



KING COUNTY

1200 King County Courthouse
516 Third Avenue
Seattle, WA 98104

Signature Report

Motion 16888

Proposed No. 2025-0206.3

Sponsors Barón

1 A MOTION acknowledging receipt of an independent
2 monitoring report on the confinement of juveniles in county
3 detention facilities as required by the 2025 Annual Budget
4 Ordinance, Ordinance 19861, Section 54, Proviso P3.

5 WHEREAS, in October 2017, Columbia Legal Services brought a class action
6 lawsuit against King County for an alleged policy and practice of holding juveniles in
7 long-term solitary confinement, including without access to learning materials, at the
8 Regional Justice Center, and

9 WHEREAS, in 2018, King County resolved the lawsuit through a negotiated
10 settlement in which the county agreed to ban the solitary confinement of juveniles in all
11 King County detention facilities except in very limited circumstances and to end the
12 practice of housing juveniles in adult detention facilities. Further, the county agreed to
13 provide self-monitoring reports to Columbia Legal Services until 2021 on a quarterly
14 basis to ensure compliance with the terms, and

15 WHEREAS, in December 2017, King County enacted Ordinance 18637, Sections
16 2 through 4 of which were codified as K.C.C. chapter 2.65, banning the use of solitary
17 confinement for juveniles, no matter what language is used to describe that confinement,
18 at all King County detention locations. K.C.C. 2.65.020 provides only one exception to
19 the ban: "when based on the juvenile's behavior, solitary confinement is necessary to
20 prevent imminent and significant physical harm to the juvenile detained or to others and

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21 less restrictive alternatives were unsuccessful." The chapter prohibits the use of solitary
22 confinement for disciplinary or punishment purposes. Further, K.C.C. 2.65.030 states the
23 policy that solitary confinement be used "only rarely," and

24 WHEREAS, independent monitors have reviewed King County's compliance with
25 K.C.C. chapter 2.65 each year from 2018 to 2024. The monitor's reports included
26 information about how often the county uses solitary confinement for juveniles in
27 detention, the circumstances of uses of solitary confinement, whether the youth in solitary
28 confinement was appropriately assessed by medical and mental health professionals, and
29 whether they received access to education and reading materials, and

30 WHEREAS, since 2019, the independent monitors have consistently identified
31 problems with the department of adult and juvenile detention's data collection and
32 documentation with respect to the use of solitary confinement. In each report, the
33 monitors have noted that department of adult and juvenile detention ("DAJD") was
34 making changes to address these problems. However, the lack of complete information
35 has persisted, with the monitors noting in the April 1, 2024 – March 31, 2025,
36 independent monitoring report that, "In all reports since 2019, the monitoring team has
37 noted inconsistencies in descriptions of how a youth's behavior created a risk of imminent
38 and significant harm requiring restrictive housing." Such information is necessary for the
39 monitors to determine compliance with the county's ban on juvenile solitary
40 confinement, and

41 WHEREAS, from 2018 to 2024, DAJD has reported that solitary confinement has
42 been used a total of 1,516 times for juveniles in detention. In 2019, solitary confinement
43 was used 139 times and in 2024, it was used 536 times. The average per year has been

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44 252 incidents of solitary confinement, and

45 WHEREAS, the July 2023 – March 2024 independent monitoring report states
46 that, "the problem of missing data has worsened over time with regards to assessments to
47 be conducted of youth in restrictive housing, making it difficult at best to draw
48 meaningful conclusions regarding some factors relevant to monitoring review and
49 reporting functions," and

50 WHEREAS, the April 2024 – March 2025 independent monitoring report states,
51 "[w]hile earlier reports have noted concerns about data reliability, the monitoring team
52 encountered issues more frequently during the current review period." The report further
53 states that while the type of restrictive housing incident is nearly always documented, the
54 additional detail describing the underlying incident is not and "[t]he detail is important in
55 evaluating whether restrictive housing is necessary to prevent imminent and significant
56 physical harm to youth or others, as required by K.C.C. chapter 2.65 and RCW 13.22,"
57 and

58 WHEREAS, K.C.C. 2.65.020 bans solitary confinement of juveniles "except
59 when based on the juvenile's behavior, solitary confinement is necessary to prevent
60 imminent and significant physical harm to the juvenile detained or to others and less
61 restrictive alternatives were unsuccessful." The monitors' report admonishes DAJD's use
62 of "imminent harm" as an independent justification category "since imminent harm
63 actually should be a consideration for all circumstances leading to restrictive housing, as
64 opposed to being used as a separate type of unacceptable behavior that could result in
65 restrictive housing." Moreover, for Adult Age Outs in Restrictive Housing, there were
66 solitary confinement incidents lasting 8 hours, 10 hours, 7 days, and "8+ days" all of

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67 which had no restrictive housing assessment completed rendering any review of the
68 circumstances of the confinement impossible, and

69 WHEREAS, the independent monitors have made numerous recommendations to
70 DAJD regarding how to improve data collection systems over the years of monitoring,
71 including recommending that supervisors review documentation of uses of solitary
72 confinement on a daily basis to ensure reporting has been made and made completely,
73 making the recording system more user-friendly, and educating staff on the rationale
74 behind required fields in the data-management system, and

75 WHEREAS, King County Council included a proviso in King County's 2025
76 Annual Budget Ordinance, Ordinance 19861, Section 54, Proviso P3, requiring the
77 independent monitor to certify that DAJD appropriately documented at least 90 percent
78 of the proviso reporting requirements related to the solitary confinement prohibitions and
79 policies. In the independent monitoring report responding to the proviso, the independent
80 monitors stated the 90-percent-documentation standard was not met. Rather, the
81 reporting noted continued inconsistency in the detail supporting the uses of solitary
82 confinement and that DAJD juvenile division documented mental health assessments in
83 only 59 percent of incidents over four hours, medical assessments in 66 percent of
84 incidents over four hours, and access to reading material in 59 percent of incidents, and

85 WHEREAS, DAJD confirmed the agency did not meet the 90 percent
86 documentation threshold required by the proviso, and

87 WHEREAS, the 2025 Annual Budget Ordinance, Ordinance 19861, Section 54,
88 Proviso P3, requires the executive to transmit a report on the confinement of juveniles in
89 county detention facilities, accompanied by a motion that should acknowledge receipt of

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90 the applicable report, and

91 WHEREAS, the report was to be transmitted no later than June 30, 2025, and

92 cover the period of April 1, 2024, through March 31, 2025, and

93 WHEREAS, Ordinance 19861, Section 54, Proviso P3, provides that \$100,000

94 shall not be expended or encumbered until the executive transmits the report and a

95 motion acknowledging receipt of each report is passed, and

96 WHEREAS, upon passage of the motion, \$100,000 shall be released for

97 expenditure or encumbrance, and

98 WHEREAS, the council has acknowledged receipt of the this report transmitted

99 by the executive;

100 NOW, THEREFORE, BE IT MOVED by the Council of King County:

101 The receipt of the independent monitoring report on the confinement of juveniles

102 in county detention facilities, entitled King County Department of Adult and Juvenile

103 Detention Independent Monitoring Team Report, Attachment A to this motion, is hereby

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- 104 acknowledged in accordance with 2025 Annual Budget Ordinance, Ordinance 19861,
105 Section 54, Proviso P3.

Motion 16888 was introduced on 7/15/2025 and passed as amended by the
Metropolitan King County Council on 9/23/2025, by the following vote:

Yes: 9 - Balducci, Barón, Dembowski, Dunn, Mosqueda, Perry,
Quinn, von Reichbauer and Zahilay

KING COUNTY COUNCIL
KING COUNTY, WASHINGTON

Signed by:



1AEA3C5077F8485...

Girmay Zahilay, Chair

ATTEST:

DocuSigned by:



8DE1BB375AD3422...

Melani Hay, Clerk of the Council

Attachments: A. King County Department of Adult and Juvenile Detention Independent Monitoring
Team Report Implementation of Ordinance 18637 Restrictive Housing, April 1, 2024 - March 31, 2025,
Updated August 20, 2025

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DAJD Restrictive Housing Monitoring Report

April 1, 2004 - March 31, 2025

Updated August 20, 2025

ATTACHMENT A

REPORTING PERIOD: APRIL 1, 2024 - MARCH 31, 2025

KING COUNTY
DEPARTMENT OF ADULT AND JUVENILE DETENTION
INDEPENDENT MONITORING TEAM REPORT
IMPLEMENTATION OF ORDINANCE 18637
RESTRICTIVE HOUSING

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and
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EXECUTIVE SUMMARY

The total and monthly average number of restrictive housing incidents for juveniles in secure detention at the Patricia H. Clark Children and Family Justice Center ("CCFJC") has increased over the past three years, to a high of 620 incidents during April 1, 2024 - March 19, 2025. Possible explanations for this are discussed, including the steady increase in average daily population (ADP). However, the average amount of total time spent in restrictive housing has steadily decreased, down to 302 minutes for this reporting period, from a high of 444 minutes during April 1, 2022 - June 30, 2023.

There are on-going challenges impacting the frequency with which restrictive housing is used, including continually high numbers of youth in custody at both juvenile and adult facilities of the Department of Adult and Juvenile Detention ("DAJD"), staffing shortages, a high number of juveniles being booked with complex needs that contribute to challenging behaviors such as assaulting staff, and longer stays for many youth. These challenges can contribute to the frequency with which restrictive housing is used, whether there are sufficient numbers of staff members experienced in responding to and de-escalating conflict among detainees, the number of living halls that can be adequately staffed and available for changes in hall assignments, and access to education and programming.

Specific challenges encountered during the April 1, 2024 - March 31, 2025, review period included personnel changes of staff who had overseen the collection of data related to restrictive housing, including routine checks for missing or incorrect information and collating documents and presenting the data for the monitoring team's review. The quality of the data appears to have been negatively impacted as staff who took over responsibility for restrictive housing were not easily able to reconcile some of the information, particularly for restrictive housing incidents from early in the reporting period. DAJD Juvenile Division personnel now are familiar with the process of documenting, confirming, and reporting restrictive housing events, which will help ensure more reliable data moving forward.

Other steps taken to improve the quality of restrictive housing data include a recent change from documenting time in restrictive housing on a hard copy form to directly inputting that information into the Jail Management System ("JMS"), the platform used to manage and report on other restrictive housing related data such as mental health and medical care provider assessments of youth in confinement. Another recent change involves giving care providers direct access to JMS, so the Juvenile Division Health Clinic can oversee documentation of restrictive housing assessments, rather than having it handled by others, which contributed to the problem of missing information.

Because DAJD did not reach a 90% documentation completion level in the different categories of information required by Budget Proviso 3, DAJD has provided an explanation as to why the goal was not met, included in report Section VII. DAJD has implemented 50% of the process improvement recommendations made by the monitoring team since 2019, including many aimed at ensuring data reliability. New Juvenile Division leadership team members are committed to evidence-based strategies to avoid restrictive housing and, with their change management experience, will be instrumental in ensuring that DAJD produces accurate data moving forward.

I. INTRODUCTION

This is the seventh report from the independent monitoring team¹ engaged to assess progress made by the King County Department of Adult and Juvenile Detention ("DAJD") to implement King County Council Ordinance 18637 ("Ordinance 18637"), which places limitations on the use of restrictive housing for youth detained in DAJD facilities, as further specified under King County Code ("K.C.C.") Chapter 2.65. Pursuant to Ordinance 19546, Section 54, Proviso P3 in the King County 2025 Annual Budget ("Proviso 3") and as required by Ordinance 18637, Sections 2 through 5, this report analyzes DAJD's compliance with requirements under K.C.C. Chapter 2.65 and RCW Chapter 13.22, and presents data regarding the use of restrictive housing during the period April 1, 2024 - March 31, 2025,² compares some data to information provided in earlier reports, discusses DAJD implementation efforts and challenges encountered with regards to restrictive housing, makes recommendations where process improvement opportunities are identified, updates DAJD's response to previous monitoring team recommendations, and considers whether DAJD documented data on at least ninety percent of incidents for each category of analysis required under Proviso 3.

II. K.C.C. CHAPTER 2.65 - CONFINEMENT OF JUVENILES, RCW 13.22 - ROOM CONFINEMENT AND ISOLATION, KING COUNTY PROVISO 3, & REPORT METHODOLOGY

Restrictive housing of juveniles in King County is regulated by K.C.C. Chapter 2.65 and Washington State RCW 13.22. Ordinance 18637 and Proviso 3 also mandate independent monitoring of restrictive housing of detained youth and require that reports concerning monitoring activities be submitted to the King County Council.³ The restrictive housing provisions mandated under the K.C.C. Chapter 2.65 and RCW 13.22 are summarized below, followed by an outline of issues reviewed and reported through the independent monitoring process, per K.C.C. Chapter 2.65 and Proviso 3, and a summary of the methodology used by the monitoring team.

¹ The independent monitoring team members are Kathryn Olson, Change Integration Consulting, LLC, and Bob Scales, Police Strategies, LLC.

² As discussed in more detail in Section IV.A of this report, restrictive housing data from March 20 - March 31, 2025, was omitted from the data tracking analysis due to the DAJD's Juvenile Division's transition from recording security checks and youth activity in hard copy format to entering data electronically using a platform called "Movements."

³ Ordinance 18637 § 6; Ordinance 19546, § 54, Proviso 3.

A. K.C.C. Chapter 2.65 - Confinement of Juveniles

K.C.C. Chapter 2.65 prohibits the restrictive housing⁴ of youth in King County's detention facilities, except when based on the youth's behavior and restrictive housing is necessary to prevent imminent and significant physical harm to the youth or others and less restrictive alternatives were unsuccessful.⁵

K.C.C. Chapter 2.65 applies to: (a) all juveniles held in detention at the Patricia H. Clark Children and Family Justice Center ("CCFJC"); (b) youth who turn 18 (Age Out) while at the CCFJC and are transferred to an adult facility; and (c) youth who are older than 18 and are booked on a juvenile probation/parole matter or on any charge stemming from criminal conduct that occurred prior to their 18th birthday. DAJD uses the term "Adult Age Outs" ("AAOs") for juveniles covered by K.C.C. Chapter 2.65 though detained at the King County Correctional Facility ("KCCF") or Maleng Regional Justice Center ("MRJC").

Under K.C.C. Chapter 2.65.010.B., "solitary confinement/restrictive housing" is defined as, "the placement of an incarcerated person in a locked room or cell alone with minimal or no contact with persons other than guards, facility staff, and attorneys." Use of restrictive housing of youth for disciplinary or punishment purposes is prohibited, though short-term placement of youth in individual cells for purposes of facility or living unit security issues or for other short-term safety and maintenance issues is permitted. Juveniles also must be given reasonable, timely access to the defense bar, juvenile probation counselors, social service providers, and educators.

B. RCW 13.22 - Room Confinement and Isolation

In 2021, Washington State legislation providing additional regulation of the use of confinement and isolation of youth in detention facilities and institutions became effective.⁶ RCW 13.22 provides limits on the use of room confinement that extend beyond the mandates of K.C.C. Chapter 2.65,

⁴ K.C.C. Chapter 2.65 uses the term "solitary confinement," though DAJD adopted the term "restrictive housing," which previously had been used by the Adult Divisions and has since been used by both the Juvenile and Adult Divisions. K.C.C. Chapter 2.65.010.B. makes clear that solitary confinement mandates apply regardless of the terminology used (e.g., solitary confinement, room confinement, segregated housing, restrictive housing, etc.). RCW 13.22.010 introduced another taxonomy of terms related to solitary confinement.

⁵ A list of explanations underlying enactment of Ordinance 18637 included studies "on the psychological effects of solitary confinement on juveniles [that] suggest that isolation may interfere with essential developmental processes, lead to irreparable damage and increase the risk of suicide ideation and suicide." King County's Zero Youth Detention Road Map also has an objective of ensuring that detained youth receive trauma-informed care. In support of this approach, the County participates in the Juvenile Detention Alternatives Initiative (JDAI) and relies on JDAI standards.

⁶ RCW 13.22. Prior monitoring reports detailed RCW 13.22 requirements and discussed ways the requirements under Washington law are similar to and differ from restrictive housing mandates under Ordinance 18637 and K.C.C. Chapter 2.65.

necessitating that the Juvenile Division bring its restrictive housing policies and practices into compliance.⁷

"Solitary confinement" under RCW 13.22.010, "means a youth is involuntarily separated from the youth population and placed in a room or cell other than the room assigned to the youth for sleeping for longer than 15 minutes for punitive purposes." While K.C.C. Chapter 2.65 also prohibits the use of solitary confinement for punitive purposes, it defines "solitary confinement" to mean "the placement of an incarcerated person in a locked room or cell alone with minimal or no contact with persons other than guards, correctional facility staff, and attorneys." DAJD uses the term "restrictive housing" instead of "solitary confinement" in defining the conditions under which youth can be confined to their room, while RCW 13.22 sets out the conditions using the terms "room confinement" and "isolation."

RCW 13.22 requires that the Juvenile Division compile and publish data on the use of confinement or isolation (i.e., restrictive housing) in excess of one hour. While continuing to document all instances when youth are confined to their room, including those of less than 60 minutes in duration, in order to comply with both RCW 13.22 and K.C.C. Chapter 2.65 and to facilitate consistency, the Juvenile Division analyzes and reports on all events that last 60 minutes or longer.⁸

In compliance with K.C.C. Chapter 2.65 and RCW 13.22, Juvenile Division policies and procedures require that all youth are checked on at least every 15 minutes and, for those in restrictive housing, provide that:

- Youth have access to clothing, mattress and bedding, medication, toilet and sink at least hourly, any necessary mental health services, and reading and writing material.
- The reason for placement in restrictive housing is documented by staff.
- A supervisor checks in with the youth within two hours of placement into restrictive housing, and then every four hours (except for ordinary sleep periods).

⁷ For example, under RCW 13.22, the term "confinement" includes both room confinement and isolation and means a youth is separated from the population and placed in a locked room for longer than 15 minutes. The Juvenile Division's original policy allowed for the confinement of a youth to their room for a short "Time Out" or a "Cool Down" period lasting up to two (2) hours which was not classified as restrictive housing. Under the DAJD Juvenile Division's revised policy, the restrictive housing time clock begins as soon as a youth is involuntarily confined to their room (the policy does not provide for the initial 15-minute buffer included under state law) and the "Time Out" or "Cool Down" options are not permitted.

⁸ The DAJD Juvenile Division developed a data sharing agreement with the DCYF to support transfer of restrictive housing data to DCYF and reviewed Juvenile Division data to align it with the variables detailed in the statute. DCYF is required to gather the data from the state and county juvenile facilities into reports to be provided to the Legislature, which also will include periodic reviews of policies, procedures, and use of confinement and isolation in all applicable facilities, including the CCFJC.

- The youth be evaluated and a care plan developed by a mental health professional as soon as possible within four hours of placement in restrictive housing.
- The youth be evaluated by a medical professional as soon as possible within six hours of placement in restrictive housing or before an ordinary sleep period, and at least once per day thereafter.
- Youth are released from restrictive housing as soon as the purpose of the confinement or isolation is met, the desired behavior is evident, or the youth is determined no longer to be an imminent risk.
- If a youth remains in restrictive housing for more than four hours within a twenty-four-hour (24) period, staff must establish a reintegration plan and share it with the youth.

An extension beyond four hours is allowed if subsequent or multiple incidents occur, and:

- All requirements above are met.
- The reason for the extension is documented.
- Medical professionals assess and address the youth's physical needs and mental health professionals evaluate their mental health needs.
- An individualized plan is established for reintegration of the youth.
- The agency head provides documented authorization for continuing restrictive housing if exceeding 24 hours.

The Juvenile Division continues to explore behavioral response alternatives to the use of restrictive housing and ways to decrease the time in which a youth is placed in confinement. When restrictive housing assignment is deemed appropriate, goals and objectives are identified and communicated to a confined juvenile so they and staff share an understanding as to what is necessary for reintegration back into routine activities with peers in their living hall.

A multidisciplinary team ("MDT team") of Juvenile Division staff, mental health professionals, a Seattle Public School teacher working with youth at the CCFJC, and others meet daily to review incidents of restrictive housing, as well as to assess behavioral support and other needs for youth experiencing acute psychological and/or social issues, whether or not they are in restrictive housing.

The Juvenile Division has developed processes to help reduce the amount of time a youth is confined to their room when assigned to restrictive housing. One approach is "split programming," which is used when two or more juveniles are in restrictive housing for fighting or engaging in other disruptive behavior together. Because the youth cannot program together until they self-regulate and problem solve about their unacceptable behavior, one youth remains in their room while the other attends classes or participates in program activities and then they switch off, so the youth who had been confined leaves their room for programming and the first youth returns to their room. Another approach that has been used is "one-on-one programming," a means to engage youth outside of

their room, as a step-down process before a youth is fully regulated and ready to integrate with other youth. As the term implies, in one-on-one programming, a youth assigned to restrictive housing meets alone with a Juvenile Detention Officer ("JDO") or other detention staff to work on school assignments or to engage in other program activities.⁹ Though one-on-one programming has rarely been used in recent years due to staffing shortages, it is considered an important part of the Juvenile Division's behavioral response protocols.

While addressed in previous reports, the monitoring team notes again that the Juvenile Division discontinued use of Restoration Hall¹⁰ after RCW 13.22 became effective, out of concern that a youth assigned to Restoration Hall would be in "isolation," as the term is defined under state law, since room confinement is preferred over isolation to address inappropriate behavior. As the Juvenile Division is exploring alternative approaches to making living hall assignments, there is some potential for reinstituting Restoration Hall. JDOs generally express support for the concept of Restoration Hall, as it allows for staff with the most interest and expertise in facilitating restorative practices to work with youth in restrictive housing, and frees up other JDOs to manage and program with the remaining youth.

It is also important to bear in mind that youth engage in unacceptable behavior more frequently than is represented by the numbers and analysis of restrictive housing incidents which are the focus of this report. Examples of alternative responses to youth negative behavior that are used by Juvenile Division staff include such actions as engaging youth in restorative problem solving without also imposing restrictive housing, taking away privileges such as the option to earn an extended bedtime, or a loss of time accumulated at a previously earned level of the tiered behavior incentive system or demotion to a lower level.

C. King County Proviso 3 & Report Methodology

Ordinance 19546, Section 54, Proviso P3 requires continued independent monitoring and reporting regarding DAJD's use of restrictive housing for juveniles in county detention facilities. The monitoring team's report is to build on prior reports and contain an analysis of DAJD's compliance with K.C.C. Chapter 2.65 and RCW 13.22 RCW, including:

⁹ One-on-one programming falls within the technical definition of restrictive housing under K.C.C. Chapter 2.65 and a monitoring team recommendation has been made to amend K.C.C. Chapter 2.65 to explicitly permit use of this approach.

¹⁰ Assignment to Restoration Hall was a behavior response alternative that had been used since May 2019. Youth presenting a risk of imminent and significant physical harm could be assigned to Restoration Hall where they would work with JDOs and other staff trained on restorative principles to understand and address the issues that led to the behavior that could require solitary confinement. Ideally, they were with other youth and, if not, could engage in one-on-one programming with staff until they were self-regulated and could return to their previous living hall.

- A. A discussion of challenges, progress, and setbacks, and any significant management, policy, or operating environment changes that have occurred since the prior report related to behavioral interventions and confinement of juveniles at county detention facilities;
- B. A review of the documentation of each incident of use of solitary confinement during the evaluation period, including identification of the number of incidents and an evaluation of the circumstances for the use of solitary confinement;
- C. A review of the average duration of solitary confinement incidents, including identification of the number of incidents exceeding four hours and an evaluation of each incident;
- D. A review of the documentation of supervisory review before the use of solitary confinement, including identification of the number of incidents exceeding two hours when supervisory review did not occur and an evaluation of each incident;
- E. A review of the documentation of medical and mental health assessments of youth in solitary confinement, including identification of the number of incidents when health clinic staff was not notified within one hour or an assessment by a medical professional was not completed within six hours and an evaluation of each incident.
- F. A review of the documentation of how youth subject to solitary confinement had continued access to education, programming, and ordinary necessities, such as medication, meals, and reading material, when in solitary confinement, and identification of the number of incidents when access was not documented and an evaluation of each such incident;
- G. The gender, age, and race of youth involved in each restrictive housing incident;
- H. An assessment of the progress by the department of adult and juvenile detention juvenile division on implementing the recommendations outlined in previous monitor reports;
- I. Any new recommendations for reducing the use and duration of solitary confinement for juveniles in detention, and recommendations for improving data collection and reporting of incidents of solitary confinement of juveniles in detention; and
- J.1. Except as otherwise provided in subsection J.2. of this proviso, a certification by the monitor or monitors that the department of adult and juvenile detention juvenile division has appropriately documented and maintained data on at least ninety percent of incidents for each category of incident described in subsections B. through subsection F. of this proviso.
- J.2. If the monitor or monitors cannot make the certification in accordance with subsection J.1. of this proviso because the department of adult and juvenile detention juvenile division did not appropriately document and maintain data on at least ninety percent of incidents for any category or categories of incident described in subsections B. through F. of this proviso, the monitor shall include in the report an explanation from the department of adult and juvenile detention as to why data was not appropriately documented and maintained on at least ninety percent of incidents for each category of incident.

Ordinance 18637 and Proviso 3 direct that the monitoring process incorporate consultation with stakeholders, including representatives of the King County Juvenile Detention Guild (Department of Adult and Juvenile Detention - Juvenile) Executive Board, representing employees of DAJD's Juvenile Division ("Juvenile Detention Guild"). The methodology used in gathering information for the April 1, 2024 - March 31, 2025, evaluation period included meetings and interviews held with representatives of the Juvenile Detention Guild Executive Board; members of the DAJD senior management team and members of the Juvenile Division management team, Juvenile Division Corrections Supervisors and administrative managers; the Juvenile Division Community Services Coordinator; JDOs; youth detained at the CCFJC and AAOs detained at KCCF; an administrator and teachers from the Seattle Public School System working with juveniles at the CCFJC; individuals from Ryther and the University of Washington providing mental health and medical services to juveniles detained at the CCFJC; and others. On-site visits and observation of programming activities also took place.

The monitoring team has compiled and relies upon an extensive list of documents since it began its work with DAJD in 2018, another important element of the methodological approach used.¹¹ For the current evaluation, in addition to reviewing earlier reports (those authored by the monitoring team and DAJD external audits) and research material, documentation and data for the period April 1, 2024 - March 31, 2025, was considered, including material related to specific restrictive housing incidents, such as Youth Accountability Checklists, Restrictive Housing Assessment Checklists, and restrictive housing summary data compiled by DAJD. The remainder of this report addresses the issues outlined in Proviso 3.

¹¹ While not a complete list, examples of documentation reviewed over time include: King County Council Ordinance 18637; Washington State legislation enacted in 2020, Juvenile Solitary Confinement, Chapter 13.22 RCW (HB2277); "Model Policy for Reducing Confinement and Isolation in Juvenile Facilities," developed by the Washington State Department of Children, Youth & Families, as required by RCW 13.22.030; DAJD policies on restrictive housing in the Juvenile and Adult Divisions; DAJD organizational charts; prior monitor's reports on Ordinance 18637; informational handbooks for detainees in DAJD Juvenile and Adult Divisions; formerly required quarterly self-monitoring reports on restrictive housing DAJD provided to Columbia Legal Services; juvenile and adult facilities behavior management forms and reference documents; King County Executive Orders and reports on Auto Declines, juvenile justice services, and related matters; Juvenile Division detainee intake and screening documents; Youth Accountability Checklists; health clinic youth monitoring forms; Juvenile Division Restrictive Housing Assessment forms; King County and other jurisdictions' write-ups about Zero Youth Detention and COVID impact statements and data; and, DAJD reports and supporting material provided to King County Council. The monitoring team strives to stay up to date on research and best practices in this area, including regular review of Juvenile Detention Alternatives Initiative standards, reports, and related documents; publications concerning room confinement issues generally and with regards to other detention facilities; and research articles on use of restorative practices with youth and alternative approaches in responding to negative behavior.

III. CHALLENGES, PROGRESS & SETBACKS (PROVISO 3.A)

DAJD continues to be challenged by issues the organization has experienced for a number of years: staffing shortages, a relatively high Average Daily Population ("ADP") in both juvenile and adult facilities, a high number of juvenile detainees being booked on more serious charges, and a longer Average Length of Stay ("ALOS") for all youth in secure detention, but particularly those whose cases are being heard in Adult Superior Court. As noted in the monitoring team's last report, these challenges can contribute to the frequency with which restrictive housing is used, whether there are sufficient numbers of staff members who are experienced in responding to and de-escalating conflict among detainees, the number of living halls that can be adequately staffed and available for changes in hall assignments as a strategy to deter conflict or as an alternative behavior response, access to education and programming, and staff morale. DAJD's ability to prioritize the documentation and tracking of restrictive housing events can also be impacted by these factors. Once notified by a JDO that a youth has been assigned to restrictive housing, Juvenile Division Corrections Supervisors perform their required checks on the youth and enter data regarding each specific incident into the Jail Management System ("JMS"). Along with the tasks of assessing and documenting restrictive housing incidents, Corrections Supervisors oversee the day-to-day work of JDOs, train and mentor new employees, and assist in juvenile detainee engagement and program management, among other duties.

In the past, Juvenile Division administrative personnel routinely reviewed restrictive housing documentation for accuracy and consistency. The person internal to the Juvenile Division who had the most familiarity with restrictive housing data, worked to ensure data reliability, and oversaw the process for collating and preparing the data for the monitoring team's review left their position at DAJD in early 2024. By the time new personnel were hired and became familiar with processing restrictive housing data, valuable time was lost when the data was not being checked for missing or incorrect entries, and it was difficult at best to reconcile inconsistent data months after restrictive housing events. Consequently, numerous issues were identified that brought into question the overall reliability of the restrictive housing data reviewed for this report.

While earlier reports have noted concerns about data reliability, the monitoring team encountered issues more frequently during the current review period. Examples of concerns with the data that were noted include:

- Only recording one restrictive housing event, though two or more youth were involved;
- Inconsistencies with documentation of instances when multiple youth were split programming over multi days;

- Corrections Supervisors receiving information from mental health and medical staff regarding restrictive housing assessments performed, but not entering the information in JMS;
- Incomplete information entered into JMS regarding restrictive housing incidents;
- Discrepancies between details documented by JDOs on Youth Accountability Checklists (where youth activities and location, including restrictive housing, are noted at 15-minute intervals) and information documented by Corrections Supervisors on the Restrictive Housing Assessment Checklists in JMS;
- Including sleep and rest times or time in modified programming in the calculation of time in restrictive housing, resulting in data that can be over-inclusive as to the number of restrictive housing incidents and/or the total time a youth experiences restrictive housing.

Proviso P3 directs that the monitoring team's report include a review of the documentation of supervisory review before the use of solitary confinement,¹² including identification of the number of incidents exceeding two hours when supervisory review did not occur and an evaluation of each incident.¹³ However, the data reliability issues noted above contributed to difficulties in identifying and analyzing restrictive housing/solitary confinement events exceeding two hours when supervisory review *did not* occur.

While there were challenges encountered in analyzing supervisory review of solitary confinement, it is important to note that the monitoring team is confident that Corrections Supervisors nonetheless are routinely involved in restrictive housing decisions exceeding two hours, and there are checks and balances to ensure continual assessment of the need to keep a youth in confinement. Time in restrictive housing is tracked by JDOs in 15-minute intervals throughout the day, with the documentation reviewed by others in the Juvenile Division, and the circumstances surrounding each youth in restrictive housing are reviewed by DAJD staff and the mental health and medical team in daily MDT meetings.

When documentation was lacking or inconsistent regarding supervisory review of restrictive housing, whether or not it exceeded two hours, the underlying behavioral event generally involved

¹² Documentation reviewed during the monitoring process included material related to supervisory review *before* the use of solitary confinement, though the focus of review has been on incidents which actually result in restrictive housing, i.e., room confinement that lasts 60 minutes or longer. Thus, Youth Accountability Checklists were considered on which JDOs document each youth's activity every 15 minutes, including notation regarding youth confined to their room, even if confinement was less than 60 minutes. Supervisors review the Youth Accountability Checklists and occasionally make a note concerning a JDO's entry, though the Checklists as a rule do not provide substantive information concerning supervisory involvement *before* the use of restrictive housing.

¹³ RCW 13.22 and K.C.C. Chapter 2.65 both require that a supervisor check in with the youth within two hours of placement into restrictive housing, and then every four hours (except for ordinary sleep periods).

multiple youth in one dorm, youth in multiple dorms, or other facility-wide safety or security concerns. The primary form used to track restrictive housing is the Restrictive Housing Assessment Checklist. Corrections Supervisors are contacted by JDOs during the decision to confine a youth to their room for 60 or more minutes, and the decision and a description of the youth's behavior resulting in confinement are documented on the Restrictive Housing Assessment Checklist form. When multiple youth were involved in an event leading to restrictive housing, sometimes a separate form was not initiated or thoroughly completed for each involved youth. Analyzing documentation was further complicated when multiple youth were split programming over multiple days. Other data reliability concerns identified above also contributed to difficulty in analyzing the issue of supervisory review, such as documentation that erroneously included sleep and rest times or time in modified programming in the calculation of time in restrictive housing, resulting in data that could be over-inclusive as to whether the two-hour threshold for supervisory review was required. Thus, though an initial attempt was made to identify and evaluate restrictive housing incidents exceeding two hours when supervisory documentation was missing, such that it appeared supervisory review did not occur, the monitoring team was unable to provide the analysis sought by Proviso P3 in this regard, at least without the expenditure of significant time and resources.

The monitoring team is aware of steps being taken by the Juvenile Division to address data reliability concerns and is optimistic that the process of analyzing supervisory review of restrictive housing events exceeding two hours will be more feasible in the future. Some of these changes are summarized in the following discussion.

On a positive note, as of March 20, 2025, the Juvenile Division is no longer using the hard copy Youth Accountability Checklists, and all restrictive housing documentation is now being entered electronically in JMS using functions called "Security Checks" and "Movements." The Youth Accountability Checklist is where the JDO noted, every 15 minutes, youth activities and location. The 15-minute checks provide assurance as to the safety and security of all youth, and the Youth Accountability Checklist is where the JDO tracks youth time in restrictive housing. Now the 15-minute checks will be entered into JMS by the JDO, eliminating the massive quantities of paper associated with the hard copy checklists and difficulty, at times, in discerning the handwriting of many JDOs involved.¹⁴ Having the information automatically associated with other restrictive housing data in JMS will hopefully cut down on discrepancies seen between the hard copy Youth Accountability Checklists and the Restrictive Housing Assessment Checklists electronically maintained in JMS, as Corrections Supervisors will have easier access to JDO data. JMS reporting will also be facilitated by the change.

¹⁴ The JDOs usually added brief comments to the back of the form when activities for a single or multiple youth or an entire living hall might benefit from more explanation, such as noting why a youth was assigned to restrictive housing or to record that all youth were in their rooms at particular times for staff breaks.

The transition from hard copy to electronic documentation of the 15-minute security checks created challenges in analyzing restrictive housing data for the transition period. Although the data was recorded and maintained, it is in a new format, making it challenging to conduct a direct comparison. Consequently, the monitoring team and the DAJD mutually determined that it would be best to include data from March 20 - March 31, 2025, in the next report.

Another significant positive change relates to the documentation of mental health and medical assessments. Though the monitoring team and DAJD staff are confident that these assessments take place when required (which is dependent on the length of time a youth is in restrictive housing), the process for documenting the assessments was problematic. The mental health and medical providers did not have access to JMS to directly record their assessments of youth in restrictive housing. Instead, the providers sent the Corrections Supervisor an email with assessment details, and the Supervisors entered the information into JMS. If the Corrections Supervisor was too busy or went off duty before having an opportunity to record the providers' assessment details in JMS, and did not follow-up when time permitted, these assessments were not formally documented. During Q1 2025, a new protocol was established whereby support staff from the Health Clinic are responsible for documenting mental health and medical assessments in JMS, based on emails from the providers. The Health Clinic manager indicated that he is copied on the assessment emails and will provide quality control and back-up to the medical assistant, as needed. Based on this change, there is reason to be optimistic that the documentation for completion of mental health and medical assessments will increase accordingly.

To improve the reliability of restrictive housing data in the Juvenile Division, the department designated a single point of oversight for the quality assurance process, which is expected to enhance consistency and accountability. This will help ensure data accuracy closer to real time by flagging any issues early so they can be addressed before there are major impacts on the quality of the information recorded.

DAJD is facing a significant challenge with the rising number of youth threats and assaults, particularly those against staff members. The percentage of assaults where a JDO was the intended victim increased from 5% to 10% during the April 1, 2024, - March 31, 2025, monitoring review period. Youth assaultive behavior against peers also has increased and many assaults on staff are related to youth assaulting their peers, with youth threatening or assaulting staff in response to a use of force to quell the underlying peer assault. In addition, JDOs report that youth are increasingly disrespectful of staff and use gender or racial slurs, do not following staff directions, and make threats to assault staff.

There continues to be progress and refinement in programming alternatives at the CCFJC. The King County Council included funds in the 2025 Annual Budget for DAJD to convert the Community Services Coordinator and Gang Intervention Specialist contract positions into permanent positions, along with budgeting for community service provider contracts. Predictable and consistent programming provides a means to engage youth and deter conflict, while the Gang Intervention Specialist can help mitigate conflict and assist in ensuring programming is not disrupted. Council is to be commended for recognizing how valuable both of these positions are for working successfully with youth detained at CCFJC.

Another area in which DAJD has made progress is with regards to modified programming, which is the confinement of youth to their rooms for staff breaks, staff shortages, or due to other administrative needs. For Q1 2025, there were zero instances of modified programming aside from the designated times youth return to their dorm to accommodate staff breaks in the Juvenile Division, compared to a high of 22 days with modified programming in October 2024.

With regards to setbacks, the total and monthly average number of restrictive housing incidents has increased over the past three years, to a high of 620 incidents during the current reporting period. However, the average amount of total time spent in restrictive housing has steadily decreased, down to 302 minutes for April 1, 2024 - March 19, 2025, from a high of 444 minutes during the period April 1, 2022 - June 30, 2023.

IV. RESTRICTIVE HOUSING DATA TRACKING (PROVISO 3 - B, C, D, E, F, & G)

A. Juvenile Division: Restrictive Housing Data Tracking

As discussed above in Section III, as of March 20, 2025, JDOs are entering information electronically into JMS regarding their 15-minute security checks. This is an important change for the Juvenile Division's restrictive housing documentation. Reconciling restrictive housing entries on the Youth Accountability Checklist completed by the JDO with other documentation maintained electronically was complicated and very time consuming. In contrast, JMS can create real-time reports so that the Juvenile Division can more quickly assess whether restrictive housing is being appropriately documented and tracked. Issues with data entry, including missing or inaccurate information, can be addressed more immediately, allowing for more reliable data.

The move to all electronic record keeping should also make it easier to focus on improving consistency with regards to describing a youth's behavior that results in restrictive housing, though

changes to JMS might still be needed to make it more user friendly.¹⁵ While the *type* of juvenile behavior that requires a restrictive housing response (i.e., assault, threat, disruptive) is routinely noted in the documentation maintained, there is still inconsistency as to the level of detail provided about each incident, though this appeared to improve in recent months. The different staff and levels of review and assessment involved with restrictive housing incidents provide a measure of assurance that the need for restrictive housing is well considered. However, for the monitoring process, the detail in documentation is important in evaluating whether restrictive housing is necessary to prevent imminent and significant physical harm to the youth or others, as required by K.C.C. Chapter 2.65 and RCW 13.22.

While DAJD is taking steps to address data-related problems, it is difficult to draw meaningful conclusions regarding some of the restrictive housing data analyzed below. Also, the switch from hard copy to electronic entry of the 15-minute security checks as of March 20, 2025, made it challenging to review any data from the last part of March. Thus, most of the analysis in this report is limited to restrictive housing data that was available from April 1, 2024, to March 19, 2025. During that period of time, there were 620 restrictive housing incidents involving a total of 379 juveniles. Details concerning these incidents and other information are summarized below.

Finally, Proviso 3.C provides that the monitoring report for this review period should identify and evaluate the number of incidents exceeding four hours, or 240 or more minutes. There were a total of 216 restrictive housing incidents that exceeded four hours, ranging from 240 minutes to 2340 minutes, with an average time of 645 minutes in confinement. Where charts or other figures are used below to illustrate the data regarding restrictive housing incidents of 240+ minutes, they are presented in gray scale, to help differentiate the information from that provided for all reported restrictive housing events.

¹⁵ A report by the Development Services Group, Inc. for DAJD titled, "Juvenile Detention Safety and Security Analysis (October 3, 2023)," p. 30, offered a number of ideas to improve data quality and make JMS easier to use without losing information, such as the use of a check-the-box format for all data elements and the formulation of variables requiring yes/no responses, followed by a narrative section, if necessary.

1.1 DAJD Juvenile Division Restrictive Housing Incidents for Current and Prior Two Reporting Periods¹⁶

Restrictive Housing Monitoring Reporting Period	April 1, 2022 - June 30, 2023 (15 months)	July 1, 2023 - March 31, 2024 (9 months)	April 1, 2024 - March 19, 2025 (11 1/2 months)
Number of Restrictive Housing Incidents	520	415	620
Average Number of Restrictive Housing Incidents per Month	35	46	54

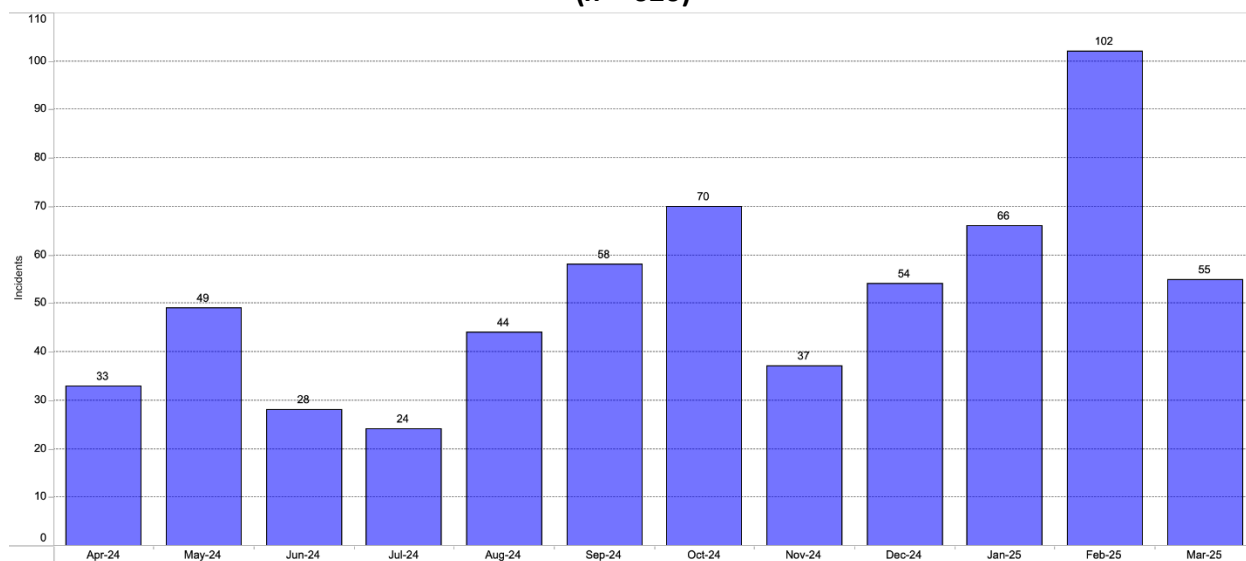
Because the number of months included in a reporting period varied over time, it is useful to consider the average number of restrictive housing incidents per month, rather than the total number reviewed during each evaluation period. As seen in Table 1.1 above, the average number of incidents per month has steadily increased over the past three years. Factors that can contribute to the increase are staff turnover and shortages, a continually high ADP of juveniles in custody, a high number of youth being booked on more serious charges and with complex needs that manifest in challenging behaviors, and a longer ALOS for all youth in secure detention. As previously noted, these challenges can impact how frequently restrictive housing is used, whether there are sufficient numbers of staff who are experienced in responding to and de-escalating conflict among the youth at the CCFJC, and the number of living halls that can be adequately staffed and available for changes in hall assignments as a strategy to deter conflict (or for reassignment, as an alternative behavior response).

In reviewing the data, regular sleep and rest times were sometimes erroneously included when calculating a youth's total time in restrictive housing, though it was not possible to measure the extent of the error. Only restrictive housing incidents lasting 60 or more minutes are reported and,

¹⁶ RCW 13.22 became effective in December 2021, providing additional regulation of the use of confinement and isolation of youth in detention facilities. The conditions under which a youth can be isolated pursuant to RCW 13.22 are more stringent in some ways than those permitted under K.C.C. Chapter 2.65. Because April 1, 2022 - June 30, 2023, was the first full reporting period that King County juvenile restrictive housing incidents were measured against RCW 13.22 requirements, restrictive housing data from earlier monitoring reports is not included in Table 1.1.

because including sleep and rest periods could move a restrictive housing incident lasting less than 60 minutes into the reportable category, it is possible that the number of incidents (620) noted for April 1, 2024 - March 19, 2025, is at least slightly inflated.

1.2 DAJD Juvenile Division
April 1, 2024 - March 19, 2025
Restrictive Housing Incidents by Month
(n = 620)



Looking at the data in Figure 1.2, it is apparent that there was an increase in the number of restrictive housing incidents in February 2025, as compared to the prior 10 months. There were a high number of incidents throughout February and two significant events involving the same living hall and almost identical groups of six juveniles. The youth were in possession of contraband and assaulted staff, causing multiple injuries. Because of the number of youth involved, group split-programming was used, with juveniles split into two groups for school and programming activities. While restrictive housing for the youth involved in the two incidents was lengthy, it appeared that all staff reviews and assessments were appropriately conducted. Adding to the high number of incidents in February, later in the month and during a JDO shift change, four of the youth involved with the first two significant events gathered together and behaved as if they were getting ready to assault another youth. After several days of restrictive housing and split programming, and a refusal to commit to safely interacting with their peers, living hall reassignments were made. The process of reclassification often requires thoughtful consideration, analysis of housing options in other units, and collaboration with several stakeholders.

1.3 DAJD Juvenile Division
April 1, 2024 - March 19, 2025
Youth in Restrictive Housing for 240+ Minutes
Restrictive Housing Incidents by Month
(n = 216)

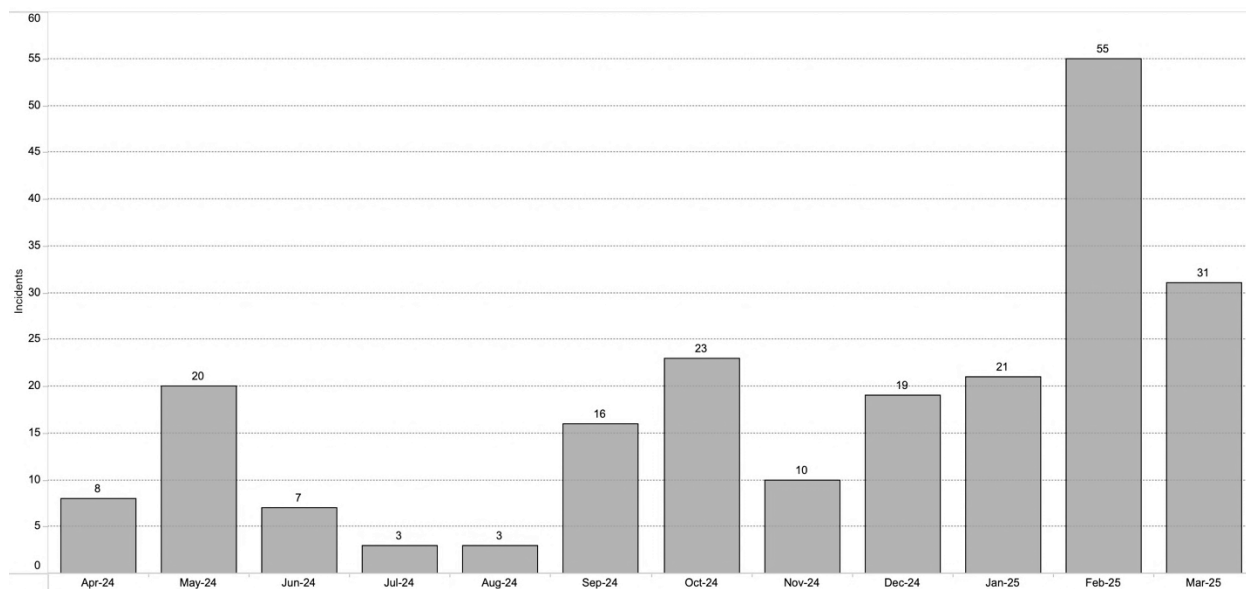
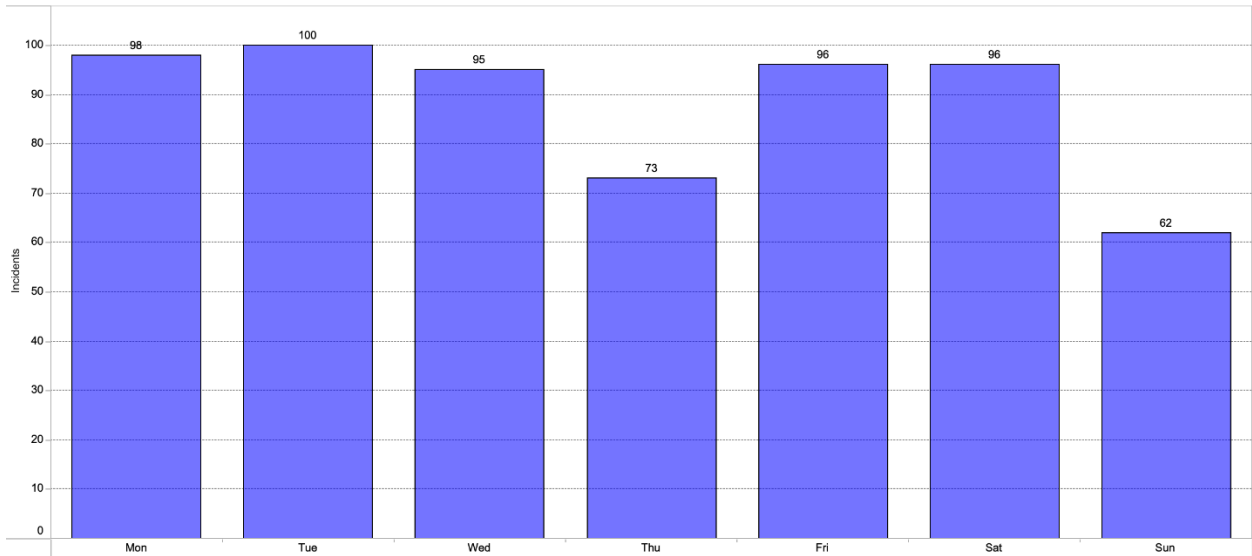


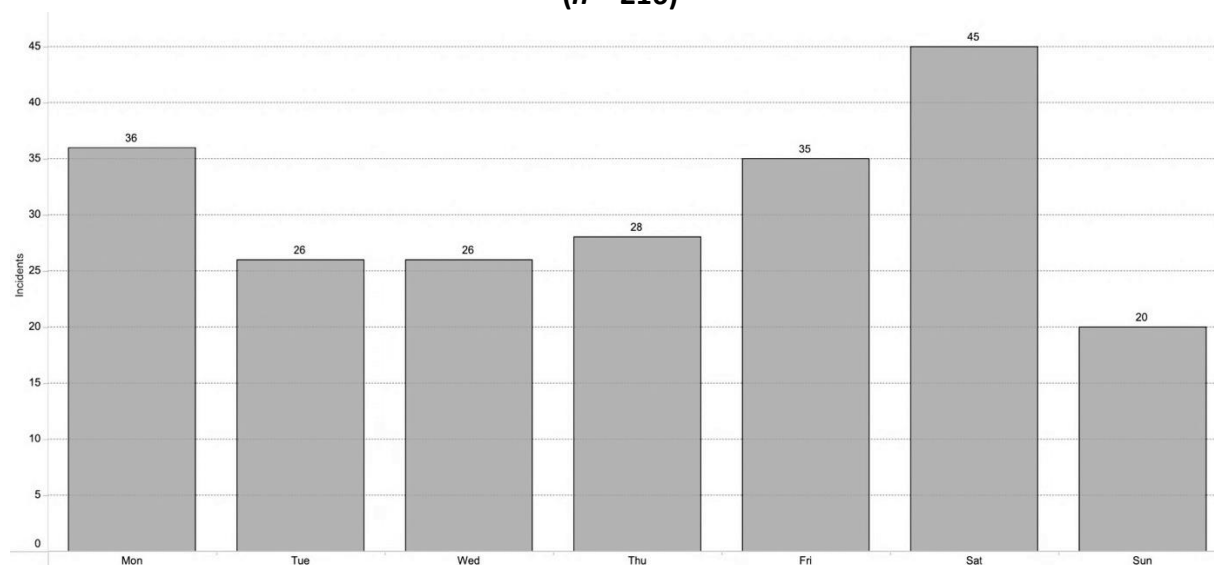
Figure 1.3 also illustrates a significant increase in February 2025 of restrictive housing incidents exceeding 240 minutes (4 hours). Given the number of youth from one living hall involved in recurring events leading to restrictive housing in February, as discussed above, split programming, individual youth regulation, restorative problem solving among the youth, and the process for making living hall reassignments resulted in more time in restrictive housing than usual.

1.4 DAJD Juvenile Division
April 1, 2024 - March 19, 2025
Restrictive Housing Incidents by Day of the Week
(n = 620)



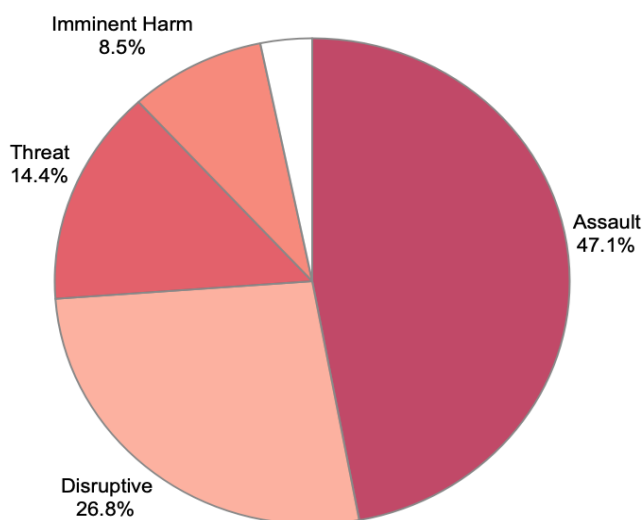
During the prior monitoring review period, the highest number of incidents leading to restrictive housing occurred on Fridays and Saturdays. In comparison, for the period April 1, 2024 - March 19, 2025, the highest number of restrictive housing incidents arose on Tuesdays. However, there is little variation between the numbers of incidents developing on Mondays, Tuesdays, Fridays, and Saturdays, ranging from 95 - 100. As noted in the last report, some JDOs had pointed to the lack of weekend programming resulting in boredom and tension among the youth, leading to more conflict and the potential need to respond with restrictive housing. The Juvenile Division indicated that it would prioritize partnering with community-based organizations to provide programming on weekends and other periods when youth are less likely to be engaged with school and other activities. To the extent this occurred, more programming on Fridays and Saturdays does not appear to have resolved the issue of high numbers of behavioral issues occurring that require a restrictive housing response. Additional factors, such as the tendency for the least experienced staff to be assigned to weekend shifts, likely warrant further analysis.

1.5 DAJD Juvenile Division
April 1, 2024 - March 19, 2025
Youth in Restrictive Housing for 240+ Minutes
Restrictive Housing Incidents by Day of the Week
(n = 216)



For juveniles experiencing restrictive housing for 240+ minutes, the behavior resulting in an assignment to restrictive housing occurred most frequently on Saturdays.

1.6 DAJD Juvenile Division
April 1, 2024 - March 19, 2025
Youth Behavioral Reasons for Restrictive Housing
(n = 620)



1.7 DAJD Juvenile Division
April 1, 2024 - March 19, 2025
Comparing Youth Behavioral Reasons for Restrictive Housing in Current
and Previous Monitoring Reporting Periods

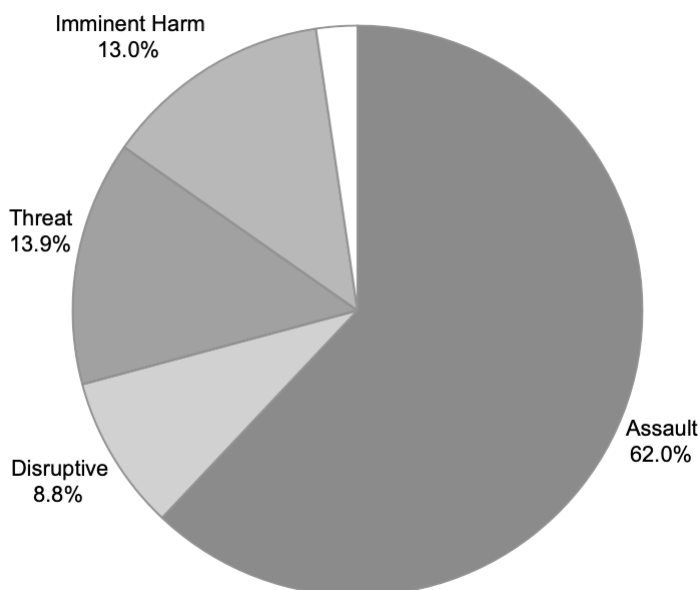
Behavioral Reason for Restrictive Housing	April 1, 2022 - June 30, 2023 (15 months) (n = 520 incidents)	July 1, 2023 - March 31, 2024 (9 months) (n = 415 incidents)	April 1, 2024 - March 31, 2025 (11 1/2 months) (n = 620 incidents)
Assault	48%	39%	47%
Threat	22%	50%	14%
Disruptive	6%	4%	27%
Imminent Harm	23%	5%	9%
Other or Unknown	1%	2%	3%

While the *type* of juvenile behavior that requires a restrictive housing response (i.e., assault, threat, disruptive) is nearly always documented, there was inconsistency as to the level of detail provided about each incident, though this generally improved in recent months. The detail is important in evaluating whether restrictive housing is necessary to prevent imminent and significant physical harm to the youth or others, as required by K.C.C. Chapter 2.65 and RCW 13.22.

During the last monitoring review period, there had been an increase in restrictive housing in response to youth making verbal threats and a decrease in imminent harm indicators leading to restrictive housing. For the period April 1, 2024 - March 19, 2025, identifying threats as the behavior resulting in restrictive housing decreased from 50% to 14%, while the number of times imminent harm was listed as the underlying behavioral trigger almost doubled, though was still significantly less than seen in the April 1, 2022 - June 30, 2023. Since restrictive housing should only be used when it is "necessary to prevent imminent and significant physical harm to the juvenile detained or to others and less restrictive alternatives were unsuccessful,"¹⁷ imminent harm actually should be a consideration for all circumstances leading to restrictive housing, as opposed to being used as a separate type of unacceptable behavior that could result in restrictive housing.

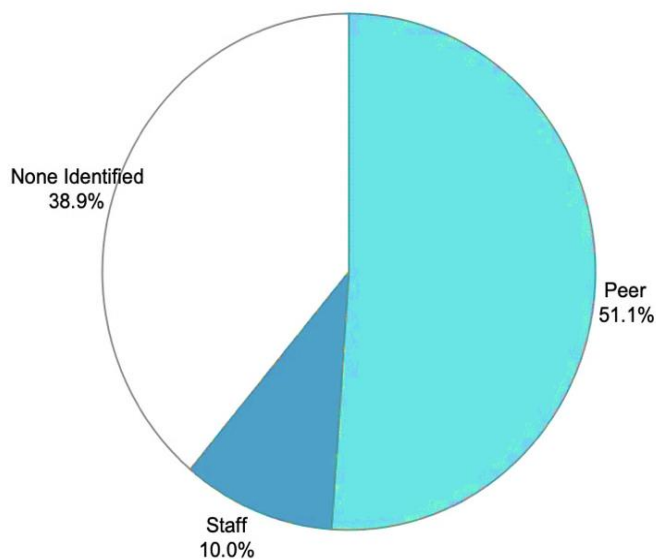
¹⁷ K.C.C. Chapter 2.65.020.

1.8 DAJD Juvenile Division
April 1, 2024 - March 19, 2025
Youth in Restrictive Housing for 240+ Minutes
Behavioral Reasons for Restrictive Housing
(n = 216)

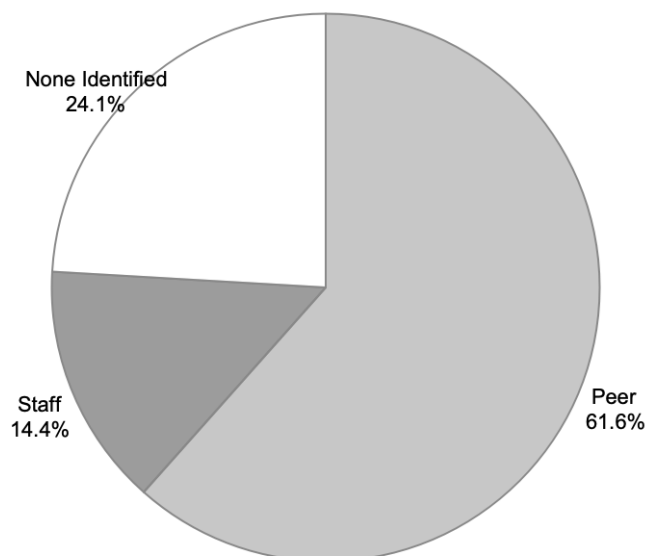


Similar to the data reported above for all restrictive housing incidents, restrictive housing events of 240+ minutes was most often necessary due to juveniles engaging in assaultive behavior, which accounted for 62% of these incidents. Disruptive behavior leading to restrictive housing of 240+ minutes was only noted in approximately 9% of the incidents, as compared to 27% of all incidents. The comments above regarding the use of imminent harm to explain the need for restrictive housing clearly apply to events of 240+ minutes, too.

1.9 DAJD Juvenile Division
April 1, 2024 - March 19, 2025
Youth Instigating Aggressive Incidents - Victim Type
(n = 620)



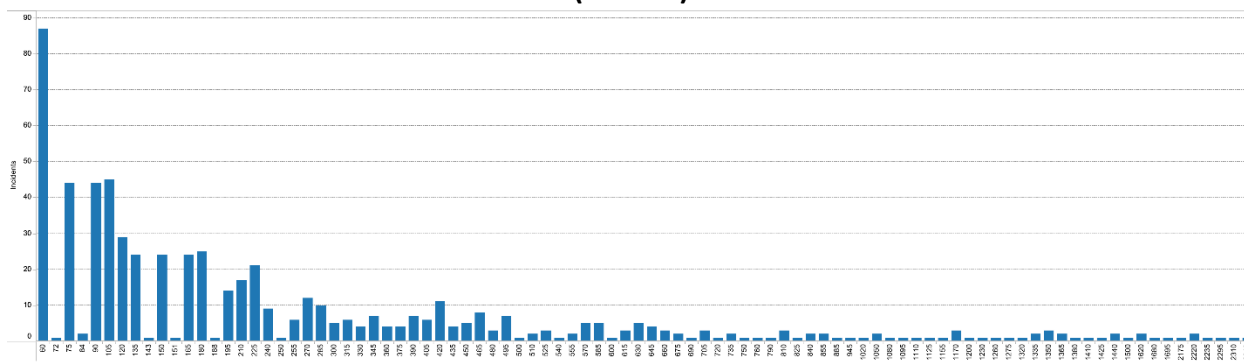
1.10 DAJD Juvenile Division
April 1, 2024 - March 19, 2025
Youth in Restrictive Housing for 240+ Minutes
Youth Instigating Aggressive Incidents - Victim Type
(n = 216)



When youth engage in aggressive behavior that cannot be de-escalated and results in restrictive housing, the target of their behavior is usually another youth, as was the case during the current monitoring review period, when a peer was the identified victim in 51% of all incidents and 62% of incidents resulting in 240+ minutes of restrictive housing. In the monitoring team's last report, another youth was documented as the intended victim in approximately 42% of the incidents. However, the data reviewed for that report also included a category of "staff and peer" in 2% of the incidents, whereas the current data did not include this combined category. The number of incidents in which the type of victim was not identified decreased by 14% when considering all incidents, from 53% during July 1, 2023 - March 31, 2024, down to approximately 39% in the period April 1, 2024 - March 19, 2025. The number of incidents in which the type of victim was not identified when resulting in 240+ minutes of restrictive housing was even lower, 24%. DAJD personnel are commended for providing more detail in their documentation regarding these events.

JDOs, Corrections Supervisors, and others in the Juvenile Division understandably express concern about the frequency of staff being assaulted by juveniles in secure custody at the CCFJC. As noted above, staff assaults are often related to youth assaults against their peers, in that youth may threaten or assault staff in response to force used by staff to suppress the underlying youth assault against a peer. Figure 1.9 indicates staff were targeted in 10% of all incidents of juveniles engaging in aggressive behavior that resulted in restrictive housing. This is double the 5% of incidents documented in the last reporting period (3% of incidents when staff were targeted alone and 2% when staff and peers were both targeted). Figure 1.10 shows that staff were the target in 14% of events leading to 240+ minutes of restrictive housing. Some staff assaults have caused serious injury and resulted in the need for the involved JDO(s) to take leave and/or be on transitional duty, which also can contribute to the problem of staff shortages.

1.11 DAJD Juvenile Division
April 1, 2024 - March 19, 2025
Range of Time (Minutes) in Restrictive Housing
(n = 620)



1.12 DAJD Juvenile Division
April 1, 2024 - March 19, 2025
Average Time (Minutes) in Restrictive Housing
(n = 620)



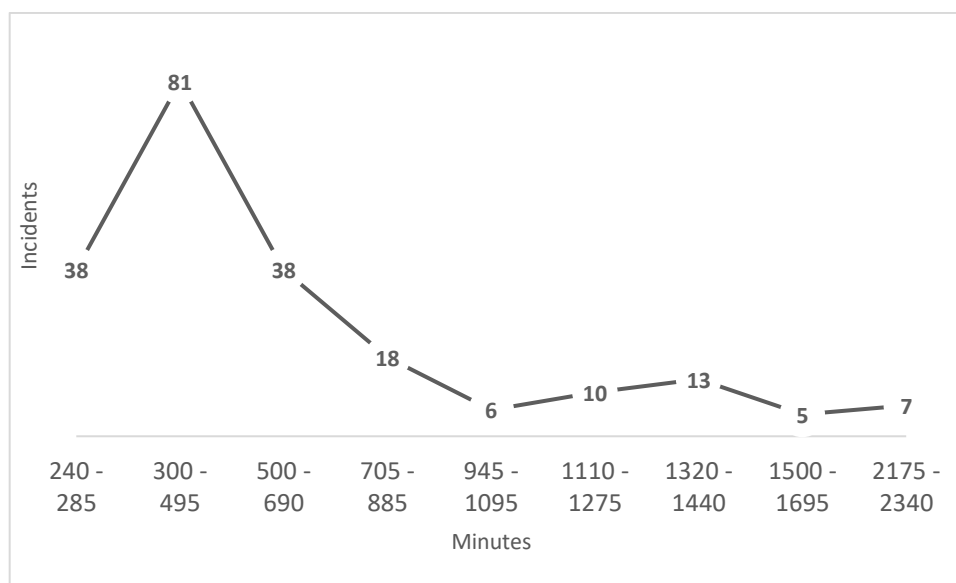
As has been the case in all reviews of restrictive housing data, the higher the number of minutes in restrictive housing, the fewer the number of youth confined for those lengthier periods of time. The average number of minutes a youth spent in restrictive housing for the period April 1, 2024 - March 19, 2025, was 302 minutes, as compared to 360 minutes averaged during the last review period, July 1, 2023 - March 31, 2024, and 444 minutes in restrictive housing averaged April 1, 2022 - June 30, 2023. This represents a continual decrease in the average time spent in restrictive housing since April 2022, down by 142 minutes over the past three years. Since the data discussed above demonstrates an increase in the frequency of assignment to restrictive housing (from an average of 35 incidents/month during April 1, 2022 - June 30, 2023, to an average of 54 incidents/month from April 1, 2024 - March 19, 2025), the decrease in average time spent in confinement is encouraging.

1.13 DAJD Juvenile Division
April 1, 2024 - March 19, 2025
Number of Restrictive Housing Incidents, Number of Youth Involved,
and Average Time in Restrictive Housing by Month
(n = 620)

	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25
Number of Incidents	33	49	28	24	44	58	70	37	54	66	102	55
Number of Youth Involved	26	32	21	21	35	38	37	27	32	33	43	34
Average Time in Restrictive Housing	258	241	191	185	129	178	206	239	324	280	550	465

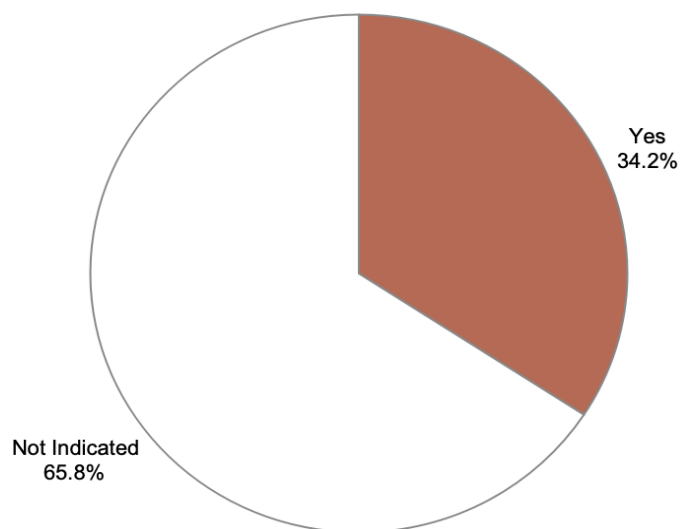
Figure 1.13 builds on the information presented in Figure 1.2, which considered the number of restrictive housing incidents by month. Adding information on the number of youth involved and average time in restrictive housing by month, February 2025 continues to stand out as representing an unusually challenging time for management of youth behavior at CCFJC. Youth repeatedly threatened staff, along with engaging in concerted assaults against staff that resulted in serious injuries. This behavior was in addition to threats and assaults against peers and an increased level of misbehavior in class, leading to juveniles being sent to their rooms for restrictive housing.

1.14 DAJD Juvenile Division
April 1, 2024 - March 19, 2025
Youth in Restrictive Housing for 240+ Minutes
Number of Incidents and Time in Restrictive Housing
(n = 216)

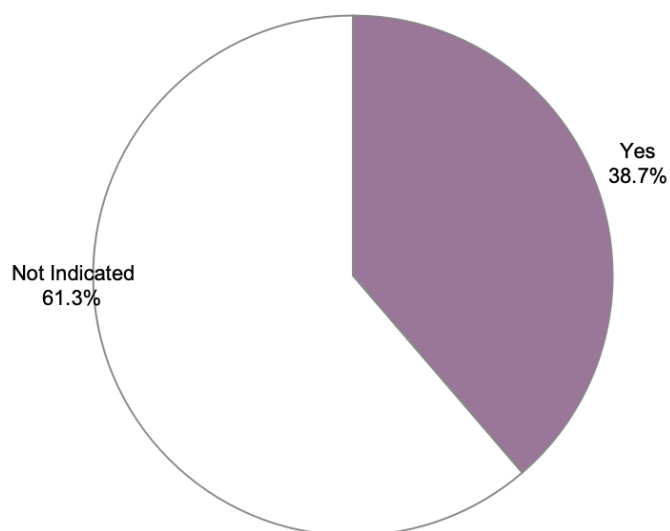


With regards to restrictive housing of 240+ minutes, which ranged from 240 to 2340 minutes, other than some small variation in the time frames presented in Figure 1.14, the higher the number of minutes in restrictive housing, the fewer the number of incidents leading to youth confined for lengthier periods of time. There was an average time of 645 minutes in restrictive housing among the 216 incidents that exceeded four hours.

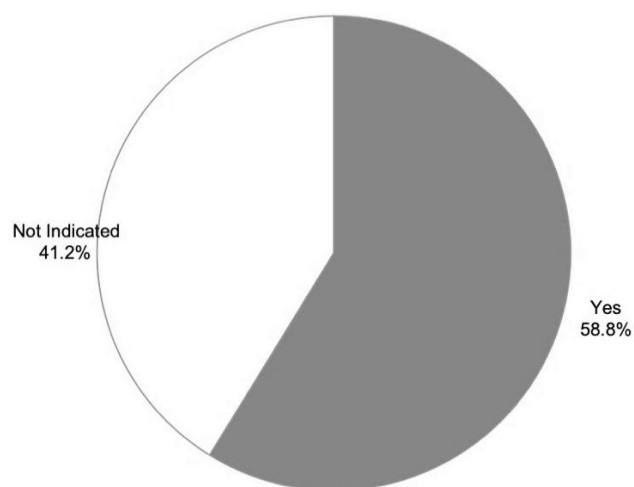
1.15 DAJD Juvenile Division
April 1, 2024 - March 19, 2025
Mental Health Assessments for Youth in Restrictive Housing
(n = 620)



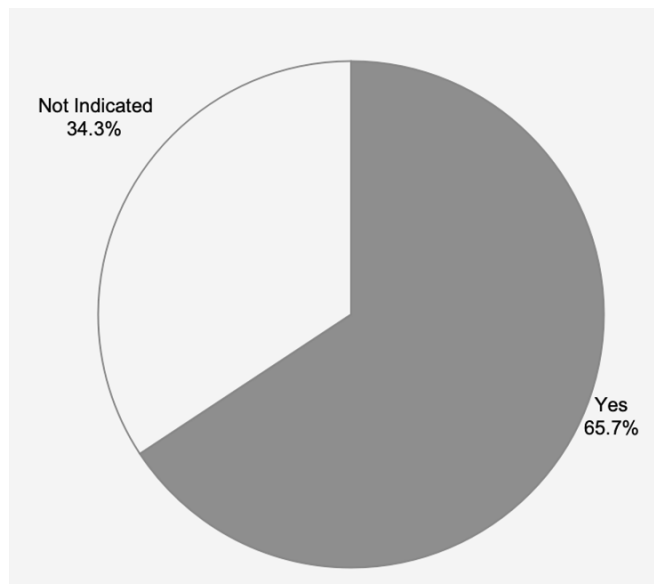
1.16 DAJD Juvenile Division
April 1, 2024 - March 19, 2025
Medical Assessments for Youth in Restrictive Housing
(n = 620)



1.17 DAJD Juvenile Division
April 1, 2024 - March 19, 2025
Youth in Restrictive Housing for 240+ Minutes
Mental Health Assessments for Youth in Restrictive Housing
(n = 216)



1.18 DAJD Juvenile Division
April 1, 2024 - March 19, 2025
Youth in Restrictive Housing for 240+ Minutes
Medical Assessments for Youth in Restrictive Housing
(n = 216)



Documentation of medical and mental health assessments of youth in restrictive housing was reviewed, along with input from medical and mental health staff and others, including youth, about the assessment process. K.C.C. Chapter 2.65 and RCW 13.22 require that a youth in restrictive housing be evaluated, and a care plan developed by a mental health professional as soon as possible within four hours of placement in restrictive housing. Youth are to be evaluated by a medical professional as soon as possible within six hours of placement in restrictive housing or before an ordinary sleep period, and at least once per day thereafter.

When considering all restrictive housing incidents, the percentage when mental health checks were not documented increased slightly, from 63% during the reporting period June 1, 2023 - March 31, 2024, to about 66% during the current monitoring review period. However, the number of incidents when medical health checks were not indicated decreased, from approximately 67% to 61%. During the reporting period, mental health and medical professionals used emails to communicate an assessment had been conducted, however, these proved challenging to analyze. Looking at the data for restrictive housing incidents of 240+ minutes, mental health assessments were recorded in 59% of the events, a 25% higher rate than seen in the data for all restrictive housing. There were similar results for medical assessments, with 66% of the incidents including documentation that the assessments were completed.

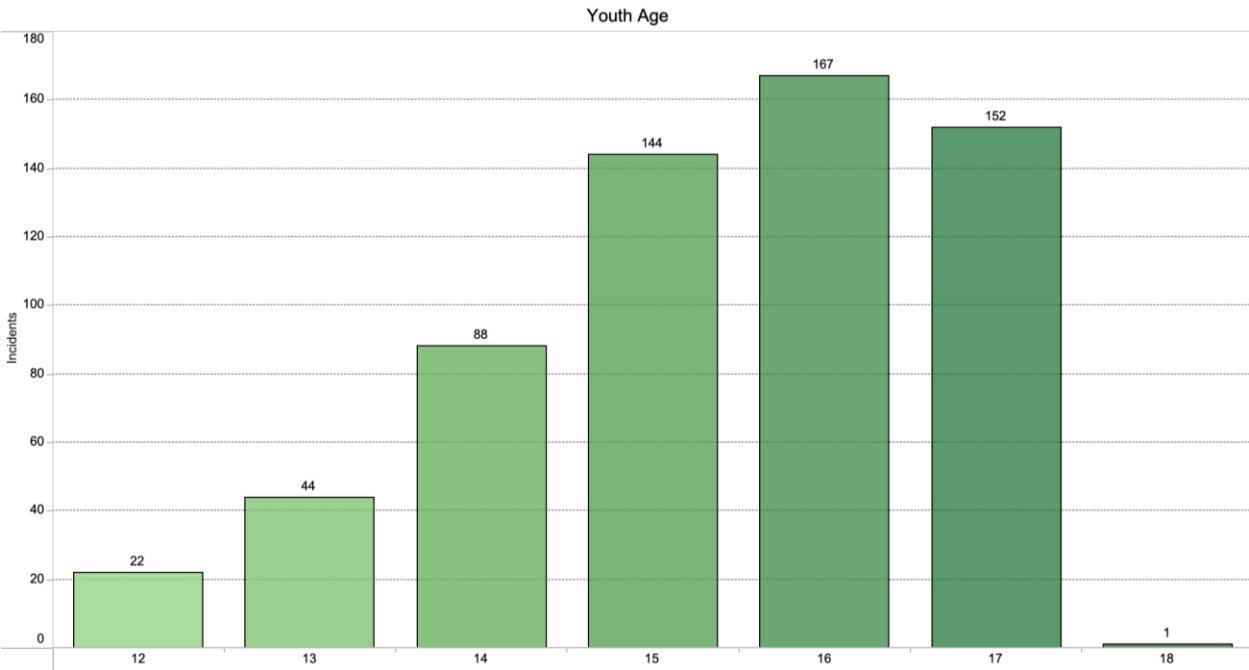
However, the percentage of mental health and medical checks documented is based on all restrictive housing incidents reported between April 1, 2024, and March 19, 2025, or all that exceeded 240 minutes, not just those incidents when an assessment was required. Thus, if a youth was in restrictive housing for 2 hours, a mental health check might have been completed, though if it was not, law and policy would not have required the assessment since the youth's time in restrictive housing was under 4 hours. Accurately computing the number of mental health and medical assessments completed is further complicated by the fact that juveniles rarely remain in restrictive housing for hours at a time; rather, efforts are made to have the youth attend school classes or engage in programming activities throughout the day, even if on a split programming basis.

In any case, mental health and medical providers are visiting the living halls throughout the day, dispensing medication, checking on juveniles in restrictive housing, and counseling other youth. For example, medical staff indicated that they are in each living hall at least twice/day in order to distribute medications and that they often conduct medical assessments of youth in restrictive housing at that point, even if an assessment is not technically due. Whether required or not, it is likely that mental health and medical assessments are occurring well within the required time. Now that DAJD has worked out an alternative to having Corrections Supervisors document

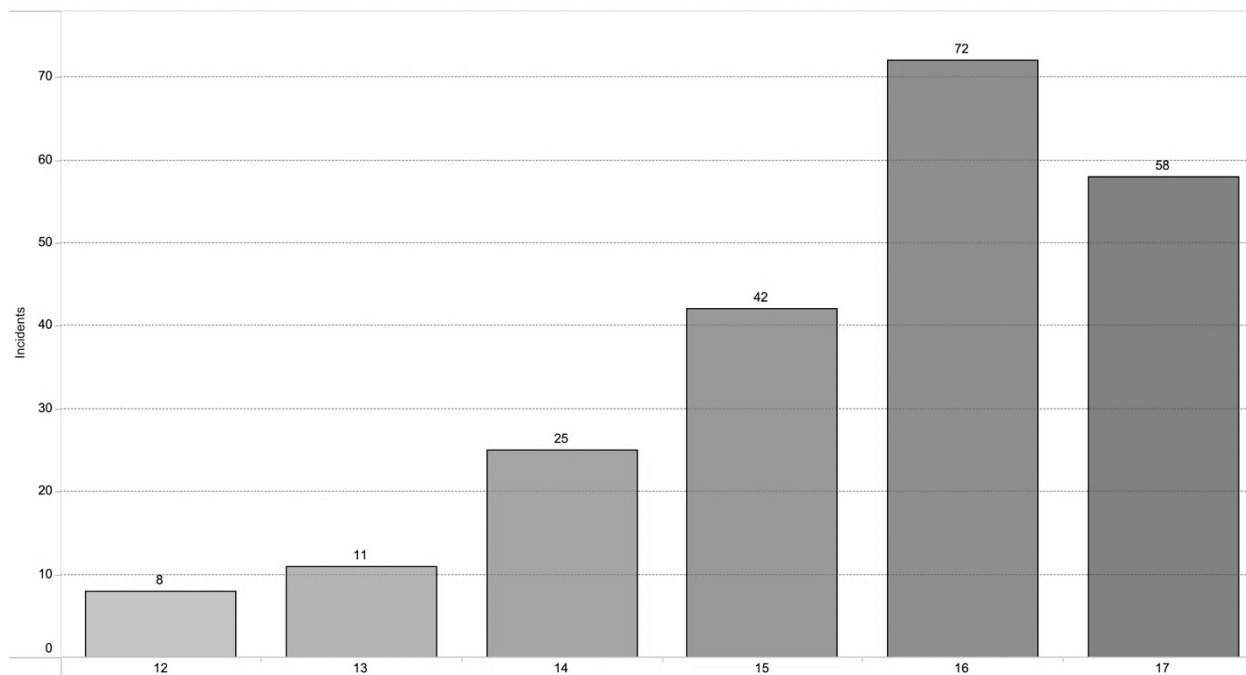
information about the mental health and medical checks, it is hoped that more accurate data regarding these checks will be documented going forward.

Furthermore, the mental health and medical care providers meet with DAJD staff and others for a daily MDT meeting. The MDT team discusses all youth who are demonstrating unsafe or otherwise troubling behavior, including any in restrictive housing. The mental health team provides an assessment of each youth discussed in the meeting or after being informed that a youth is on restrictive housing. The mental health care providers also meet with Corrections Supervisors every morning to discuss youth on restrictive housing and then follow-up to assess the youth. If there are youth with behavioral health needs requiring attention, whether on restrictive housing or not, an action plan is formulated during MDT or the supervisory meetings to address the juvenile's needs and help them self-regulate and reintegrate with the rest of their living hall peers.

1.19 DAJD Juvenile Division
April 1, 2024 - March 19, 2025
Age of Youth in Restrictive Housing Incidents
(n = 620)



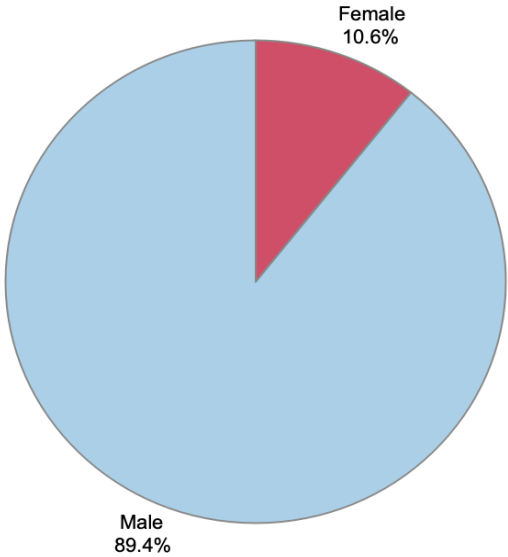
1.20 DAJD Juvenile Division
April 1, 2024 - March 19, 2025
Youth in Restrictive Housing for 240+ Minutes
Age of Youth in Restrictive Housing Incidents
(n = 216)



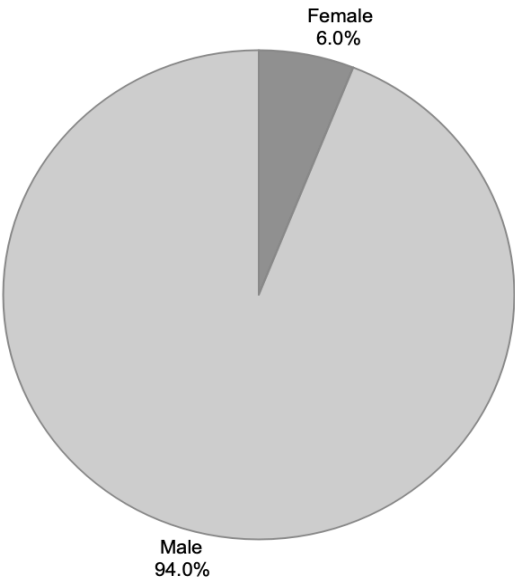
In the last report, most incidents leading to restrictive housing involved 16 and 17 year old youth. During the current reporting period, particularly in regard to all restrictive housing events, 15 year old juveniles joined the 16 and 17 year olds, representing a significant percentage of youth participating in events requiring a behavioral response of restrictive housing. While comparative data is not available for incidents of 240+ minutes duration from earlier reports, for the current monitoring period, 15 year old juveniles also were the third highest age group involved in these incidents.

The recommendation has been made in previous monitoring reports that living hall assignments should be made based on age, developmental stage, and/or other factors, to reduce opportunities for older juveniles to negatively influence the behavior of younger detainees, and to limit the frequency of situations where threatening or aggressive behavior is directed towards younger youth by those who are older. DAJD has indicated the recommendation is being explored by the Juvenile Division, along with other evidence-based approaches to living hall assignments.

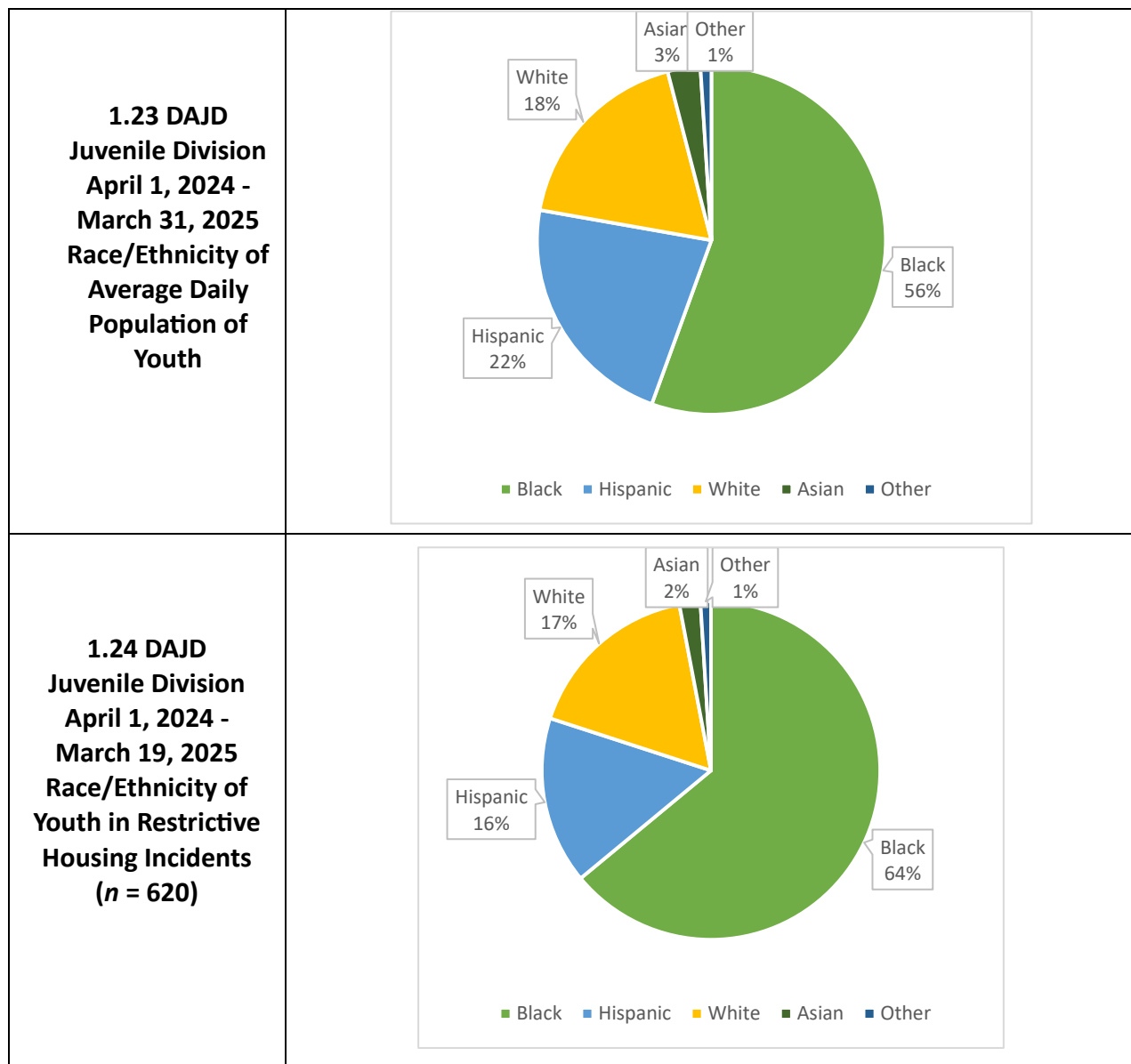
1.21 DAJD Juvenile Division
April 1, 2024 - March 19, 2025
Gender of Youth in Restrictive Housing Incidents
(n = 620)



1.22 DAJD Juvenile Division
April 1, 2024 - March 19, 2025
Youth in Restrictive Housing for 240+ Minutes
Gender of Youth in Restrictive Housing Incidents
(n = 216)



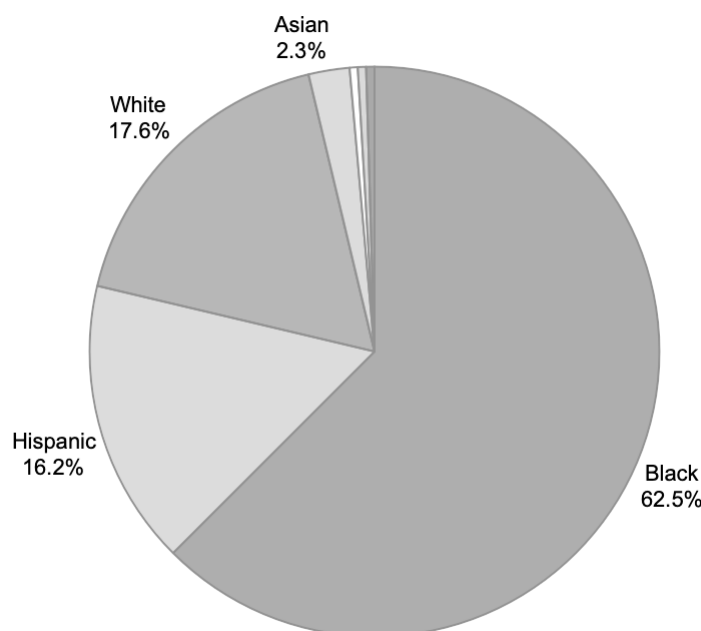
During the months April 1, 2024 - March 19, 2025, 91.2% of the ADP detained at CCFJC were males and 8.8% were female. Thus, females were slightly over-represented in the population of all youth assigned to restrictive housing - 10.6% versus their 8.8% ADP representation - and males were slightly under-represented. The gender breakdown of youth in restrictive housing during the last review period was only slightly different - 88.9% of youth who were assigned to restrictive housing were male and 11.1% were female. Looking at the data for youth in restrictive housing 240+ minutes, only 6% were female.



As seen with the data reviewed in the monitoring team's last report, there are some differences in the race/ethnicity distribution of juveniles in restrictive housing during the period April 1, 2024 -

March 19, 2025, as compared to the race/ethnicity of the ADP of youth booked into detention during the twelve month period, April 1, 2024 - March 31, 2025.¹⁸ Black youth represent 56% of the ADP for all youth booked into secure detention during this period, while 64% of youth assigned to restrictive housing were Black. Hispanic youth accounted for 16% of juveniles who experienced restrictive housing, while they were 22% of the juvenile ADP during the current monitoring review period. White youth represented 18% of the ADP for all youth booked into detention and accounted for 17% of youth placed into restrictive housing. Three percent of the ADP for the juvenile facility were Asian, while 2% of youth who experienced restrictive housing were Asian.

1.25 DAJD Juvenile Division
April 1, 2024 - March 19, 2025
Youth in Restrictive Housing for 240+ Minutes
Race/Ethnicity of Youth in Restrictive Housing Incidents
(n = 216)



Approximately 63% percent of the youth assigned to restrictive housing for 240+ minutes are Black, while 16% are Hispanic, 18% are White, and 2% are Asian. This demonstrates only slight differences in the race/ethnicity distribution in this group, as compared to the data for all youth in restrictive housing.

¹⁸ Note that because of the switch from using hard copy documentation for the mandatory 15-minute security checks to entering that data electronically beginning March 20, 2025, the restrictive housing data set only runs through March 19, 2025. The race/ethnicity data for the CCFJC ADP includes the full twelve months, April 1, 2024 - March 31, 2025.

B. Adult Divisions: Restrictive Housing Date Tracking of Adult Age-Outs

The number of Adult Age Outs (AAOs) who are housed at the DAJD Adult Divisions' King County Correctional Facility (KCCF) or the Maleng Regional Justice Center (MRJC) increased during the current reporting period. While there were 11 AAOs at the time of Independent Monitoring interviews at KCCF and MRJC in 2023 and 2024, there were 13 AAOs detained in an adult facility when AAOs were interviewed in 2025. Thirteen AAOs amount to two to three times as many AAOs for the Average Daily Population (ADP) reported for the third and fourth quarters in 2020 and first quarter of 2021.

Despite this growth in numbers, AAOs still comprise only a very small group within the overall population of DAJD Adult Divisions detainees.¹⁹ This results in different policies, procedures, and tracking of AAO restrictive housing as compared to processes in place at the juvenile facility. The adult facilities use a system of publishing a daily list of AAOs with booking information, jail location, and other brief details about each AAO. These daily lists are distributed to each facility's managers and supervisors, who are tasked with monitoring living assignments for the AAOs included on the daily document. AAOs wear a yellow wristband, facilitating easy identification by Correctional Officers and other DAJD staff.²⁰

The DAJD Adult Divisions reported relatively few instances of restrictive housing for AAOs during the initial three years of the Independent Monitoring Team's review. However, the Adult Divisions later discovered previously unreported instances of AAOs in restrictive housing, involving 60 incidents and 29 AAOs.²¹ This discovery prompted DAJD to take steps to ensure appropriate documentation and tracking of all AAO housing assignments, and no restrictive housing events were identified during the following reporting period.

However, as discussed in the last monitoring report, the Adult Divisions provided information indicating there had been 33 restrictive housing incidents involving 10 AAOs during the period July 1, 2023 - March 31, 2024. Details as to the AAO's precipitating behavior that led to restrictive housing confinement was limited or missing for 30 of the 33 incidents, making it difficult to determine if each restrictive housing assignment was necessary to prevent imminent and significant physical harm to the youth or others involved, or that less restrictive alternatives were unsuccessful. After providing

¹⁹ For example, in April 2025, the Average Daily Population (ADP) in KCCF secure detention was 814. All 13 AAOs at the time were in custody at KCCF, amounting to approximately 1.6% of the facility's total ADP.

²⁰ When AAOs were interviewed for this report, one noted that he was not given a yellow wristband, though he understood he was supposed to have one and did not know why the wristband was not issued. This information was communicated to a member of the DAJD Senior Management Team for follow-up and a wristband was provided to the AAO.

²¹ These instances of AAO restrictive housing are detailed in the July 1, 2021 - March 31, 2022, monitoring report.

this data to monitoring team, DAJD indicated that it would redouble efforts to stress the requirements under the restrictive housing Ordinance and to provide proper oversight and more timely corrective action regarding restrictive housing in the Adult Divisions.

For the current reporting period, DAJD researched the housing assignments over time for each AAO in the Adult Divisions during the 12 months under review, along with records for each individual to determine if any disciplinary sanctions were noted, possibly indicating restrictive housing. There were 20 individuals classified as an AAO during this time, with some in custody for a relatively short period of time and others for longer periods, up to several years. No indication of restrictive housing confinement was found for 14 of the 20 AAOs. Of the remaining six, one individual was confined to the KCCF medical floor following knee surgery and due to another medical issue he experiences, which theoretically at times might entail solitary cell confinement that meets the restrictive housing definition.²²

Five out of the 20 AAOs confined to KCCF during the current reporting period experienced a single or multiple instances of restrictive housing, ranging in time from 8 hours to 8 days, as seen below in Table 2.1. The behavior leading to restrictive housing generally was not indicated and assessment checks were not completed in eight of 11 incidents. Assessments were completed in two incidents and only partially completed regarding one event.

²² This will depend on how many other individuals in custody are housed on the medical floor for their own medical issues and the number will vary over time. During an interview, the AAO on the medical floor indicated he was in a pod with 13 other inmates at that time.

2.1 DAJD Adult Divisions

April 1, 2024 - March 31, 2025

Adult Age-Out (AAO) Restrictive Housing Incidents

AAO	Date	Duration ²³	Restrictive Housing Assessments Completed	Notes
1	2/10/25	8+ days	No	
2	2/5/25	10 hours	No	Notes refer to a 2 hour Cool Down in the visitation booth and then the AAO was moved to a restrictive housing location for 10 hours. ²⁴
	3/28/25	8 hours	No	
3	9/27/2425	7 days	No	
	2/20/25	13 hours	Partially	
4	8/4/2024	1 day	Yes	
5	11/19/24	24 hours	Yes	

The Adult Divisions exempts from its definition of restrictive housing, "Temporarily placing an AAO whose behavior presents a security issue for a Cool Down Period not to exceed two (2) hours."²⁵ Several of the AAOs most recently interviewed mentioned that they had been isolated from other inmates for a Cool Down, which led to them being placed in a visitor's booth (when visitors were not present), rather than being confined to their cell or bunk area. KCCF visitor booths have a glass wall dividing each booth into two sections, one side for the inmate and the other for the visitor (personal or professional). Each side of the booth is approximately 3x3 feet or 9 square feet, is entered by a

²³ Some of the AAO restrictive housing incidents were recorded in hours and others by the number of days involved.

²⁴ Use of a visitation booth for a Cool Down Period is discussed below.²⁵ Department of Adult and Juvenile Detention, Adult Divisions, General Policy Manual, 6.03.011, defines the following terms: "Cool Down Period" is, "A period of time, not exceeding two hours, when a AAO whose behavior presents a Security Issue is racked back, alone, with minimal or no contact with others, other than corrections or medical staff." "Security Issue," is defined as, "Any behavior that may impair the safe and secure operation of the facility," [that] "includes, but is not limited to, behavior that constitutes a Risk of Physical Harm." "Risk of Physical Harm," occurs when "the AAO's behavior creates a risk of imminent and significant physical harm to the AAO or others," such as threats to staff or others, physically aggressive behavior, a major destruction of property, or facility disturbance. "Rack back" is the term used in Adult Divisions facilities for confining an AAO or other inmate to their cell or bunk area.

²⁵ Department of Adult and Juvenile Detention, Adult Divisions, General Policy Manual, 6.03.011, defines the following terms: "Cool Down Period" is, "A period of time, not exceeding two hours, when a AAO whose behavior presents a Security Issue is racked back, alone, with minimal or no contact with others, other than corrections or medical staff." "Security Issue," is defined as, "Any behavior that may impair the safe and secure operation of the facility," [that] "includes, but is not limited to, behavior that constitutes a Risk of Physical Harm." "Risk of Physical Harm," occurs when "the AAO's behavior creates a risk of imminent and significant physical harm to the AAO or others," such as threats to staff or others, physically aggressive behavior, a major destruction of property, or facility disturbance. "Rack back" is the term used in Adult Divisions facilities for confining an AAO or other inmate to their cell or bunk area.

swing or sliding door, has a small desk and seat, and is equipped with a telephone receiver for the visitor and detainee to communicate with each other. There were five or six visitor booths on each floor visited by the monitoring team, with the booths separated by glass walls, allowing for visibility between booths by both inmates and visitors, and by Correctional Officers in a separate, raised room across from the visitor booths.

Because AAOs detained at KCCF typically are housed with other adult inmates and assigned to communal cells with bunks for sleeping, rather than individual rooms, as found in the juvenile facility, they are not as easily separated from other detainees when they need to regulate their behavior by temporarily being isolated from others. Given KCCF's layout, the high number of individuals in custody at the jail facility, and limited alternatives when an AAO's behavior results in the need for a Cool Down Period, temporary assignment to a visitor's booth might be the only option that allows for isolation, while also permitting observation by Correctional Officers situated in the raised room across from the visitor booths.²⁶ However, it is far from ideal, given the size of the area in which an AAO is confined, and it is recommended that DAJD explore other options.

V. ACCESS TO EDUCATION, PROGRAMMING, AND NECESSITIES (PROVISO F)

A. Access to Education, Programming, and Necessities in the Juvenile Division

1. Access to Education

School instruction for detained youth is provided through the Seattle Public Schools (SPS) Interagency Academy and occurs in a classroom set up in each living hall or through the use of written instruction packets. Typically, youth are in class approximately 5 hours/day on Monday, Tuesday, Thursday, and Friday, and 3 hours/day on Wednesday. Teachers rotate among the living halls, teaching a specific subject for a one-hour period in each hall. If an individual youth does not attend class for any reason, including a youth in restrictive housing who has not self-regulated and cannot safely reintegrate with other youth, the teacher generally prepares an individual instruction packet so that the youth can review material covered in class and keep up with homework assignments.

Due to the need to open more living halls to accommodate the high average daily population (ADP) at the CCFJC, there can be more halls than subjects taught or teachers available. Thus, one or more halls might not receive the full five (or three on Wednesday) hours of instruction on a given day. The Juvenile Division has been actively negotiating with SPS to rectify this problem so all youth at the CCFJC have an opportunity to continue their education following a regular schedule. The school

program site lead and several teachers were interviewed for this report (and in prior years). The site lead indicated that an attendance record is maintained and that the vast majority of youth housed at the CCFJC attend classes regularly.

Prior reports have addressed education-related issues generally at the CCFJC and in regard to restrictive housing more specifically. For example, the last monitoring team report used a scenario taken from incidents reviewed that illustrated the impact of split programming and modified programming on two youth in restrictive housing for physically fighting with each other.²⁷ Because the youth were segregated from each other until they could self-regulate and problem-solve together, split programming allowed each to attend half of the classes meeting each day, while the other youth was confined to their room. In this instance, all youth on the living hall also were confined to their rooms in the afternoon for two hours (referred to as "modified programming"). Thus, the youth who was confined to their room earlier and otherwise would have attended school in the afternoon missed that in-class instructional opportunity. None of the youth on a hall that does not meet in class due to a shortage of teachers will receive instructional packets, including youth on restrictive housing.

The teachers pointed to the increasing number of youth at the CCFJC, which also increases class size, indicating that larger classes can add to tension between the youth and lead to conflict, which in turn can result in restrictive housing. Perhaps illustrating the teachers' observation, the monitoring team noted that during the first week of February 2025 alone, there were 13 incidents that resulted in youth being removed from the classroom, likely due to teacher requests, with youth confined to their room for a time ranging from 15 - 60 minutes. There were a variety of reasons for removal listed in the restrictive housing documentation, including behavior such as youth attempting to start a physical altercation, engaging in excessive horseplay, flipping a desk and threatening to assault a staff after walking out of the classroom, and having a verbal altercation with the teacher.

The educators observed that youth generally appeared motivated by that part of the Juvenile Division's behavior management approach that rewards desirable behavior over time, noting that the incentives system and honors program play an important part in the Juvenile Division's culture. They also indicated that one-on-one programming (when a JDO and youth on restrictive housing program together away from other youth in the living hall) can be beneficial educationally. The example provided involved an 11-year old who was on restrictive housing and not ready to reintegrate with other youth, who worked with a JDO outside his room on class assignments. The teachers remarked that one-on-one programming allowed the younger youth to stay more focused on the material being covered, avoiding the distraction of other youth as old as 17 in the classroom.

²⁷ Reporting Period: July 1, 2023 - March 31, 2024, King County Department of Adult and Juvenile Detention Independent Monitoring Team Report Implementation of Ordinance 18637 Restrictive Housing, p. 38.

Issues of concern that were raised during interviews included the educators' sense that the tablets available to detained youth could be better managed by DAJD staff.²⁸ For example, they expressed their belief that if a youth elects not to attend class, youth generally still have access to their computer tablet and spend time using it instead of going to school or doing homework assignments.²⁹ The educators also were interested in exploring ways to use the tablets to help facilitate learning. An example discussed was to provide access on the tablets to AI tutors, which might be useful for youth struggling to understand a particular topic or to provide alternative pathways to learn subject areas outside the traditional courses offered.

One of the teachers working in secure detention is a member of the Multi-Disciplinary Team (MDT) that meets daily to discuss how best to work with specific youth on restrictive housing to help them self-regulate, problem solve, and reintegrate with other youth, and ways to support youth needing particular attention, though not on restrictive housing. Given the teachers' continuing interactions with youth in the secure facility, they are in a unique position to make observations about them, and having a teacher involved with MDT is likely beneficial to both youth and staff.

2. Access to Programming

Strong programming in a juvenile detention facility is an important consideration in any strategy to reduce the need for restrictive housing, as it can "reduce idleness that may lead to conflict between youths by increasing access to groups, recreation, and other activities."³⁰ There were many post-pandemic programming challenges as the ADP for the Juvenile Division increased significantly and many who had formerly volunteered their programming time were no longer available. DAJD recognized the need to adopt a more strategic approach to programming and the 2023 - 2024 King County Metropolitan Council (Council) Biennium Budget included funds to revitalize programming,

²⁸ Beginning in March 2024, youth at the CCFJC were provided individual tablets with telephone capability, specialized content such as select reading material, and games. Benefits and challenges associated with the tablets was addressed in the monitoring report for the period July 1, 2023 - March 31, 2024.

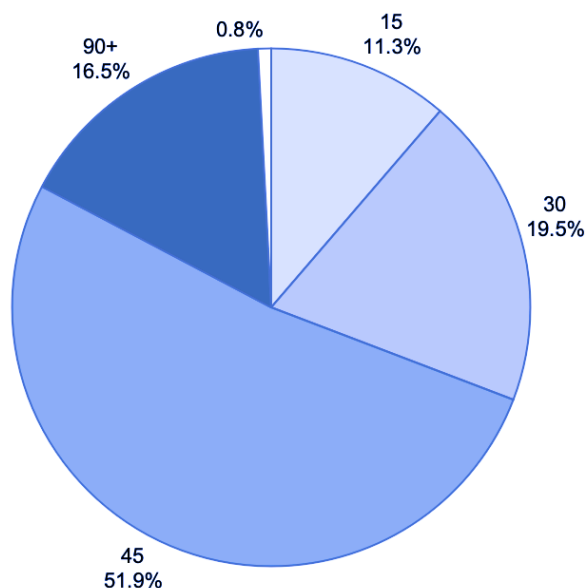
²⁹ The educators also believed that DAJD cannot turn off tablets remotely, which they thought would help with tablet management concerns. Juvenile Division staff indicated to the monitoring team that they actually can control tablet access remotely, and it might be helpful to relay that information to the teachers.

³⁰ National Commission on Correctional Health Care (NCCHC). (2021). *Restrictive Housing in Juvenile Settings* (Position statement, endorsed by the American Academy of Pediatrics and the Society for Adolescent Health and Medicine). <https://www.ncchc.org/position-statements/restrictive-housing-in-juvenile-settings-2021/>
NCCHC recommended other restrictive housing alternatives, indicating juvenile facilities should: have policies requiring safe, trauma-informed, and developmentally sensitive behavioral management; train staff and provide resources to utilize therapeutic strategies, such as de-escalation techniques, one-on-one time with staff, carefully described consequences, the option for youth to voluntarily be in their cell to avoid conflict, access to mental health and conflict resolution professionals, and evidence based interventions, such as cognitive-behavioral or dialectical-behavioral therapy; and the repurposing of unused cells for soothing, de-escalation rooms.

including support for a one-year contract for a Community Services Coordinator position. Given the vital role that robust programming plays in managing youth in detention, the Council is commended for including funds in the 2025 Annual Budget for DAJD to convert the Community Services Coordinator role into a permanent position and for community service provider contracts.³¹

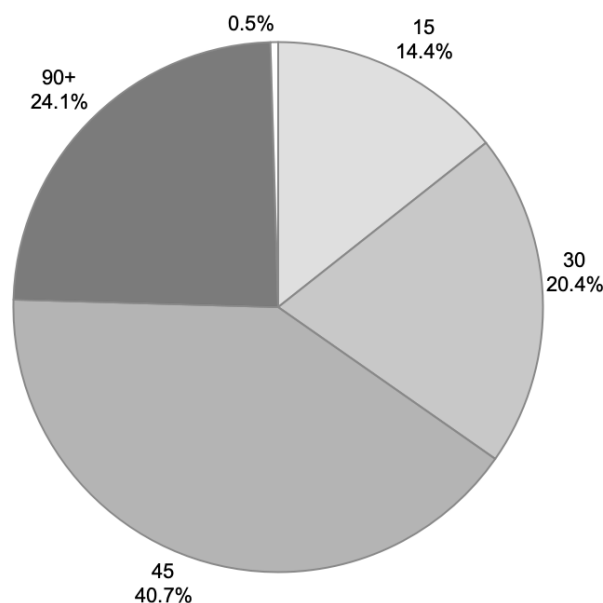
The Community Program Coordinator initially worked to identify a variety of programs appealing to different kinds of interests, facilitated the contracting process and background checks for service providers, and addressed scheduling, space, and other operational needs for programming. While these are continuing tasks, more recently, programming related efforts have included developing ways to involve youth at the front-end stage, having them review program applications and assist in making selections. The Community Program Coordinator also created feedback forms that are completed by each program provider and the youth who participated in an activity, to assess how well suited a particular program is in meeting the interests and needs of Juvenile Division youth and ways that providers' experiences might be improved.

3.1 DAJD Juvenile Division
April 1, 2024 - March 19, 2025
Time in Restrictive Housing Before Initial Release for Programming
(n = 620)



³¹ Council also provided funds supporting a permanent position for the Gang Intervention Specialist.

3.2 DAJD Juvenile Division
April 1, 2024 - March 19, 2025
Youth in Restrictive Housing for 240+ Minutes
Time in Restrictive Housing Before Initial Release for Programming
(n = 216)



Efforts are made to bring youth assigned to restrictive housing out of their rooms for school and other activities throughout the day. As seen in Figure 3.1, youth are programming outside of their rooms in 45 minutes or less time in 83% of all restrictive housing incidents, including the 31% of incidents when youth are engaged in programming within 30 minutes of their initial assignment to restrictive housing. Figure 3.2 indicates that for youth in restrictive housing for 240+ minutes, they initially re-engage with programming in 15 - 30 minutes in 35% of the incidents and within 45 minutes in 76% of the events. As discussed above in the section on Access to Education, if two or more youth are in restrictive housing for fighting or other disruptive behavior, split programming is often used to maximize the time both youth have outside their rooms for school and programming activities. When youth are in their room for longer periods before first being allowed out to participate in activities, it most often is a function of needing to keep the youth separated, with one youth waiting for their turn to be released for a programming opportunity, at which point the other youth returns to their room.

As of Q1 2025, there were approximately 40 programs available for youth detained at the CCFJC, in addition to SPS educational services and medical, mental health, and psychiatric services. Some programs are administered on a contractual basis or through an MOU with individual community

organizations, and others are offered by community volunteers and DAJD staff. Activities cover such diverse topics as physical fitness, trauma informed poetry writing, theatre skills, financial wellness, healthy relationships, songwriting and recording, alternatives to violence, college and career competency, sexual education, graphic design, chess, Alcoholics Anonymous, religious services and study, and visits with therapy dogs.

The monitoring team had an opportunity to observe a small sample of programs and was impressed by the providers' enthusiasm for working with the youth, the different ways providers sought to engage with youth, and how most youth appeared to enthusiastically participate in the activity. Program providers used a trauma-informed approach at times in communicating with the youth. For example, when reviewing the lyrics for a song one youth was recording in the CCFJC music studio, the provider and DAJD staff supported and guided him to revise his words from negative language and influences, and instead express his experience in a more positive and constructive way.

3. Modified Programming

The Juvenile Division operates each day with a general programming schedule that identifies mealtimes, programming times, and rest periods. "Modified programming" refers to time that juveniles are confined to their rooms when they otherwise would be engaged in regular programming, including attending school classes, participating in programming activities, or interacting with other youth in the living hall common area or courtyard. Thus, the program schedule must be modified to ensure the facility can operate safely despite short staffing. Unlike restrictive housing, which is a response to unacceptable behavior by one or more youths, modified programming is not related to youth behavior, though results in juveniles spending unscheduled time in their rooms. Modified programming can impact one or more living halls or the entire juvenile facility and results from events such as staff shortages and staff breaks.³²

As observed in the past, most modified programming in 2024 was attributable to staff breaks. JDOs and other staff receive two 15-minute breaks, and one 30-minute break during their eight-hour shift. If JDO breaks cannot be staggered due to staff shortages or other reasons, all youth return to their rooms while the JDOs assigned to a living hall takes their break. JDOs designated as "rovers" or other staff who take their breaks at a different time, handle the mandatory 15-minute room checks and related documentation. At the end of the 15- or 30-minute break, JDOs return to the living hall and youth are able to return to regular programming outside of their rooms. Thus, the amount of time an individual youth is in their room for modified programming on an average day is usually very limited, whether it is for one staff break or all three breaks throughout the shift, though when

³² During the COVID pandemic, the need to quarantine was another factor that resulted in modified programming at different points.

considered across all living halls for all detainees, the number of incidents and time can quickly add up. Also, modified programming for other reasons can result in youth being confined to their rooms for periods much longer than typical staff breaks.

3.4 DAJD Juvenile Division
April 1, 2024 - March 31, 2025
Modified Programming³³

Month	# of Days with Modified Programming by Month	Average # of Hours Per Month
April	14	1.82
May	18	2.71
June	11	2
July	20	2.05
August	19	1.32
September	13	2.06
October	22	1.69
November	10	1.13
December	1	0.75
January	0	0
February	0	0
March	0	0
Total # of Days	128	
Average # of Days/Month	10.66	
Total # of Hours		15.53
Average # of Hours/Month		1.29

Modified programming began to taper off in late 2024 and, as can be seen in table 3.2 above, youth programming was not impacted aside from the designated periods when youth return to their rooms for staff breaks. Because modified programming can be especially impactful for youth assigned to restrictive housing, adding on more time that they are confined to their rooms, it will be important to track that the trend away from modified programming seen in early 2025 continues throughout the year.

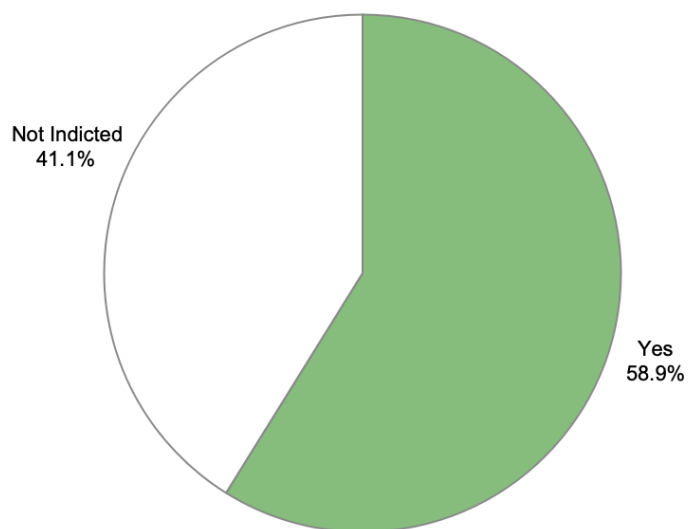
³³ Table 3.2 reflects the number of days each month when youth programming time was reduced due to short staffing, in addition to the designated periods when youth return to their rooms for staff breaks.

4. Access to Necessities, Such as Reading Material

Youth indicate that they generally have access to reading material, even if in restrictive housing. They borrow books from the CCFJC library, the SPS Language Arts Teacher, and other youth. While the July 1, 2023 - March 31, 2024, report noted the general disarray in the CCFJC library for several months when a librarian was not available to provide oversight, that problem was rectified in Q1 2024, and the space now appears organized, well stocked, and welcoming. In addition, youth have extensive reading material available to them on their computer tablets, which are generally available to them even if confined to their room for restrictive housing.

Access to reading materials is one of a number of factors that Corrections Supervisors are tasked with checking when they review the decision of a JDO to place a youth in restrictive housing and during follow-up assessments. They complete the Restrictive Housing Assessment Checklist electronically, through JMS, throughout the workday for all youth on restrictive housing. For each supervisory check on each youth in restrictive housing, the Corrections Supervisor provides a brief description of the youth's behavior at that point in time and generally notes whether the youth appears regulated, is ready to problem solve, has any questions, and the like. JMS has a drop down box to check "yes" or "no" as to the youth having access to materials, and it is to be completed whenever the Corrections Supervisor documents a required check of youth in restrictive housing. However, because supervisory review of on-going restrictive housing occurs frequently throughout the day, some Corrections Supervisors might not repeatedly document access, having already determined during an earlier check that the juvenile has reading and other necessary materials.

**3.5 DAJD Juvenile Division
April 1, 2024 - March 19, 2025
Youth in Restrictive Housing
Access to Reading Material
(*n* = 620 Incidents)**



**3.6 DAJD Juvenile Division
April 1, 2024 - March 19, 2025
Youth in Restrictive Housing for 240+ Minutes
Access to Reading Material
(*n* = 216)**

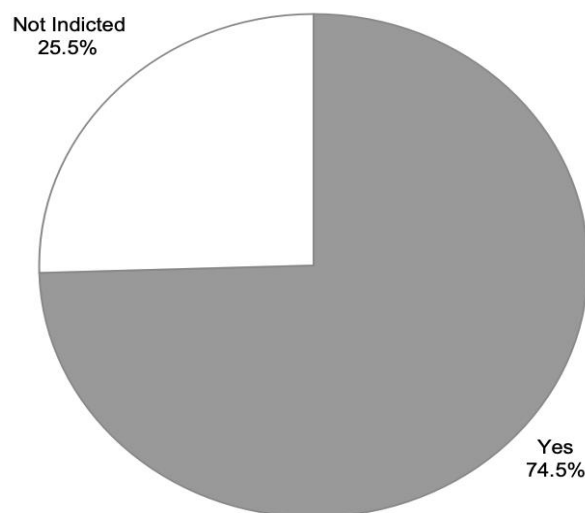


Figure 3.5 above represents the percentage of all incidents in which Corrections Supervisors documented access to reading materials for youth in restrictive housing during the current monitoring review period, while Figure 3.6 illustrates the percentage of incidents of 240+ minutes duration where access to reading materials was recorded. Supervisors documented whether youth had access to reading materials in approximately 59% of all restrictive housing incidents and 75% of those lasting 240+ minutes. While all youth in restrictive housing should have access to reading material, it is all the more important when juveniles are confined for longer periods. The 59% documentation for all incidents represents a 14% increase in the documentation of access to reading material as compared to the last evaluation period, a trend in the direction of more consistent record-keeping. The lack of documentation is most likely a function of competing work responsibilities encountered by Corrections Supervisors, as documenting a youth's access to reading materials is sometimes de-prioritized when Supervisors face more urgent demands. It is reassuring that youth, including those who have experienced restrictive housing, consistently indicate they have access to books and reading material on their tablets.

Law and DAJD policy require that youth in restrictive housing have access to other basics besides reading material, including clothing, a mattress and bedding, medication, a toilet and sink at least hourly, and any necessary mental health services. While not specifically tracked for juveniles in restrictive housing, all youth in detention at CCFJC (unless there is a concern for self-harm) have a mattress, bedding, toilet, and sink in their rooms, where restrictive housing takes place. Access to medication and mental health services is tracked through the Restrictive Housing Checklist form in JMS, where information related to mental health and medical care providers' assessments of youth in restrictive housing are to be maintained, as discussed in Section IV.A.

B. Access to Education, Programming and Necessities in the Adult Divisions

for Adult Age-Outs

Adult Age Outs (AAOs) constitute a relatively small group in the overall population of detainees in King County adult detention facilities,³⁴ and DAJD does not consider it feasible to provide AAOs with the same level of in-class education and other programming provided to youth detained at the CCFJC. As noted in the July 1, 2023 - March 31, 2024, and earlier reports, SPS provides educational services to AAOs in custody at KCCF. While in-class public school instruction is not available, teachers work with AAOs to develop individualized goals, provide written educational packets, and meet with AAOs one-on-one, approximately once a week, to review assignments and give feedback.

Eight of the 13 AAOs in custody at KCCF were interviewed, including three who had been interviewed a year earlier for the monitoring team's last report. AAOs in general report they had completed or were close to completing the work required for a high school degree or, if newer to the facility, working with teachers to determine how many more credits they needed.

DAJD provides detainees in the adult facilities, including AAOs, with access to individual computer tablets. As with the tablets available to youth housed at the CCFJC, the tablets used in the Adult Divisions have telephone capability, select reading material, and games. They provide an outlet for AAOs and a means to have more regular contact with their families, both of which might help reduce conflict and, ultimately, the need for restrictive housing.

While AAOs report they have access to necessities, such as medication, meals and reading material generally, an issue that arose during the monitoring team's most recent interviews concerned the use of Cool Down Periods, lasting up to two hours, that take place in visitor booths, as discussed in Section IV.B. AAOs who had experienced a Cool Down Period and were confined to a visitor's booth indicated they did not have access to reading material, including school related material, while there.³⁵ Even if DAJD does not view a Cool Down Period as constituting restrictive housing, the department should consider permitting AAOs to have reading and educational materials when assigned to a Cool Down Period in a visitor's booth. This might serve the goal of helping the AAO self-regulate more quickly, particularly if they are inclined to feel more agitated in such a confined space for a two-hour period of time.

VI. PROGRESS IN IMPLEMENTING RECOMMENDATIONS AND NEW RECOMMENDATIONS FOR REDUCING USE AND DURATION OF SOLITARY CONFINEMENT & FOR IMPROVING DATA COLLECTION AND REPORTING INCIDENTS OF SOLITARY CONFINEMENT (PROVISO 3.H & I)

³⁴ In April 2025, the ADP in KCCF secure detention was 814. The 13 AAOs in custody at KCCF at the time constituted approximately 1.6% of the facility's ADP.

³⁵ None of the AAOs mentioned access to medication or meals as a concern, though one said he experiences claustrophobia, which has been triggered while confined to a visitor's booth during a Cool Down Period.

Submitted along with this report is a list of recommendations made by the monitoring team beginning with the July - December 2019 report, along with notes regarding the status of each recommendation.³⁶ During that time, the monitoring team made a total of 29 recommendations, with 13 completed by DAJD, 14 in progress, and two recommendations withdrawn, as no longer relevant. The monitoring team is available to work closely with DAJD during the next restrictive housing review period to gauge the effectiveness of changes being made to help ensure data reliability, and will share any recommended adjustments in real time. One new recommendation is made for this reporting period, focused on AAOs in custody at KCCF, as discussed below.

Recommendations 1.8 and 2.5 are directed towards King County Council and address what are perhaps untended consequences as to how prohibited restrictive housing is defined under Ordinance 18637, which has been interpreted to cover situations such as youth in their rooms voluntarily, a single female in custody at the juvenile facility, and one-on-one programming between a JDO and youth used as a therapeutic step towards reintegration or to facilitate restorative problem solving. While significant progress was made during the July 2023 - March 2024 monitoring period, Ordinance revisions were not moved forward beyond the Law & Justice Committee. DAJD remains open to discussions and Councilmembers have expressed an interest in revisiting revisions to the Ordinance.

DAJD's Juvenile Division uses a multi-layered approach to behavior management that includes both incentives to encourage desirable behavior and disincentives to discourage behavior that can escalate to a level that results in restrictive housing. Recommendation 1.13 recognizes that DAJD's behavior management system is constantly being refined and improved, with the Department working to identify evidence-based practices to facilitate more youth programming and alternative means to address and divert unacceptable behavior. During the last reporting period, the Juvenile Division recruited members for a Behavior Management Workgroup dedicated to improving current behavior management strategies. Additional members joined during the current reporting period and several proposals to enhance behavior management have been submitted to Juvenile Division leadership for consideration.

In all of the monitoring reports since 2019, the monitoring team has noted inconsistencies in the descriptions of how a youth's behavior created a risk of imminent and significant physical harm requiring restrictive housing. In the last report, training and policy enforcement with Corrections Supervisors was noted as key to increasing documentation consistency with regards to behavioral indicators. During the current monitoring period, DAJD stepped up its training and ongoing support for Correction Supervisors to ensure that the specific behaviors leading to restrictive housing are

³⁶ Attachment A, Independent Monitoring Team Report: April 1, 2024 - March 31, 2025, Status of Restrictive Housing Monitoring Recommendations (Updated June 11, 2025).

documented. Restrictive housing events are now to be reviewed weekly to ensure compliance using reporting capabilities in JMS.

JDOs, Corrections Supervisors, and others stressed the importance of consistent, predictable programming throughout the week, but especially during times that are otherwise unstructured, such as on weekends. Recommendation 4.3 grew out of this concern and DAJD noted during the April 1, 2024 - March 31, 2025, reporting period that, in considering applications for program expansion, priority was given to organizations that could provide programming on weekends. Furthermore, the Juvenile Division has implemented a pilot program using a second Recreation Coordinator on Thursday - Sunday afternoons and evenings. The Division intends to review performance metrics such as use of force and behavior data to determine if the 2nd position has a positive impact operationally.

An unexpected issue that developed with the individual computer tablets provided to youth beginning in March 2024 was the approach to be used when a juvenile refused to return the tablet. Recommendation 4.4 urged DAJD, with input from JDOs and Corrections Supervisors, to develop strategies to address the problem. While implementation of this recommendation is still in progress, and different situations might require different strategic responses, if a student's tablet is a distraction (an issue that came up during recent interviews with teachers and discussed in Section V.A.1), Corrections Supervisors now can turn off individual tablets remotely.

Recommendation 3.4 suggested that the Juvenile Division, with input from staff, explore the option of making living hall assignments based on age and developmental stage of youth detainees. DAJD informed the monitoring team during the current review period that it is planning to implement a new classification model which will have youth housed by age and developmental stage in June 2025, when the current school year ends.

As programming increased in the Juvenile Division over the past year, an issue was raised by JDOs that at least some activities should be mandatory and that individual activities should be evaluated regularly regarding whether they should be compulsory. The Juvenile Division has made programs mandatory if held outside of the living halls and is still developing a final approach to determine which programs held inside the living halls should/should not be compulsory.

A few final recommendations on which progress has been made by DAJD are directed towards improving the restrictive housing documentation function, improving data accuracy, and setting up a quality assurance process. The advantages to robust data analysis is the focus of Recommendation 1.12, which encourages DAJD to more fully explore the data analytic capacities of JMS, now that various datasets have been integrated into the system. DAJD recently reported that some datasets

are now linked through JMS, others are not, so realizing the full potential of JMS is still in progress. However, of particular significance to documenting and tracking restrictive housing incidents, nine new reports were created to verify that all required checks and assessments have been completed by appropriate staff. Corrections Supervisors also have noted that JMS could be made more user friendly. Recommendations 3.1 and 4.1 were made to encourage DAJD to work with Supervisors so they understand the purpose for collecting each type of data required and so management and those who program JMS appreciate what it is about the current process that particularly frustrates users. DAJD indicated that it has developed reports and dashboards specifically for Corrections Supervisors, Chiefs, and others who are responsible for restrictive housing oversight and that training has been provided to help Supervisors better understand use of the reports and dashboards, along with restrictive housing monitoring requirements. Also, short cuts were identified to simplify data entry and to help with accuracy. Ongoing JMS support is available thru a designated staff person.

Recommendation 3.3 was made to encourage DAJD to adopt electronic room check technology, to eliminate the need for hard copy tracking of youth location and activity, which is monitored and recorded every 15 minutes during non-sleep hours. Electronic security checks and movements were fully implemented as of March 17, 2025.

Recommendation 3.2 was aimed at the need for more data quality assurance and initially was made after the Chief of Operations, who had provided a level of quality assurance, retired during the reporting period April 2022 - June 2023. As discussed in Section III above, another staff person who had made significant contributions to quality assurance left DAJD shortly before the beginning of the current reporting period. The sample of data collection problems discussed in Section III underscores the need for quality assurance and DAJD has proposed a process that includes daily review of restrictive housing assessments by shift, weekly review by the Chief, and monthly review by the Juvenile Division data analyst. The monitoring team is optimistic that with these and other changes that have been implemented, DAJD will not encounter the same level of restrictive housing data reliability issues it experienced during this reporting period.

Regarding recommendations directed towards supporting AAOs in the Adult Divisions facilities, Recommendation 2.6 encouraged DAJD to consider ways to improve the system used by those in custody to learn about and participate in educational and programming opportunities. The system in place relies upon the use of hard copy forms called "kites." Over the last year, computer tablets were made available in the adult facilities, as previously discussed with regards to juvenile detention, that include some programming options. In the coming months, DAJD intends to move the hard copy kite process to the tablets, which should make it easier for inmates, including AAOs, to submit an educational or programming request and for both the Department and inmates to update information and communicate more quickly and efficiently.

The only new recommendation made for the current reporting period is directed towards KCCF's use of visitors booths for two hour Cool Down Periods, which AAOs might experience instead of a longer restrictive housing assignment or prior to a move into restrictive housing. As discussed in Section V.B., AAOs do not have access to reading or educational material when confined to a visitors booth during a Cool Down Period. Though a Cool Down Period is not defined as restrictive housing under Adults Divisions policy, it is recommended that AAOs have access to reading material when restricted to such a confined space for up to two hours (and possibly longer under certain circumstances).

VII. CERTIFICATION OF 90% DOCUMENTATION FOR CATEGORIES OF INFORMATION REQUIRED BY PROVISO 3B - F, OR DAJD EXPLANATION WHY NOT MEET 90% GOAL (PROVISO 3.J.1 & 2)

Proviso 3 requires that the monitoring team certify that at least 90% of restrictive housing incidents were appropriately documented for each category of information described in Proviso 3B - 3F. Because the 90% documentation standard was not met, the following is an explanation from the department, which is required to be included in this report under Proviso 3.J.2.

The Department of Adult and Juvenile Detention (DAJD) recognizes that documentation associated with the placement of youth in restrictive housing has not met the 90% compliance standard set forth in Proviso 3.J.1 & 2 during the most recent reporting period. The Department takes this matter seriously and appreciates the opportunity to provide context regarding the operational challenges contributing to this issue. DAJD is confident that assessments are completed while youth are in restrictive housing. Medical providers conduct twice-daily interactions with each youth during medication distribution, while mental health staff regularly engage with youth in every living unit. In addition, a daily multidisciplinary team meeting is held, during which key stakeholders review the status of each youth in restrictive housing and assess overall facility operations.

As discussed in this and previous reports, the processes required to document restrictive housing placements are labor-intensive and time-sensitive, especially given the episodic and often unpredictable nature of these events. During this and previous reporting periods, Detention Supervisors were responsible for the data entry for all assessments, including those provided by mental health and medical providers. This documentation often competed with other critical operational duties such as training, coaching, direct supervision of detention operations, and assisting juvenile detention officers in de-escalation efforts. The Juvenile Division recently reassigned the data entry duties so that health clinic staff enter assessment information for those completed by mental health and medical providers. DAJD has also created several reports in JMS that facilitates

daily, weekly, and monthly review of restrictive housing documentation. These changes will greatly improve adherence to the documentation compliance standard.

During this period, DAJD experienced a significant increase in the overall population, including a rise in the number of youth charged as adults. These youth typically remain in custody for longer durations, which often correlates with a higher incidence of restrictive housing events. Additionally, the division has undergone a period of significant staffing transition, with many new employees across all levels, including detention officers, supervisors, and managers.

DAJD acknowledges that prior monitoring reports have consistently identified opportunities to refine the existing ordinance language to mitigate operational challenges. The department remains committed to working in partnership with the Council to explore and implement adjustments that uphold accountability while supporting practical and sustainable implementation within the facility.

VIII. CONCLUSION

While there were a number of issues impacting the reliability of data documenting the use of restrictive housing during the reporting period April 1, 2024 - March 31, 2025, DAJD has instituted a number of operational changes aimed at improving the documentation process moving forward. New Juvenile Division leadership team members have deep experience in evidence-based and trauma-informed strategies for detained youth behavior management and organizational change management and will be instrumental in ensuring that the systems being put into place will provide data quality assurance.

Robust programming is vital in keeping youth active and engaged and contributes to reduction of tension and conflict. King County Council's inclusion of funds in the 2025 Annual Budget for DAJD to convert the Community Services Coordinator and Gang Intervention Specialist contract positions into permanent positions, along with budgeting for community service provider contracts, gave DAJD the means to ensure predictable and consistent programming for detained youth. Concerted efforts are made to ensure youth assigned to restrictive housing are regularly outside of their rooms for school and other programming activities throughout the day.

DAJD continually reviews alternative approaches to deterring and responding to conflict among youth that can result in restrictive housing. For example, a workgroup is meeting regularly to consider different behavior management strategies and a new classification model for living hall assignments is being implemented that will house youth by age and developmental stage. While these steps might help create conditions to avoid the need for restrictive housing, they also serve other goals for supporting youth in detention.

All DAJD staff have consistently been forthcoming and collaborative with the restrictive housing monitoring team. As concerns with documentation data were raised with DAJD during the current reporting period, staff were open in discussing what could and could not be reasonably accomplished in an attempt to reconcile the data for April 1, 2024 - March 31, 2025. While DAJD has implemented a number of changes aimed at improving restrictive housing related documentation, the Department likely will need to adjust some approaches as data for the next reporting period is reviewed. The monitoring team will be available where it would be useful to consider the team's perspective regarding the data and the on-going changes being made.

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