieving System Change Using Resolution, Reinvestment, and Realignment Strategies, Research and Evaluation Center at John Jay College of Criminal Justice, City University of New York, July 2012 \[PDF\].](#)

[The Costs of Confinement: Why Good Juvenile Justice Policies Make Good Fiscal Sense, Justice Policy Institute, May 2009 \[PDF\]](#)
This policy brief details how states can see a net reduction in costs by moving expenditures away from large, congruent care facilities (often called “training schools”) for youth and investing in community-based alternatives. Such a resource realignment can reap better results for communities, taxpayers, and children. Evidence is growing that there are cost-effective policies and programs for intervening in the lives of delinquent youth which actually improve community safety and outcomes for children.

[Cost-Effective Youth Corrections: Rationalizing the Fiscal Architecture of Juvenile Justice Systems, Justice Policy Institute, March 2006 \[PDF\]](#)
Policy brief that outlines how state systems create inadvertent funding incentives that drive youth toward state institutions and how five states rationalized their fiscal architecture to reverse the incentives. Brief details efforts in Pennsylvania, California, Wisconsin, Ohio, and Illinois that led to overall reductions in out of home commitments and better outcomes for youth.

[Juvenile Incarceration, Human Capital and Future Crime: Evidence from Randomly-Assigned Judges, Anna Aizer and Joe Doyle, June 2013 \[PDF\].](#)

[Breaking the Cycle of Abuse in Juvenile Facilities, Barry Krisberg, February 2009 \[PDF\]](#)

[Understanding the Risk Principle: How and Why Correctional Interventions Can Harm Low-Risk Offenders, Christopher Lowenkamp and Edward Latessa, 2004 \[PDF\]](#)

[State by State Imprisonment Rate Data, The Sentencing Project, 2016 \[PDF\]](#)

MARYLAND SPECIFIC RESEARCH



Baltimore Youth Diversion Assessment, Center for Children’s Law and Policy, 2019. [PDF]

This report, prepared as a part of the Baltimore Police Department’s Consent Decree process, put in place after the U.S. Department of Justice found a pattern and practice of racially discriminatory policing, illegal stops and searches, illegal use of force, and inadequate investigation into officer misconduct focuses on BPD diversion practices. The report notes important flaws in the juvenile justice system in Baltimore – namely that DJS does not have basic memorandums of understanding in place that designate primary service providers for diversion, which referrals should be sent to each program, the process and timeline for said referrals, or the data that should be collected and reported, nor is there a structure for regular meetings or oversight of the diversion process. CCLP found that except for youth who have committed serious violent crimes and youth who pose a significant threat to public safety, youth referred to the juvenile justice system should be diverted to alternatives to formal system processing whenever possible. The report provides strong support for the proposition that while the standard response to juvenile court involvement in Baltimore has long been to place young people on probation, jurisdictions have developed alternatives to probation and formal system involvement with improved results for young people and public safety.

Juvenile Justice Monitoring Unit 2019 Annual Review, Office of the Attorney General, April 2019. [PDF]

Report finds that DJS has not made the changes necessary to develop a positive and therapeutic culture at their placement facilities and calls on DJS to adopt a proven (evidence-based), targeted treatment model instead of the generic behavior management system that currently serves as the foundation of programming at DJS facilities. The report also documents the Maryland State Department of Education Juvenile Services Education System (MSDE JSES) failures to appropriately serve the academic and career preparation needs of the children and young people at these facilities JJMU finds DJS facilities will continue to be at risk of periodic or sustained deterioration and young people at the deepest end of the system will continue returning to their communities without the tools and supports they need to succeed at home. JJMU avers that investing in an approach to juvenile justice that centers on the utilization of remote placement facilities like the Victor Cullen Center, the other four youth centers in western Maryland and the Carter Center on the eastern shore is a barrier rather than a pathway to successful treatment. States, including neighboring Virginia, are closing youth prisons and replacing them with regionalized and community-based treatment programs (residential and non-residential) that are more economical and more effective at improving youth outcomes.

[Doors to Commitment: What Drives Juvenile Confinement in Maryland?](#), Annie E. Casey Foundation, 2016. [PDF]



This is a quantitative analysis conducted at the request of the Maryland Department of Juvenile Services that found Juvenile crime in Maryland is lower than it has been in decades. In virtually every state, juvenile confinement has fallen with crime, allowing many states to substantially reduce residential capacity and re-direct public funds to more efficient and effective interventions. But unlike virtually every other state, the dramatic reduction in juvenile crime has not produced a dramatic reduction in Maryland's reliance on juvenile confinement. From 2007-2011, the national commitment rate fell by 29%, while the Maryland commitment rate increased by 10%. Contrary to research and best practice, our analysis found that juvenile confinement in Maryland is not reserved for the riskiest youth. As a result, a significant number of low-risk youth are consuming DJS resources in commitment facilities. Those youth could be held accountable in far less expensive home-based settings that focus on the family and more effectively address youths' needs. Technical violations of probation (VOPs) account for 1 in 3 commitments statewide. In fact, a youth is more than twice as likely to be committed for a VOP as for a violent felony. We also found a striking number of low-risk youth on probation. In 16 counties, low-risk youth account for 50% or more of all probation dispositions

[JUST KIDS: Baltimore's Youth in the Adult Criminal Justice System, A Report of the Just Kids Partnership to End the Automatic Prosecution of Youth as Adults, 2010](#) [PDF]

Just Kids Partnership followed 135 individual cases of youth charged as adults in Baltimore City and found a child charged as an adult will, more likely than not, have the charge dismissed or sent back to the juvenile system; that charging youth as adults does not reduce crime; rather, it makes crime worse; that transfer hearings are untimely and judges' decisions are based on unreliable and incomplete information. The report recommends ending automatic adult jurisdiction for children.

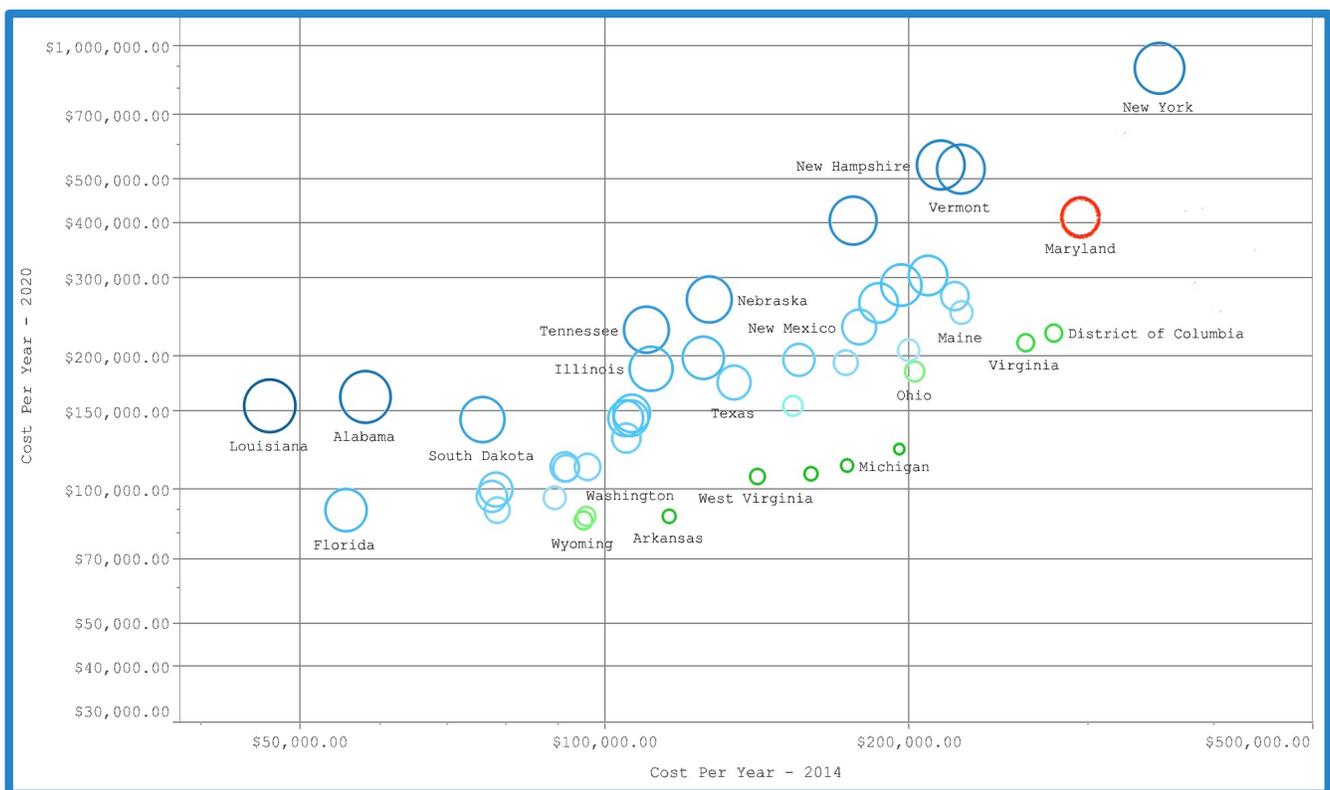
[Don't Throw Away the Key: Reevaluating Adult Time for Youth Crime in Virginia, Legal Aid Justice Center's Just Children Program, December 2009](#) [PDF]

A report prepared for the Virginia State Crime Commission by the Virginia Legal Aid Justice Center's JustChildren Program. The JustChildren's Program has spent a number of years representing young people at different stages of the transfer process, meeting with stakeholders and families, and researching the issue of children being tried as adults. The report calls on policymakers to reevaluate the transfer system in light of new findings about youth crime, adolescent brain development, and the current transfer system's impact on youth and their communities. It highlights the way that Virginia's transfer system, which like Maryland's allows youth as young as 14 to be treated as adults, is at odds with all other laws and policies in Virginia regarding our children. The report also reveals the extent to which a substantial majority of juvenile justice professionals have been dissatisfied with the current system since its creation and are seeking reform.

A Tale of Two Jurisdictions: Youth Crime and Detention Rates in Maryland & the District of Columbia, Lisa Feldman, Michael Males and Vincent Schiraldi, 2001. [PDF]

“Five years later, the majority of Maryland’s detained youth were still confined for nonviolent offenses. An analysis released by the Maryland House of Delegates on March 5, 2001, found that only 10 percent of the youth in detention are detained for violent offenses, and another 23 percent are detained for serious property crimes...This recent data confirms that predominately low-risk youth are being housed in Maryland’s secure detention facilities.”

¹ Justice Policy Institute, *Sticker Shock 2020: The Cost of Youth Incarceration*, July 30, 2020. <http://www.justicepolicy.org/research/12928>



² Jeremy Arias, *Independent Report Implicates Staff in April Riot at Victor Cullen*, Frederick News Post, Dec. 18, 2018. www.fredericknewspost.com/news/crime_and_justice/independent-report-implicates-staff-in-april-riot-at-victor-cullen/article_7e6c84b7-131e-562d-85bc-72b484421e5f.html.

³ Maryland Attorney General Juvenile Justice Monitoring Unit, 2018 Annual Report, 8 (2019). www.marylandattorneygeneral.gov/JJM%20Documents/JJMU_2018_Annual_Report.pdf. “Youth are isolated in remote areas of the state where family and community support is largely absent. Phone and visiting privileges are identical to the allowance given youth in detention centers.”

⁴ No Kids in Prison, *Youth Incarceration in Maryland*, www.nokidsinprison.org/explore/maryland/?section=race-interactive, “In Maryland it can cost \$415K/year to incarcerate a child, but only \$15K/year for public education.”

⁵ *Supra*, note 4. “DJS has not made the changes necessary to develop a positive and therapeutic culture at their placement facilities...The current state-run model is largely governed by a correctional approach that is hyper-attentive to safety and security issues, privileges youth compliance over normalization and meaningful behavioral change, and isolates children and young people in remote areas which make family and community supports and resources difficult to access.... For youth sent out-of-home by the courts and DJS, small, specialized, regionally-based community programs that offer individualized services based on the identified needs of each young person are needed. Regionalized and community-based services are more likely to reduce recidivism and are far less expensive than remote congregate institutions that cost hundreds of thousands of dollars per youth per year.”

⁶ Maryland Department of Juvenile Services (DJS), Data Resource Guide FY19, 01/2020.

Name	Type	County	Capacity	ADP Aug 2020	Annual Expenditure	# Served FY19
Backbone Youth Center	Staff Secure	Garrett	24	11	\$19,990,787*	103
Garrett Children's Center	Hardware Secure	Garrett	24	4		13
Greenridge Youth Center	Staff Secure	Alleghany	24	9	\$4,969,720	68
Victor Cullen Center	Hardware Secure	Frederick	48	8	\$9,888,244	58
Mountain View (formerly Carter Center)	Staff Secure	Garrett	6	2	\$3,238,411	20
Total			126	34	\$ 18,096,375.00	340

* includes the cost of operating Meadow Mountain Youth Center which has since been closed. Meadow Mountain served 78 young people in FY19 and is reflected in the total number of young people served.

⁷ Office of Juvenile Justice and Delinquency Prevention, *Intersection between Mental Health and the Juvenile Justice System*, July 2017. www.ojjdp.gov/mpg/litreviews/Intersection-Mental-Health-Juvenile-Justice.pdf

⁸ Maryland Attorney General Juvenile Justice Monitoring Unit, *Fourth Quarter Report and 2019 Annual Review*, <https://www.marylandattorneygeneral.gov/Pages/JJM/default.aspx>; Annie E. Casey Foundation on behalf of Maryland Department of Juvenile Services, *Doors to DJS Commitment: What Drives Juvenile Confinement in Maryland?*, January 2015. <https://djs.maryland.gov/Documents/publications/AECF%20Assessment%20of%20MD%20Dispositions%20-%20Updated%20March%2016%20-%20Final%20PDF.pdf>

⁹ *Id.*

¹⁰ Dept. of Juvenile Services, *FY19 Data Resource Guide*, <https://djs.maryland.gov/Pages/Data-Resource-Guides.aspx>; See also, Justice Policy Institute, *Sticker Shock*, *supra* endnote 1.

¹¹ *Supra*, note 2.

¹² *Id.*, page 4.

¹³ National Research Council, *Reforming Juvenile Justice: A Developmental Approach*, 2013. Committee on Assessing Juvenile Justice Reform, Bonnie et al., Eds. Committee on Law and Justice, Division of Behavioral and Social Sciences and Education. Washington, DC: The National Academies Press. See also, e.g., Ryan, J.P., et al., *First-Time Violent Juvenile Offenders: Probation, Placement, & Recidivism*, SOCIAL WORK RESEARCH, Vol. 38, No. 1 (Mar. 2014), p.8 (internal citations omitted); Gatti et al., *Introgenic Effect of Juvenile Justice*, JOURNAL OF CHILD PSYCHOLOGY & PSYCHIATRY 50 (8) (2009): 991-998; Andrews, *Enhancing Adherence to Risk-Need Responsivity: Making Quality a Matter of Policy*, CRIMINOLOGY & PUBLIC POLICY 5 (3) (2006): 595-602; Lowenkamp et al., *The Risk Principle in Action: What Have We Learned From 13,676 Offenders and 97 Correctional Programs?*, CRIME & DELINQUENCY 52 (2006); Lowenkamp &

Latessa, *Understanding the Risk Principle: How and Why Correctional Interventions Can Harm Low-Risk Offenders*, TOPICS IN COMMUNITY CORRECTIONS (2004).

¹⁴ *Supra*, note 2.

¹⁵ Center for Children's Law & Policy, *Implementation of New York's Close to Home Initiative: A New Model for Youth Justice*, Feb. 2018. www.cclp.org/wp-content/uploads/2018/02/Close-to-Home-Implementation-Report-Final.pdf

¹⁶ Samantha Harvell, Chloe Warnberg, Andreea Matei, Eli Mesning, *Closing Youth Prisons: Lessons from Agency Administrators*, Urban Institute (March 2020) https://backend.nokidsinprison.org/wp-content/uploads/2020/05/closing-youth-prisons-lessons-from-agency-administrators_1.pdf; See also, California, https://backend.nokidsinprison.org/wp-content/uploads/2019/07/NOTHING-GOOD_7.1.2019-1.pdf, New York City Close to Home Program, <https://www.centernyc.org/closetohomepage>.