



# OKLAHOMA

## OFFICE OF JUVENILE AFFAIRS

### 2024 THREE YEAR PLAN

U.S. DEPARTMENT OF JUSTICE  
OFFICE OF JUVENILE JUSTICE AND DELINQUENCY PREVENTION

**Administered by the Office of Juvenile Affairs**

J. Kevin Stitt, Governor  
Jeffrey Cartmell, Executive Director  
Laura Broyles, Program Administrator

## **Structure and Function of the Oklahoma Juvenile Justice System**

The juvenile code for Oklahoma lists specific agencies as part of the juvenile justice system. The Office of Juvenile Affairs (OJA) is the agency responsible for programs and services for juveniles alleged or adjudicated delinquent or in need of supervision. These services include intake, probation, residential services, and reentry or aftercare. Oklahoma has four (4) statutorily constituted Juvenile Bureaus (JB): Oklahoma, Tulsa, Canadian, and Comanche counties. The other 73 counties operate under the umbrella of OJA. Each JB provides intake and probation services. OJA provides custody, aftercare services in the Bureau counties. A group of non-profit treatment service agencies involved with juvenile justice and delinquency prevention are the 36 statutory Youth Services Agencies (YSA). YSAs contract with OJA to provide evidence-based prevention, diversion, and intervention programs. Oklahoma has a statewide detention program. There are 11 detention centers across the state that provide beds for both male and females. By statute, OJA pays for 85% of the bed and the counties pay for the remaining 15%.

As a statewide juvenile justice agency responsible for overseeing and administering delinquency prevention, intervention, and treatment services in all seventy-seven counties within the state, OJA has the authority and resources to implement the three-year plan. **Oklahoma affirms that the chief executive officer of Oklahoma designated the Office of Juvenile Affairs as the sole agency for supervising the preparation and administration of the State Plan for Juvenile Justice and Delinquency Prevention submitted under the Formula Grant program.**<sup>1</sup>

Youth are usually referred to the system by law enforcement. However, parents, educators and public/private agency personnel can also refer youth. When an officer encounters a juvenile for referral, they may take the youth home, to an emergency shelter, a Community Intervention Center

---

<sup>1</sup> (Executive Order, 1996)

(CIC), or the officer may request a screening for detention. Screening guidelines were adopted by the Senate Joint Resolution (SJR) 13 Judicial Oversight Committee for the Oklahoma Supreme Court in 1984. These screening guidelines are crucial to ensuring detention is used only when it is necessary to assure the appearance of the youth in court or for the protection of the public. All youth apprehended where detention may be appropriate are administered a standardized detention screening tool. The development and support of community-based alternatives to detention programs played an important role in the formulation of the [Oklahoma State Plan for Detention](#).<sup>2</sup> Alternatives may include, but are not limited to, community intervention centers (24 hour holding/assessment centers, youth service shelters, attendant care, and electronic monitoring with community-based support services. The appropriate use of detention and detention alternatives safeguards against further traumatizing youth who have encountered law enforcement. Oklahoma children have the highest rates of Adverse Childhood Experiences (ACEs) in the nation.<sup>3</sup>

When a referral is made to the juvenile justice system, a formal intake is completed. A parent/custodian must be present during the intake, and they must be informed of their rights under the law. Demographic data, tribal affiliation, socio-economic, academic, and behavioral information, as well as information on the alleged offense, is gathered. An evidence-based risk screening tool, the YLS screener, is completed. The intake worker uses the data gathered to make a recommendation to the District Attorney. The juvenile court process in Oklahoma is a bifurcated process. After the adjudicatory hearing, a dispositional hearing is set. The dispositional hearing determines the level a youth penetrates the system. Youth adjudicated delinquent are placed on Probation with supervision or in OJA Custody. The objective of custody is to provide rehabilitative services in the least restrictive placement that is closest to the youth's home and takes

---

<sup>2</sup> (2023 State Plan for the Establishment of Secure Detention Services)

<sup>3</sup> (Tulsa World, 2019)

into consideration the protection of the community. Under Oklahoma law a review hearing must be held every six months while the youth is a ward of the court. Residential Treatment Services are provided in the community for youth who require out-of-home resources. Residential programs include community-based group homes, foster care, and secure institutions. Oklahoma has one state operated secure residential facility with a total of 144 beds. In Oklahoma, a youth may be certified to stand trial as an adult pursuant to one of three processes: Certification, Reverse Certification, or Youthful Offender (YO). State law outlines six guidelines for consideration by the court when deciding on certification. The guidelines contemplate: seriousness of the offense; whether the offense was against persons or property; whether the juvenile can distinguish right from wrong; prior record and history of the juvenile; prospects for protection of the public; and likelihood of rehabilitation if treated in the juvenile system. At the conclusion of the certification hearing, the juvenile may be certified as an adult or may remain in the juvenile justice system. The YO Act created a new class of juvenile offenders who can be transferred to the adult criminal justice system if they fail to meet certain conditions related to their stay in the juvenile justice system.

**The Oklahoma State Advisory Group on Juvenile Justice and Delinquency Prevention consists of not less than 15 and not more than 33 members appointed by the chief executive officer of the State, and which meets specific statutory requirements set forth in 34 (USC 11133(a)(3)(A)(I) (v). Members represent all requirements.** Oklahoma does envision a SAG with one or more parent members and additional system involved youth members. Youth and family/[parent voice are actively involved in state planning due to revisions in the SAG by-laws allowing ad-hoc to participate in state planning. Listening sessions with youth and parent voice are in the state plan for the next three years with a long-term goal of embedding their involvement

permanently in process of quality assurance and program / policy development.

**Oklahoma affirms the SAG participates in the review and development of the state plan prior to submission to the supervisory board for final action.** The Oklahoma SAG, comprised of leaders representing communities in rural and urban Oklahoma, met in January of 2024 for two days of planning. The retreat was attended by the majority of members. Membership includes one locally elected official representing general purpose local government, two tribal representatives, one juvenile referee judge representing a county juvenile bureau, one probation worker, one person who is a licensed professional counselor with expertise in preventing and addressing mental health and substance abuse needs in delinquent youth and addressing the challenges of sexual abuse, exploitation, and trauma. We have representatives from every required category but would like to have a parent appointed and law enforcement who specialize in human trafficking and exploitation.

During the January 2024 planning retreat, the SAG reviewed their purpose on the SAG and the state plan. The 2023 data was reviewed, discussed, and priorities established.

Prior to the award of subgrants, the State Advisory Group is afforded an opportunity to review and comment, not later than 45 days after submission to the advisory group on all juvenile justice and delinquency prevention grant applications submitted to the Office of Juvenile Affairs.

**Oklahoma affirms that the SAG advises OJA as the designated state agency , consistent with Title II, and its supervisory board.** In addition, the chair of the State Advisory Group is a member of the supervisory board and represents the SAG on the supervisory board.

**Oklahoma affirms that the SAG submits to the Chief Executive Officer and the legislature of the state at least every two years a report and necessary recommendations regarding compliance with core requirements.**

**Oklahoma affirms the SAG contacts and seeks regular input from youth currently under the jurisdiction of the juvenile justice system.** A SAG meeting is held on campus at the state's only secure care facility. The SAG meeting includes a listening session comprised of a panel of youth residing within the Central Oklahoma Juvenile Center. Beginning with this three-year plan, advisory councils will be established within residential placements and the current SAG prevention grants require a youth advisory council. Presentation will be given to the SAG throughout the year for the next year of planning. Youth / young adults with lived experience also participate on the SAG and/or on the Youth Emerging Leaders sub-committee of the SAG. Input from all of these platforms is put forth to the SAG and support staff and included in three-year planning.

Oklahoma affirms that the SAG advises on the supervisory board and local criminal justice advisory board compositions as needed. The SAG Chair is a member of the supervisory board and represents the SAG in his role on the board. He has also served on various justice advisory boards over the years.

**Oklahoma affirms that during the annual planning retreat, the SAG reviews progress, accomplishments, and challenges of projects funded under the state plan.** This review process is used, along with youth and parent input, as well as outcomes to prepare and plan for the upcoming year. Progress and accomplishments are reviewed during regular SAG meetings on the agenda, including current spending levels, projections on lapse funding, and challenges, concerns, and accomplishments with implementation of funded projects.

**Oklahoma affirms that it provided for active consultation with and participation of units of local government or combinations thereof in the development of the state plan** which adequately takes into account the needs and requests of units of local government, except that nothing in the plan requirements, or any regulations promulgated to carry out such requirements,

shall be construed to prohibit or impede the state from making grants to, or entering into contracts with, local private agencies or the advisory group. Notification of all meetings are open to the public and posted to the DSA and secretary of state websites. Program staff, DSA staff, and SAG members interact with local entities in a variety of settings, contractually and in other collaborative settings. Implementation of an ongoing needs assessment process is critical to the work we all do as system stakeholders and this process happens organically during compliance visits with local governments, local coalition meetings with service providers, and other environments in which juvenile justice system stakeholders work together. Program staff will meet with stakeholders throughout the year.

**Oklahoma has requested a waiver of the requirements for passthrough funds** under U.S.C. §11133(a). Section 223(a)(5).

**a. Description of the Issue**

Process of Analysis of Juvenile Delinquency Problems (youth crime) and Needs

OJA has contracted, as required by Oklahoma state law with a state agency, the Oklahoma Office of Management and Enterprise Services (OMES). This agency is charged with providing data services, research, and budgeting programs for Oklahoma state agencies.

OJA maintains a training department and contracts for specialized training as required. Specialized training has included training staff in trauma-focused care, the Science of Hope, Motivational Interviewing, the four core requirements of the JJDP, the proper use of detention, administration of the YLS/CMI 2.0 and other evidence-based instruments to determine treatment needs of youth.

The Oklahoma SAG, comprised of leaders representing communities in rural and urban Oklahoma, met in January of 2024 for two days of planning. The retreat was attended by

the majority of members. Membership includes one locally elected official representing general purpose local government, two tribal representatives, one juvenile referee judge, one probation worker, one person who is a licensed professional counselor with expertise in preventing and addressing mental health and substance abuse needs in delinquent youth and addressing the challenges of sexual abuse, exploitation, and trauma. We have representatives from every required category but would like to have a parent appointed and law enforcement who specialize in human trafficking and exploitation. During the January retreat, the SAG reviewed their purpose on the SAG and the state plan. The 2023 data was reviewed, discussed, and priorities established. The Oklahoma SAG analyzes the current juvenile delinquency problems as they relate to the structure and operation of the juvenile justice system in Oklahoma bi-monthly and annually at SAG meetings, at an annual SAG Retreat, and from correspondence from the Juvenile Justice Specialist and SAG support staff. The governing board of the Office of Juvenile Affairs is the supervisory board of the federal grants program. SAG work, including data analysis and the identified priorities, are presented to the OJA Board throughout the year. The SAG reviewed and analyzed fiscal year 2023 Referral Trends, Disposition Findings, Offense Types by age, race, and gender, Detention Admissions, and data reported to OJJDP on the four core requirements. This data was used to identify and develop the priorities for the three-year plan. See Attachment: Charts Used for Analysis. The source of this data is the centralized Juvenile Online Tracking System (JOLTS). Law enforcement agencies, tribes, units of local government, and private non-profits have limited access to the system and contribute to the data entry for reports and data elements reviewed throughout the year. Discussions regarding data



occurs in formal meetings, as well as individual meetings with juvenile justice system stakeholders.

#### Analysis of Juvenile Crime Problems

#### **Referral Trends FY 2004-2023 (See Table I of Attachment: Charts Used for Analysis)**

- The number of juveniles (5,956) is steadily increasing.
- The number of offenses (12,069) committed by juveniles is steadily increasing.
- The number of referrals, arrest reports (8,093) received for intake into the juvenile justice system increased
- The increases have steadily risen over the past two years.
- The number of offenses, referrals, and juveniles referred have not hit pre-pandemic trends yet.
- Evidence based training for law enforcement, juvenile justice stakeholders, and educators on the four core requirements, adolescent development, the impact of trauma, current scientific research, the importance of examining personal attitudes regarding youth behavior, understanding teen culture, effectively establishing trust, de-escalating difficult situations, and accessing early diversion options improves outcomes for youth.
- Expansion of Functional Family Therapy at the DSA Level (non-Title II funding) improves outcomes for youth and families impacted by substance abuse

#### **Referral Offense Types by Age (Table II of Attachment : Charts Used for Analysis)**

- Fifty-one referrals for youth under the age of ten were received for crimes against persons
- Referrals for weapons increased significantly between the ages of 15-17
- Referrals for Possession of Drugs/Alcohol is a significant problem as seen an increase in referrals for youth 13-17 years old.

- School based prevention and Functional Family Therapy is effective for these referrals.
- Weapons charges need to be examined closer and consideration of gang intervention programs being reinstated.

#### **Offense Categories by Gender (Table III of Attachment: Charts Used for Analysis)**

- All categories of offenses are much more likely to be committed by male offenders than female offenders
- Female offenders are most likely to commit minor offenses, closest in offense rate with males in the category of “status offenses”
- Females would be well served by community-based intervention and family treatment resources for truancy, runaway, and family conflict

#### **Offense Type by Race (Table IV of Attachment: Charts Used for Analysis)**

- Offenses that are Crimes against Persons are the offense most likely to bring youth into contact with law enforcement.
- Minority youth may be overrepresented for Public Order/Public Decency referrals
- To truly capture significance of overrepresentation a closer analysis of the data needs to occur

#### **Dispositions of Juvenile Cases FY 2021-2023 (Table V of Attachment: Charts Used for Analysis)**

- The data indicates more youth were treated in the juvenile justice system instead of the adult system.
- More serious crimes (Youth Offender) increased slightly.
- The number of Probation Cases increased significantly in 2023.
- The number of Custody cases increased in 2023.

- The number of youth provided with a formal diversion opportunity increased.

**Detention Admissions by Category FY 2021-2023 (Table VI of Attachment: Charts Used for Analysis) and Detention Admissions Overview 2021-2023 (Table IX of Attachment: Charts Used for Analysis)**

- Detaining youth charged with Public Order/Public Decency has had a steady decline.
- Detaining youth for a Judicial Citations increased.
- Detaining youth for Drug/Alcohol offenses decreased slightly.
- Detaining youth for Crimes against Property decreased.
- There were seven youth detained with a status offense and a delinquent offense. There were zero youth detained with only a status offense.
- Detainment for felonies has steadily risen since FY 2021.
- Detainment for misdemeanors has decreased since FY 2021.

**Detention Admissions by Race (Table VII of Attachment: Charts Used for Analysis)**

- Minority youth are overrepresented at Detainment for Public Order/Public Decency.
- Minority youth were not arrested for status offenses.
- Minority youth were arrested more often for felonies.
- A closer look at delinquent findings is necessary to understand the trend of the overrepresentation.

**Detention Admissions by Gender (Table VIII of Attachment: Charts Used for Analysis)**

- Females are placed in detention for drug/alcohol offenses more than any other offense.

- Continued education of all Oklahoma stakeholders in the appropriate use of detention remains ongoing.
- Referrals to Functional Family Therapy for females impacted by substance abuse would be a more effective response to drug/alcohol offenses.
- Continued focus on R/ED efforts with law enforcement agencies statewide and detention center operators must continue.
- Girls are detained more for Crimes against Persons with Judicial Citations nearly equal in volume.

#### Key Elements of the Three-Year Plan

#### Existing and Missing Resources for Delinquency Prevention and Treatment

- Services for females experiencing exploitation or trafficking are in need of specialized services. This is an area that is lacking in the state of Oklahoma. The DSA is actively working with potential service providers for treatment and support options.
- Oklahoma has an enhanced group home for girls to meet the small number of females in need of a higher level of care
- Oklahoma has one community-based group home for females, one co-ed group home for youth in need of short-term mental health stabilization, and one specialized community home for girls. All three of these services offer treatment for girls in the juvenile justice system.
- Oklahoma has a Children’s Emergency Resource Center network of “shelters” for temporary housing that will serve male and females in need.
- Oklahoma has “host homes” for housing for male or females in rural areas of Oklahoma in need of a stable home environment.

- GirlStrong is a delinquency prevention summer camp provided to females who are school age. The curriculum teaches how to set appropriate boundaries, manage stress, among other skills critical for females to learn so they can successfully navigate the adolescent years. This is one example of gender specific programming provided by a local youth service agency.
- Thirty-six youth service agencies across the state provide specialized prevention and intervention services unique to the client referred. No youth or family is turned away due to their inability to pay. Some services may have a waiting list due to a statewide shortage of licensed clinicians. The DSA has implemented retention and hiring incentives to assist the agencies with hiring qualified staff.
- In Oklahoma, all seventy-seven counties are served by youth service agencies. The DSA contracts with the agencies to provide prevention and intervention services in rural and urban Oklahoma. A large menu of services may be provided and reimbursed. In rural Oklahoma, therapists may be reimbursed for windshield time and mileage when they have to drive a long distance to meet with a youth or family.
- Through the partnership with Youth Service Agencies, Oklahoma is able to refer youth to programming and services in lieu of detention; this includes community-based services for substance use when the agency is certified by the Oklahoma Department of Mental Health and Substance Abuse Services.
- The DSA has a plan in place to provide Functional Family Therapy to youth and families in need of home based or community-based services, or treatment services for those with mental health, substance use, or co-occurring disorders. In some cases, this may be used as a diversion opportunity.

- The DSA partners with the Oklahoma Department of Mental Health and Substance Abuse Services to provide resources and guidance on the provision of resources and supports for youth and families in need of mental health and/or substance youth services
- The current placement process is tracked on a real-time dashboard to ensure youth are not “housed in secure detention” awaiting placement. This is a metric tracked and responded to daily with staff designated to making sure the process is efficient and fair.
- In 2023, a Parent subcommittee of the SAG was formed to lead, grow, and sustain family engagement. In 2024, a subaward will be released for an entity to administer the fiduciary responsibilities and support a Parent Coordinator for the committee.

#### Analysis of Gender Specific Services and Plan to Provide Prevention and Treatment of Delinquency

Analysis of Oklahoma’s Juvenile Crime Problems demonstrates female juvenile offenders account for only a small percentage of statewide juvenile crime. The State of Oklahoma provides individualized treatment for all juveniles on probation or in custody. Female offenders are recognized as particularly challenging. Female offenders are provided services in an equitable manner with male offenders. Yet their disparate needs are taken into consideration when addressing treatment options. All youth are given a YLS/CMI assessment of risks and needs. Case plans are developed for each individual based upon their risk levels, needs and strengths. Oklahoma requires gender specific services be provided by treatment providers in the community setting and out of home placement providers. These services include, but are not limited to; individual, group and family counseling, substance use treatment and trauma focused treatment. Oklahoma detention operators provide gender specific services to female offenders during their temporary stays in detention facilities. Female offenders who are placed

on probation and remain in their homes receive these services from community treatment providers. Traditional foster care, therapeutic foster care, and group home settings, including an enhanced group home setting, are out of home placement options for female juvenile offenders, contracted for by the State of Oklahoma. These contractors are aware of and mandated to address the treatment needs which are specific to female juvenile offenders. Additionally, Trauma-Informed Treatment and Motivational Interviewing training is provided to all staff and is the basis for all treatment interactions with juvenile offenders throughout the system but is of particular importance in the treatment of female offenders who, research has shown, are highly likely to have experienced significant trauma prior to contact with the juvenile justice system.

OJA contracts for one girls group home which as of the date of this report, is not at full capacity (16 beds). In addition, beds are available to girls in a group home designed to assist adolescents with mental health stabilization.

#### Analysis of Rural Prevention and Treatment Services and Plan to Provide Needed Services

Oklahoma is predominately a rural state, and our statewide juvenile justice system is set up to deliver prevention and treatment services to accommodate this geographic reality. The state is divided into seven (7) regional districts. Each district has several county offices serving each county in the region. State law mandates OJA is to provide intake, probation, and parole services. These offices also provide pre-court intervention services such as diversion, deferred filing, and informal adjustments (deferred prosecution agreements). Each county is served by one of the 36 Youth Service Agencies (YSAs), which are mandated by state law to provide outreach, prevention early intervention and first-time offender services to local youth and their families. These programs divert low-level offenders from the juvenile justice system and

provide needed accountability and access to local treatment resources. Each process for grant funding, state funded prevention, and intervention services considers the unique needs and service gaps found in rural Oklahoma. OJA and the SAG are committed to ensuring equitable distribution of Title II funding within the state. OJA has developed unique rates to entice service delivery in rural areas of the state and compensate providers for the added time it takes to deliver services to a smaller number of clients. In addition, a hiring and retention rate was established to assist youth service agencies with recruiting licensed and under supervision counselors in rural or hard to fill locations. This opportunity was made available to every youth service agency in the state but was developed after the needs were identified in a very remote community within the state. The DSA set aside more than two million dollars to help meet this need.

Plan to Provide Alternatives to Detention for Status Offenders, Survivors of Commercial Exploitation, and others such as Specialized or Problem-Solving Courts or Diversion to Home-Based or Community Based Services or Treatment for those in Need of Mental Health, Substance Abuse, or Co-Occurring Disorder Services at the time such Juveniles first come into Contact with the Juvenile Justice System

“The development and support of community-based alternatives to detention programs played an important role in the formulation (of the) State Plan (for Detention). Legislation prohibits status offenders from being detained solely on a status offense or violations of a valid court order. This legislation, coupled with increased education of stakeholders, has led to a reduction of low-level offenders being detained.”<sup>1</sup> Youth are usually referred to the juvenile justice system by law enforcement. However, parents, educators, and public/private agency personnel



also refer youth. When officers encounter a young person who has committed a status or low-level offense, they may take the youth home, to an emergency shelter, or a Community Intervention Center (CIC).<sup>ii</sup>

The evidence-based methods used to conduct mental health and substance abuse screening, assessment, referral, and treatment for juveniles who request a screening or show signs of needing a screening are as follows:

1. For youth who request a screening, a referral is made to a local youth service agency for assessment by a qualified behavioral health professional or licensed/certified drug and alcohol counselor.
2. The Oklahoma State Department of Health and the Office of Juvenile Affairs (OJA) have committed to a partnership to bring in nationally leading treatment to address adolescent substance abuse and the underlying behavioral health conditions that lead teens to misuse substances. Under this agreement, OJA is providing the evidence-based intervention, Functional Family Therapy, to OJA families. This home-based model prevents young people from leaving the community to access this high-quality treatment option.
3. For youth who request an immediate screening or exhibit signs of needing a screening, the Youth Crisis Mobile Response Unit is available and easily accessible. This same resource is used for youth placed in detention, who upon arrival are exhibiting a need for immediate mental health treatment. Youth are administered the MAYSI-2 within twenty-four hours of admission. Youth scoring moderate or high are also referred to the Crisis Response Unit. In cases where the Youth Crisis Mobile Response Unit is activated, field staff initiate steps to secure an inpatient treatment bed. Within forty-eight hours of

admission, and prior to the initial detention hearing, a standardized detention screening is used to give all parties the level of risk the youth pose to the community and if further detention is necessary or appropriate. Low risk youth shall not remain in detention.<sup>iii</sup>

4. For youth placed in an OJA secure residential placement, OJA Policy P-35-15-05 defines and prescribes the Mental Health Treatment protocol. Within the first hour of admission, the MAYSI 2 is administered by a mental health professional. The entire assessment process is designed to identify mental health and substance abuse treatment needs to be addressed during youth's confinement within the first seven days of admission. Juveniles referred for a mental health evaluation and/or mental health treatment will receive a comprehensive evaluation by a qualified mental health care professional with the first thirty day of the referral request date. A mental health treatment plan is developed for youth being treated on an ongoing basis by a qualified mental health professional. Treatment plans include juvenile participation to the extent that is possible. When necessary, youth with severe mental illness or who are severely developmentally disabled are referred for placement in non-correctional facilities or units specifically designated for handling the unique needs of this type of individual. Emergency transfers to mental health facilities are approved and supervised by the responsible health care practitioner and/or mental health authority and reported to the court the next working day.<sup>iv</sup>

Plan to Reduce the Number of Children Housed in Secure Detention Awaiting Placement

The 2023 State Plan for the Establishment of Detention [[Detention Centers \(oklahoma.gov\)](https://www.oklahoma.gov)] contains a plan to minimize the number of children housed in secure detention and corrections facilities who are awaiting placement. The state formula for bed capacity reduces future beds based on the number of therapeutic beds needed (determined by average number of youths awaiting placement). It is the position and intent of OJA, to minimize the length of stay in detention so youth can access services in the community or the least restrictive setting as possible. OJA collaborates with the Oklahoma Department of Mental Health and Substance Abuse Services to develop and implement strategies designed to improve outcomes and minimize the adverse effects of detainment. OJA Proposed rule, policy, contractual language, and legislative changes in the state plan as it relates to OJA Custody youth awaiting placement. The proposed policy change states, OJA will pay 100% of the approved detention rate for all OJA Custody youth on the OJA placement waiting list for an out-of-home placement. However, if OJA, as the placement authority, determines the youth will not be placed in an OJA contracted or operated facility, and the youth continues to be held in detention, OJA will recoup costs of continued detainment at 100% from the county of jurisdiction.”<sup>v</sup>

### Plan to Engage Family Members in the Design and Delivery of Juvenile Delinquency

#### Prevention and Treatment Services

During 2023, the State Advisory Group added a Strengthening Families Parent Advisory Subcommittee to the SAG after participating in a listening session with the OJA Parent Advisory Council. As part of long-term sustainability planning, the DSA decided to move this council to the SAG. During SFY 2025, funds will be passed-through to an entity willing to support the travel, compensation, and hiring of a Parent Committee Coordinator. Every bi-monthly SAG

meeting and sub-committee meeting has one or more parents present. SAG by-laws were modified to allow ad-hoc members of the sub-committee to vote on relevant voting items. The current Justice Simulations/Poverty Simulations are underway and parent representation has been involved in providing feedback on the development of the curriculum and will be invited to participate in training staff and stakeholders.

Plan to Use Community Based Services to Respond to the Needs of at-risk Youth or Youth who Have Come into Contact with the Juvenile Justice System

As noted in the description of the Oklahoma Juvenile Justice System, OJA contracts with 36 community-based youth service agencies designed to provide services within the local community supporting youth at-risk and justice involved along the entire continuum of care. Dashboards with data have been established to track utilization of services, identify gaps in resources, and support local service delivery. Without this network of youth service agency providers, many youth and families would not have access to evidence-based prevention and treatment programming. It is important to note, OJA oversees approximately twenty-three million dollars in funding awarded to agencies within this community-based services network.

A Plan to Promote Evidence-based and Trauma-Informed Programs and Practices

The Oklahoma Juvenile Justice System is a graduated sanctions system designed to provide a continuum of evidence-based, trauma-informed prevention and intervention services to youth who are at-risk of delinquency or further penetration into the juvenile justice system. Each youth referred has an individualized treatment plan which considers their unique circumstances and developmental milestones. Oklahoma children have the highest rates of Adverse

Childhood Experiences (ACEs) in the country. Youth who encounter the juvenile justice system typically have high ACE scores. The Oklahoma Juvenile Justice System strives in every aspect to respond to young Oklahomans with this in mind. It is our mission to reduce exposure to trauma instead of compounding it. The State of Oklahoma collaborates with the Oklahoma Department of Mental Health and Substance Abuse Services (ODMHSAS) and 36 designated Youth Service Agencies, to provide for the mental health needs for at-risk youth. Services provided consider the current scientific research regarding adolescent development and behavior. State and federal funds are used to support evidence-based or promising prevention and intervention programs that take into account adolescent development and behavior. Ongoing plans includes the provision of trauma-informed and evidence-based programming and practices for all service providers, staff, and system stakeholders such as, judges, prosecutors, and defense attorneys. The Oklahoma Department of Mental Health and Substance Abuse Services provides training and resources to understand and implement Trauma Informed programming and practices. This resource, as well as other resources support service provision throughout the juvenile justice continuum.

A main priority of the SAG is to, “ Support a Continuum of Evidence-based or Promising Programs (delinquency prevention, intervention, mental health, behavioral health and substance abuse treatment, family services for children exposed to violence) that are trauma-informed, reflect the science of adolescent development, and are designed to meet the needs of at-risk youth who come into contact with the justice system.” Through the SAG, the OJA Board, the OJA Director of Behavioral Health, the lead Psychologist, and agency leadership, this message is conveyed to every service provider and sub-grantee through contracting procedures, payment for services, messaging, training, and consultation. Pilot projects will

continue to be pursued to assist system stakeholders and providers with understanding and demonstrating responses to Oklahoma youth that strengthen hope, resilience, and focuses on the supports needed to lead healthy successful lives.

The Elimination of the Use of Restraints of Known Pregnant Youth Housed in Secure Detention and Correction Facilities During Labor Delivery and Post-Partum Recovery

OJA Policies P-35-03-02 and 35-03-06, approved in December of 2019, notes that written policy, procedure, and practice prohibits the use of restraints on female juveniles during active labor and the delivery of a child. Any deviation from the prohibition requires approval by, and guidance on, methodology from the medical authority and is based on documented serious security risks. The medical authority provides guidance on the use of restraints on pregnant juveniles prior to active labor and delivery.

**Plan for Compliance with Racial and Ethnic Disparities (R/ED) Core Requirement**

Pursuant to the JJDP Act at 34 U.S.C. § 11133(a)(15), to achieve compliance with the R/ED requirement, states and territories must “implement policy, practice, and system improvement strategies at the state, territorial, local, and tribal levels, as applicable, to identify and reduce racial and ethnic disparities among youth who come into contact with the juvenile justice system, without establishing or requiring numerical standards or quotas, by:

A) Establishing or designating existing coordinating bodies, composed of juvenile justice stakeholders (including representatives of the educational system) at the state, local, or tribal levels, to advise efforts by states, units of local government, and Indian Tribes to reduce racial and ethnic disparities.

*The Office of Juvenile Affairs (OJA) governing board and the State Advisory Group on Juvenile Justice and Delinquency Prevention, composed of juvenile justice stakeholders, including representatives of the educational system, at the state, local, and tribal levels advise on efforts to reduce racial and ethnic disparities.*

B) Identifying and analyzing data on race and ethnicity at decision points in state, local, or tribal juvenile justice systems to determine which such points create racial and ethnic disparities among youth who come into contact with the juvenile justice system; and

*Oklahoma utilizes the Juvenile Online Tracking System (JOLTS) that allows examination to occur at all decision points. Current data, progress, and plans for mitigating racial disparity is discussed and steps are taken to meet the goals of the R/ED Compliance Plan during internal staff meetings, bi-monthly SAG meetings, and as needed with the OJA board.*

(C) Developing and implementing a work plan that includes measurable objectives for policy, practice, or other system changes, based on the needs identified in the data collection and analysis under subparagraph (B).”

*The Oklahoma SAG has a long history of prioritizing the reduction and mitigation of racial and ethnic disparity in the juvenile justice system. Through the analysis of data and the monitoring of outcomes, the Oklahoma R/ED plan has evolved and changed to respond to current trends and needs within the Oklahoma juvenile justice system. The OJA governing board and the Oklahoma SAG will continue to monitor and analyze data throughout the year*

*to better understand the contributing factors, as well as, determining if current strategies are effective.*

## **B. Projects Goals and Objectives**

During SFY 2024, the Oklahoma SAG expanded the existing sub-committees, and added the Strengthening Families Parent Advisory Sub-committee, amending the by-laws to allow for the changes. In January of 2024, the Oklahoma SAG analyzed juvenile justice data, the existing SAG state plan, the challenges, and barriers faced to meeting goals within plans, and then broke into sub-committees to develop recommendations for the state plan. Recommendations below are divided up by the committee that brought the recommendations forth for approval by the full SAG.

### **Recommendations from the following Sub-committees of the SAG with Outcomes/Outputs:**

- Compliance/ Racial and Ethnic Disparity Sub-Committee
- Youth Emerging Leaders/ Youth Engagement Sub-Committee
- Native American /Tribal Youth Justice Sub-Committee
- Strengthening Families Parent Advisory Sub-Committee

### **Prioritized SAG Recommendations with Goals and Objectives**

- 1) Increase statewide awareness of disparities (COMPLIANCE-PRIORITY 1)
  - a. Train Oklahoma juvenile justice system stakeholders in R/ED and the three core requirements utilizing a pre and post survey and track results



- b. Establish a Dashboard or other Process to track survey results easily
  - c. Track output by region (districts) and correlation with post tests demonstrating increase in knowledge of R/ED
- 2) Increase opportunities for diversion for youth (COMPLIANCE-PRIORITY 1)
  - a. Identify funding source and evidence based, restorative practice models for local jurisdictions to choose from
- 3) Target jurisdictions with underutilization of diversion, high arrest, and high detention disparities (COMPLIANCE-PRIORITY 1)
- 4) Establish a paid Youth Engagement Coordinator (COMPLIANCE-PRIORITY 1)
- 5) Expand opportunities to harness youth voice through meeting with youth and parents to bring more family input before the SAG, with : Focus groups at group homes, detention centers, shelters, and local youth advisory councils. (COMPLIANCE AND POSITIVE YOUTH DEVELOPMENT-PRIORITY 1 AND 2)
  - a. Implement youth advisory council training venue to include mini youth summit and annual summit with call to action
  - b. Provide Transportation for residential youth and virtual feed for secure care not eligible to leave facility. Ensure positive youth activities available on campus for youth not able to join off campus events.
  - c. Utilize recommendations from established residential and community-based Youth Advisory Councils to update 2025 State Plan.
  - d. Utilize Youth Researchers from AIR project to assist with gathering data and engaging system involved youth.
  - e. Utilize Building COC mentors as allies / chaperones at events.

- f. Support family members with bringing their voice and experience to the juvenile justice landscape.
  - g. Train parents to serve as allies if they choose to be involved in youth events.
  - h. Establish YACs in 85% of the residential placement facilities.
  - i. Implement recommendations gleaned from annual Youth Summit.
- 6) Expand EPIY training with the Training team to provide training to more child-serving professionals, to target more district attorneys, courts and education professionals and develop multi-disciplinary teams at the local level (COMPLIANCE-PRIORITY 1)
- 7) Improve access to culturally competent providers that meet the needs of the youth and the parents (COMPLIANCE-PRIORITY 1)
- a. Recruit mentors who youth can relate to (Minority, successful credible messengers)
  - b. Provide access to services before justice involvement.
  - c. Utilize Mentoring Central training resource to onboard mentors who will serve as allies to chaperone events and mentoring projects.
  - d. Increase access to culturally competent providers
- 8) Improve the efficiency of passing through grant funds to tribal nations (COMPLIANCE AND TRIBAL YOUTH JUSTICE-PRIORITY 1 AND 3)
- 9) Hire a Tribal Coordinator/Liaison position to assist with: (COMPLIANCE-PRIORITY 1)
- a) Building positive relationships between the DSA and tribal nations,
  - b) Connecting with tribal youth organizations,
  - c) Strengthening implementation of JJDPA in tribal nations, and

10) Expand opportunities to meet with youth and parents to bring more family input before the SAG, with: Focus Groups at group homes, detention centers, shelters, and local youth advisory councils (STRENGTHENING FAMILIES-PRIORITY 4)

Additional SAG Recommendations:

- 1) Develop and implement a youth leadership program developed by youth
- 2) Improve incentives for youth participation in YEL or System Improvement work
- 3) Continuation of Functional Family Therapy across the state
- 4) Resources: Make QR codes public connecting youth and families to services
- 5) Make Services available for families at times and locations that meet their needs to overcome barriers to services.
- 6) Strengthen justice involved family voice in the implementation of programs, policies, and practices
- 7) Provide resources and supports to assist families with navigating the expungement process (e.g., brochures, posters, etc.)
- 8) Implement a social media platform and digital presence for youth engagement work
- 9) Creation of safe places for community service/programs especially in neighborhoods and communities with high gang activity

**POSITIVE YOUTH DEVELOPMENT (COMPLIANCE AND POSITIVE YOUTH DEVELOPMENT-PRIORITY 1 AND 2)**

Oklahoma benefits from the Positive Youth Development Activities and Lived Testimony of the Youth Served in the Juvenile Justice System. By developing a statewide network of Youth Advisory Councils, the YEL work will become more meaningful and effective. Youth who are

delinquent or at-risk obtain a sense of safety and structure; a sense of belonging and membership; a sense of self-worth and social contribution; a sense of independence and control over one's life; and a sense of closeness in interpersonal relationships. The Oklahoma SAG and OJA recognize and support the work of the YEL committee and value the perspectives of persons with lived experiences.

The Oklahoma YEL committee is comprised of youth members who currently are or who have been system-involved; youth members who have special experience or interest in serving in the juvenile justice system; and SAG members who have chosen to serve the youth as an ally. Staff support is provided to the committee. The role of every adult present for the meetings is as an ally. Allies may be "invited" into the meeting. Parents are welcome to attend meetings, they too sit in the audience to support the work of the committee. Youth have ownership of their stories and are not required to share their story to participate. Guidelines and boundaries are addressed in meetings and in the application process for membership. Youth who have invested in the committee and express an interest in the SAG are invited to apply for appointment to the SAG. All YEL members are ad-hoc members of the SAG, as revised in the SAG by-laws in October 2019.

Oklahoma proposes to 1) ensure compliance of the JJDPa by hiring a split funded employee to assist with coordination of the Youth Advisory Councils and Youth Emerging Leaders work. This may include management of funds to coordinate a contract or subaward that assists youth with travel and an allowance for their time on the state subcommittee. It will also include assisting staff with planning and implementing the Youth Summit training series; 2) Fund guest speaker (s), trainers at the youth advisory council training events; and 3) Utilize funds to pay for youth to participate in Justice/Poverty Simulations to train juvenile justice system stakeholders' empathy.;

2) YEL members and staff will become a trauma-informed support to youth who returning to the

community after an out of home residential placement; 3) provide funding to support positive development youth activities among system-involved youth; and 4) develop statewide and national youth leaders on best practices in juvenile justice through in state and national trainings.

## **RACIAL AND ETHNIC DISPARITIES (COMPLIANCE-PRIORITY 1)**

Pursuant to 34 U.S.C. § 11133(a)(15) of the Federal JJDP Act, as amended in 2018, the States participating in the Formula Grants program are required to implement policy, practice, and system improvement strategies at the State, territorial, local, or tribal levels to identify and reduce racial and ethnic disparities among youth who come into contact with the juvenile justice system. To address R/ED issues, Oklahoma proposes to:

The Oklahoma SAG and the Office of Juvenile Affairs are committed to ensuring all youth receive fair and equal treatment. The prioritized contact points, as indicated by data, guides the Oklahoma Strategy for Success. If accomplished, the following action steps and outcomes will strengthen the historical progress made to implement a multi-prong approach to reduce or mitigate minority overrepresentation in the juvenile justice system. Success in R/ED reduction would include the following action steps, outcomes, and outputs:

- a) Increase the number of officers and system gatekeepers trained in evidence based (i.e., Effective Police Interactions with Youth) law enforcement training on effectively interacting with diverse youth, understanding adolescent/brain development, youth culture, the impact of trauma, the core requirements, and skills for de-escalation, prevention, and diversion. This increase would be seen throughout Oklahoma and

trained officers would be engaged to assist with compliance needs through cross training on the four core requirements.

*Targeted Contact Point (s):* Arrest, Pre-Arrest Diversion, Post Arrest Diversion, and Detention (Reduction of Black and Native American Youth)

*Outcomes to be Achieved:* Officers trained will demonstrate an increase in knowledge about adolescent brain development, racial and ethnic diversity, effective strategies for communication with youth, and strategies for de-escalation and diversion from arrest and detainment. Volume of activity and percentages at arrest, diversion, and detention will be measured by jurisdiction and by region, as well as, statewide. Develop methods of tracking pre-arrest diversion by race, ethnicity, and gender.

- b) Provide ongoing training, technical assistance, and education to system stakeholders such as Judges, District Attorneys, Field Staff (Intake, Probation staff), and Law Enforcement on the appropriate use of detention and the four Core Requirement of the JJDPA.

*Targeted Contact Point (s):* Detention (Reduction of Black, Native American, and Hispanic Youth)

*Outcomes and/or Outputs to be Achieved:*

- i. Oklahoma will offer training to field staff and system stakeholders on the appropriate use of detention.
- ii. Training on the proper use of detention, along with the four core protections, is included in the law enforcement training

- iii. Engage detention gatekeepers on multi-disciplinary teams to support youth and families, ensuring they receive the Effective Practices for Positive Interactions with Youth training with law enforcement and child serving professionals. Continue to work with local stakeholders to implement evidence-based alternatives.
- iv. Examine data for contributing factors and include current findings in training and technical assistance conversations.
- v. Continue to engage tribal nations in Effective Practices for Positive Interactions with Oklahoma Youth and the Proper Use of Detention training. Hire a Tribal Coordinator at the DSA to improve efficiency and trust building within the pass-through process of federal funds to native nations for purpose of improving their juvenile justice infrastructure with culturally relevant, evidence informed interventions, including alternatives to detention. This will improve compliance of this plan and the remaining three core requirements of the JJDPA.
- vi. Monitor volume of activity at detention by jurisdiction where targeted interventions are implemented to see if there is an impact.

*Justification for Intervention:* Education, training, and resources have shown to be effective methods to support local level policy and procedure change. Tribal support at the state level with a designated tribal coordinator will improve the state's ability to

pass-through the funding needed to implement system tribal youth funding further supporting native nations with building infrastructure in their juvenile justice systems.

- c) Implementation of law enforcement Youth Specialists (Year I Target: 3 of 7 Regions fulfilled)

Targeted Contact Point: Full Continuum with emphasis on Arrest, Diversion, Detention, Community Based Prevention and Secure Confinement

Outcomes or Outputs to be Achieved:

- i. Sub-Awards for Law Enforcement Youth Specialists in three of the seven districts or regions in the state
  - ii. Continue to implement and expand the youth training for officers designed to provide them with the education and resources necessary to become subject matter experts on the unique needs of youth. Training includes: 1) Separation core requirement, 2) DSO, 3) Jail Removal, 4) trauma, 5) empathy, 6) adolescent brain development, 7) racial and ethnic disparities, 8) the JJDPA, and 9) restorative practices for diversion. Additional topics may be added if identified as a need throughout project.
- d) Facilitate further analysis of Secure Confinement Data to Determine Contributing Mechanisms (i.e., Accumulated Disadvantage, Differential Offending, Differential



Treatment, etc.) and further Development of Intervention Strategy with Input from Families and the Youth Served

*Targeted Contact Point:* Secure Confinement (Parity among all youth)

*Action Steps and Outcomes to be Achieved:*

- i. Internal review of cases referred to COJC
- ii. Identify Possible Factors Contributing to Disparity among Black youth compared to their White peers
- iii. Review Existing Policies and Procedures
- iv. Establish diverse Youth Advisory Council (YAC) at COJC
- v. Establish diverse Parent Advisory Council (PAC) at COJC
- vi. Utilize input from planning sessions conducted during meetings to develop programmatic and policy changes; encouraging youth voice in discussions about what contributes to placement within the different decision points of the juvenile justice system
- vii. Fund YAC training and onboard youth as YEL members of SAG
- viii. Fund a Youth Coordinator to support engaging youth, developing trust, planning summit with youth, and gathering qualitative data for input on contributing factors for each decision point.
- ix. Use qualitative data gleaned from youth and parents to strengthen reduction plan.

*Justification for Intervention:* The Office of Juvenile Affairs has the placement authority in the state of Oklahoma and is committed to using quantitative and

qualitative data and best practices to drive all decision making and system improvement activities. Quantitative data is available to review and can easily be redacted to protect the identities of the youth served. OJA hired a R/ED Coordinator/Compliance Specialist to assist with building the relationships needed to implement the action steps noted above. Partnerships with law enforcement, including jail staff, is a critical component needed to see success at all contact points in the system. A key component that is missing is a Youth Coordinator. The Youth Coordinator will assist with implementation of the YAC at COJC.

**PROTECTING CHILDREN FROM THE IMPROPER USES OF DETENTION, ADULT JAILS, AND LOCKUPS (COMPLIANCE-PRIORITY-1)**

Pursuant to U.S.C. § 1133(a)(11-14) Oklahoma must protect Oklahoma children from the improper uses of detention, adult jails, and lockups. The racial and ethnic disparity at every decision point, including the use of adult jails and lockups, must be examined, and addressed.

- A) Eliminate Deinstitutionalization of Status Offenders (DSO) Violations in Oklahoma by monitoring for compliance with the core requirements and providing training and technical assistance to secure facilities.
- B) Decrease the Frequency of Jail Removal Violations in Oklahoma by monitoring for compliance with the core requirement and providing training and technical assistance to secure facilities, judges, attorneys, and juvenile justice system field staff.
- C) Eliminate Separation Violations by monitoring for compliance with the core requirement and providing training and technical assistance to secure facilities.
- D) Strengthen the quality of training for secure facility staff who work with both adults

and juveniles by requiring the Effective Police Interactions with Youth training or similar evidence-based model for facility staff in jails who are approved to hold.

In order to seriously commit to addressing juvenile delinquency prevention strategies for Native American Youth, Oklahoma will solicit the development of programs, which are specifically designed to meet the needs of Native American youth.

Oklahoma has a significant Native American population representing more than 13% of the total population. Oklahoma values and respects the rich cultural heritage of Native Nations. Oklahoma wants to partner with Native Nations to ensure the best outcomes for Native youth, who face unique life challenges. As a result of the Supreme Court ruling, *McGirt v. Oklahoma*, the Oklahoma juvenile justice system is rapidly changing for native youth and families. The Office of Juvenile Affairs is committed to partnering with the tribes to strengthen their juvenile justice systems.

### **SUPPORTING TRIBAL YOUTH JUSTICE (COMPLIANCE AND NATIVE AMERICAN PASS THROUGH-PRIORITY 1 AND 3)**

To address Native American issues, Oklahoma proposes to: 1) Utilize Compliance funding to Hire a Tribal Coordinator to Improve the Efficiency of Passing Through Tribal Funding; 2) Re-establish a statewide system of liaisons to Oklahoma Native Nations; 3) collaborate to support Native Nations' ability to operate their own prevention, diversion and re-integration programs; 4) and provide pass through funding to Native Nations' to assist them with complying with the four core requirements and strengthening culturally relevant prevention programming.

#### Planning and Administration

Improve the juvenile justice system through statewide coordination and collaborative planning and development of a state plan, with the assistance of all relevant agencies, communities, families,

and youth who are impacted by this system.

Ensure planning and administration of all federal monies for Juvenile Justice Programs awarded to the Office of Juvenile Affairs are administered according to federal guidelines.

- a) Sustain the efforts of a state advisory group and YEL sub-committee which represents the full spectrum of the juvenile justice system and delinquency prevention efforts.
- b) Develop and implement a cohesive comprehensive plan.
- c) Complete federal reports and annual reports.
- d) Increase knowledge and practical application of proven programs and effective policies.

**STRENGTHEN FAMILIES THROUGH FAMILY ENGAGEMENT AND SUPPORTIVE RESOURCES (STRENGTHENING FAMILIES-PRIORITY 4)**

To elevate justice involved family voices and ensure their needs and experiences are used to improve the juvenile justice system, the State Advisory Group and the DSA have established a Parent Advisory Council that serves as a sub-committee of the SAG. This priority of the SAG ensures parent voice contributes to state planning of resources, programs, policies, and prevention services. To build capacity and support sustainability, the SAG proposes to 1) Use grant funding to support the implementation of supports to strengthen family voice and ensure parents are supported for their engagement in system improvement work; 2) Offer opportunities for parents to learn about evidence-based juvenile justice practice on a state and national landscape; and 3) Offer opportunities for parents to participate in training the Justice Simulation (Poverty Simulation) to system stakeholders as a community leader. This shift in the power dynamic empowers parents

and allows them to interact with system stakeholders from a different perspective.

**C. Collecting and Sharing Juvenile Data**

To obtain input on activities and services, SAG members and staff at the designated state agency, including JJDP staff; maintain ongoing relationships with stakeholders representing Units of Local Government. Each new appointment to the SAG was strategically in addition to the direct work with county and municipal law enforcement agencies throughout the state during compliance activities, the JJDP Unit and DSA collaborates with school districts, court jurisdictions, case workers, Oklahoma Human Services, Department of Mental Health, and Substance Abuse Services, and many other state and local level resources. OJA has contracted, as required by Oklahoma state law with the Oklahoma Office of Management and Enterprise Services (OMES). This agency is charged with providing data services, research, and budgeting programs for Oklahoma State agencies. Data sharing agreements are in place between state level agencies within the juvenile justice system. The juvenile code for Oklahoma lists the following agencies as part of the juvenile justice system: “ the courts, the District Attorney's Council and offices of the district attorneys, state and local law enforcement agencies, juvenile bureaus, the Department of Human Services, the Department of Juvenile Justice of the Office of Juvenile Affairs, the Oklahoma Commission on Children and Youth, the Department of Corrections, the Criminal Justice Resource Center, any other state agency responsible for the care, custody or supervision of youth alleged or adjudicated to be delinquent, and educational, treatment or residential services, local school districts and area vocational technical schools and other public or private agencies not otherwise specifically included

in subparagraph of the paragraph, compromising the children and youth service system.”

In 2017, a multi-agency data sharing agreement was finalized and signed by the following agencies: Oklahoma State Departments of Health, Human Services, Mental Health and Substance Abuse Services, Corrections, Office of Juvenile Affairs, Health Care Authority, Commission on Children and Youth, Rehabilitation Services, and the State Department of Education. This agreement removed the majority of the barriers to access cross-systems data.

---

<sup>i</sup> OJA State Plan for the Establishment of Juvenile Detention Services, <http://oja.ok.gov/detention-centers>

<sup>ii</sup> Oklahoma 2018 Three-Year Plan, Page 2

<sup>iii</sup> OJA State Plan for the Establishment of Juvenile Detention Services, <http://oja.ok.gov/detention-centers> , page 11

<sup>iv</sup> Policy P-35-15-05, Mental Health Treatment, Office of Juvenile Affairs

<sup>v</sup> OJA State Plan for the Establishment of Juvenile Detention Services, <http://oja.ok.gov/detention-centers> , page 19