



**SECURE YOUTH TREATMENT
FACILITIES SUBCOMMITTEE**

Briefing Materials

JUVENILE TITLES 15 & 24 REGULATIONS REVISION

September 19, 2025



Board of State and Community Corrections
2590 Venture Oaks Way, Suite 200
Sacramento CA 95833

www.bscc.ca.gov

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Board of State and Community Corrections Members

Chair, Board of State and Community Corrections **Linda M. Penner**

Secretary, Department of Corrections and Rehabilitation **Jeffrey Macomber**

Director (A), Division of Adult Parole Operations **Dr. Heather Bowlds, PsyD**
Department of Corrections and Rehabilitation

County Sheriff in charge of a local detention facility **Eric Taylor**
with a jail rated capacity of 200 or less inmates Sheriff, San Benito County

County Sheriff in charge of a local detention facility **Vacant**
with a jail rated capacity of over 200 inmates

County Supervisor or County Administrative Officer **Vacant**

Chief Probation Officer from a county with **Kirk Haynes**
a population over 200,000 Chief Probation Officer, Fresno County

Chief Probation Officer from a county with **Jennifer Branning**
a population under 200,000 Chief Probation Officer, Lassen County

A judge appointed by the Judicial Council of California **Hon. Janet Gaard**
Retired Judge, Yolo County

Chief of Police **William "Bill" Scott**
Chief of Police, City of San Francisco

Community provider of rehabilitative treatment **Scott Budnick**
or services for adult offenders Founder, Anti-Recidivism Coalition

Community provider or advocate with expertise **Angeles D. Zaragoza**
in effective programs, policies, and treatment Attorney, Deputy Executive Director
of at-risk youth and juvenile offenders Youth Justice Programs, LARB

Public Member **Norma Cumpian**
Assistant Deputy Director, Women's Department
Anti-Recidivism Coalition

Licensed health care provider **Dr. Karen Lai, MD**
Berkeley, Alameda County

Licensed mental or behavioral health **Dr. Gena Castro Rodriguez, PsyD, LMFT**
care provider San Francisco

Juvenile Titles 15 and 24 Regulations Revision Executive Steering Committee Members

**Kirk Haynes, ESC Co-Chair,
BSCC Board Member, Chief Probation
Officer**
Fresno County Probation Department

**Roberto Luca ¹, ESC Co-Chair,
Co-Founder & Executive Director**
Restorative Academic Mentorship Program

Katherine Lucero, Director
Office of Youth and Community Restoration

Heile Gantan, Senior Program Associate
Food in Prison Project, Impact Justice

Kristen Vela, Health Program Manager
Sonoma County Public Health

**Esa Ehmen-Krause, Chief Probation
Officer**
Contra Costa County Probation

**Amanda Yoacham, Chief Mental Health
Clinician**
San Joaquin Behavioral Health Services

Meredith Desautels, Directing Attorney
Youth Law Center

Jane Halladay Goldman, Senior Director
Rape Treatment Center, UCLA Santa
Monica Medical Center

**Katherine Aaron ², Assistant
Superintendent**
San Luis Obispo County Office of Education

Danielle “Danny” King, JD, MA

Brian Richart, Chief Probation Officer
El Dorado County Probation

Dean Farrah ³, Chief Probation Officer
Merced County Probation

Kaci Smith⁴, Chief Probation Officer
El Dorado County Probation Department

**Ezekiel Nishiyama⁵, Advocacy &
Community Organizing Coordinator**
Anti-Recidivism Coalition

¹ April 13, 2023 - Roberto Luca has been appointed as the ESC Co-Chair.

² March 7, 2023 - San Luis Obispo County Assistant Superintendent and Juvenile Justice Commissioner, DJ Pittenger, has been replaced by San Luis Obispo County Assistant Superintendent, Katherine Aaron

³ December 14, 2022 - Riverside County Chief Probation Officer Ron Miller has been replaced by Merced County Chief Probation Officer Kalisa Rochester. As of April 3, 2025, Merced County Chief Probation Officer Kalisa Rochester has been replaced by Solano County Chief Probation Officer Dean Farrah.

⁴ April 3, 2025 – SLO County Deputy Chief Probation Officer Marguerite Harris was replaced by El Dorado County Chief Probation Officer Kaci Smith.

⁵ January 25, 2023 - CAYCJ Deputy Director, Israel Villa has been replaced by Juvenile Justice Advocate, Luis Venegas. On April 14, 2025, Luis Venegas was replaced by ARC Advocacy & Community Organizing Coordinator, Ezekiel Nishiyama.

Juvenile Titles 15 and 24 Regulations Revision
Secure Youth Treatment Facilities Subcommittee Members

Katherine Lucero, Co-Chair, Director
Office of Youth and Community Restoration

Ezekiel Nishiyama, Co-Chair, Development Program Analyst
Los Angeles County Department of Youth Development

Roberto Luca, Co-Founder & Executive Director
Restorative Academic Mentorship Program (RAMP LA)

Kellie Nadler, Dean
Academic Pathways, Strong Workforce, and Student Success
Peralta Community College District

Chris Eldridge, Mental Health Program Coordinator
Sacramento County Behavioral Health Services

Joni Spears, Assistant Public Defender
Contra Costa County Office of the Public Defender

Dean Farrah, Chief Probation Officer
Solano County Probation Department

Jeremy Roberts, Probation Division Director
Youth Detention Center, Kern County Probation

Regulations Revision Process and Timeline

On February 10, 2022, the BSCC Board directed staff to launch the Juvenile Regulations Revision process, including development of an Executive Steering Committee (ESC) that represents experience and subject-matter expertise in a variety of areas, including lived experience, impact on community, facility management, advocacy, adolescent health care, adolescent behavioral health care, trauma-informed care, nutrition, and education.

The ESC considers recommended regulation revisions, discusses issues relevant to the operation and design of juvenile facilities, and directs BSCC staff during the revision process. The ESC will review feedback received from public input processes and staff analysis of that feedback, develop draft revisions, or direct staff to develop revisions based on their direction. The ESC may accept, deny, or modify revisions that are presented. The ESC Co-Chairs will ultimately present the proposed regulations revisions to the BSCC Board for approval. BSCC staff serve as a resource to the ESC and complete all the necessary actions and documents for the Office of Administrative Law (OAL) processes.

Public Input

On April 8, 2022, BSCC staff began a public input period that included several opportunities for feedback, including:

- A 90-day public input survey (April 8, 2022, to July 7, 2022)
- Four (4) subject matter-specific public listening sessions:
 - May 10, 2022 – Title 15 Administrative, Food and Diet, Facility Operations and Training
 - May 24, 2022 – Title 15 Classification, Separation, and Youth Discipline, Confinement, Use of Force and Restraining Devices
 - June 7, 2022 – Title 15 Suicide Prevention, Medical, Mental, and Behavioral Health Care Services
 - June 21, 2022 – Title 15 Hygiene and Sanitation, Programs; Title 24 Programs, Design and Planning, Physical Spaces, Furnishings, and Equipment
- A Request for Offer (RFO) for public comment services in which three (3) local community nonprofit, nongovernmental organizations (*Anti-Recidivism Coalition (ARC)*, *Focus Forward*, and *Fresh Lifelines for Youth (FLY)*) were awarded up to \$10,000 to:
 - Hold a minimum of three (3) community meetings or listening sessions.
 - Conduct a survey of youth and families affected by juvenile detention.
 - Identify areas for revision and justify priority issues.
 - Provide input from youth and families who are, or have been, impacted by local juvenile detention facilities in California.

A voluminous amount of feedback was received through these opportunities. BSCC staff also gathered feedback from the current biennial inspection cycle and received input from other organizations, detention facility administrators, and managers.

All feedback received by the BSCC is contained in Attachments A through F and Attachments L through V.

BSCC staff carefully considered each piece of feedback received and conducted a thorough analysis of all input to determine how the information could inform a proposed regulation revision. Included in the analysis was a consideration of related best practices, recent legislation, people's experiences, subject matter expertise, and operational and fiscal impact.

Executive Steering Committee Meetings

On November 2 and 3, 2022, the first meetings of the Juvenile Regulations Revision ESC occurred. During these meetings, the ESC discussed the creation of subcommittees to review specific regulations, including a Secure Youth Treatment Facilities (SYTF) Subcommittee to review regulations and propose changes to the operation, design, or construction of facilities that house SYTF populations. The ESC reconvened on March 23, 2023 and August 31, 2023 to continue their review of Title 15 juvenile regulation revision recommendations. At its meeting on August 31, 2023, the ESC agreed to convene four subject-matter expert (SME) workgroups, covering Nutrition, Medical and Mental Health, Education, and Environmental Health, to review regulations applicable to their subject matter and provide recommendations to the ESC.

Secure Youth Treatment Facilities Subcommittee Meetings

The SYTF Subcommittee meetings occurred on March 10, 2023 and July 28, 2023 to review juvenile Title 15 and Title 24 regulations and propose changes specific to the operation, design, or construction of facilities that house SYTF populations.

Subject-Matter Expert Workgroup Meetings

Throughout 2024, each of the four SME workgroups met to review input and recommendations, highlight critical issues, and draft proposed revisions to address the needs of youth, staff, and facilities. By the end of January 2025, members of each SME Workgroup had the opportunity to review their group's draft proposed revisions, suggest corrections, provide feedback, and ask questions. The SME workgroups consisted of:

- (1) Nutrition Workgroup. This workgroup reviewed and proposed revisions to Article 9, *Food*. This workgroup's meetings occurred on February 28, 2024 and April 24, 2024, and their review period occurred August 15-29, 2024. Recordings of the Nutrition Workgroup's meetings are available [here](#).

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- (2) Medical and Mental Health (MMH) Workgroup. This workgroup reviewed and proposed revisions to Article 8, *Health Services* and other closely related sections. This workgroup's meetings occurred on April 23, April 30, May 30, June 25, August 6, and September 24, 2024, and their review period occurred October 31-November 21, 2024. Recordings of the MMH Workgroup's meetings are available [here](#).
 - (3) Education Workgroup. This workgroup reviewed and proposed revisions to section 1370, *Education Program*. This workgroup's meetings occurred on June 3-4, 2024, and their review period occurred September 17-October 1, 2024. Recordings of the Education Workgroup's meetings are available [here](#).
 - (4) Environmental Health Workgroup. This workgroup reviewed and proposed revisions to Articles 10, *Clothing and Personal Hygiene*, 11, *Bedding and Linens*, and 12, *Facility Sanitation and Safety*. This workgroup's meetings occurred on July 31, 2024 and September 30, 2024, and their review period occurred January 2-17, 2025. Recordings of the Environmental Health Workgroup's meetings are available [here](#).

BSCC staff finalized Title 15 and Title 24 drafts that reflect proposed revisions from the ESC, the SYTF Subcommittee, each SME Workgroup, and BSCC' staff revisions made during its internal review and editing process. BSCC' internal review process focused on several criteria, including, but not limited to, clarity, consistency, cohesion, operational feasibility, grammar/spelling, and compliance with the Administrative Procedures Act. The finalized drafts will undergo a final review and approval by the SYTF Subcommittee and the ESC.

Following the ESC process and approval of proposed revisions, the BSCC Board will review and approve proposed revisions that will proceed through the Administrative Procedure Act (APA) for adoption in the California Code of Regulations, as outlined in Government Code 11340, et seq. During the APA, OAL attorneys will ensure that proposed revisions meet required clarity, consistency, nonduplication, necessity, and format standards. This process includes an additional public comment period and opportunities for public input at BSCC Board meetings.

The BSCC Board will review and approve the proposed final revisions once again before the regulations are adopted by OAL.

All milestones, timelines, activities, and documents for this regulation revision process will be updated regularly on the BSCC website: <https://www.bscc.ca.gov/juvenile-titles-15-and-24-regulations-revision/>

An overview of the OAL's rulemaking process is found on the OAL website: https://oal.ca.gov/rulemaking_participation/

Statutes v. Regulations

Statutes

Statutes are laws adopted by a legislative body and established in a formal document, such as the California Penal Code. Requirements in statute are mandatory, enforceable, and may only be amended by the state legislature. The BSCC does not inspect local detention facilities for compliance with statute.

Regulations

Regulations are administratively established by state agencies through the APA to implement, interpret, or make specific the law enforced or administered by it, or to govern its procedure (Government Code Section 11342.600). Welfare and Institutions Codes 210 and 885, for example, require the Board of State and Community Corrections to establish minimum standards for juvenile facilities.

There are two basic types of regulations:

Prescriptive Standards	Performance Standards
<p>Specifies the sole means of compliance with a standard by specific actions, measurements, or other quantifiable means (Government Code, Section 11342.590).</p> <p>An example is Title 24, Section 1230.1.2, Locked Holding Room, which requires a locked holding room to provide a minimum of 45 square feet of floor space and have a clear ceiling height of 8 feet.</p>	<p>Describes an objective with the criteria stated for achieving the objective (Government Code, Section 11342.570).</p> <p>Performance Standards indicate what is required without directing how the standards should be implemented. These standards allow greater flexibility in addressing the objective.</p> <p>An example is Title 15, Section 1362, Reporting of Incidents, which requires that a written report of specific incidents be maintained but does not prescribe how reports are to be maintained, a schedule of maintenance, or what is to be included in such reports.</p>

How to Use the Briefing Material

There is a **Regulation Text** document and a **Matrix** document for Title 15, as well as for Title 24, which will be used as guides for member's review.

▶ The **Regulations Text** contains all current Title 15 and Title 24 minimum standards for juvenile detention facilities.

- Proposed changes to the regulation text appear in ~~strike-out~~ if the text is proposed for deletion or underline if it is proposed for addition.
- Each section is numbered with a footnote, which corresponds with numbers in the applicable **Matrix**.
- The regulation text includes yellow-highlighted text that identifies recommendations made directly by the SYTF Subcommittee; however, all regulations are intended to serve as minimum standards for all juvenile facilities, including SYTFs, unless specifically noted.

▶ The **Matrix** contains a summary of the feedback received and a description of the recommended revisions for each section.

- Within the matrix is a column titled "Summary of Initial Feedback" which summarizes public input received for the section and includes references to attachments containing all public input received. **Attachments A – V** (available on the ESC Meeting Materials page [here](#)) contain all the public input referenced in the matrices. Attachments listed on the following page are specific to the SYTF population, including Powerpoint presentations presented at a prior SYTF Subcommittee meeting.
- The matrix includes yellow-highlighted descriptions that identify recommendations made directly by the SYTF Subcommittee; however, all regulations are intended to serve as minimum standards for all juvenile facilities, including SYTFs, unless specifically noted.

To make the most efficient use of time, SYTF Subcommittee members must review the briefing material in advance of the meeting. SYTF Subcommittee members are encouraged to take notes prior to the meeting.

SYTF Subcommittee members may contact BSCC staff at regulations@bscc.ca.gov for assistance at any time.

Attachments

Title 15 Regulations Revision Text

Title 15 Regulations Revision Matrix

Title 24 Regulations Revision Text

Title 24 Regulations Revision Matrix

WIC 224-224.704 Youth Bill of Rights

WIC 736.5 DJJ Closure

WIC 875 SYTF

WIC 2200 – 2201 OYCR and Ombudsperson

California Alliance for Youth & Community Justice (SYTF)

Small Changes Can Make Big Differences (PPT)

Creating Trauma-Informed Spaces (PPT)

*[*Hyperlink to Attachments](#)*