
SENATE COMMITTEE ON PUBLIC SAFETY

Senator Steven Bradford, Chair
2021 - 2022 Regular

Bill No: SB 493 **Hearing Date:** April 20, 2021
Author: Bradford
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Urgency: No **Fiscal:** Yes
Consultant: SJ

Subject: *Local government financing: juvenile justice*

HISTORY

Source: Alliance for Boys and Men of Color
ACLU of California
Anti-Recidivism Coalition
Center on Juvenile and Criminal Justice
Children's Defense Fund - California
MILPA Collective
National Center for Youth Law
Urban Peace Institute
W. Haywood Burns Institute
Youth Justice Coalition

Prior Legislation: AB 1007 (Jones-Sawyer), not heard in 2020 due to COVID-19
AB 1998 (Campos), Ch. 880, Stats. 2016
AB 109 (Com. on Budget), Ch. 15, Stats. 2011
SB 81 (Com. on Budget & Fiscal Rev.), Ch. 175, Stats. 2007
AB 1913 (Cardenas), Ch. 353, Stats. 2000
AB 2261 (Aguiar), Ch. 325, Stats. 1998
SB 1760 (Com. on Budget & Fiscal Rev.), Ch. 133, Stats. 1996

Support: Angelenos Organizing 4 Education; Arts for Healing and Justice Network; Bend the Arc; Jewish Action; California Alliance for Youth and Community Justice; California Alliance of Boys & Girls Clubs; California Public Defenders Association; Californians for Safety and Justice; Children Now; Clergy and Laity United for Economic Justice; Club Stride, Inc.; Coalition for Engaged Education; Code Tenderloin; Communities United for Restorative Youth Justice; Courage California; East Bay Community Law Center; Ella Baker Center for Human Rights; Empowering Pacific Islander Communities; Everychild Foundation; Flyaway Productions; Freedom 4 Youth; Fresno Barrios Unidos; Friends Committee on Legislation of California; Get Lit - Words Ignite; Habonim Dror Camp Gilboa; Healing Dialogue and Action; Homeboy Industries; Huckleberry Youth Programs; Human Impact Partners; Immigrant Legal Resource Center; Initiate Justice; InnerCity Struggle; Journey House; LA Forward; LA's BEST After School Enrichment Program; Latino Coalition for a Healthy California; League of Women Voters of California; Legal Services for Prisoners with Children; Mid-City Community Advocacy Network; National Association of Social Workers, California Chapter; National Center for Lesbian Rights; National

Institute for Criminal Justice Reform; National Juvenile Justice Network; Pacific Juvenile Defender Center; Parent Revolution; People's City Council - Los Angeles; PICO California; Public Counsel; Public Health Advocates; Root & Rebound; Safe Place for Youth; San Francisco Public Defender; San Francisco Youth Commission; San Jose State University Human Rights Institute; Santa Cruz Barrios Unidos; Starting Over, Inc.; Sunset Youth Services; The Unity Council; TransLatin@ Coalition; U.S. Congressman Tony Cárdenas; UnCommon Law; Underground GRIT; Women's Foundation California; Young Women's Freedom Center; Youth ALIVE!; Youth Forward; Youth Justice Education Clinic, Center for Juvenile Law and Policy, Loyola Law School; Youth Law Center; 4 individuals

Opposition: Association of Orange County Deputy Sheriffs; California Association of Counties; Chief Probation Officers of California; Fraternal Order of Police, N. California Probation, Lodge 19; Fresno County Deputy Probation Officer's Association; Los Angeles County Probation Officers Union, AFSCME Local 685; Rural County Representatives of California; Sacramento County Board of Supervisors; Sacramento County Probation Association; San Joaquin County Probation Officers Association; San Mateo County Probation and Detention Association; Santa Barbara County Board of Supervisors; State Coalition of Probation Organizations; Urban Counties of California

PURPOSE

The purpose of this bill is to revise and recast components of the Juvenile Justice Crime Prevention Act (JJCPA), including requiring funded programs to be modeled on trauma-informed and youth development approaches in collaboration with community-based organizations (CBOs), requiring that no less than 95% of funds are allocated to CBOs and non-law enforcement government entities, and changing the membership provisions of a county juvenile justice coordinating council.

Existing law establishes in each county treasury a Supplemental Law Enforcement Services Account (SLESA). (Gov. Code, § 30061, subd. (a).)

Existing law requires the county auditor, in any fiscal year for which a county receives moneys to be expended, to allocate the moneys in the county's SLESA within 30 days of the deposit of those moneys into the fund. Specifies how the moneys are allocated. (Gov. Code, § 30061, subd. (b).)

Existing law requires fifty percent of the money allocated to the county or city and county to implement a comprehensive multiagency juvenile justice plan, as provided. Requires the juvenile justice plan to be developed by the local juvenile justice coordinating council in each county and city and county. Requires the plan to be reviewed and updated annually by the council. (Gov. Code, § 30061, subd. (c)(4).)

Existing law provides that the plan or updated plan may, at the discretion of the county or city and county, be approved by the county board of supervisors. Requires the plan or updated plan to be submitted to the Board of State and Community Corrections (BSCC) by May 1 of each year in a format specified by the board. (Gov. Code, § 30061, subd. (c)(4).)

Existing law requires the multiagency juvenile justice plan to include, but not be limited to, all of the following components:

- An assessment of existing law enforcement, probation, education, mental health, health, social services, drug and alcohol, and youth services resources that specifically target at-risk juveniles, juvenile offenders, and their families.
- An identification and prioritization of the neighborhoods, schools, and other areas in the community that face a significant public safety risk from juvenile crime, such as gang activity, daylight burglary, late-night robbery, vandalism, truancy, controlled substances sales, firearm-related violence, and juvenile substance abuse and alcohol use.
- A local juvenile justice action strategy that provides for a continuum of responses to juvenile crime and delinquency and demonstrates a collaborative and integrated approach for implementing a system of swift, certain, and graduated responses for at-risk youth and juvenile offenders.
- A description of the programs, strategies, or system enhancements that are proposed to be funded. (Gov. Code, § 30061, subd. (c)(4)(A).)

Existing law requires that programs, strategies, and system enhancements proposed to be funded satisfy all of the following requirements:

- Be based on programs and approaches that have been demonstrated to be effective in reducing delinquency and addressing juvenile crime for any elements of response to juvenile crime and delinquency, including prevention, intervention, suppression, and incapacitation.
- Collaborate and integrate services of all resources to the extent appropriate.
- Employ information sharing systems to ensure that county actions are fully coordinated, and designed to provide data for measuring the success of juvenile justice programs and strategies. (Gov. Code, § 30061, subd. (c)(4)(B).)

Existing law requires each county or city and county to submit an annual report to the county board of supervisors and to the BSCC on the programs, strategies, and system enhancements funded in order to assess their effectiveness. Requires the report to be in a format specified by the board and to include all of the following:

- An updated description of the programs, strategies, and system enhancements that have been funded in the immediately preceding fiscal year.
- An accounting of expenditures during the immediately preceding fiscal year for each program, strategy, or system enhancement funded.
- A description and expenditure report for programs, strategies, or system enhancements that have been co-funded during the preceding fiscal year using JJCPA funds and Youthful Offender Block Grant funds.
- Countywide juvenile justice trend data available from existing statewide juvenile justice data systems or networks, as specified by the BSCC, including, but not limited to, arrests, diversions, petitions filed, petitions sustained, placements, incarcerations, subsequent petitions, and probation violations, and including, in a format to be specified by the board, a summary description or analysis, based on available information, of how the programs, strategies, or system enhancements funded pursuant to this chapter have or may have contributed to, or influenced, the juvenile justice data trends identified in the report. (Gov. Code, § 30061, subd. (c)(4)(C).)

Existing law requires the BSCC to compile the local reports and, by March 1 of each year following their submission, make a report to the Governor and the Legislature summarizing the programs, strategies, and system enhancements and related expenditures made by each county and city and county. Requires the annual report to the Governor and the Legislature to also summarize the countywide trend data and any other pertinent information submitted by counties indicating how the programs, strategies, or system enhancements supported by appropriated have or may have contributed to, or influenced, the trends identified. Requires the annual report to be posted for access by the public on the website of the board. (Gov. Code, § 30061, subd. (c)(4)(E).)

Existing law establishes the Juvenile Crime Enforcement and Accountability Challenge Grant Program that is administered by the BSCC for the purpose of reducing juvenile crime and delinquency. Requires this program to award grants on a competitive basis following request-for-proposal evaluation standards and guidelines developed by the board to counties that develop and implement a comprehensive, multiagency local action plan that provides for a continuum of responses to juvenile crime and delinquency, including collaborative ways to address local problems of juvenile crime; and demonstrate a collaborative and integrated approach for implementing a system of swift, certain, graduated responses, and appropriate sanctions for at-risk youth and juvenile offenders. (Welf. & Inst. Code, § 749.21.)

Existing law provides that to be eligible for the grant, each county is required to establish a multiagency juvenile justice coordinating council that develops and implements a continuum of county-based responses to juvenile crime. Requires the coordinating councils include, at a minimum, the chief probation officer, as chair, and one representative each from the district attorney's office, the public defender's office, the sheriff's department, the board of supervisors, the department of social services, the department of mental health, a community-based drug and alcohol program, a city police department, the county office of education or a school district, and an at-large community representative. (Welf. & Inst. Code, § 749.22.)

Existing law requires a coordinating council to include representatives from nonprofit community-based organizations providing services to minors. Requires the board of supervisors to be informed of community-based organizations participating on a coordinating council. Requires the coordinating councils to develop a comprehensive, multiagency plan that identifies the resources and strategies for providing an effective continuum of responses for the prevention, intervention, supervision, treatment, and incarceration of male and female juvenile offenders, including strategies to develop and implement locally based or regionally based out-of-home placement options for youths. (Welf. & Inst. Code, § 749.22.)

Existing law provides that counties may utilize community punishment plans developed pursuant to grants awarded from funds included in the 1995 Budget Act to the extent the plans address juvenile crime and the juvenile justice system or local action plans previously developed for this program. Requires the plan include, but not be limited to, the following components:

- An assessment of existing law enforcement, probation, education, mental health, health, social services, drug and alcohol and youth services resources which specifically target at-risk juveniles, juvenile offenders, and their families.
- An identification and prioritization of the neighborhoods, schools, and other areas in the community that face a significant public safety risk from juvenile crime, such as gang

activity, daylight burglary, late-night robbery, vandalism, truancy, controlled substance sales, firearm-related violence, and juvenile alcohol use within the council's jurisdiction.

- A local action plan for improving and marshaling the resources described above to reduce the incidence of juvenile crime and delinquency in the targeted areas and the greater community. Requires the councils to prepare their plans to maximize the provision of collaborative and integrated services of all the resources described above, and to provide specified strategies for all elements of response, including prevention, intervention, suppression, and incapacitation, to provide a continuum for addressing the identified male and female juvenile crime problem, and strategies to develop and implement locally based or regionally based out-of-home placement options for youths.
- Develop information and intelligence-sharing systems to ensure that county actions are fully coordinated, and to provide data for measuring the success of the grantee in achieving its goals. Requires the plan to develop goals related to the outcome measures that will be used to determine the effectiveness of the program.
- Identify outcome measures which must include, but not be limited to, the following: the rate of juvenile arrests, the rate of successful completion of probation, and the rate of successful completion of restitution and court-ordered community service responsibilities. (Welf. & Inst. Code, § 749.22.)

This bill revises the components of the multiagency juvenile justice plan. Specifically, requires the plan include:

- An assessment of existing law enforcement, probation, education, mental health, health, social services, drug and alcohol, and community-based youth development services and resources that specifically target at-promise youth, youth in the juvenile justice system, and their families.
- An identification and prioritization of the neighborhoods, schools, and other areas in the community that face a significant public safety risk from violence and crime.
- A local juvenile justice action strategy that provides for a continuum of responses to juvenile crime and delinquency that is modeled on a framework of youth development and demonstrates a community-based, collaborative and integrated approach for at-promise youth and youth in the justice system.
- A description of the programs and strategies that are proposed to be funded, including documentation of their effectiveness, specific objectives, and outcome measures.
- A description of the target population for the programs and strategies that are proposed to be funded, including a description of the target population's race, ethnicity, age, gender identity, and residence ZIP Code.

This bill revises the requirements for JJCPA-funded programs and strategies. Specifically, requires a program or strategy to:

- Be based on programs and approaches that have been demonstrated to be effective in reducing crime and violence and modeled on trauma-informed and youth development approaches.
- Collaborate and integrate services of all the resources to the extent appropriate, and prioritize collaboration with CBOs.
- Employ information sharing systems to ensure that county actions are fully coordinated, and designed to provide data for measuring the success of juvenile justice programs and

strategies, while still protecting participant confidentiality in pre-arrest and pre-booking diversion programs.

This bill requires that no less than 95 percent of the funds allocated be distributed through an accessible and transparent solicitation process to CBOs and public agencies or departments that are not law enforcement agencies or departments. Prohibits any funds distributed to CBOs or non-law enforcement government entities from being used for law enforcement activities or personnel.

This bill specifies that the descriptions of programs and strategies contained in the annual report that a county juvenile justice coordinating council submit to the BSCC include evidence supporting the program, program staff qualifications and positions, and the number of years the program has received funding. Requires the annual report to include an updated list of coordinating council members, including their assigned seats and professions, if applicable, and dates for all council meetings in the immediately preceding fiscal year.

This bill requires the countywide juvenile justice trend data included in the annual report be disaggregated by race, ethnicity, gender identity, age, and residence ZIP Code. Requires the annual report to include data on the total number of youth referred to and receiving services funded under this chapter, disaggregated by program, race, ethnicity, age, gender identity, residence ZIP Code, probation status, charges or activities warranting intervention, and program outcomes, including, but not limited to, an accounting of all participants' completion or non-completion of the program.

This bill requires the BSCC's annual report provide statewide analysis of county spending on programs and strategies that have been funded pursuant to this chapter, including a quantitative and qualitative description of the total population of youth served in the preceding fiscal year, disaggregated by race, ethnicity, age, gender identity, residence ZIP Code, and charges or activities warranting intervention.

This bill changes the membership of a county's juvenile justice coordinating council. Specifically, requires each coordinating council to, at a minimum, include seven members with at least 50 percent community representatives with the remainder of seats allocated to government agencies. Defines a "community representative" to mean an individual who has not formerly served as a law enforcement agent and who is not currently a government employee. Requires each coordinating council to include community representatives who are currently or formerly justice system-involved in addition to the existing requirement that the council include representatives from nonprofit, CBOs providing services to youths. Requires each coordinating council to elect two co-chairs from among its members and requires at least one be a community representative.

This bill requires each coordinating council to meet no less than three times per year and to announce meetings at least 10 days in advance of a meeting. Requires the coordinating councils to develop a comprehensive multiagency juvenile justice plan that identifies the resources and strategies for providing an effective continuum of responses for at-risk youth and youth involved in the justice system. Revises the components of the juvenile justice plan to conform to other provisions of the bill.

This bill makes other technical and conforming changes.

COMMENTS

1. Need for This Bill

According to the author:

Since 2000, youth arrests have declined by over 80 percent, leaving far more youth whose needs can only be met in the community. However, most counties spend little to none of their Juvenile Justice Crime Prevention Act (JJCPA) funds on community-based organizations (CBOs). Some JJCPA-funded programs can even have a net-widening effect and negatively impact youth participants, unless the state establishes guidelines and accountability measures.

Reforming JJCPA responds to rising calls for racial justice and addresses economic challenges heightened by the COVID-19 pandemic. This bill will provide for greater accountability, effectiveness, and equity in supporting our youth. The PROMYSE Act will ensure state funds are invested in youth development and crime prevention.

Organizations providing services for youth in marginalized communities have been hard hit financially by the COVID-19 pandemic. This bill ensures stable funding for critical services run by schools, public health agencies, and CBOs to support at-risk and justice-involved youth.

2. Juvenile Justice Crime Prevention Act

The JJCPA was enacted in 2000 to provide funding to counties with the goal of helping them reduce crime among young people, and involves a partnership between the state, counties, and various CBOs in order to accomplish that goal. The target demographic includes youth on probation and in juvenile halls and camps, as well as at-risk youth. The JJCPA requires that each county establish a Juvenile Justice Coordinating Council made up of representatives from various local government agencies, CBOs, and the community. The Coordinating Council is required to develop a comprehensive multiagency juvenile justice plan for the county. State law specifies the four components that must be included in every county's juvenile justice plan which taken together, generally summarize a county's holistic efforts to reduce juvenile crime. The JJCPA requires counties to base their programs on approaches that are effective in reducing juvenile crime and delinquency and requires JJCPA-funded programs and strategies to be designed to provide data for measuring their success. Each county must submit its plan to the BSCC annually, along with a year-end report that describes the county's JJCPA-funded programs and how those programs may have affected the county's juvenile justice trends. The BSCC then compiles the information it receives from the counties and submits an annual report to the Governor and Legislature.

The state provides JJCPA funding to counties based on population. Funding is provided through an annual guaranteed funding amount, referred to as base funding, and if funds are available, an additional variable amount, referred to as growth funding. Because growth funding varies from year to year, counties do not know how much growth funding they will receive in any given year which has resulted in counties not spending their entire JJCPA allocations. During the 2019-2020 fiscal year, the statewide base allocation of JJCPA funds was \$107.1 million with an additional \$59.9 million allocated from growth funding. (Board of State and Community Corrections,

Juvenile Justice Crime Prevention Act and Youth Offender Block Grant Annual Report to the Legislature (Mar. 2021), p. 7 available at <<http://www.bscc.ca.gov/wp-content/uploads/2021-JJCPA-YOBG-Leg-Report-FINAL.pdf>>.)

Counties enjoy broad discretion in how JJCPA funds are used to support and enhance their juvenile justice systems. According to a report published by the Children’s Defense Fund-California in 2018, “[JJCPA funds] ha[ve] been allocated for a range of programs, including policing and probation supervision in schools, public housing and park services, mental health screening and treatment, and community-based arts and after-school programs.” (Soung et al., *Juvenile Justice Crime Prevention Act in Los Angeles: A Case Study on Advocacy & Collaborative Reform* (Dec. 2018), p. 3 available at <https://www.cdfca.org/wp-content/uploads/sites/4/2019/01/juvenile-justice-crime-prevention-act-in-los-angeles.pdf?_ga=2.215258129.705757938.1618379732-177568109.1618379732>.) The report noted that there were 150 JJCPA programs administered by the counties in 2014-2015 which served 84,450 at-risk and probation youth. (*Id.*)

3. State Auditor’s Report

At the request of the Joint Legislative Audit Committee, the State Auditor conducted an audit to assess five counties’ spending and reporting of JJCPA funds, and decision-making processes related to and evaluations of their JJCPA-funded programs. The report containing the audit findings was published in May 2020. The overall conclusion of the report was that weak oversight of the JJCPA by the state and counties had resulted in some counties not having a Juvenile Justice Coordinating Council at all, some counties having vacancies on their council, and several counties making only limited revisions to their comprehensive juvenile justice plan over the last two decades despite significant changes in the statewide juvenile justice landscape. (State Auditor, *Juvenile Justice Crime Prevention Act: Weak Oversight Has Hindered Its Meaningful Implementation* (Report 2019-116), available at <<http://auditor.ca.gov/pdfs/reports/2019-116.pdf>>.)

The State Auditor made the following recommendations for legislative action:

- To ensure that counties adequately identify how they serve at-risk youth, the Legislature should require counties to define at-risk youth in their comprehensive plans. The Legislature should also require the BSCC to review counties’ comprehensive plans to ensure that each contains an adequate definition of at-risk youth.
- The Legislature should direct the BSCC to monitor reports that counties submit to ensure that they include meaningful descriptions or analyses of how their JJCPA-funded programs may have contributed to or influenced countywide juvenile justice trends.
- To enable the BSCC to provide effective oversight of the required elements of the JJCPA, the Legislature should amend state law to describe a process for restricting the spending of JJCPA funding by counties that do not meet JJCPA requirements. As part of that process, the State should prohibit counties from spending JJCPA funds if they have not established Coordinating Councils.
- To make JJCPA funding more stable and predictable, the Legislature should amend state law to increase the amount of guaranteed JJCPA funding the State provides to counties.

(*Id.* at p. 5.)

4. Argument in Support

The W. Haywood Burns Institute, one of the bill's co-sponsors, writes:

...SB 493, [] will amend California's Juvenile Justice Crime Prevention Act (JJCPA). JJCPA was enacted in 2000 to support youth locally and limit involvement in the justice system through collaborative efforts. For twenty years, county spending has fallen short of the bill's original goals. In Fiscal Year (FY) 2018-19, the state spent nearly \$160 million through the non-competitive JJCPA grant without adequate oversight and accountability.

SB 493 will ensure the state effectively invests these hundreds of millions in grant dollars to support youth locally. This bill will ensure that youth: (1) Are protected from contact with the justice system through an investment in community-based youth development, prevention, and intervention services; (2) Benefit from improved planning and coordination of youth-serving agencies by local counties, including greater community and youth representation in decision making; and (3) Receive support that aligns with best practices by increasing county reporting and state oversight, as recommended in a recent state audit of JJCPA grant administration.

...

SB 493 addresses chronic shortcomings of JJCPA implementation and will distribute grant funds, serving as a stimulus for community-based organizations (CBOs) and public health and education agencies. Specifically, SB 493:

- Ensures that 95 percent of JJCPA funds are distributed to CBOs and/or non-law enforcement public agencies providing youth development services in schools and/or communities;
- Requires that JJCPA-funded programs be modeled on trauma-informed and youth development approaches; and
- Improves reporting requirements to assess each program's effectiveness.

Under SB 493, counties' Juvenile Justice Coordinating Councils, which decide how JJCPA funds are allocated, will have a balanced representation of government and community stakeholders. This is an opportunity to invest in youth development, equity and more democratic governance.

...

Unfortunately, JJCPA funds have been distributed with little local or state oversight, resulting in poor spending decisions. The majority of funds have been "distributed" by county probation departments for their own staffing, or to other law enforcement agencies, running counter to the bill's collaborative goals. In some cases, counties have used JJCPA grants to implement harmful "voluntary probation" programs, which impose invasive probation conditions on youth who have not been arrested for any crime. Law enforcement contact and probation

involvement – including the “net-widening” effects of excessive supervision – does more harm than good.

The recent state audit verifies these long-held concerns, as insufficient planning and reporting has led to irresponsible spending. The audit finds that counties maintain outdated spending plans and that reports do not adequately assess program effectiveness. Many counties left mandatory stakeholder seats vacant on their Juvenile Justice Coordinating Council, with 20 percent of all California counties lacking a JJCC entirely during the audit review period. In Fiscal Year 2017–18, four of the five counties spent over 75 percent of their JJCPA funds on probation departments despite massive declines in youth contact with probation, leaving youths’ needs unmet when they could be best served in the community.

SB 493 supports youth development through building stronger communities and counters the historic harm of criminalization of youth of color throughout California; a mission that is especially important in light of the impacts of the Covid-19 pandemic. We know that communities of color have been hit the hardest by the pandemic in a variety of ways that are the result of structural inequities. This bill ensures stable funding for critical services run by schools, public health agencies, and CBOs to support at-risk and justice-involved youth. Better JJCPA investments will no longer allow these state funds to prop up a system that has failed communities of color.

5. Argument in Opposition

According to the California State Association of Counties, the Urban Counties of California, and the Rural County Representatives of California:

This measure would redirect Juvenile Justice Crime Prevention Act (JJCPA) funds, revise the composition of local Juvenile Justice Coordinating Councils, and recast various elements of required multiagency juvenile justice plans. While our organizations support the continued evaluation of the best and most effective ways to address the therapeutic needs of youth in our community, we are steadfast in our opposition to diverting meaningful and long-standing investments in local systems, particularly when implementation of interrelated juvenile justice reforms (SB 823, 2020) are now underway.

It is our understanding that SB 493 is in response to findings of a 2019 state audit report that examined five counties’ use and reporting of JJCPA funds. As was outlined briefly in the audit report, JJCPA was enacted statutorily in 2000 and funded for just over a decade through the state General Fund. JJCPA – along with a variety of other local assistance services and programs – was moved under the 2011 Public Safety Realignment fiscal structure where it now is guaranteed a minimum level of Vehicle License Fee (VLF) funding and enjoys constitutional protections approved in Proposition 30 (2012). This latter development requires careful thinking and understanding about the constitutional implications of potentially repurposing, or redirecting, the entirety of JJCPA funds as we believe is intended in SB 493. We would note that in the drafting, this measure may also capture other law enforcement designated programs that are statutorily linked to

JJCPA and have no reasonable way of being carried out by community-based organizations or non-law enforcement departments.

SB 493 proposes to permit redirection of nearly every dollar of JJCPA funds, which today are – in many instances – dedicated to staffing and personnel costs that make up the backbone of our juvenile probation departments. These expenditures have been and continue to be wholly eligible and lawful under JJCPA. While counties are not opposed to evaluating ways in which to improve JJCPA reporting and the structure of local coordinating councils (as was done through Chapter 880, Statutes of 2016), we must oppose this measure that would destabilize a stable, constitutionally protected funding structure at a time when we are assuming vast new responsibilities on the juvenile justice continuum.

At the same time, we believe community-based organizations provide valuable programs and services to criminal justice-involved populations in many parts of the state. The process for allocating funds to these organizations should remain a local decision with robust community engagement. Furthermore, we would value a collaborative discussion on separate, new investments in these programs as to complement the existing work of county probation departments that share the goals of diverting individuals from the criminal justice system where possible, and facilitating positive community reentry.

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