

To: BSCC Board, Juvenile Titles 15 & 24 Regulations Revision Executive Steering Committee
Re: Title 15 & 24 Juvenile Regulations Revisions Process

Dear Chair and Members of the Board,

We write as a coalition of service providers, justice advocates, system-impacted young people and adults, and family members to express our growing concern and frustration regarding the ongoing delays in the Juvenile Titles 15 and 24 Regulations revision process.

Since this effort began in early 2022, the Executive Steering Committee (ESC), BSCC staff, subject matter experts, and members of the public have devoted years of work to developing thoughtful recommendations for updating these critical regulations. Several expert subcommittees were convened to address complex and highly technical subject areas, including Education (§ 1370), Medical and Mental Health (Article 8), Nutrition (Article 9), and Environmental standards (Articles 10, 11, and 12). Young people, family members, advocates, and community stakeholders have consistently participated in public meetings and provided meaningful feedback throughout the process.

While lengthy, the process has been transparent and deliberate, with progress being made at each stage. Following the completion of the subcommittee process, it was our understanding that ESC members would have the opportunity to submit any additional redlines and proposed language revisions before reconvening to review and approve recommendations developed through this extensive stakeholder process.

Importantly, the subcommittees were established precisely because these sections required focused attention and specialized expertise. They dedicated months to reviewing existing regulations and crafting new language. We are concerned that, rather than honoring and building upon that work, the ESC has increasingly revisited and reopened issues that had already been thoroughly considered and addressed. The purpose of the subcommittee process was to leverage the subject matter expertise of the subcommittee members. Reopening and relitigating that work at the ESC level risks undermining both the purpose of the subcommittees and the substantial investment of time and expertise made by those who participated in them.

Likewise, we are concerned that the current phase of the process has strayed from its intended purpose. At this stage, ESC members have had multiple opportunities to identify concerns and are expected to submit specific redlines and proposed language. Constructive participation requires more than raising general questions or expressing broad concerns; it requires clearly articulating what language should be changed and offering proposed alternatives. The time for flagging issues without specific recommendations has passed. After years of work, progress now depends on all ESC members engaging in good faith and contributing concrete revisions that can be debated, refined, and ultimately voted upon.

Since reconvening in October 2025, however, the ESC has met several times with limited progress. Repeated efforts to revisit previously settled questions and requests for analyses that BSCC staff have consistently identified as outside the scope of this process have contributed to

further delays and raised concerns among members of the public regarding whether the process is moving forward as originally envisioned.

As the ESC prepares to reconvene on July 21, 2026, we respectfully request that the next phase of this process prioritize efficiency, transparency, and meaningful public engagement. If the decision to convene virtually is intended to streamline the work ahead, that objective should not come at the expense of robust opportunities for public participation.

Specifically, we ask that:

- Meaningful opportunities for public observation and public comment continue throughout the process;
- Discussions remain focused on advancing the work already completed and avoiding unnecessary delays or revisiting issues that have already been thoroughly considered;
- The BSCC Board provides regular public updates on the status of the regulations revision process; and
- The ESC and BSCC provide clarity regarding the anticipated timeline for completion, including how many additional ESC meetings are expected before the revisions move to the next stage of the rulemaking process.

After more than four years of work, the public deserves clarity regarding the path forward. More importantly, the young people in California's juvenile facilities deserve updated standards that reflect current best practices and the considerable expertise that has been brought to this process. Continued delays postpone improvements intended to safeguard the health, safety, education, and well-being of young people in custody.

We respectfully urge the BSCC Board and the ESC co-chairs to honor the substantial work already completed, uphold the process that has guided this effort, and move these revisions forward without unnecessary delay. We appreciate the commitment and expertise that so many stakeholders have brought to this effort and look forward to seeing this phase of the process concluded so that the state can fulfill its responsibility to incarcerated young people and the public.

Sincerely,

All Youth Are Sacred, Sandy Valenciano, Project Director

Bend the Arc: Jewish Action California, Lauren Wolchok

California Alliance for Youth and Community Justice

Californians for Safety and Justice, Ed Little, CA Government Affairs Manager

Center on Juvenile and Criminal Justice, Tina Curiel, Communications and Policy

Communities United for Restorative Youth Justice, J. Vasquez, Policy Director

Fresh Lifelines for Youth, Colin Ford, Director of Policy

MOVA Contracts Administration, Cynthia Burnett

Project Rebound, San Francisco State University

Sister Warriors Freedom Coalition, Analisa Zamora, Program Director

Urban Peace Movement, Dieudonné Brou, Youth Advocacy Programs

Young Women's Freedom Center, Abigail E. Richards

Youth Justice Coalition, Emily Zamora,

Youth Law Center, Christopher Middleton, Staff Attorney