Public Policy Supplement

State of Texas Agency Mental Health-Related Juvenile Justice Policies, Management Standards, & Memoranda of Understanding

THE UNIVERSITY OF TEXAS AT AUSTIN
SCHOOL OF SOCIAL WORK

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State Policy Review

Methodology

In the spring of 2009, Texas state agencies were asked to forward policies, procedures, management standards and other operating guidelines relating to the care, education and treatment of court-involved youth of color with mental health needs (see Agency Request Letter—Attachment 4). Specifically requested were copies of current polices, procedures and/or operating guidelines relating to services or programs for youth, family members, staff, or external service providers addressing mental health evaluations, access to services, or continuation of care as youth transition back to communities. The purpose of this exercise was to identify what Texas state agencies were already doing to address the mental health needs of this population. The goal was to determine the extent to which these policies aligned with the policy recommendations offered in the report.

Ten state agencies and offices submitted a total 142 documents in excess of 1,000 pages (a complete listing of documents with description can be found at www.utexas.edu/research/cswr/yji/recentwork.html or www.swkey.org).

Attachment 1 provides descriptions of each agency from which documents were requested, including:

1. Texas Health and Human Services Commission (HHSC)
2. Texas Department of Aging and Disability Services (DADS)
3. Texas Department of Assistive and Rehabilitation Services (DARS)
4. Texas Department of Family and Protective Services (DFPS)
5. Texas Department of State Health Services (DSHS)
6. Texas Department of Criminal Justice (TDJC)
7. Texas Commission on Jail Standards (TCJS)
8. The Texas Correctional Office on Offenders with Medical or Mental Impairments (TCCOOMMI)
9. Texas Juvenile Probation Commission (TJPC)
10. Texas Youth Commission (TYC).

Table 1: Documents Received

Policies

- *State Statutes and Codes*
- *State Administrative Rules and Regulations*
- *Grant Requirements*
- *Advisory Committee Reports to Legislature*
- *Policy Council Mandates*
- *Compliance Resource Manuals*

Management Standards

- *Rehabilitation Policy Manual*
- *Administrative Directive*
- *Operations Manual*
- *Executive Directive*
- *Handbook of Consumer Rights*
- *Management and Operating Guidelines*
- *Performance Contract*
- *Special Program Manuals*
- *Provider Procedures Manual*
- *Online Training Guides*
- *Special Medicaid Bulletin*
- *Case Management Standards*

Memoranda of Understanding

- *Between DARS'Early Childhood & TEA*
- *Between the TDCJ's CSCD-Community Justice Assistance Division & DSHS*

Results

Policy documents represented the greatest number received (69%), followed by management standards and memoranda of understanding (MOUs), 27% and 4% respectively. A policy emphasized a state or federal statute or codified regulation (i.e., reiteration of a state law or implementing rule); a management standard emphasized an implementing procedure or operational directive (i.e., performance contract requirements, procedural manual or guidelines handbook); a memorandum of understanding highlighted required interagency collaboration (i.e., obligatory cooperating agreement among agencies).

The Texas Health and Human Services Commission (HHSC), umbrella agency overseeing five agencies offering health and human services, submitted documentation providing the most comprehensive system-focused programming, including those impacting court-involved youth (accounting for 60 percent of all documents received). For example, in its Management Standard: Office of Program Coordination for Children and Youth— Community Resource Coordination Groups (CRCG) of Texas, it authorizes "local interagency groups comprised of public and private agencies [to] develop service plans for individuals and families whose needs can be met only through interagency coordination and cooperation. Participating agencies include the Texas Youth Commission TYC, Texas Juvenile Probation Commission (TJPC), and the Texas Department of Criminal Justice's (TDCJ) Texas Correctional Office on Offenders with Medical or Mental Impairments (TCCOOMMI) each of whom have vested interests in the Texas juvenile justice system. The Texas Youth Commission (TYC) submitted the second greatest number of documents, 25, accounting for 18% of the total received. In contrast to HHSC's broader, comprehensive health "systems" focus, TYC's documents reflected youth-centered mental health and rehabilitation services. This was not unexpected given the agency's mandate to provide education, rehabilitative and medical services to youth in its care. The remaining agencies submitted a total of 33 documents (with the exception DFPS and DADS that chose not to submit documents believing theirs would be provided by their umbrella organization, the Health and Human Services Commission [HHSC]).

The documents were reviewed for language that ad-

Table 2: Agency Document Alignment with Recommendations

	A: Identification and Assessment	B: Pathways into the Juvenile Justice System	C: Contact with the System	D: Treatment and Aftercare
Texas DARS				Rec D2: 1 document
TCJS				
TCOOMMI			Rec C2: 1 document	
Texas DADS				Rec D2: 1 document
TDCJ			Rec C2: 3 documents	Rec D2: 2 documents
Texas DFPS				Rec D2: 2 documents
TDSHS	Rec A2: 1 document	Rec B2: 1 document	Rec C1: 3 documents Rec C2: 1 document	Rec D1: 5 documents Rec D2: 9 documents
TEA			Rec C2: 1 document	Rec D2: 2 documents
Texas HHSC		Rec B1: 1 document Rec B2: 1 document	Rec C2: 3 documents	Rec D2: 3 documents
TJPC		Rec B2: 1 document	Rec C2: 2 documents	Rec D2: 3 documents
TYC			Rec C2: 2 documents	Rec D2: 3 documents

dressed issues of mental health, system-involvement and youth of color, cultural competency or ethnicity. Our approach was purposefully broad in scope (1) to acknowledge agency awareness of the need to address court-involved youth of color with mental health challenges and (2) to highlight critical issue areas where current policy, management standards, or interagency agreements need strengthening or new public policy written. Recommendations published in the final report: Juvenile Justice, Mental Health and Youth of Color: A Framework for Action in Texas (see Attachment 3) were cross-referenced with these policies, management standards and MOUs to identify redundancies and gaps.

Table 2 lists the instances where a state agency document was believed to align with a report recommendation. An agency policy or standard was associated to a recommendation when it implied in its purpose or intent improvement to or implementation of the action. The shaded areas in Table 2 thus represent possible gaps in public policy and suggest, at minimum, the need to reassess current policies (or lack thereof) concerning court-involved youth of color with mental health needs. It should be noted that while every critical issue was addressed by at least one document, not every recommendation within each issue was covered.

Table 2: Agency Document Alignment with Recommendations (also see Attachment 2 that identifies referenced agency documents)

Conclusion

In our review of the 142 documents, none of them were directed specifically to court-involved youth of color with mental health needs. The typical response to our request for information was to supply us with everything that might meet one of our criteria. This agency response may indicate one or more of the following: 1) the agencies do not have policies, MOUs or management standards specifically addressing youth of color, but they wanted to demonstrate their work in other specified areas of juvenile justice and mental health, or 2) we did not obtain the documents that were most relevant to our request because the people coordinating the compilation were unaware of their existence or location. Exemplifying the latter was the Texas Education Agency's submission of its interagency MOU pertaining to early childhood intervention—an area at best tangentially related to court-involved youth of color with mental health needs. In a number of cases, our request was sent to the agency's open records coordinator who then sent a call for information to any department that might have something to say about the request. It is possible that the people who would have been most knowledgeable were not contacted.

To strengthen the policy review, we recommend a follow up occur with appropriate-level staff at each agency to discuss and validate these impressions. At that time additional documents could be identified that we failed to receive but considered relevant to the initial request. We can only conclude from the current review that Texas state agencies have insufficient written policy concerning the mental health needs of court-involved youth of color.

Concluding Recommendation

The Office of Juvenile Justice and Delinquency Prevention (OJJDP) currently monitors state disproportionate minority contact (DMC) on a state-by-state basis (OJJDP, 2009). Texas, a participating Juvenile Justice Delinquency Prevention Act formula grant state (administered through the Governor's Office, Criminal Justice Division), reports annually on the state's compliance with core DMC-related requirements and activities. These results in turn are used to (1) identify the extent to which DMC exists within the state; (2) evaluate the reasons DMC exits; (3) develop, organize and implement DMC-reduction strategies; and (4) evaluate and monitor the effectiveness of those strategies.

Table 3 summarizes OJJDP's DMC-reduction activities. Data reported to the OJJDP by Texas in its annual 2008 update reveal progress in only three of the twelve activities (#1, 4 and 6). Many of the other

activities, if implemented, would promote improvements not only in disproportionate representation of court-involved youth of color but also in efforts to address this population's critical mental health-related issues. With its ongoing focus on juvenile justice system reform, the Criminal Justice Division in the Governor's Office is an excellent mechanism for leading and coordinating reviews of state agency policies and practices affecting court-involved youth of color with mental health needs.

In summary, subsequent to the project symposium and the drafting of recommendations, staff conducted a content review of Texas state agency mental health-related policies, management standards, and memoranda of understanding specific to court-involved youth of color. The purpose of this post-study review was to identify existing policies targeting youth of color with mental health needs and to assess the extent to which agency policies address project recommendations. Ten state agencies and offices submitted a total 142 documents.

Efforts to align current policies and practices with project recommendations revealed significant policy gaps across the juvenile justice spectrum, including: identification and assessment practices; educational, treatment, and community-based opportunities; culturally-grounded interventions; and transition and aftercare planning and programming. None of the documents we reviewed specifically targeted court-involved youth of color with mental health needs. In sum, we have proposed several recommendations, including meeting with staff at each agency to discuss and validate the policy review findings, identifying other documents relevant to our initial request which were missing in the initial submissions, and engaging the Criminal Justice Division in the Governor's Office (within the context of its DMC reduction efforts) in an evaluation of state agency policies and practices affecting court-involved youth of color with mental health needs.

Table 3. DMC Reduction

OJJDP State-level DMC-Reduction Activities
Source: OJJDP, 2008

1. Have full-time, state-level DMC Coordinators.
2. Have part-time or other state-level staff designated as DMC Coordinators.
3. Have DMC subcommittees under their State Advisory Groups.
4. Have data for six or more (out of nine) contact points in their juvenile justice systems.
5. Have data for all nine contact points in their juvenile justice systems.
6. Update data annually (more frequently than OJJDP's minimum requirement of every 3 years).
7. Have invested in targeted local DMC-reduction sites.
8. Have funded alternatives to detention and/or Burns Institute approach.
9. Use objective risk assessment instruments.
10. Have done significant work with American Indians.
11. Have implemented cultural competency training and/or organizational cultural competency assessment.
12. Have State laws intended and/or expected to positively impact DMC.

Attachment 1: State Agencies

Responsive to Request for Mental Health-Related Juvenile Justice Policies, Management Standards, & MOUs

Texas Department of Aging and Disability Services (DADS): "DADS strives to provide a comprehensive array of aging and disability services, supports and opportunities that are easily accessed in local communities. The DADS mission is to provide a comprehensive array of aging and disability services, supports, and opportunities that are easily accessed in local communities." [www.dads.state.tx.us/index.cfm]

Texas Department of Assistive and Rehabilitation Services (DARS): "Our Mission is: To work in partnership with Texans with disabilities and families with children who have developmental delays to improve the quality of their lives and to enable their full participation in society." [www.dars.state.tx.us/index.shtml]

Texas Department of Family and Protective Services (DFPS): "DFPS is charged with protecting children, adults who are elderly or have disabilities living at home or in state facilities, and licensing group day-care homes, day-care centers, and registered family homes.The agency is also charged with managing community-based programs that prevent delinquency, abuse, neglect and exploitation of Texas children, elderly and disabled adults. The agency's services are provided through its Adult Protective Services, Child Protective Services, Child Care Licensing, and Prevention and Early Intervention divisions. Every day, almost 6,800 DFPS employees in more than 249 offices across the state protect the physical safety and emotional well-being of the most vulnerable citizens of Texas." [www.dfps.state.tx.us]

Texas Department of State Health Services (DSHS): "The agency administers and regulates public health and behavioral health programs. DSHS is governed by laws and rules that are designed to improve the quality and efficiency of public and private services and supports for Texans with mental illnesses." [www.dshs.state.tx.us]

Texas Education Agency (TEA): "The TEA and the State Board of Education (SBOE) guide and monitor activities and programs related to public education in Texas." [www.tea.state.tx.us/index4.aspx?id=3793]

Texas Department of Criminal Justice (TDJC): "TDCJ manages offenders in state prisons, state jails and private correctional facilities that contract with TDCJ. The agency also provides funding and certain oversight of community supervision (previously known as adult probation) and is responsible for the supervision of offenders released from prison on parole or mandatory supervision." [www.tdcj.state.tx.us]

Texas Commission on Jail Standards (TCJS): "It is the duty of the Commission to promulgate reasonable written rules and procedures establishing minimum standards, inspection procedures, enforcement policies and technical assistance for: the construction, equipment, maintenance, and operation of jail facilities under its jurisdiction; the custody, care and treatment of inmates; programs of rehabilitation, education, and recreation for inmates confined in county and municipal jail facilities under its jurisdiction." [www.tcjs.state.tx.us]

Texas Correctional Office on Offenders with Medical or Mental Impairments (TCCOOMMI): TCCOOMI operates within TDCJ and its purpose is "to provide a formal structure for criminal justice, health and human service, and other affected organizations to communicate and coordinate on policy, legislative, and programmatic issues affecting offenders with special needs. Special needs include offenders with serious mental illnesses, mental retardation, terminal or serious medical conditions, physical disabilities and those who are elderly." [www.tjpc.state.tx.us/about_us/default.htm] Their community- based interventions include Wrap Around Services for Juvenile Probationers and TYC Youths on Parole.

Texas Youth Commission (TYC): "TYC manages state-operated secure facilities and halfway houses to provide treatment services to those youth who have chronic delinquency problems and who have exhausted their options in the county. Additionally, youth who have committed the most serious offenses requiring specialized treatment services that counties are not equipped to provide are also likely to be committed to TYC." [www.tyc.state.tx.us/about/overview.html]

Texas Juvenile Probation Commission (TJPC): "At the state level, two primary agencies work with juvenile justice matters: TJPC and TYC. Both have distinct roles and missions. TJPC works in partnership with local juvenile boards and juvenile probation departments to support and enhance juvenile probation services throughout the state by providing funding, technical assistance, and training; establishing and enforcing standards; collecting, analyzing and disseminating information; and facilitating communications between state and local entities. TJPC also provides oversight of county-operated detention facilities. [www.tyc.state.tx.us/about/overview.html]

Texas Health and Human Services Commission (HHSC): "HHSC oversees the Texas health and human services system, which is composed of five agencies: HHSC, DADS, DARS, DFPS and DSHS." [www.hhsc.state.tx.us/about_hhsc/index.shtml]

Attachment 2: State Agency Submitted Policies, Management Standards, and/or MOUs that Align or Address Mental Health Symposium Recommendations[2][3]

Texas State Agency	A: Identification and Assessment of Mental Health Needs	B: Pathways into the Juvenile Justice System	C: Contact with the Juvenile Justice System	D: Treatment and Aftercare
Department of Assistive & Rehabilitative Services (DARS)				Rec. D2: **Management Standard:** Office of Program Coordination for Children and Youth Community Resource Coordination Groups (CRCG) of Texas
Texas Commission on Jail Standards (TCJS)				
Texas Correctional Office on Offenders with Medical or Mental Impairments (TCOOMMI)			Rec. C2: **Policy: Grant:** Grant M - Special Needs Diversionary Program	
Texas Department of Aging and Disability Services (DADS)				Rec. D2: **Management Standard:** Office of Program Coordination for Children and Youth Community Resource Coordination Groups (CRCG) of Texas
Texas Department of Criminal Justice (TDCJ)			Rec. C2: **Management Standard:** Operations Manual The Challenge Opportunity Understanding Respect Acceptance Growth Education	Rec. D2: **Management Standard:** Office of Program Coordination for Children and Youth Community Resource Coordination Groups (CRCG) of Texas Rec. D2: **Memorandum of Understanding:** Between

[2] Broad Areas with recommendations follow this table.

[3] A policy, management standard, or MOU was selected if (1) its general content explicitly identified the CritiCIl Issue (e.g., program/service and/or point of juvenile justice system contact) **and** (2) its content implicitly covers mental health issues for ethnic or racial minority youth.

			(COURAGE) Program and Young Adult Transition Offenders (YATO) Operations Manual Rec. C2: **Policy:** Government Code Title 4. Executive Branch Subtitle I. Health and Human Services Commission Subchapter A. General Provisions; Organization of Commission Rec. C2: **Policy: Grant:** Grant M - Special Needs Diversionary Program	TDCJ's CSCD-Community Justice Assistance Division & DSHS
Texas Department of Family and Protective Services (DFPS)				Rec. D2: **Management Standard:** Office of Program Coordination for Children and Youth Community Resource Coordination Groups (CRCG) of Texas Rec. D2: **Management Standard:** The Texas Integrated Funding Initiative (TIFI) Consortium
Texas Department of State Health Services (TDSHS)	Rec. A2: **Management Standard:** Case Management for Children and Pregnant Women - ED-02.R39 (Rev. 1); Authority - Section 493.006(b) Texas Government Code (CPW) Response	Rec. B2: **Management Standard:** The 2009 Mental Health Performance Contract	Rec. C1: **Policy:** Texas Administrative Code Chapter 412 Local Mental Authority Responsibilities Subchapter G: Mental Health Community Services Standards RULE §412.R313 Rights and Protection & RULE §412.R324 Additional Standards of Care Specific to Mental Health Community Rec. C1: **Policy:** Texas Administrative Code Chapter 412 Local Mental Authority Responsibilities	Rec. D1: **Policy:** Texas Administrative Code Chapter 412 Local Mental Authority Responsibilities Subchapter G: Mental Health Community Services Standards RULE §412.R313 Rights and Protection Rec. D1: & Rec. D2: **Policy:** Texas Administrative Code Chapter 412 Local Mental Authority Responsibilities Subchapter G: Mental Health Community Services Standards RULE §412.R324 Additional Standards of Care Specific to Mental Health Community Rec. D1: & Rec. D2: **Policy:** Texas Administrative Code Chapter 412 Local Mental Authority Responsibilities Subchapter I: Mental Health Case Management Services Subchapter P: Provider Network Development

			Subchapter I: Mental Health Case Management Services Subchapter P: Provider Network Development RULE §412.R411 Rec. C1: **Policy**: Texas Administrative Code Chapter 419 Mental Health Services -- Medicaid State Operating Agency Responsibilities Subchapter L: Mental Health Rehabilitative Services RULE §419.R464 Rec. C2: **Policy:** Texas Administrative Code Chapter 412 Local Mental Authority Responsibilities Subchapter D: Mental Health Services – Admission, Continuity, and Discharge Continuity of Services – State Mental Retardation Facilities RULE §412.R173	RULE §412.R411 Rec. D1: & Rec. D2: **Policy**: Texas Administrative Code Chapter 419 Mental Health Services -- Medicaid State Operating Agency Responsibilities Subchapter L: Mental Health Rehabilitative Services RULE §419.R464 Rec. D1: **Management Standard:** Online training for Texas Health Steps [Cultural competency training] Rec. D2: **Management Standard:** Mental Health Handbook of Consumer Rights Rec. D2: **Management Standard:** Office of Program Coordination for Children and Youth Community Resource Coordination Groups (CRCG) of Texas Rec. D2: **Management Standard:** The Texas Integrated Funding Initiative (TIFI) Consortium Rec. D2: **Memorandum of Understanding:** Between TDCJ's CSCD-Community Justice Assistance Division & DSHS Rec. D2: **Policy**: Texas Administrative Code Chapter 419 Mental Health Services -- Medicaid State Operating Agency Responsibilities Subchapter L: Mental Health Rehabilitative Services RULE §419.R464 Rec. D2: **Policy**: Texas Administrative Code Title 25, Part 1, Chapter 448, Subchapter I, Rules 448.906-907
Texas Education Agency (TEA)			Rec. C2: **Policy:** Government Code Title 4. Executive Branch Subtitle I. Health and Human	Rec. D2: **Management Standard:** Office of Program Coordination for Children and Youth Community Resource Coordination Groups (CRCG) of Texas

			Services Commission Subchapter A. General Provisions; Organization of Commission	Rec. D2: **Management Standard:** The Texas Integrated Funding Initiative (TIFI) Consortium
Texas Health & Human Services Commission (HHSC)		Rec. B1: **Policy:** Report to the Governor and the 79th Legislature, Submitted by the State Texas Integrated Funding Initiative Consortium in Cooperation with the Texas Health And Human Services Commission Rec. B2: **Policy:** Systems of Care - SAMHSA (Substance Abuse & Mental Health Services Administration)	Rec. C2: **Management Standard:** Office of Program Coordination for Children and Youth Community Resource Coordination Groups (CRCG) of Texas Rec. C2: **Policy:** Government Code Title 4. Executive Branch Subtitle I. Health and Human Services Commission Subchapter A. General Provisions; Organization of Commission Rec. C2: **Policy:** Report to the Governor and the 79th Legislature, Submitted by the State Texas Integrated Funding Initiative Consortium in Cooperation with the Texas Health And Human Services Commission Rec. C2: **Policy:** Systems of Care - SAMHSA (Substance Abuse & Mental Health Services Administration)	Rec. D2: **Management Standard:** Office of Program Coordination for Children and Youth Community Resource Coordination Groups (CRCG) of Texas Rec. D2: **Policy:** Report to the Governor and the 79th Legislature, Submitted by the State Texas Integrated Funding Initiative Consortium in Cooperation with the Texas Health And Human Services Commission Rec. D2: **Policy:** Systems of Care -SAMHSA (Substance Abuse & Mental Health Services Administration)
Texas Juvenile Probation Commission (TJPC)		Rec. B2: **Management Standard:** Special Needs Diversionary Program for	Rec. C2: **Management Standard: Policy and Procedure Manual** Special Needs Diversionary Program	Rec. D2: **Management Standard:** Office of Program Coordination for Children and Youth Community Resource Coordination Groups (CRCG) of Texas Rec. D2: **Management Standard: Policy and Procedure**

		Mentally Ill Juvenile Offender, FY 2007 Published March 2008	Rec. C2: **Policy: Grant:** Grant M - Special Needs Diversionary Program	**Manual** Special Needs Diversionary Program (with Texas Council on Offenders with Mental Impairments [TCOMI]) Rec. D2: **Management Standard:** The Texas Integrated Funding Initiative (TIFI) Consortium
Texas Youth Commission (TYC)			Rec. C2: **Management Standard:** Case Management Standard CMS.09.04 Rec. C2: **Policy:** Government Code Title 4. Executive Branch Subtitle I. Health and Human Services Commission Subchapter A. General Provisions; Organization of Commission	Rec. D2: **Management Standard:** Case Management Standard CMS 11.39 & 12.51 Rec. D2: **Management Standard:** Office of Program Coordination for Children and Youth Community Resource Coordination Groups (CRCG) of Texas Rec. D2: **Management Standard:** The Texas Integrated Funding Initiative (TIFI) Consortium

Attachment 3: Report Recommendations by Category

Identification and Assessment of Mental Health Needs

A1. Use research-based screening and assessment tools that take into account cultural factors and demonstrate effectiveness with youth of color.

A2. Involve youth of color and their families in the process of early identification, screening and assessment of needs.
A3. Establish an infrastructure of culturally competent community-based services that address the mental health needs of youth of color and prevent juvenile justice system involvement.

A4. Ensure screening and assessment tools identify youth of color exposed to violence, abuse and trauma and treat this as a mental health issue.

A5. Identify assessment tools that have been validated for use with different racial and ethnic groups.

Pathways into the Juvenile Justice System

B1. Reform of the Texas Education Code disciplinary provisions to take into account mental health issues when school-based disciplinary action is being considered or has been taken. Ensure teachers have training, support and options to work with youth of color displaying behavioral issues without resorting to juvenile justice system involvement.

B2. Provide stronger and more effective interventions and supports within the home school environment to prevent students of color who display disruptive behavior from being removed and sent away to inadequate educational alternatives.

B3. Expand Texas' community-based program infrastructure to divert youth of color who have mental health issues but do not pose a public safety threat away from institutional settings. Ensure programs are culturally responsive.

B4. Strengthen defense attorney services for juveniles. Ensure youth of color and their family members are made aware of their rights and have culturally competent and grounded advocates.

B5. Educate communities of color about the impact of trauma and witnessing violence on a young person's mental health and how to get help without going to law enforcement or the juvenile justice system.

Contact with the Juvenile Justice System

C1. Racial injustice and disparities experienced by youth of color need to be more adequately addressed through an explicit commitment to cultural competence and awareness. This should include development and implementation of policies and practices with measures for accountability and ongoing training and support of service providers.

C2. Strengthen the coordination of efforts among school, family, social service, mental health and juvenile justice service providers in order to improve fragmented service delivery approaches where youth of color are transferred numerous times from different placements and providers. There must be a focus on sustaining relationships whenever possible.

C3. Redirect funds from incarceration to the development and expansion of culturally competent community-based treatment program options.

Treatment and Aftercare

D1. Provide culturally responsive treatment options for youth of color who are in the system and involve family members in its delivery.

D2. Establish culturally responsive aftercare programs for youth of color transitioning from the system, keeping youth in their home communities to draw on social support networks, while ensuring continuity of treatment and access to medication after release.

Attachment 4: Letter of Request for Policy Documents Pertaining to Court-involved Youth of Color with Mental Health Needs

Dear <Addressee>:

Southwest Key Programs in collaboration with the Inter-American Institute for Youth Justice (Justice4Youth) at The University of Texas at Austin, School of Social was recently awarded a grant from the Hogg Foundation to increase awareness about the numerous barriers that youth and families of color face when attempting to access mental health services. Data reveal that up to 70 percent of youth in the juvenile justice system have mental health disorders while more than 20 percent have a serious mental illness. Our project's intent is to develop and disseminate recommendations that promote and support effective mental health policy designed to: 1) Alter the use of the juvenile justice system as a system of last resort for youth of color with mental health needs; and 2) Increase access to mental health services to children and families of color involved in the juvenile justice system (i.e., community-based services).

To assist the Texas Mental Health & Juvenile Justice Initiative's evaluation of current mental health practices within the juvenile justice systems in Texas, we are asking Texas state agencies to help us identify current policies, procedures and operating guidelines that emphasize or directly speak to the mental health needs of youth they serve. We are particularly interested in mental health or other treatment-related policies and practices that target youth of color, a group historically disproportionately represented in the juvenile justice system.

We are writing your agency given its role as an advisory committee member of Texas Correctional Office on Offenders with Medical or Mental Impairments (TCOOMMI). Your interest and commitment to continuity of care systems to youth offenders with special mental health needs suggests you may have developed policies and procedures in this area. We respectfully request your assistance in identifying and sharing with us current policies and guidelines your agency follows pertinent to youth with mental health needs. Specifically we are requesting:

Copies of current polices, procedures and/or operating guidelines relating to services or programs to youth, family members, staff, or external service providers that facilitate mental health evaluations, access to services, or continuation of care as youth transition back to communities.

We will be sharing these documents with a group of nationally recognized panelists prior to a planned symposium this summer to discuss current mental health trends and practices and to make policy recommendations for improving mental health services to youth in Texas' juvenile justice system.

We know this is a very busy time for you with the Legislature in session and thank you in advance for your help. If at all possible, we ask that you respond by March 30, 2009. [NOTE: CONTACT INFORMATION WAS PROVIDED]

An electronic copy of the report and supplemental materials, including a complete listing of state agency documents submitted for review, is available at www.utexas.edu/research/cswr/yji/recentwork.html or www.swkey.org

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