

HEALTH MANAGEMENT ASSOCIATES

Final Recommendations

Health Management Associates/ Los Angeles Probation Juvenile Justice Coordinating Council
Governance and Procedure Ad Hoc Subcommittee
August 31, 2023

Health Management Associates (HMA) along with the Governance and Procedure Ad Hoc Subcommittee (G&P) have completed a review of governance criteria outlined in the Scope of Work. While each Scope of Work has discrete recommendations, we have sorted all recommendations by topic area and have compiled them by topic for ease in reviewing and deciding on process improvement priorities:

Enhancement of the current CMJJP (SOW 1.3, 2.1.3, 2.3.1):

HMA was asked to review how to enhance the current process of CMJJP development. We compiled results of interviews, as well as feedback provided during the JJCC Process improvement Event (July 2022), to develop the following recommendations:

- a. The written CMJJP has a good review of areas of need, including percentage of youth in need of primary prevention, focused prevention/early intervention, and intervention, as well as zip codes which demonstrate areas where services should be focused. It is not clear whether there is a system in place to assess whether the services are funded in a way that is wholly consistent with the identified needs. This should be verified, and an important process improvement step is to ensure this happens yearly.
- b. There has been a concern among JJCC members that the current evaluations of programs are not robust enough to adequately assess the services provided by grantees. However, the level of evaluation requested may not be feasible due to funding considerations. Currently, Rand is conducting an extensive evaluation on a few programs per year. It is recommended that JJCC members continue to review what types of evaluations can inform the best use of funding.
- c. Delineate clearly how the program evaluations impact funding priorities or continued funding.
- d. The funding application scoring process has been improved over the last few years to operationalize this process so that it is more consistent between and among reviewers. It is recommended that this scoring process be reviewed every year to assure continued relevance and efficacy.
- e. Several people felt that JJCC meetings lack direction and are too long. Several people suggested in the survey or interview that it may be beneficial to have a regular monthly meeting of the JJCC that can be shorter. The G&P should look at this recommendation and decide whether this is feasible or practical. If it is not practical to schedule additional meetings, discussion on how to shorten meetings and increase efficiency should be undertaken by the G&P committee.
- f. Currently, The JJCC Community Advisory Committee (CAC) accepts community feedback on programs but it is unclear how or if this information is used in the funding decisions. It is recommended that the CMJJP subcommittee clearly delineate how this information is included in the allocation process.
- g. Community Feedback Survey: There was quite a bit of discussion on the Community Feedback Survey during our Process Improvement Event. A number of recommendations came from that:
 - i. There is not a clear relationship between the survey and how funding is allocated. It is recommended that the connection is more clearly articulated.

- ii. The CMJJP subcommittee has worked on adjusting the process to allow more time to consider funding decisions. Nevertheless, there continues to be feedback that there is not enough time to consider feedback. Considering additional time for feedback should continue to be a priority of this committee.
- iii. The probation listserv should be reviewed to confirm that the survey is being sent to appropriate stakeholders.
- iv. Survey dissemination should be reviewed in order to find ways to make the outreach more effective, due to the current low response rate.
- v. Listserv respondents should include stakeholders who have a good understanding of the system, such as school administrators and CBO's.
- vi. The timeline for responding to the survey is from July 1 to October 1. This timeline should be limited and the turnaround should be relatively quick so that respondents can utilize the survey results to determine funding priorities.
- vii. Consider the use of survey vendor.
- viii. If the decision is made to use a vendor, consider financing, time commitment, etc.

Evaluation of JJCC (SOW 2.4.1, 2.4.2)

HMA reviewed potential performance metrics for Criminal Justice Coordinating Councils.¹ Following are recommended best practice metrics for evaluating the JJCC, as well as review of JJCC's practices regarding benchmarks:

1. Meeting attendance and continuity: In the survey, most people said they felt that there was not enough attendance at subcommittees. However, attendance is taken at all subcommittee meetings and there must be a quorum for the meeting to continue. Since this is information that is available, this is a metric that can demonstrate the effectiveness of the JJCC.
2. Structure and the contribution of members: Contribution of members is difficult to quantify. There also would be a question about whose responsibility it is to assess the level of contribution of each member. Some CJCC's have developed metrics based on yearly goals. Some CJCC's have also used meeting attendance, number of replacements requested, assigning a measurable outcome to issues brought up in meetings, and then assessing that outcome.
3. Programs and policies: The CJCC has a process in place for assessing the programs it funds, so this performance measure is already in place.
4. Level of satisfaction: The survey, such as the one completed by HMA in 2022, can be provided yearly to assess progress in levels of satisfaction. In our interviews, while committee members discussed problems with the JJCC, many also commented that the committee has become more organized and better functioning over the last few years.

Brown Act/Community Advisory Committee (CAC) (SOW 2.4.1)

There was a specific concern about the CAC meetings, and whether their meetings fall under Brown Act rules. HMA was asked to assess this issue and make recommendations about how the CAC can work effectively.

¹ <https://www.jmijustice.org/wp-content/uploads/2019/11/CJCCMiniGuide-Performance-Measures.pdf>

- a. HMA provided the opinion that the CAC is subject to the Brown Act. The chair and co-chair of this committee may want to further discuss how to ensure the meetings are effective.
- b. Our understanding is that the CAC chairs have valued the opportunity to have more open conversations by eliminating application of the Brown Act. This has been accomplished by having the CAC meetings in person but adjourning the formal CAC meetings to allow smaller groups have more open discussions, and then readjourn.
- c. This has been difficult since the beginning of COVID because of the limitations of Zoom meetings; however, it is possible to have break-out sessions over Zoom and this may be reconsidered. At the same time, since the CAC meeting was considered much more productive when it was in person, consider having the in-person meeting following current COVID guidelines. While it is much more convenient to have meetings over Zoom, it appears that the importance of allowing community voice outweighs the inconvenience.

By-Laws (SOW 2.1.1, 2.1.2)

HMA was asked to review the by-laws and make suggestions on gaps, and an assessment on whether the by-laws are consistent with 749.22 (WIC). Overall, by-laws were consistent with 749.22. There were, however, several recommendations:

- a. HMA recommends the JJCC continue to review information that can be added to the by-laws in order to articulate clearer rules and expectations for JJCC process.
- b. Other counties have updated by-laws to include information on the authority and polices of the Realignment Block Grant (RBG) subcommittee. Since the RBG committee has been deliberating for several months on issues of consequence to the youth served under this block grant, it may be beneficial to review bylaws specifically related to this subcommittee.
- c. HMA recommends adding specific references to Government Code section 30061(b)(4) and Welfare and Institutions Code section 1961(b), which requires that the Plan shall be a consolidation of the annual comprehensive multiagency Juvenile Justice Plan and the annual Youthful Offender Block Grant (YOBG) Plan.
- d. HMA recommends adding specific language indicating that the JJCC serves as the parent body for the realignment subcommittee in accordance with Welfare and Institution Code Division 2.5, Chapter 1.7, Section 1995, for the purpose of securing Juvenile Justice Realignment Block Grant funding for the County of Los Angeles.

Conflicts of interest (SOW 2.2.1)

HMA was asked to review issues surrounding Conflicts of Interest (COI). In addition, confusion around COI rules was brought up when HMA interviewed JJCC participants. Therefore HMA reviewed COI practices, as well as the by-laws, to assess whether COI was clearly discussed in the by-laws. Following were the HMA recommendations:

- a. The Conflict-of-Interest section of the bylaws clearly states that JJCC members must comply with all conflict-of-interest laws, and notes the Government Code Sections 1090 and 87100. However, JJCC members expressed concern about not understanding the Conflict-of-Interest rules. There is no change needed to this aspect of the bylaws; however, it is recommended that JJCC request that County Counsel provide a yearly training on Conflict of Interest so the government codes are clear to all JJCC members.

- b. Even with regular training, specific questions may come up among voting members of the JJCC. HMA recommends developing an avenue for obtaining answers to such questions, such as opportunities to submit written or oral questions to County Counsel.
- c. Some JJCC members have requested that they be allowed to involve their own choice of attorneys to offer additional opinions and review of the County Counsel's findings. Since County Counsel's primary client is the Board of Supervisors, this decision would likely necessitate approval by the Board of Supervisors². We recommend that interested JJCC members make their request to the JJCC chair for consideration by County Counsel. Once County Counsel weighs in on this request, this final opinion should be consistently applied and provided to all members of the JJCC. If there are clear criteria developed on this practice that is consistent and durable, there will be less confusion on this topic.
- d. A written procedure for COI should be provided to JJCC members which establishes a protocol for people to self-report possible conflicts, report suspected conflict of interest, or ask for guidance.
 - e. When County Counsel weighs in on a COI question, it may be helpful in increasing the perception of transparency if this information could be recorded and available to members of the JJCC. This is a question for County Counsel.

Subcommittees (SOW 2.1.4, 2.4.1, 2.4.2, 2.4.3)

HMA was asked to review the functioning of the subcommittees, including whether they had clear goals and objectives in accordance with JJCC's mission. Following were findings and recommendations:

- a. While the basic structure and function of subcommittees is to report information back to the larger JJCC, there were some concerns raised about that process. For instance, it is not clear to some members whether voting members of the JJCC can decide not to accept the subcommittees' work. Also, it is not always clear to subcommittee members when they should bring information from the subcommittees back to the larger group. Clarity on these processes should be developed and communicated to the larger group.
- b. While the subcommittees each have clear goals and there are no redundancies, some members would like more information on the actions of each subcommittee. There is a question about how this can happen. The G&P has decided that each subcommittee should report on work and progress at the JJCC meeting. However, these meetings often have extensive agendas and there is not always time for these reports. The G&P may want to discuss the structure of meetings and how to improve their efficiency.
- c. While there was some concern that there was not enough attendance at subcommittees, there is a record of attendance. Subcommittees can assess whether there should be attendance requirements with consequences for not attending, such as being asked to resign from a subcommittee if individual members are unable to maintain a specific commitment.

Gap analysis (2.3.1, 2.3.2, 2.4.3)

- a. Many of HMA's findings regarding gaps in the CMJJP report were consistent with Rand's findings. It is unclear how Rand's findings are incorporated into future JJCC work. It is

² <https://www.counties.org/county-office/county-counsel>

recommended that the JJCC form some consensus regarding how future work on process improvement will take place, which would include how Rand's findings as well as recommendations of the G&P will be included in JJCC work.

- b. Information regarding data on the impact of funded programs on reducing contact with law enforcement, in addition to specific information on types and level of contact, will be beneficial to make future determinations about funding allocations and priorities.
- c. We recommend continuing to work on how information can be provided by grant recipients so that this information can be assessed.³
- d. Additional data to ensure the continuum of responses is reducing delinquency will be beneficial in determining whether the JJCC is meeting stated goals.
- e. Outcome measures should be included in funding decisions; however, it is not clear from the report whether Rand's outcome measures and findings are used as a basis for future funding and even if they are for some grantees, it is difficult to tell how comprehensive it is at any given point in time.
- f. There appears to be a gap in "measuring success." While RAND is being used for evaluation, there is no clear process for tying funding decisions to evaluations of success for all the grantees at a given point in time.

Contracting

One ongoing issue that was clear from this process was the amount of time and detailed work necessary to complete the work of this committee in a timely manner. There was discussion on whether the JJCC operation should be contracted out to a CBO that is knowledgeable about Probation, the JJCPA, and community resources. This is an ongoing discussion. Probation has developed a list of the tasks required to oversee the JJCC and the process of completing a yearly CMJJP. Recommendations for next steps include:

- a. Continue to evaluate the steps, workload and time allotted for all tasks.
- b. Consider whether additional resources can be allocated to the process of running the JJCC, whether they be additional staff members from the department, or contracted out to local organizations that are familiar with the JJCPA.

³ https://www.rand.org/pubs/research_reports/RRA1663-1.html