



# King County

1200 King County  
Courthouse  
516 Third Avenue  
Seattle, WA 98104

## Meeting Agenda Law and Justice Committee

**Councilmembers:**  
*Jorge L. Barón, Chair;*  
*Claudia Balducci, Vice-Chair;*  
*Rod Dembowski, Teresa Mosqueda*

**Lead Staff:** Leah Krekel-Zoppi (206-477-0892)  
**Committee Clerk:** Gabbi Williams (206-477-7470)

9:30 AM

Wednesday, September 3, 2025

Hybrid Meeting

**Hybrid Meetings:** Attend King County Council committee meetings in person in Council Chambers (Room 1001), 516 3rd Avenue in Seattle, or through remote access. Details on how to attend and/or provide comment remotely are listed below.

Pursuant to K.C.C. 1.24.035 A. and F., this meeting is also noticed as a meeting of the Metropolitan King County Council, whose agenda is limited to the committee business. In this meeting only the rules and procedures applicable to committees apply and not those applicable to full council meetings.

**HOW TO PROVIDE PUBLIC COMMENT:** The Law and Justice Committee values community input and looks forward to hearing from you on agenda items.

There are three ways to provide public comment:

1. In person: You may attend the meeting and provide comment in the Council Chambers.
2. By email: You may comment in writing on current agenda items by submitting your email comments to [kcccomitt@kingcounty.gov](mailto:kcccomitt@kingcounty.gov). If your email is received before 11:30 a.m. on the day of the meeting, your email comments will be distributed to the committee members and appropriate staff prior to the meeting.
3. Remote attendance at the meeting by phone or computer: You may provide oral comment on current agenda items during the meeting's public comment period by connecting to the meeting via phone or computer using the ZOOM application at <https://zoom.us/join> and entering the Webinar ID number below.



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TTY Number - TTY 711.  
Council Chambers is equipped with a hearing loop, which provides a wireless signal that is picked up by a hearing aid when it is set to 'T' (Telecoil) setting.



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Via phone by calling 1 253 215 8782 and entering the webinar ID above.

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- 2) Watch King County TV on Comcast Channel 22 and 322(HD) and Astound Broadband Channels 22 and 711(HD).
- 3) Listen to the meeting by telephone see "Connecting to the Webinar" above.

To help us manage the meeting, if you do not wish to be called upon for public comment, please use the Livestream or King County TV options listed above, if possible, to watch or listen to the meeting.

1. **Call to Order**

2. **Roll Call**

3. **Approval of Minutes** p. 4

*July 29, 2025 meeting minutes*

4. **Public Comment**

To show a PDF of the written materials for an agenda item, click on the agenda item below.



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## Discussion and Possible Action

5. [Proposed Motion No. 2025-0201](#) p. 9

A MOTION acknowledging receipt of a report on the results of an analysis of racial disparities in response to infractions as required by the 2025 Annual Budget Ordinance, Ordinance 19861, Section 54, Proviso P1.

**Sponsors:** Barón

*Leah Krekel-Zoppi, Council staff*

6. [Proposed Motion No. 2025-0220](#) p. 31

A MOTION acknowledging receipt of a plan for use of the west wing of the King County Correctional Facility as an area to provide alternatives to secure detention services as required by the 2025 Annual Budget Ordinance, Ordinance 19861, Section 54, Proviso P2.

**Sponsors:** Barón

*Leah Krekel-Zoppi, Council staff*

7. [Proposed Motion No. 2025-0206](#) p. 61

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

**Sponsors:** Barón

*Leah Krekel-Zoppi, Council staff*

## Other Business

## Adjournment



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## Meeting Minutes Law and Justice Committee

**Councilmembers:**  
*Jorge L. Barón, Chair;*  
*Claudia Balducci, Vice-Chair;*  
*Rod Dembowski, Teresa Mosqueda*

**Lead Staff:** Leah Krekel-Zoppi (206-477-0892)  
**Committee Clerk:** Gabbi Williams (206-477-7470)

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9:30 AM

Tuesday, July 29, 2025

Hybrid meeting

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### DRAFT MINUTES - SPECIAL MEETING

1. **Call to Order**

*Chair Barón called the meeting to order at 9:30 a.m.*

2. **Roll Call**

**Present:** 4 - Balducci, Barón, Dembowski and Mosqueda

3. **Approval of Minutes**

*Councilmember Dembowski moved approval of the minutes of the June 4, 2025 meeting. Seeing no objections, the minutes were approved.*

4. **Public Comment**

*The following individuals were present to provide public comment:  
Alex Tsimmerman*

### Discussion and Possible Action

5. **[Proposed Motion No. 2025-0188](#)**

A MOTION confirming the executive's appointment of Betelhem Michael, who resides in council district one, to the King County human and civil rights commission.

*Erica Newman, Council staff, briefed the committee. Betelhem Michael, appointee to the King County Human and Civil Rights Commission, provided comments on their background and interest on serving on the commission.*

**A motion was made by Councilmember Dembowski that this Motion be Recommended Do Pass Consent. The motion carried by the following vote:**

**Yes:** 4 - Balducci, Barón, Dembowski and Mosqueda

**6. [Proposed Motion No. 2025-0189](#)**

A MOTION confirming the executive's appointment of Emily Huynh, who resides in council district two, to the King County human and civil rights commission, representing a member who has familiarity with King County government, systems, or agencies.

*Erica Newman, Council staff, briefed the committee. Emily Huynh, appointee to the King County Human and Civil Rights Commission, provided comments on their background and interest on serving on the commission.*

**A motion was made by Councilmember Dembowski that this Motion be Recommended Do Pass Consent. The motion carried by the following vote:**

**Yes:** 4 - Balducci, Barón, Dembowski and Mosqueda

**7. [Proposed Motion No. 2025-0190](#)**

A MOTION confirming the executive's appointment of Allison Hastings, who resides in council district three, to the King County human and civil rights commission.

*Erica Newman, Council staff, briefed the committee. Allison Hastings, appointee to the King County Human and Civil Rights Commission, provided comments on their background and interest on serving on the commission.*

**A motion was made by Councilmember Dembowski that this Motion be Recommended Do Pass Consent. The motion carried by the following vote:**

**Yes:** 4 - Balducci, Barón, Dembowski and Mosqueda

**8. [Proposed Motion No. 2025-0191](#)**

A MOTION confirming the executive's appointment of Jacob Joens-Poulton, who resides in council district four, to the King County human and civil rights commission.

*Erica Newman, Council staff, briefed the committee. Jacob Joens-Poulton, appointee to the King County Human and Civil Rights Commission, provided comments on their background and interest on serving on the commission.*

**A motion was made by Councilmember Dembowski that this Motion be Recommended Do Pass Consent. The motion carried by the following vote:**

**Yes:** 4 - Balducci, Barón, Dembowski and Mosqueda

**9. [Proposed Motion No. 2025-0192](#)**

A MOTION confirming the executive's appointment of Aneeka Ferrell, who resides in council district five, to the King County human and civil rights commission, representing a member who has experience with investigations and enforcement of either human or civil rights or both.

*Erica Newman, Council staff, briefed the committee. Aneeka Ferrell, appointee to the King County Human and Civil Rights Commission, provided comments on their background and interest on serving on the commission.*

**A motion was made by Councilmember Dembowski that this Motion be Recommended Do Pass Consent. The motion carried by the following vote:**

**Yes:** 4 - Balducci, Barón, Dembowski and Mosqueda

**10. [Proposed Motion No. 2025-0193](#)**

A MOTION confirming the executive's appointment of Jennifer Karls, who resides in council district six, to the King County human and civil rights commission, representing a member with professional or lived experience in the disability community.

*Erica Newman, Council staff, briefed the committee. Jennifer Karls, appointee to the King County Human and Civil Rights Commission, provided comments on their background and interest on serving on the commission.*

**A motion was made by Councilmember Dembowski that this Motion be Recommended Do Pass Consent. The motion carried by the following vote:**

**Yes:** 4 - Balducci, Barón, Dembowski and Mosqueda

**11. [Proposed Motion No. 2025-0194](#)**

A MOTION confirming the executive's appointment of Mona Jaber, who resides in council district seven, to the King County human and civil rights commission.

*Erica Newman, Council staff, briefed the committee. Mona Jaber, appointee to the King County Human and Civil Rights Commission, provided comments on their background and interest on serving on the commission.*

**A motion was made by Councilmember Dembowski that this Motion be Recommended Do Pass Consent. The motion carried by the following vote:**

**Yes:** 4 - Balducci, Barón, Dembowski and Mosqueda

**12. [Proposed Motion No. 2025-0195](#)**

A MOTION confirming the executive's appointment of Bishop Steven Sawyer, who resides in council district eight, to the King County human and civil rights commission.

*Erica Newman, Council staff, briefed the committee. Bishop Steven Sawyer, appointee to the King County Human and Civil Rights Commission, provided comments on their background and interest on serving on the commission.*

**A motion was made by Councilmember Dembowski that this Motion be Recommended Do Pass Consent. The motion carried by the following vote:**

**Yes:** 4 - Balducci, Barón, Dembowski and Mosqueda

**13. [Proposed Motion No. 2025-0196](#)**

A MOTION confirming the executive's appointment of Daisy Wong, who resides in council district nine, to the King County human and civil rights commission.

*Erica Newman, Council staff, briefed the committee. Daisy Wong, appointee to the King County Human and Civil Rights Commission, provided comments on their background and interest on serving on the commission.*

**A motion was made by Councilmember Dembowski that this Motion be Recommended Do Pass Consent. The motion carried by the following vote:**

**Yes:** 4 - Balducci, Barón, Dembowski and Mosqueda

**14. [Proposed Motion No. 2025-0203](#)**

A MOTION confirming the executive's appointment of Vanessa Sanchez-Mexicano, who resides in council district eight, to the King County human and civil rights commission.

*Erica Newman, Council staff, briefed the committee. Vanessa Sanchez-Mexicano, appointee to the King County Human and Civil Rights Commission, provided comments on their background and interest on serving on the commission.*

**A motion was made by Councilmember Dembowski that this Motion be Recommended Do Pass Consent. The motion carried by the following vote:**

**Yes:** 4 - Balducci, Barón, Dembowski and Mosqueda

**15. [Proposed Motion No. 2025-0167](#)**

A MOTION confirming the executive's appointment of Lane Loland, who resides in council district one, to the King County community advisory committee on law enforcement oversight, as a representative from King County sheriff contract cities.

*The appointee withdrew their name from consideration.*

**This matter was Lapsed**

**16. [Proposed Motion No. 2025-0170](#)**

A MOTION confirming the executive's appointment of Jonathan Deex, who resides in council district nine, to the King County community advisory committee on law enforcement oversight, as a representative from King County sheriff contract cities.

*Leah Krekel-Zoppi, Council staff, briefed the committee. Jonathan Deex, appointee to the King County Community Advisory Committee of Law Enforcement Oversight, provided comments on their background and interest on serving on the committee.*

**A motion was made by Councilmember Balducci that this Motion be Recommended Do Pass Consent. The motion carried by the following vote:**

**Yes:** 4 - Balducci, Barón, Dembowski and Mosqueda

**17. [Proposed Ordinance No. 2025-0216](#)**

AN ORDINANCE related to civil immigration enforcement; amending Ordinance 18665, Section 1, as amended, and K.C.C. 2.15.005, and adding a new section to K.C.C. chapter 2.15.

*Melissa Bailey, Council Staff, briefed the committee and answered questions. Alison Holcomb, Deputy General Counsel, Executive's Office, also addressed the committee and answered questions from the members.*

*Councilmember Balducci moved Amendment 1. The Amendment was adopted. Councilmember Balducci moved Title Amendment T1. The Amendment was adopted.*

**A motion was made by Councilmember Balducci that this Ordinance be Recommended Do Pass Consent. The motion carried by the following vote:**

**Yes:** 4 - Balducci, Barón, Dembowski and Mosqueda

**18. Proposed Motion No. 2025-0207**

A MOTION acknowledging receipt of a report on the status of safety improvements at adult detention facilities as required by the 2025 Annual Budget Ordinance, Ordinance 19861, Section 54, Proviso P5.

*Leah Krekel-Zoppi, Council Staff, briefed the committee. Steve Larsen, Deputy Director, Department of Adult and Juvenile Detention, and Mohamed Eltayeb, Facility Commander, Maleng Regional Justice Center - Kent, also addressed the committee and answered questions from the members.*

**A motion was made by Councilmember Balducci that this Motion be Recommended Do Pass Consent. The motion carried by the following vote:**

**Yes:** 4 - Balducci, Barón, Dembowski and Mosqueda

**Adjournment**

*The meeting was adjourned at 11:02 a.m.*

Approved this \_\_\_\_\_ day of \_\_\_\_\_

\_\_\_\_\_  
Clerk's Signature



## King County

### Metropolitan King County Council Law and Justice Committee

#### STAFF REPORT

<b>Agenda Item:</b>	5	<b>Name:</b>	Leah Krekel-Zoppi
<b>Proposed No.:</b>	2025-0201	<b>Date:</b>	September 3, 2025

#### SUBJECT

A proposed motion acknowledging receipt of a report on the results of an analysis of racial disparities in response to infractions in adult detention, as required by proviso P1, Section 54 in the 2025 Annual Budget ordinance.

#### SUMMARY

Proposed Motion 2025-0201 responds to a proviso included in the 2025 Annual Budget requiring an analysis of racial disparities in response to infractions in adult detention. The proviso was added to the budget as follow up to a recommendation in a Jail Safety Audit undertaken by the King County Auditor's Office in 2021.

The report transmitted with the proposed motion includes information on the way that infractions are classified and adjudicated in adult detention, and the types of sanctions imposed. The report states that 5,005 infractions were issued in adult detention in 2024. The report analyzed both infractions issued and the most common sanction, days in disciplinary segregation, for racial disparities and found no significant disparities. However, Council staff found discrepancies in the underlying data published in the report, which were not able to be clarified before publication of this staff report, so Council staff is unable to verify that the analyses were based on accurate data.

The report states that the Department of Adult and Juvenile Detention (DAJD) applies an equity lens to the department's work, and that the department is implementing a data warehouse project that will enhance DAJD's ability to monitor, analyze, and report on key data about detention operations.

#### BACKGROUND

**King County Adult and Juvenile Detention.** King County's Department of Adult and Juvenile Detention (DAJD) operates three detention facilities as well as community supervision programs. King County's secure detention facilities are located at the King County Correctional Facility (KCCF) in downtown Seattle, the Maleng Regional Justice Center (MRJC) in Kent, and the Judge Patricia H. Clark Child and Family Justice Center (CCFJC) in Seattle's First Hill neighborhood, which houses juveniles.

The county's secure detention facilities house pre-trial individuals who have been arrested or had charges filed and are awaiting adjudication of their cases in King County Superior Court or District Court, or who are awaiting state psychiatric competency restoration services. King County also houses post-trial individuals who have been sentenced to secure detention for less than a year. Individuals in the county's custody who receive sentences that exceed one year are transferred to the state correctional system.

In 2024, annual bookings into adult detention were over 15,000, and the average daily population (ADP) was 1,407.<sup>1</sup>

DAJD also operates alternatives to detention for those eligible as determined by the courts. Alternatives to detention include community corrections programs and electronic home detention. Community corrections programs allow individuals to stay in community and access services while awaiting adjudication of their cases. The ADP for electronic home detention was 354 in 2024.

**Behavior Management in Adult Detention.** According to DAJD, every resident of King County's adult detention facilities receives a Resident Information Handbook that includes rules of behavior. Rules are also posted in all housing units.

DAJD classifies violations of rules of behavior into three levels of seriousness: general, serious, and major. General infractions, being the least consequential rule violations, are subject to disciplinary actions including loss of commissary, loss of visitation, or loss of good time credits.<sup>2</sup> Serious infractions include violations such as fighting and flooding housing units and are subject to sanctions of between three to seven days of disciplinary segregation and loss of good time credits. Major infractions are the most consequential rule violations and include assaulting a staff member or resident, arson, and possession of weapons. The sanction for major violations is up to ten days in disciplinary segregation.

General infractions are resolved by Corrections Officers through written warnings and onsite sanctions, which are sanctions imposed at the time of the infraction and within the resident's housing unit, rather than following a disciplinary hearing. Serious and major infractions are adjudicated through a hearing that involves the resident, officer or other staff members, and potential witnesses. Residents have an opportunity to appeal disciplinary sanctions issued from disciplinary hearings, and classification supervisors review the hearing results. Infractions and disciplinary results are documented in DAJD's Jail Management System (JMS).

**2021 Jail Safety Audit.** In 2021, the King County Auditor's Office released an audit entitled, "Adult Jails Needs Risk-Based Approach to Improve Safety, Equity."<sup>3</sup> The audit included findings related to improving risk management, reducing rates of fights and assaults, caring for people with serious mental illness housed outside of psychiatric

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<sup>1</sup> [2024-12-kc-dar-scorecard.pdf](#)

<sup>2</sup> According to DAJD, good time credits are given to residents who maintain good behavior in detention and result in a reduction in time served in jail.

<sup>3</sup> [Adult Jails Need Risk-Based Approach to Improve Safety, Equity - King County](#)

housing due to capacity constraints, and reducing racial disparities in housing and discipline. The audit included 25 recommendations, including:

- Using a risk-based approach to improving jail safety,
- Avoiding housing people in two-people cells,
- Increasing the number of suicide-resistant cells,
- Enhancing communication and training to better care for people with mental illness, and
- Reducing racial inequities in housing and discipline.

The Auditor's Office issued a follow-up report on August 1, 2022, showing that of the 25 recommendations, four have been fully implemented, 16 have been partially implemented, four remain unresolved, and one is no longer applicable.

In September 2024, the King County Auditor's Office issued a High-Risk List to King County Councilmembers,<sup>4</sup> identifying outstanding audit concerns on items that the County Auditor believes pose substantial risk. For DAJD, this included items from the 2021 Jail Safety Audit:

- Evaluating the risk-scoring system for bias and adjusting it as needed to reduce racial disparities,
- Reviewing infractions and sanctions data by race to detect racial disparities at least annually and taking steps to reduce any disparities, and
- Developing a plan to manage the population in county jails with the goal of no double-bunking of cells.

In response, Executive staff noted that DAJD reviewed the agency's classification system for racial bias in 2023 and also last performed a racial disparity analysis on responses to infractions in 2023.

Additionally, DAJD and the Executive do not agree with the Auditor's recommendation for single bunking. Executive staff state that single bunking is not an efficient use of limited jail staffing and facility space and is less safe for many low classification residents because of the increased isolation from peers. Executive staff instead states that a better approach to safety is to use single and double bunking strategically based on residents' classification levels.

**Analysis of Racial Disparities in Response to Infractions Proviso.** The King County Council included Proviso P1, Section 54 in the county's 2025 Budget<sup>5</sup> requiring a report on the results of an analysis of racial disparities in response to infractions in adult detention. The proviso states:

*Of this appropriation, \$50,000 shall not be expended or encumbered until the executive transmits a report on the results of an analysis of racial disparities in response to infractions in adult detention and a motion that should acknowledge receipt of the report, and a motion acknowledging receipt of that report is passed by the council. The motion should reference the subject matter, the proviso's ordinance,*

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<sup>4</sup> [High-risk-2024.pdf \(kingcounty.gov\)](#)

<sup>5</sup> Ordinance 19861

ordinance section, and proviso number in both the title and body of the motion.

The report shall include, but not be limited to:

A. Disaggregated data on all infractions and responses to infractions, including, but not limited to, restrictive housing placements, in adult detention in 2024;

B. An analysis of those infractions and responses to infractions by race;

C. Discussion of any racial disparities found in the analysis of infractions and responses to infractions by race, and identification of actions or planned actions that will be taken in an effort to reduce any racial disparities found in the analysis; and

D. A discussion of whether and how frequently the department of adult and juvenile detention intends to conduct future analyses of racial disparities in response to infractions in adult detention.

The executive should electronically file the report and a motion required by this proviso by June 30, 2025, with the clerk of the council, who shall retain an electronic copy and provide an electronic copy to all councilmembers, the council chief of staff, and the lead staff for the law and justice committee or its successor.

**ANALYSIS**

Adoption of Proposed Motion 2025-0201 would acknowledge receipt of the Department of Adult and Juvenile Detention Report of the Analysis of Racial Disparities to Infractions, June 2025. It would also satisfy the requirements of Proviso P1, Section 54, Ordinance 19861 and release \$50,000 in the DAJD budget to be spent or encumbered. Following is a summary of the report as it responds to the proviso requirements.

**Data on Infractions and Responses to Infractions.** The report states that DAJD issued, investigated, and sanctioned or dismissed 5,005 infractions in adult detention in 2024. As provided in the report, Table 1 includes the total number and classification of infractions, broken down by facility. Note that while this table shows six major infractions in 2024, when asked by Council staff to clarify discrepancies in the report, DAJD stated there were 276 major infractions in 2024. Council staff was not able to obtain further clarification by the time of publication of this staff report.

**Table 1. Infractions in KC Adult Detention in 2024**

Facility	General Infraction	Serious Infraction	Major Infraction
KCCF	1,492	362	5
MRJC	2,708	437	1

The report also shows a breakdown of the infractions data by gender, age, and race.

Additionally, the report provides a breakdown of the sanctions imposed for various infractions. Sanctions are categorized as written warnings, onsite sanctions (sanctions that immediately follow the infraction), and sanctions imposed after disciplinary hearings. Infractions, particularly serious and major infractions, can result in multiple infractions, such as an onsite sanction followed later by a number of days in disciplinary segregation. Table 2, based on data from the report, shows specific sanctions by category and infraction type.

Note that there is a discrepancy in the number of major infractions shown in Table 2 compared to Table 1 of this staff report. Council staff was unable to obtain clarity for this discrepancy by the time of publication of this staff report.

**Table 2. 2024 Sanctions Imposed**

<b>Sanction Type</b>	<b>General Infraction</b>	<b>Serious Infraction</b>	<b>Major Infraction</b>
Written Warning	145	28	
<b>Onsite Sanctions</b>			
2-Hour Rack-Back <sup>6</sup>	2,346	274	1
Cool Down Period	20	18	
Loss of Dayroom Access <sup>7</sup>	1,391	381	5
Other	298	98	
<b>Sanctions Imposed Following Disciplinary Hearing</b>			
Behavior Modification		7	
Disciplinary Segregation	3	1,878	246
Loss of Commissary		9	1
Loss of Good Time Credit		75	85
Loss of Program Privileges	1	59	4
Loss of Visitation		6	
Other		44	5
Program Removal		3	
Restitution		34	3
Verbal Warning		124	9
Written Warning		83	13

**Racial Analysis of Infractions and Results.** The report analyzed the relationship between the distribution of infractions by the perpetrator's race and the average daily population broken down by race. Because Council staff was unable to obtain clarification about discrepancies in the underlying data before publication of this staff report, Council staff was unable to verify that this analysis is based on accurate data.

<sup>6</sup> For residents in general population housing who have dayroom access with the general population.

<sup>7</sup> For residents in segregated housing who receive dayroom access by themselves.

**Table 3. 2024 DAJD Average Daily Population and Infraction Distribution by Race**

<b>Race</b>	<b>ADP</b>	<b>Infractions</b>	<b>Delta</b>
<b>American Indian</b>	2.2%	2.3%	-0.1
<b>Asian</b>	6.3%	5.6%	0.7
<b>Black</b>	37.7%	41.3%	-3.6
<b>Hispanic</b>	12.1%	8.5%	3.6
<b>Other/Unknown</b>	4.0%	4.0%	0.0
<b>White</b>	37.8%	37.2%	0.6

The report states that days in disciplinary segregation is by far the most frequently imposed sanction for serious and major infractions. The report provides an analysis of the average number of days of disciplinary segregation imposed for serious and major violations, broken down by the race of the resident involved, shown in Table 4. Because Council staff was unable to obtain clarification about discrepancies in the underlying data before publication of this staff report, Council staff is unable to verify that the analyses in Tables 3 and 4 are based on accurate data.

Additionally, while the analysis provided by DAJD in Table 3 looks at the breakdown of all infractions by race, the Jail Safety Audit raised concerns about racial disparities in the issuance of serious infractions.<sup>8</sup> A racial disparities analysis of serious infractions was not provided in this report.

**Table 4. 2024 Average Days of Disciplinary Segregation by Race**

<b>Race</b>	<b>Average Days of Disciplinary Segregation for Serious Violations</b>	<b>Average Days of Disciplinary Segregation for Major Violations</b>
American Indian	4.4	9.4
Asian	4.5	8.3
Black	5.0	8.7
Hispanic	4.7	9.3
Other/Unknown	5.0	9.3
White	4.8	8.7

**Discussion of Any Racial Disparities.** The report states that the largest racial disparity in the number of days in disciplinary segregation for serious infractions is just over half of a day. The largest racial disparity in the number of days in disciplinary segregation for major infractions is just over one day. Again, Council staff was not able to verify the accuracy of the data used in these analyses by the time of staff report publication.

The report states that DAJD found no significant racial disparity in the number of infractions or the resulting number of days in disciplinary segregation. DAJD states that this is consistent with findings from racial analyses conducted in 2021 and 2022. The report also states that, “The Department strives to apply an equity lens to all its work, including the performance and operational data that it monitors.”

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<sup>8</sup> Adult Jails Need Risk-Based Approach to Improve Safety, Equity - King County, pg. 34

**Plans for Future Analyses.** The report states that DAJD is implementing a project to build a data warehouse that will enhance DAJD's data analysis and reporting. The project will include data dashboards with commonly requested data, including use of force, restrictive housing, and infractions. The report states that the dashboards will enhance DAJD's ability to monitor data in real time. The data warehouse project is projected to be completed in 2026.

### **INVITED**

- Jennifer Albright, Deputy Chief of Administration, Department of Adult and Juvenile Detention

### **ATTACHMENTS**

1. Proposed Motion 2025-0201 (and its attachments)
2. Transmittal Letter



**KING COUNTY**  
**Signature Report**

ATTACHMENT 1  
1200 King County Courthouse  
516 Third Avenue  
Seattle, WA 98104

**Motion**

**Proposed No. 2025-0201.1**

**Sponsors Barón**

1 A MOTION acknowledging receipt of a report on the  
2 results of an analysis of racial disparities in response to  
3 infractions as required by the 2025 Annual Budget  
4 Ordinance, Ordinance 19861, Section 54, Proviso P1.

5 WHEREAS, the 2025 Annual Budget Ordinance, Ordinance 19861, Section 54,  
6 Proviso P1, requires the executive to transmit a report on the results of an analysis of  
7 racial disparities in response to infractions, accompanied by a motion that should  
8 acknowledge receipt of the applicable report, and

9 WHEREAS, Ordinance 19861, Section 54, Proviso P1, states that the report and  
10 the motion should be transmitted no later than June 30, 2025, and

11 WHEREAS, Ordinance 19861, Section 54, Proviso P1, provides that \$50,000  
12 shall not be expended or encumbered until the executive transmits both the report and the  
13 motion, and the motion acknowledging receipt is passed, and

14 WHEREAS, upon passage of the motion, \$50,000 shall be released for  
15 expenditure or encumbrance, and

16 WHEREAS, the council has acknowledged receipt of the report transmitted by the  
17 executive;

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

19 The receipt of a report on the results of an analysis of racial disparities in response  
20 to infractions, entitled King County Department of Adult and Juvenile Detention Report

21 on the Analysis of Racial Disparities in Response to Infractions, Attachment A to this  
22 motion, is hereby acknowledged in accordance with 2025 Annual Budget Ordinance,  
23 Ordinance 19861, Section 54, Proviso P1.

KING COUNTY COUNCIL  
KING COUNTY, WASHINGTON

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Girmay Zahilay, Chair

ATTEST:

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Melani Pedroza, Clerk of the Council

APPROVED this \_\_\_\_ day of \_\_\_\_\_, \_\_\_\_.

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Shannon Braddock, County Executive

**Attachments:** A. Department of Adult and Juvenile Detention (DAJD) Report on the Analysis of Racial Disparities in Response to Infractions, June 2025

**Department of Adult and Juvenile Detention**  
**Report on the Analysis of Racial Disparities in Response to Infractions**

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June 2025



**King County**

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## II. Proviso Text

Ordinance 19861, Section 54, Department of Adult and Juvenile Detention P1<sup>1</sup>:

Of this appropriation, \$50,000 shall not be expended or encumbered until the executive transmits a report on the results of an analysis of racial disparities in response to infractions in adult detention and a motion that should acknowledge receipt of the report, and a motion acknowledging receipt of that report is passed by the council. The motion should reference the subject matter, the proviso's ordinance, ordinance section, and proviso number in both the title and body of the motion.

The report shall include, but not be limited to:

A. Disaggregated data on all infractions and responses to infractions, including, but not limited to, restrictive housing placements, in adult detention in 2024;

B. An analysis of those infractions and responses to infractions by race;

C. Discussion of any racial disparities found in the analysis of infractions and responses to infractions by race, and identification of actions or planned actions that will be taken in an effort to reduce any racial disparities found in the analysis; and

D. A discussion of whether and how frequently the department of adult and juvenile detention intends to conduct future analyses of racial disparities in response to infractions in adult detention.

The executive should electronically file the report and a motion required by this proviso by June 30, 2025, with the clerk of the council, who shall retain an electronic copy and provide an electronic copy to all councilmembers, the council chief of staff, and the lead staff for the law and justice committee or its successor.

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<sup>1</sup>Ordinance 19861, Section 54, p26 [LINK](#)

### III. Executive Summary

One of the primary ways that the Department of Adult and Juvenile Detention manages the safety of its adult facilities is through the behavior management system that is detailed in the Resident Information Handbook. The behavior management system includes rules designed to ensure safety and security, and related sanctions for violating those rules. Sanctions for rule violating behavior range from written warnings to disciplinary housing and are constrained in use by a sanctions matrix that is also documented in the Resident Information Handbook. The report that follows details the violative and sanction behavior observed in the adult divisions over the previous year.

Both the infraction and sanction behavior that is analyzed below are as expected by the Department and are consistent with previous reports detailing infraction and sanction outcomes. Some disparity in volume is observed, particularly in gender and race. Gender disparities are to be expected. While some race disparity is observed, it is small. The outcome measures are examined for disparity, such as whether there are meaningful differences in the number of days of disciplinary housing by gender or race. The differences in disciplinary housing length, which is the most serious sanction, are not meaningful, which is an indication that the sanction matrix is working well to control disparities.

Finally, DAJD is midway through a major data warehouse build, which will enhance the Department's ability to analyze and report on performance measures that encompass adult and juvenile operations and community corrections. The Department will continue to build out analytics and reporting capability and be responsive and responsible for reporting key performance measures. The data warehouse project is currently expected to be completed in Q1 2026.

## IV. Background

**Department Overview:** The Department of Adult and Juvenile Detention (DAJD) operates three secure detention facilities and a number of community supervision programs for pre- and post-trial defendants throughout King County. The two adult secure detention divisions are the Seattle Division and the Kent Division. The Seattle Division operates the King County Correctional Facility (KCCF), and the Kent Division operates the secure detention portion of the Maleng Regional Justice Center (MRJC). In 2024, the combined average daily population of both adult detention facilities was 1,407.

The mission of DAJD is to provide in-custody and community-based services that are data-informed, advance safety, lead system change, and promote equitable outcomes for the people served. The Department's priorities include ensuring the safety and security of staff and residents, managing operational risks, strengthening community connections, promoting opportunities to humanize the people in the facilities and programs, and recruiting, developing, supporting, and retaining staff.

**Context:** DAJD issues a Resident Information Handbook to each resident of its adult facilities.<sup>2</sup> The handbook contains useful information and includes a chapter regarding the rules of behavior for all adult residents housed at KCCF and MRJC. In addition, the rules are posted in all housing locations.

Violation of any of the rules of behavior is disruptive to the safe and secure operation of the facilities and may result in discipline. The rules of behavior are classified into three levels of seriousness: general, serious, and major. *General infractions* are considered the least critical of rule violations, ranging in behavior from refusing orders, tampering with equipment, and interfering with headcounts and/or security checks. General infractions are subject to penalties such as loss of commissary, loss of visitation, or loss of good time credits. *Serious infractions* include behaviors such as fighting and flooding of housing units. Adjudication of serious infractions can result in sanctions of between three and seven days of disciplinary segregation, as well as loss of good time,<sup>3</sup> loss of privileges related to the violation, and potential classification to a higher security level. *Major infractions*, the most critical violations of behavior standards, include assaulting<sup>4</sup> a staff member or other resident, arson, or possession of weapons. Major violations can result in a sanction of up to 10 days in disciplinary housing.

Infractions are adjudicated in two ways. For lower-level infractions, officers adjudicate the rule-breaking behavior. Officers can resolve general infractions through written warnings and onsite sanctions. This tool allows officers to address negative behaviors quickly which can keep issues from escalating and helps to ensure that officers can manage their housing units or other posts. For serious and major infractions, officers provide documentation of the violation to DAJD's classification staff through the Jail Management System (JMS). Classification staff then hold a hearing, involving the resident, officer or other staff members, as well as potential witnesses, to adjudicate the infraction. Findings regarding responsibility are assessed at that time, but the resident still retains an opportunity to appeal. Finally, outcomes from disciplinary hearings are reviewed by classification supervisors for completeness and

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<sup>2</sup> The handbook is available in English, Spanish, Somali, Vietnamese, Russian, Chinese, and Korean. It is also available as an ASL (American Sign Language) video on the resident tablets.

<sup>3</sup> Good time is a reduction in time served in jail given to residents who maintain good behavior while in custody. It can also be referred to as good conduct time, or time off for good behavior.

<sup>4</sup> In a legal context, fighting differs from assault in intent and threat. A fight can involve mutual physical contact, while assaults are targeted, with intent to cause harm to another individual.

accuracy. All portions of this process are documented in JMS. The data and analysis provided below follows those two operational tracks.

In April 2021, the King County Auditor completed an extensive audit of the adult jail facilities that focused on safety and equity.<sup>5</sup> As part of that audit, it was recommended that DAJD annually review certain metrics related to the racial breakdown of security classifications and disciplinary sanctions. DAJD implemented a new JMS in August 2021 and continues to develop capacity to better monitor many aspects of operations, including more efficient analysis of security classifications and disciplinary sanctions. DAJD reported on that progress to the King County Auditor in August 2022 and again in April 2024.

**Report Methodology:** Data underlying this report was gathered from DAJD’s JMS. It was analyzed and compiled by DAJD staff. Infractions and resulting sanctions were evaluated using univariate analysis to determine the impact on different racial and gender groups. The data and analysis in this report includes all infractions that were reported and adjudicated between January 1 and December 31, 2024.

## V. Report

### A. Disaggregated data on all infractions

The analysis that follows is based on the totality of infraction data in 2024. No data was trimmed from the total. Given that all data is available to DAJD for this analysis, no sampling is needed, which can simplify the analysis. In addition, it allows for investigation of the data by breaking it down (disaggregating) by gender, age and race.

DAJD issued, investigated, and completed 5,005 infraction reports in 2024, which is the entirety of all infraction reports for the year. Infractions are not evenly distributed between the two adult secure facilities, which is due to the unequal distribution of security classifications between KCCF and MRJC. While DAJD’s adult population was relatively evenly split between KCCF and MRJC in 2024 (2024 KCCF Average Daily Population = 56 percent), the MRJC houses the majority of the minimum and medium security residents, while KCCF houses all of DAJD’s maximum-security residents. KCCF also houses residents who consistently exhibit serious negative behaviors, such as fighting, or other assaultive behavior.

After residents are found to have committed serious and major infractions, it is DAJD’s practice to increase their security classification in response. Because of this, data shows a higher proportion of major infractions at KCCF and a much higher proportion of general infractions at the MRJC given the population housed in that facility. The distribution of infractions by facility is displayed in Table 1.

**Table 1: Infractions by Facility (2024)**

Facility	General	Serious	Major
King County Correctional Facility	1,492	362	5
Maleng Regional Justice Center	2,708	437	1

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<sup>5</sup> [Jail Safety Audit](#)

The following tables examine the gender, age and race distribution of DAJD’s population which helps to determine whether the department’s infraction numbers, and demographic distributions, are in line with existing scholarship (see below). For example, if DAJD were to find wildly incongruous distributions of gender in the population compared to the infraction data, further analysis would need to be completed. Likewise with age and race distributions.

Longstanding criminological research finds that females offend less frequently, generally engage in less serious and violent behavior, and engage in that behavior for very different reasons than males.<sup>6, 7</sup>

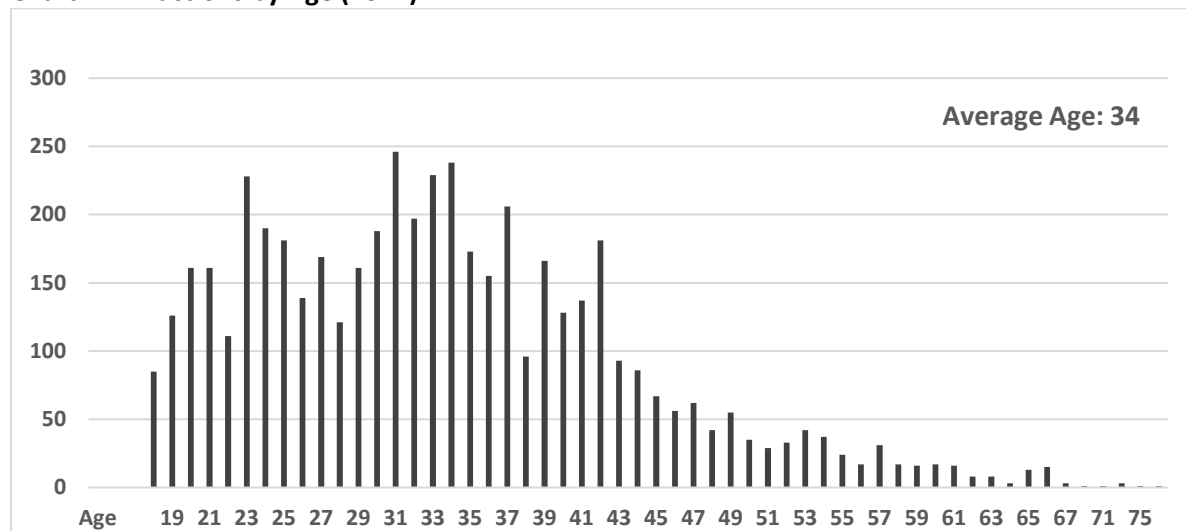
Table 2 displays the distribution of the number and seriousness of 2024 infractions by gender. The smaller number and less serious classification of infractions by female residents is consistent with what would be expected.

**Table 2: Infractions by Gender (2024)**

Gender	General	Serious	Major
Female	997	105	
Male	3,203	694	6

Chart 1 illustrates the age distribution of infractions in 2024. The age-crime curve is a fundamental concept in criminology that describes the pattern of criminal offending that increases through the 20s and into the early 30s, peaks, and then starts to taper off quickly.<sup>8</sup> This pattern is sometimes referred to as desistance or ‘aging out’.<sup>9</sup> The distribution displayed in Chart 1 matches the theoretical age-crime curve closely, with an average age at infraction of 34 years.

**Chart 1: Infractions by Age (2024)**



<sup>6</sup> Chesney-Lind, M. and Pasko, L. (2004). *The Female Offender: Girls, Women and Crime* (2<sup>nd</sup> Ed.). Sage Publications. <https://sk.sagepub.com/book/mono/the-female-offender-2e/toc>

<sup>7</sup> Gelsthorpe, L. and Morris, A. (2002). *The Role of Gender in Understanding Offending Behavior: An Overview*. Journal of Gender Studies, 11(3), 349-360.

<sup>8</sup> Farrington, D.P. (1986). Age and Crime. *Crime and Justice*, 7, 189-250. <http://www.jstor.org/stable/1147518>

<sup>9</sup> Sampson, R.J. and Laub, J.H. (1993). *Crime in the Making: Pathways and Turning Points Through Life*.

In Table 3, the racial distribution of infractions is displayed. The Department anticipates that the race distribution of infractions should closely follow the race distribution of the average daily population (ADP) but will not match perfectly.

**Table 3: Infractions by Race (2024)**

Race	General	Serious	Major
American Indian	99	16	
Asian	244	38	1
Black	1,681	407	2
Hispanic	382	50	
Other/Unknown	170	34	
White	1,624	254	3

#### **B. Analysis of infractions and responses by race**

Table 4 indicates that the infraction percentage for Black residents is slightly above their ADP, and Hispanic residents are slightly below, while all other racial categories are nearly identical to their ADP distribution.

**Table 4: Average Daily Population and Infraction Distribution by Race (2024)**

Race	ADP	Infractions	Delta
American Indian	2.2%	2.3%	(0.10)
Asian	6.3%	5.6%	0.70
Black	37.7%	41.3%	(3.60)
Hispanic	12.1%	8.5%	3.60
Other/Unknown	4.0%	4.0%	0.00
White	37.8%	37.2%	0.60

#### **C. Analysis of infractions and responses**

Table 5 shows sanctions issued for infractions issued and adjudicated in 2024. The majority (80 percent) of infractions result in an onsite sanction. Onsite sanction is a term that the Department uses to indicate sanctions issued nearly immediately and can be carried out within the resident's housing unit.

Table 6 provides further details regarding onsite sanctions. The majority of onsite sanctions, and in fact, the majority of all sanctions issued in 2024, are two-hour placements into a resident's cell (commonly referred to as rack backs), and loss of dayroom access. In-cell placements apply to residents that are in general population housing, who would normally have access to the dayrooms. When given a two-hour in-cell sanction, those residents remain in their cells, while other people assigned to the housing unit would remain in the dayroom. Loss of dayroom access applies to residents housed in areas where they received dayroom access by themselves. When given a loss of dayroom sanction, they lose their access for the remainder of the day.

**Table 5: Sanction by Violation Severity (2024)**

Sanction Type	General	Serious	Major
Onsite Sanction	4,055	771	6
Written Warning	145	28	

**Table 6: Specific Onsite Sanction (2024)**

Specific Onsite Sanction	General	Serious	Major
2 Hour Rack-Back	2,346	274	1
Cool Down Period	20	18	
Loss of Dayroom Access	1,391	381	5
Other (see Behavior Modification/Corrective Action)	298	98	

**Disciplinary Hearings and Sanctions:** More serious infractions, because they are subject to more restrictive sanctions, are handled in a more considered manner. Rule violations are written and forwarded to DAJD's classification unit where a hearing is held, and the resident can present evidence and witnesses. Classification staff consider the written record, and testimony from officers and residents before determining sanctions. The vast majority of disciplinary hearings are held at the KCCF, consistent with the more serious nature of the infractions. Table 7 indicates that 79 percent of the hearings resulting from rule violations in 2024 were held at KCCF.

**Table 7: Disciplinary Hearings by Facility (2024)**

Facility	Number of Hearings
King County Correctional Facility	2,943
Maleng Regional Justice Center	798

Classification staff review the record of the rule violations and consider all evidence before holding a hearing and considering sanctions. Occasionally, hearings do not occur. The most common reason that hearings are cancelled is due to the resident being released from custody, but classification staff may also determine that the resident is not competent to participate in a hearing or be sanctioned for the behavior. Details on the completion or cancellation of disciplinary hearings are detailed in Table 8.

**Table 8: Hearing Status (2024)**

Status	Number of Hearings
Cancelled	632
Competency	172
Complete	2,720
Decision Overruled	5
Decision Upheld	212

In a disciplinary hearing, if allegations are founded, residents can be sanctioned to one or more restrictions, ranging from written and verbal warnings, loss of commissary, through disciplinary segregation. Hearings can result in the issuance of a sanction, however, due to the fluid nature of a jail,

those sanctions can often not be imposed, primarily due to release. The tables below are inclusive only of sanctions that were imposed.

As demonstrated in Table 9, the majority of serious and major violations are sanctioned with some number of days in disciplinary segregation.

**Table 9: Count of Sanctions by Seriousness Level (2024)**

Sanction	Unknown	Serious	Major
Behavior Modification		7	
Disciplinary Segregation	3	1,878	246
Loss of Commissary		9	1
Loss of Earned Good Time Credit		75	85
Loss of Program Privileges	1	59	4
Loss of Visitation		6	
Other		44	5
Program Removal		3	
Restitution		34	3
Verbal Warning		124	9
Written Warning		83	13

As noted previously, the DAJD Resident Information Handbook constrains the number of days of disciplinary segregation that a resident can be sanctioned to for a serious infraction versus a major infraction. In addition, DAJD practices progressive discipline, meaning that the sanction for a first serious infraction may result in three days of disciplinary segregation, where a second infraction may result in five days and so on. Likewise for major infractions. In addition, residents can be sanctioned to a number of days in disciplinary segregation and then some number of those days can be suspended, and therefore not initially applied, but held as a disincentive to further negative behavior. What follows in Tables 10 and 11 are the average days of disciplinary segregation actually imposed for rule violations by race in 2024.

**Table 10: Average Days of Disciplinary Segregation for *Serious* Violations, by Race (2024)**

Race	Average Days
American Indian	4.4
Asian	4.5
Black	5.0
Hispanic	4.7
Other/Unknown	5.0
White	4.8

Table 10 indicates that the differences in disciplinary segregation days resulting from serious infractions are minimal, with the largest disparity between Black and American Indian residents of just over one-half of a day.

**Table 11: Average Days of Disciplinary Segregation for Major Violations, by Race (2024)**

Race	Average Days
American Indian	9.4
Asian	8.3
Black	8.7
Hispanic	9.3
Other/Unknown	9.3
White	8.7

The largest difference in disciplinary segregation days for major violations are between American Indian and Asian residents, with a difference of just over one day, as evidenced in Table 11.

Consistent with analysis that was conducted as part of the Jail Safety Audit in 2021, and a follow-up in 2022, DAJD finds no significant racial disparity in either the number of infractions, or the number of days of disciplinary segregation issued. DAJD actively monitors performance and operational metrics, and reports them to the Executive, on a monthly and quarterly basis, however much of this work requires manual compilation, and is therefore impacted by limited resources. The Department is mid-way through a data warehouse project, which will improve its ability to store and manage data. Concurrently, DAJD is continuing to modify procedures and the use of JMS to expand data collection and is building data dashboards to more effectively report and analyze data in near real time. The Department strives to apply an equity lens to all its work, including the performance and operational data that it monitors.

#### **D. Discussion of Future Analysis**

DAJD implemented a new JMS in 2021, which laid the foundation to continuously improve the Department's access to data. The Department is now in the middle of a multi-year project with support from the Department of King County Information Technology to implement a data warehouse which will enhance DAJD's ability to analyze and report out data. As part of that effort, the Department will be developing data visualization dashboards to more effectively and efficiently provide access to the Departments most commonly requested metrics, including population demographics, staffing and overtime data, safety metrics such as use of force, access to programming, restrictive housing, and infractions. Upon development and execution of those dashboards, DAJD will be able to monitor infraction data in near real time. The data warehouse project is currently expected to be completed in Q1 2026.



**King County**

**Shannon Braddock**

King County Executive

401 Fifth Avenue, Suite 800

Seattle, WA 98104

**206-296-9600** Fax 206-296-0194

TTY Relay: 711

[www.kingcounty.gov](http://www.kingcounty.gov)

June 25, 2025

The Honorable Girmay Zahilay  
Chair, King County Council  
Room 1200  
C O U R T H O U S E

Dear Councilmember Zahilay:

As called for by Ordinance 19861, Section 54, Proviso 1, this letter transmits a report on the results of an analysis of racial disparities in response to infractions in Department of Adult and Juvenile Detention (DAJD) adult detention facilities and a proposed Motion that would, if approved, acknowledge receipt of the report. The enclosed report covers the period of January 1, 2024, through December 31, 2024.

The enclosed report provides analysis of sanction data by gender and race in 2024. It finds that while some disparity exists, it is minimal and consistent with prior reviews and reports on the topic. The report outlines the procedure and practices associated with DAJD's rule violation and sanction processes and includes a description of the department's rules and sanction matrix as presented in the Resident Information Handbook. Finally, DAJD provides a description of ongoing work to build out a data warehouse for the department that will allow for additional analytic capability in the coming years.

Thank you for your consideration of this report and proposed Motion.

If your staff have questions, please contact Diana Joy, Chief of Administration, Department of Adult and Juvenile Detention at 206-263-2769.

The Honorable Girmay Zahilay

June 25, 2025

Page 2

Sincerely,

A handwritten signature in black ink, appearing to read 'Shannon Braddock', written in a cursive style.

for

Shannon Braddock

King County Executive

Enclosure

cc: King County Councilmembers

ATTN: Stephanie Cirkovich, Chief of Staff, King County Council

Melani Hay, Clerk of the Council

Karan Gill, Deputy Executive, Chief of Staff, Office of the Executive

Stephanie Pure, Council Relations Director, Office of the Executive

Allen Nance, Director, DAJD

Steve Larsen, Deputy Director, DAJD

Diana Joy, Chief of Administration, DAJD



## King County

### Metropolitan King County Council Law and Justice Committee

#### STAFF REPORT

<b>Agenda Item:</b>	6	<b>Name:</b>	Leah Krekel-Zoppi
<b>Proposed No.:</b>	2025-0220	<b>Date:</b>	September 3, 2025

#### SUBJECT

A motion acknowledging receipt of a plan for use of the West Wing of the King County Correctional Facility as an area to provide alternatives to secure detention services.

#### SUMMARY

King County's 2025 Annual Budget required a plan for the use of the West Wing of the King County Correctional Facility (KCCF) as a "side door" space for law enforcement to bring people who have been arrested for non-violent misdemeanor offenses, as an alternative to booking them in jail. The plan was developed with input from stakeholders, including representatives from the criminal legal system and diversion programs, and includes discussion of the feasibility of using all or a portion of the West Wing of KCCF as an alternative to detention, the types of services that could be provided onsite, the number of people likely to be served, estimated capital and operating costs, potential funding sources, and next steps.

A potentially feasible "side door" option identified in the report is to renovate the existing shelter storage space on the first floor of the West Wing to provide 16 beds for "side door" occupants. Doing so would require finding alternative storage space. Downtown Emergency Services Center operates a homeless shelter on the first floor of the West Wing and expressed potential interest in expanding the behavioral health and case management services they currently provide there to include "side door" participants.

Stakeholders expressed concern about the feasibility of establishing a "side door" using the upper floors of the West Wing and did not support displacing the existing first floor shelter. Stakeholders also questioned whether the "side door" would be duplicative of other behavior health facilities located in Seattle and Pioneer Square, including a soon-to-open Crisis Care Center.

Costs of establishing and operating a "side door" could be funded by a \$2 million West Wing reserve in the MIDD fund and Medicaid reimbursements. Additional ongoing funding would need to be identified as Medicaid would not fully cover costs. However, Executive staff state that the Executive plans to eliminate the West Wing MIDD reserve after 2025 and the plan identified the need for additional analysis before moving forward with a "side door."

## **BACKGROUND**

**King County Adult and Juvenile Detention.** King County's Department of Adult and Juvenile Detention (DAJD) operates three detention facilities as well as community supervision programs. King County's secure detention facilities are located at the King County Correctional Facility (KCCF) in downtown Seattle, the Maleng Regional Justice Center (MRJC) in Kent, and the Judge Patricia H. Clark Child and Family Justice Center (CCFJC) in Seattle's First Hill neighborhood, which houses juveniles.

The county's secure detention facilities house pre-trial individuals who have been arrested or had charges filed and are awaiting adjudication of their cases in King County Superior Court or District Court, or who are awaiting state psychiatric competency restoration services. King County also houses post-trial individuals who have been sentenced to secure detention for less than a year. Individuals in the county's custody who receive sentences that exceed one year are transferred to the state correctional system.

In 2024, annual bookings into adult detention were over 15,000, and the average daily population (ADP) was 1,407.<sup>1</sup> Currently, the adult population in secure detention is 1,360.<sup>2</sup>

DAJD also operates alternatives to detention for those eligible as determined by the courts. Alternatives to detention include community corrections programs and electronic home detention. Community corrections programs allow individuals to stay in community and access services while awaiting adjudication of their cases. The ADP for electronic home detention was 354 in 2024.

**King County Community and Human Services.** King County's Department of Community and Human Services (DCHS) oversees human services in King County and contracts with a network of community-based providers and partners to implement regional human services. DCHS implements revenue from the county's dedicated human services revenue streams, including the Veterans, Seniors, and Human Services levy; the Best Starts for Kids levy; and the Mental Illness and Drug Dependency (MIDD) behavioral health sales tax fund; the Health Through Housing sales tax, and the Puget Sound Taxpayer Accountability Account.

Revenue for the MIDD Behavioral Health sales tax fund comes from a countywide 0.1 percent sales tax which generates approximately \$136 million per biennium. MIDD provides dedicated funding for behavioral health treatment and prevention programs and services. MIDD is managed by DCHS's Behavioral Health and Recovery Division.

**King County Correctional Facility (KCCF) and the West Wing.** The KCCF is located in downtown Seattle and is connected by tunnel to the King County Courthouse (KCCH). The facility opened in 1986 to replace a jail on the upper floors of the KCCH. The structure of KCCF is a tower jail with a central 11-floor tower and a shorter seven-floor tower wing known as the "West Wing."

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<sup>1</sup> [2024-12-kc-dar-scorecard.pdf](#)

<sup>2</sup> As of July 17, 2025

As of July 2025, KCCF had 765 residents, representing approximately 56 percent of the county's adult detention residents. KCCF houses individuals of all risk classifications, including low, medium, and high-risk. It also houses most of the people in county custody who have medical or psychological treatment needs. KCCF has a bookings area open 24 hours a day and seven days a week and receives 85 percent of the county's bookings.

Since 2019, the first floor of the KCCF West Wing has been used by DCHS as a shelter for unhoused individuals and also provides space for Jail Health Services (JHS) release planning and coordinated discharge services. The remaining floors of the West Wing are restricted access due to the structural integration between the West Wing and the main tower. The second and third floors of the West Wing are used as dormitory-style housing for jail residents who perform jobs in the facility such as meal preparation and laundry services. The fourth and fifth floors of the West Wing are used for administrative and operational functions, including training space, employee facilities, and workspaces. The six floor houses the JHS health clinic and the seventh floor houses the infirmary.

**West Wing Proviso.** King County's 2025 Annual Budget<sup>3</sup> included Proviso P2, Section 54, which stated:

*Of this appropriation, \$100,000 shall not be expended or encumbered until the executive transmits a plan for use of the west wing of the King County Correctional Facility as an area to provide alternatives to secure detention services and a motion that should approve the plan, and a motion acknowledging receipt of the plan is passed by the council. The motion should reference the subject matter, the proviso's ordinance, ordinance section, and proviso number in both the title and body of the motion.*

*The plan shall include, but not be limited to:*

*A. A discussion of the feasibility and advantages of using all or a portion of the west wing of the King County Correctional Facility and other facilities to provide a "side door" alternative space to bring people with behavior health needs arrested for non-violent misdemeanor offenses, as an alternative to booking them into jail, including consideration of whether the space should be secure, and the feasibility of co-locating the facility with the homeless shelter currently occupying the west wing;*

*B. A discussion, in collaboration with the behavioral health and recovery division, of the types of services that could be provided on-site, including assessments, therapy, medication assisted treatment, and case management, and how those services might be administered through existing or new alternatives to detention and diversion programs, and consideration of whether currently available on-site services and case management at the site could be used as a shared resource for the homeless shelter and "side door";*

---

<sup>3</sup> Ordinance 19861

*C. Projection of the number of people likely to be served by the "side door" and the capital and operating resources that would be needed to implement the plan.*

*D. Identification of potential funding sources to implement the plan, including use of the \$2,000,000 expenditure reserve in the Mental Illness and Drug Dependency Fund set aside for supporting changes to the future use of the west wing; and*

*E. Identification of the timeline and next steps to implement the plan.*

*The executive should electronically file the plan, and a motion required by this proviso by June 30, 2025, with the clerk of the council, who shall retain an electronic copy and provide an electronic copy to all councilmembers, the council chief of staff, and the lead staff for the law and justice or its successor.*

## **ANALYSIS**

Proposed Motion 2025-0220 would acknowledge receipt of the report, Use of West Wing of the King County Correctional Facility to Provide Alternatives to Secure Detention Services, dated July 2025. Adoption of the proposed motion would satisfy the requirements of the proviso and allow for \$100,000 in the DAJD budget to be released to be spent or encumbered. The report was developed by the Office of Policy, Strategy, and Budget (PSB); DAJD; and DCHS. In developing the report, PSB sought input from over 30 interested parties from various county and other public agencies, both individually and at a group meeting held in March 2025. PSB also engaged with Downtown Emergency Services Center (DESC), the nonprofit that contracts with DCHS to operate the homeless shelter currently located on the first floor of the West Wing.

The report responds to the following requirements of the proviso:

- Feasibility of using all or a portion of the West Wing of KCCF as an alternative to detention,
- The types of services that could be provided onsite,
- Number of people likely to be served and estimated capital and operating costs,
- Potential funding sources
- Timeline and next steps.

**A. Feasibility of West Wing as an Alternative to Detention.** The proviso required that the report discuss the feasibility and advantages of using all or a portion of the West Wing for a "side door," meaning an alternative space to bring people with behavior health needs who have been arrested for non-violent misdemeanor offenses, as opposed to booking them in jail. The proviso also requested consideration of whether the "side door" space should be secure and whether it was feasible to co-locate it with the homeless shelter currently occupying the first floor of the West Wing.

*Feasibility.* The report defines "side door" as a non-secure alternative to jail booking. Because KCCF is a secure facility, the report states that it would be most feasible for jail operations to locate it on the first floor of the West Wing, where capital investments

have already been made to separate the space from the rest of the secure facility. The rest of the West Wing is operationally and architecturally integrated with the KCCF central tower, making it a less feasible option for locating a non-secure use, according to the report.

Other factors, according to the report, that reduce the feasibility of locating a “side door” space on the upper floors of the West Wing is that it would displace functions necessary for KCCF operations, including dormitory-style housing that incentivizes residents to volunteer for the resident worker program and accommodate the various shifts of resident workers, the defensive tactics training room, offices, classrooms, the resident library, and employee sleeping spaces and amenities. The report states that, “there is no other location within the KCCF or MRJC footprint to relocate these services.”

However, the report also raises feasibility concerns with locating “side door” space on the first floor of the West Wing if it displaced existing uses located there. The homeless shelter located on the first floor provides 40 shelter beds in a space that was renovated for that purpose in 2019. The shelter has a 95 percent occupancy rate and focuses on serving the people with the greatest needs. According to the report, there was not stakeholder<sup>4</sup> support for relocating the shelter beds or the JHS release and coordinated discharge services housed on the first floor of the West Wing.

*Advantages.* According to the report, the primary advantage of locating “side door” services at KCCF is its proximity to services and transportation accessibility. Additionally, the Washington State Department of Corrections (DOC) Office of Community Corrections expressed interest in contracting with King County for use of “side door” space for people in community corrections struggling with behavioral health issues when they violate their community corrections orders. Such a partnership, if it were to be successfully negotiated, would prevent community corrections violators from being confined to state prison for short periods of time.

*Secure vs. Non-Secure Consideration.* According to the report, most stakeholders agreed the facility should be non-secure. Some stakeholders raised that there may be legal concerns with a secure site for individuals not being held in jail or detained for involuntary behavior health treatment services. Other stakeholders raised the concern that creating additional secure detention space would not be consistent the goals of stabilizing people in crisis through evidence-based diversion programs and alternatives to detention.

*Feasibility of Co-Location with the Shelter.* The report states that the National Registry of Evidence Based Practices does not support the mixing of the shelter population and people in acute crisis. For that reason, and the high utilization rates of the existing shelter beds, it would not be feasible to co-locate the shelter and “side door” occupants. However, the report states that it would be feasible to renovate the existing shelter storage space on the first floor to provide 16 beds for “side door” occupants. Doing so would require finding alternative storage space for the shelter clients’ belongings.

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<sup>4</sup> Stakeholders consulted included representatives from PSB, DAJD, DCHS, King County Sheriff’s Office, King County Prosecuting Attorney’s Office, King County Department of Public Defense, Seattle Police Department, Seattle Mayor’s Office, Washington State Department of Corrections, the courts, and diversion programs.

*Other Stakeholder Discussion.* The report states that stakeholder feedback included focusing on using existing and planned behavioral health crisis diversion programs for providing “side door” services. Stakeholders discussed whether “side door” services would be duplicative of existing and planned facilities including the Opioid Recovery and Care Center (ORCA) Center, Stability Through Access and Resources (STAR) Center, and the Crisis Care Center that is to be located in the Seattle/Central Zone in the Capitol Hill neighborhood.

Stakeholders also discussed encouraging law enforcement to transport people experiencing behavioral health crises to a crisis stabilization unit or crisis relief center, refer the individual to a designated crisis responder for evaluation, or refer the individual to voluntary outpatient treatment. The report notes that the Crisis Diversion Facility is currently underutilized, but stakeholders did not extensively discuss the barriers that may be contributing to underutilization by law enforcement.

**B. Types of Services That Could Be Provided at a West Wing “Side Door.”** The proviso required a discussion of the types of services that could be delivered onsite at the West Wing, how services might be administered through existing or new alternatives to detention and diversion programs, and whether currently available onsite services at the West Wing could be shared between the homeless shelter and the “side door.”

According to the report, services that could be provided onsite at the West Wing include behavioral health assessments, individual and group therapy, medication assisted treatment, and case management. These services could be Medicaid eligible if provided outside of secure detention.<sup>5</sup> The report states that the co-location of “side door” services and the DESC shelter could potentially result in economies of scale savings for DESC and King County, and that DESC is potentially interested in expanding their contract to provide additional services and beds at the West Wing.

A “side door” contractor could work with law enforcement, referral sources, and local providers to transport and provide a warm handoff for “side door” participants to available and appropriate locations and services. The report states that this would be a similar function to the planned crisis care center. According to Executive staff, crisis care centers are places where anyone can seek urgent care for behavioral health crises and where law enforcement and first responders can take an individual experiencing a behavioral health crisis. By contrast, the “side door” would serve as a place law enforcement could take people who have committed low level, nonviolent offenses as an alternative to booking them into jail.

The report also lists the following facilities that provide or will provide services similar to those contemplated for the “side door”:

- The King County Crisis Solution Center (currently open and under capacity)
- Crisis Care Center (could open in 2027)
- King County Sheriff’s Office Therapeutic Response Team (currently available)
- King County Designated Crisis Responders (currently available with an average response time of nine hours)

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<sup>5</sup> Behavioral health services provided in secure detention are currently not eligible for Medicaid reimbursement and must be funded by the county.

- The ORCA Center (opening fall 2025)
- The STAR Center (currently available)
- The Sobering Center (permanent location opening in early 2026)

**C. Projection of the Number of People to be Served and Capital and Operating Costs.** As required by the proviso, the report states an estimated 12-16 beds could be made available for “side door” services by renovating the storage space on the first floor of the West Wing. With an average length of stay of five days, this would serve 600-800 people annually. The report provides an estimated annual cost for operating the beds and services of \$1.5 million. The estimated capital cost of renovating the West Wing first floor storage space is \$700,000.

**D. Potential Funding Sources.** The proviso required the report to include identification of potential funding sources to implement a “side door” at the West Wing. Currently, there is a \$2 million expenditure reserve in the MIDD behavioral health sales tax fund that is restricted for future uses of the KCCF West Wing. According to the report, PSB estimates that the capital, start up, and first year operating costs for the “side door” could be funded with the \$2 million designated reserve. However, the financial plan for the MIDD sales tax fund shows the West Wing reserve expiring after 2025, and Executive staff stated the Executive does not intend to reserve funds for West Wing after 2025. Note that extension of the MIDD sales tax is currently before the Council (Proposed Ordinance 2025-0212). If the Council approves the extension of MIDD, the Executive intends to transmit an implementation plan in 2026; the Council could choose to specify funding for West Wing purposes in the implementation plan.

Medicaid reimbursements could help cover ongoing program costs, but additional revenue would be needed to sustain the programmatic costs not fully covered by Medicaid. The report does not provide an estimate of such costs, stating that final design of “side door” programming would be needed to determine operating costs and revenue options.

**E. Timeline and Next Steps.** The report identified two topics for further analysis: 1) the legal feasibility of developing and implementing an involuntary, secure side door program, and 2) consideration of the concentration of human services in Downtown Seattle and Pioneer Square. The report states that because these topics were identified for further analysis, the report cannot provide a timeline for implementing the “side door” program.

### **INVITED**

- Steve Larsen, Deputy Director, Department of Adult and Juvenile Detention
- Susan McLaughlin, Division Director, Behavioral Health and Recovery Division, Department of Community and Human Services

### **ATTACHMENTS**

1. Proposed Motion 2025-0220 (and its attachment)
2. Transmittal Letter



**KING COUNTY**  
**Signature Report**

ATTACHMENT 1  
1200 King County Courthouse  
516 Third Avenue  
Seattle, WA 98104

**Motion**

**Proposed No. 2025-0220.1**

**Sponsors Barón**

1           A MOTION acknowledging receipt of a plan for use of the  
2           west wing of the King County Correctional Facility as an  
3           area to provide alternatives to secure detention services as  
4           required by the 2025 Annual Budget Ordinance, Ordinance  
5           19861, Section 54, Proviso P2.

6           WHEREAS, the 2025 Annual Budget Ordinance, Ordinance 19861, Section 54,  
7   Proviso P2, requires the executive to transmit a plan for use of the west wing of the King  
8   County Correctional Facility as an area to provide alternatives to secure detention  
9   services, accompanied by a motion that should acknowledge receipt of the applicable  
10   plan, and

11          WHEREAS, Ordinance 19861, Section 54, Proviso P2, states that the plan and the  
12   motion should be transmitted no later than June 30, 2025, and

13          WHEREAS, Ordinance 19861, Section 54, Proviso P2, provides that \$100,000  
14   shall not be expended or encumbered until the executive transmits both the plan and the  
15   motion, and the motion acknowledging receipt is passed, and

16          WHEREAS, upon passage of the motion, \$100,000 shall be released for  
17   expenditure or encumbrance, and

18          WHEREAS, the council has acknowledged receipt of the plan transmitted by the  
19   executive;

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

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21           The receipt of a plan for use of the west wing of the King County Correctional  
22 Facility as an area to provide alternatives to secure detention services, entitled King  
23 County Department of Adult and Juvenile Detention Use of the West Wing of the King  
24 County Correctional Facility to Provide Alternatives to Secure Detention, Attachment A  
25 to this motion, is hereby acknowledged in accordance with 2025 Annual Budget  
26 Ordinance, Ordinance 19861, Section 54, Proviso P2.

KING COUNTY COUNCIL  
KING COUNTY, WASHINGTON

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Girmay Zahilay, Chair

ATTEST:

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Melani Pedroza, Clerk of the Council

APPROVED this \_\_\_\_ day of \_\_\_\_\_, \_\_\_\_.

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Shannon Braddock, County Executive

**Attachments:** A. Use of the West Wing of the King County Correctional Facility to Provide Alternatives to Secure Detention Services, July 2025

**Use of the West Wing of the King County Correctional Facility  
to Provide Alternatives to Secure Detention Services**

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July 2025



**King County**

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## I. Proviso Text

Ordinance 19861, Section 54, Department of Adult and Juvenile Detention, P2<sup>1</sup>

Of this appropriation, \$100,000 shall not be expended or encumbered until the executive transmits a plan for use of the west wing of the King County Correctional Facility as an area to provide alternatives to secure detention services and a motion that should approve the plan, and a motion acknowledging receipt of the plan is passed by the council. The motion should reference the subject matter, the proviso's ordinance, ordinance section, and proviso number in both the title and body of the motion.

The plan shall include, but not be limited to:

A. A discussion of the feasibility and advantages of using all or a portion of the west wing of the King County Correctional Facility and other facilities to provide a "side door" alternative space to bring people with behavior health needs arrested for non-violent misdemeanor offenses, as an alternative to booking them into jail, including consideration of whether the space should be secure, and the feasibility of co-locating the facility with the homeless shelter currently occupying the west wing;

B. A discussion, in collaboration with the behavioral health and recovery division, of the types of services that could be provided on-site, including assessments, therapy, medication assisted treatment, and case management, and how those services might be administered through existing or new alternatives to detention and diversion programs, and consideration of whether currently available on-site services and case management at the site could be used as a shared resource for the homeless shelter and "side door";

C. Projection of the number of people likely to be served by the "side door" and the capital and operating resources that would be needed to implement the plan.

D. Identification of potential funding sources to implement the plan, including use of the \$2,000,000 expenditure reserve in the Mental Illness and Drug Dependency Fund set aside for supporting changes to the future use of the west wing; and

E. Identification of the timeline and next steps to implement the plan.

The executive should electronically file the plan, and a motion required by this proviso by June 30, 2025, with the clerk of the council, who shall retain an electronic copy and provide an electronic copy to all councilmembers, the council chief of staff, and the lead staff for the law and justice or its successor.

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<sup>1</sup> Ordinance 19861, Section 54, DAJD, P2, p26-27 [LINK](#)

## II. Executive Summary

This document was developed in response to Ordinance 19861, Section 54, P2. The Proviso calls for a plan for use of the west wing of the King County Correctional Facility as an area to provide alternatives to secure detention services.

The Department of Adult and Juvenile Detention (DAJD) operates two adult secure detention facilities: the King County Correctional Facility (KCCF) in Seattle, and the Maleng Regional Justice Center (MRJC) in Kent. As of April 1, 2025, KCCF housed approximately 56 percent of all residents (804), while the MRJC housed the other 44 percent (642). KCCF is also DAJD's primary intake location, where 90 percent of the 14,092 adult bookings took place in 2024.

KCCF is a building with an 11-floor main tower, and a seven-floor western tower referred to as the west wing (WW). The WW is an integrated part of KCCF. All floors above the first floor are occupied and used by DAJD. The second and third floors remain in use as resident housing and supports the department's management of its population and operations with resident workers.<sup>2</sup> Following a \$2 million renovation which included security modifications, the first floor of the WW was turned over to DCHS to operate a homeless shelter.

The first floor of the WW space is used for as a contracted homeless shelter and as office space used by contracted staff and Jail Health Services (JHS) Release Planning. The shelter operates under contract of the King County Regional Homelessness Authority with the Downtown Emergency Service Center (DESC), a nonprofit organization. The shelter focuses on helping those with the greatest and most acute needs. Services provided include behavioral health treatment, housing counseling, and employment services. DESC specifically reaches out to people who have been living unsheltered for long periods of time and/or to those with mental health or substance use needs. The shelter can accommodate up to 40 people and generally operates at 95 percent of capacity, or roughly 38 beds, year-round. In 2024, 127 unique persons were served, for a total of 14,640 bed nights and an average length of stay (ALOS) of 154 days. Performance measures are required under contract and have been consistently met.

Office of Performance, Strategy, and Budget (PSB) staff convened individual and group stakeholder discussions to develop this Proviso response with representatives from DAJD, DCHS, the King County Sheriff's Office (KCSO), Prosecuting Attorney's Office (PAO), Department of Public Defense (DPD), Seattle Police Department (SPD), the Seattle Mayor's Office, State Department of Corrections (DOC), the courts, and diversion programs. In these discussions, many partners expressed concerns about making the side door a locked, or involuntary program; dislocating the functioning shelter beds or JHS Release and Coordinated Discharge services on the first floor of the WW; and concerns about the amount of time and funding it would take to replace this capacity at a different location. Partners emphasized the importance of utilizing existing, available diversion programs, such as the King County Crisis Solution Center, and encouraged more focus on existing programs. In addition, new alternative treatment and shelter options that serve individuals with acute behavioral health needs are or will soon be available, such as DESC's Opioid Recovery & Care Center (ORCA) Center and Stability Through Access and Resources (STAR) Center, and a Crisis Care Center in the Central Zone covering Seattle and Vashon.

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<sup>2</sup> Resident workers are incarcerated persons who perform a number of tasks which support operations within the secure perimeter of DAJD adult detention facilities, such as resident meal preparation or laundry (under the supervision of DAJD staff) and cleaning of common areas outside of housing units.

As considered for this report, the side door program would be a non-secure alternative to booking to jail where law enforcement could divert amenable persons with low level, nonviolent offenses. The side door space would be operated by a licensed behavioral health agency that would receive and assess immediate needs and as appropriate, provide up to five nights of shelter and coordinated case management including transporting the individual to the facility best prepared to address identified needs.

This report explores the potential to renovate and repurpose storage space used by DESC for the first-floor shelter to create side door services. Currently, the secure-storage space is in use by DESC, necessary for clients and program staff. It provides space for client belongings, program supplies, client laundry, and overflow space that is used to accommodate pets and service animals. With renovation, this storage space could be repurposed to provide beds for up to 16 adult males for a 24/7 side door program. Because the storage space is essential for shelter operations, repurposing it while keeping the shelter would require finding alternative space for client storage and program supply or reducing the number of shelter beds.

By adding 12-16 single beds in the identified renovated and repurposed storage space on the first floor and assuming an average length of stay of five days, the space could potentially accommodate 600-800 admits per year at an estimated annual operating cost of \$1.5 million per year. For planning purposes, the Facilities Management Division of the Department of Executive Services (DES) provided an initial estimate of \$700,000 for renovations to WW space for the side door build out. This estimate does not include start up materials, furnishings or staff support infrastructure, or the cost to restructure the shelter's storage and laundry use. Reserved MIDD Behavioral Health Sales Tax funds could be used for initial capital and operating costs as long as the services focus on serving individuals behavioral health needs. Medicaid reimbursements are also anticipated to eligible services, though notably, Medicaid reimbursements do not fully cover the cost of providing services. Additional funding would be necessary over time.

During the development of this report, two subject areas were identified by stakeholders which require further analysis. The topics for further work are summarized below:

- *Legal/statutory feasibility analysis on developing and implementing an involuntary, secure side door program.* While this report notes that most stakeholders consulted for the Proviso response coalesced around creating a voluntary side door program, some interested parties hold that the side door program should be a locked facility implemented as secure alternative to jail. Further analysis is needed in this area to inform policy decisions around the side door program.
- *Consider the concentration of human services downtown Seattle and Pioneer Square.* Some stakeholders have noted that the area around KCCF in downtown Seattle/Pioneer Square neighborhood has a high concentration of human services. Given the existing constraints of the WW, its use as a shelter, and the potential additional services offered through a new Crisis Care Center on Capitol Hill, policymakers and stakeholders may wish to reexamine the concept of locating a side door program in the downtown Seattle Pioneer Square neighborhood.

Analysis on the two topics above directly impact development of a plan for use of the WW as an area to provide alternatives to secure detention services via a side door program. Consequently, this report does not include a specific timeline to implement a plan for the side door program.

This report identifies two areas for further work to inform policymaker decisions around developing and implementing a side door program: legal feasibility analysis for creating a secure alternative to jail and location of a side door program outside of the downtown Seattle/Pioneer Square area. These next steps should be undertaken in collaboration with stakeholders, the County Executive, and the King County Council.

### III. Background

#### Department Overviews:

*DAJD* operates three secure detention facilities and community supervision programs for pre- and post-trial defendants throughout King County. The two adult secure detention divisions are the Seattle Division and the Kent Division. The Seattle Division operates the KCCF, and the Kent Division operates the secure detention portion of the MRJC. In 2024, the combined average daily population of both adult detention facilities was 1,407.

The mission of *DAJD* is to provide in-custody and community-based services that are data-informed, advance safety, lead system change, and promote equitable outcomes for the people served. The department's priorities include ensuring the safety and security of staff and residents, managing operational risks, strengthening community connections, promoting opportunities to humanize the people in the facilities and programs, and recruiting, developing, supporting, and retaining staff. *PSB* provides comprehensive planning, management, budgeting, and performance assessment for King County government. *PSB*'s work is guided by best practices in financial stewardship and performance management, which includes enhancing accountability and transparency, and integrating strategic planning, business planning, resource allocation, and continuous improvement into a systematic approach throughout the County.

*DCHS* provides equitable opportunities for people to be healthy, happy, and connected to community. *DCHS* envisions a welcoming community that is racially just, where the field of human services exists to undo and mitigate unfair structures. The department, along with a network of community providers and partners, plays a leading role in creating and coordinating the region's human services infrastructure. *DCHS* stewards the revenue from the Veterans, Seniors and Human Services Levy, the Best Starts for Kids levy, the MIDD behavioral health sales tax fund ), the Health Through Housing sales tax, and the Puget Sound Taxpayer Accountability Account (PSTAA), along with other state and federally directed revenues.<sup>3, 4, 5, 6, 7</sup>

**Key Context:** The KCCF is located downtown Seattle, occupying a square block between 5<sup>th</sup> and 6<sup>th</sup> Avenues and Jefferson and James Street. It is an integrated structure with a central "tower" and a subordinate, shorter wing of the building known as, "the west wing" (WW). The KCCF WW has seven floors adjoining the tower with eleven floors.

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<sup>3</sup> Veterans, Seniors, and Human Services Levy [\[LINK\]](#)

<sup>4</sup> King County Best Starts for Kids initiative [\[LINK\]](#)

<sup>5</sup> MIDD behavioral health sales tax fund (MIDD) [\[LINK\]](#)

<sup>6</sup> Health Through Housing sales tax [\[LINK\]](#)

<sup>7</sup> Puget Sound Taxpayer Accountability Account [\[LINK\]](#)

The first floor of the WW was utilized by the DCHS to operate a shelter for unhoused individuals beginning in March 2019. The change in space use required substantial renovations, including upgrades to facility internal systems, new sinks and other plumbing fixtures, new fiber optic cables, paint, laundry, and other improvements, as well as removing security equipment and signage. Access to the elevator leading up to secure areas of the WW was restricted. The renovation was completed in 2019 at a cost of approximately \$2 million.

To facilitate the opening of the new shelter, DAJD workspace on the first floor of the WW that had been used for things like training, volunteers, and partners agencies were moved to the fourth floor. In 2020, in response to the COVID-19 global pandemic, and the need to distance jail residents from each other as much as possible to slow the spread of the disease, DAJD re-opened the second and third floors of the WW to resident housing. The second and third floors of the WW are dormitory style housing units, with eight dormitories on the second floor and six on the third connected by an open stairway. The third floor can only be accessed by stairs; there is no elevator leading to the third floor. The dorms on the second and third floors have a combined capacity of up to 224 residents when fully open and operational.

Currently, the first floor of the WW space is divided into two areas: King County Regional Homelessness Authority contracted homeless shelter on the larger east side of the space; and office space used by contracted staff and JHS Release Planning in the remaining areas. DAJD occupies floors two through four for resident housing, staff offices, community partner work and meeting space, training, and staff fitness and rest areas, as noted below.

**DCHS Homeless Shelter (1st Floor)** - Since inception, the shelter has been operated under contract with DESC.<sup>8</sup> The contract with DESC is administered by the King County Regional Homelessness Authority, and DESC is required to provide performance measures to DCHS. The shelter serves an important role in reducing unsheltered homelessness for the 16,868 individuals experiencing homelessness in King County per the 2024 “Point-in-time Count” per King County Regional Homelessness Authority. The shelter can accommodate up to 40 people and generally operates at 95 percent of capacity, or roughly 38 beds, year-round. In 2024, 127 unique persons were served, for a total of 14,640 bed nights, with an average length of stay (ALOS) of 154 days. Based on the 2024 annual contract amount, the cost per available bed night was \$133.52. The 2025 contracting costs of operating the shelter are \$2.04 million and is funded solely by King County. Performance measures are required under contract and have been consistently met.

The shelter focuses on helping those with the greatest needs who traditionally have the most acute needs. Services provided include behavioral health treatment, housing counseling, and employment services. DESC specifically reaches out to people who have been on the streets the longest, and/or to those with mental health or substance use needs. The shelter designated as a “low barrier” shelter, meaning sobriety is not a behavioral expectation to stay, although consuming or possessing alcohol or other drugs on site is prohibited. Clients come and go at will but are required to utilize their bed at least four nights out of the week, and engage in activities, case management, and services, which may include medical and mental health wrap-around care.

**JHS Release Planning (1st Floor)** - Release planning and coordinated discharge services are offered by JHS staff currently occupying the first floor of the WW. JHS release planning and coordinated discharge staff serve an average of seven individuals per day but report an expected increase of up to 18 patients

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<sup>8</sup> <https://www.desc.org/>

per day by the end of 2025, as expanded hours are achieved under a new Coordinated Discharge initiative funded by the County's MIDD sales tax. The Office of Performance, Strategy and Budget is working closely with JHS to ensure adequate space is available for services and program needs.

**DAJD Operations (2nd - 7th Floors)** - All floors above the first floor of the WW are occupied by DAJD and necessary for operations. The second and third floors are resident housing, particularly for resident workers, and are essential to management of the population. As previously noted, the second and third floors have a combined capacity of up to 224 residents when fully open and operational. DAJD is in the midst of substantial facility work to retrofit the bunk beds in the WW to eliminate potential ligature tie-off points and therefore reduce the risk of suicide in these housing areas. The retrofitting is being completed dorm by dorm, meaning that at any one time, one or more dorms may be offline for facility work.

The fourth and fifth floors house DAJD administrative and operational functions, including training space for new employee training, and includes specially equipped defensive tactics training rooms. It also includes officer fitness, briefing, and rest/sleeping spaces. The fourth floor is home to operationally necessary workspaces for volunteers, trainers, JHS, and Washington State Department of Social and Health Services competency evaluators. The KCCF JHS operated health clinic and infirmary are located on floors six and seven, respectively.

**Plan Methodology:** Staff from PSB, DAJD, and DCHS contributed to the development of this report.

PSB engaged in multiple conversations with agencies and systems partners to gather information to inform the contents of this Proviso response. PSB conducted interviews in February and March 2025 with department leadership and subject matter experts from PSB, DAJD, DCHS and DESC, King County Sheriff's Office (KCSO), King County Prosecuting Attorney's Office (PAO), King County Department of Public Defense (DPD), the Seattle Police Department (SPD), Washington State Department of Corrections (DOC), Harborview, the City of Seattle Mayor's Office along with community providers and persons with lived experience.

On March 17, 2025, a group meeting was held with more than 30 interested parties, and included partners listed above, as well as representatives Superior Court's Involuntary Treatment Court, the Washington State Department of Corrections (DOC), Evergreen Treatment Service, and Law Enforcement Assisted Diversion (LEAD).

PSB and DCHS engaged with DESC to discuss community needs, and review the shelter contract, service delivery, and performance measures for the shelter.

#### **IV. Plan Requirements**

- A. A discussion of the feasibility and advantages of using all or a portion of the west wing of the King County Correctional Facility and other facilities to provide a "side door" alternative space to bring people with behavior health needs arrested for non-violent misdemeanor offenses, as an alternative to booking them into jail, including consideration of whether the space should be secure, and the feasibility of co-locating the facility with the homeless shelter currently occupying the west wing;**

## **Feasibility Analysis of using all or a portion the West Wing for Side Door**

**Side Door Defined:** This document considers the side door program as a non-secure alternative to booking to jail where law enforcement could divert amenable persons with low level, nonviolent offenses. The side door space would be operated by a licensed behavioral health agency that would receive and assess immediate needs and as appropriate, provide up to five nights of shelter and coordinated case management including transporting the individual to the facility best prepared to address identified needs. It would be a 24/7 non-secure alternative to jail booking.

**Facility Overview:** The WW is a fully integrated and important part of the overall jail system at KCCF, both operationally and architecturally. The feasibility of space use depends on whether the use is limited to the first floor, where investments have already been made in isolating the space from the rest of the secure facility, or whether it is intended to include additional floors.

The physical facility constraints are such that the WW cannot be detached from the rest of the jail building. The WW shares elevators, stairwells (including emergency evacuation stairwells), security electronics, and ingress and egress with the rest of the jail building. The infirmary and clinic are an integral part of the KCCF which sit on the top two floors of the WW and share all the core architectural functions of the secured area of the building, such as stairwells and elevators.

The non-secure shelter's use of the first floor is less problematic because the shelter only utilizes a single floor, requiring only horizontal access to the space. The first floor is segregated from the rest of the floors in the WW. If floors two, three, or four were to be used for a non-jail purpose, it would require vertical access to the building, which could not be segregated from jail use. For safety purposes, DAJD has strict access requirements and cannot allow incarcerated people to co-mingle with non-incarcerated people or uncleared staff. In an emergency situation, the only way out of the building for certain areas is through the WW. In addition, if the shelter continues to operate on the first floor, there is no alternative way to move people to the second, third, and fourth floors without transiting the first floor of the jail, through the shelter intake area. Finally, the third floor of the WW is only accessible by stairs, making it less accessible, and more challenging to segregate from the other floors for non-secure purposes.

**Resident Worker Space:** The second and third floors of the WW currently house resident workers. The open housing configuration provides greater freedom of movement, which helps incentivize voluntary participation in the resident worker program. To be a resident worker, the resident must be screened and determined to be low risk based on their incarceration history, charges, and other factors. As the population of the jail has shifted to include a higher percent of individuals with more serious charges, as well as those with more physical and behavioral challenges, a lower percentage of the population has been eligible to meet the criteria required to be a resident worker. It has become increasingly difficult to incentivize enough resident workers to support operations. Relocating these resident workers off the WW would likely mean the loss of an important incentive. Further, DAJD does not currently have other appropriate housing options for resident workers due to their work schedules. Resident workers report for their jobs at all hours of the day, and the WW is the only housing configuration in the KCCF where small units can be segregated such that residents can sleep at off hours from the schedule of the rest of the KCCF. Mingling resident workers with the rest of the KCCF population could impact workers struggling to get meaningful sleep while the rest of their units has lights on, and other residents were awake and moving around the housing units.

**Floors Two and Three Facility Improvements:** DAJD is in the midst of significant physical plant changes to the second and third floors to retrofit resident housing areas. This includes installation of new beds, tables and stools, in part pursuant to a 2024 settlement with the ACLU of Washington. These changes require fortification of walls. Jump barriers are also being installed on the third floor to further reduce the risk of harm to residents. The completed retrofit work is planned to cost between approximately \$2M and be finalized by Q4 2025.

**Current DAJD WW Use:** In addition to the resident housing space on floors two and three, laundry distribution occurs in this space. The fourth floor of the WW houses a number DAJD operations including space for program and administrative staff, resident library, training unit and classrooms, volunteer and religious programming office space, the employee gym, defensive tactics training room, and male and female officer sleeping spaces. Due to existing space constraints, there is no other location within the KCCF nor the MRJC footprint to relocate these services. In addition, it is not possible to move many of these functions outside the secure area, as they are relied on by corrections officers whose work is confined to the secure area (e.g. rest, fitness, and training areas must be accessible). Repurposing this space would displace DAJD staff and resident spaces, resulting in inefficiencies to day-to-day operations. There is also no other adequate available space for regular storage in the KCCF.

Adding additional services to any KCCF space other than the first floor of the WW would result in increased costs and a reduction to the number of shelter beds for those living unhoused. It would be disruptive to DAJD resident housing, day-to-day operations, and would eliminate necessary staff and training space. The provision of any behavioral health and medical services provided in total confinement (jail) cannot currently be billed to Medicaid and must be paid by the County.<sup>9</sup> Additional analysis would be needed regarding potential labor implications in the event contracted provided services would overlap with current JHS services.

Ongoing DAJD staffing shortages, the anticipated historical increase in jail bed demand during the spring and summer months, along with the lack of ingress and egress for non-confined individuals to other WW floors are considerations for the use of those floors as side door space.

**Repurposing Existing First Floor Space:** Repurposing the existing shelter space would result in a loss of up to 40 shelter beds at a time when shelter bed capacity and availability is significantly less than the need in Seattle. Specifically, ending the contract would eliminate 40 shelter beds that have been meeting the needs of the community as evidenced by the 95 percent user rate and achievement of the performance expectations in the contract. It is a year-to-year contract and can be cancelled at the end of a calendar year. The next contract renewal date is December 31, 2025.

Because the first floor of the WW is currently utilized as a shelter, repurposing the space for side door services would require reinvesting in further capital improvement expenditures to the space that was recently rebuilt in 2019. The County would need to replace furnishings purchased by DESC and require technology improvements for wi-fi access.

**Stakeholder Feedback:** Discussions with representatives from PSB, DAJD, DCHS, KCSO, PAO, DPD, SPD and Seattle Mayor's Office, DOC, the courts, and diversion programs (stakeholders), indicated no interest in dislocating or losing the existing shelter beds, or losing the space for JHS release and

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<sup>9</sup> JHS participation in a potential Medicaid 1115 Waiver analysis is underway which may impact this rule in the future.

coordinated discharge services both of which are housed on first floor of the WW. Nor was there an expressed desire to expand services to other WW floors, and disrupt the space needed for DAJD and its partners.

### **Advantages of WW for Side Door**

**Location:** The central location of the KCCF is a primary advantage in considering the use of the WW as a location for the provision of services and alternatives to detention. It is close to both County and City of Seattle services and a number of transit options, and close to I-5 making it relatively easy to access. The location is also ideal in circumstances where a participant can be referred to the space from first appearance hearings conducted at the jail. At the time of the writing of this report, the Executive is considering the siting of a Crisis Care Center in the Central Zone that is similarly centrally located.

In a follow-up to the March 17<sup>th</sup> meeting, PSB staff had a preliminary conversation with the DOC Office of Community Corrections about potentially contracting with King County for community-based jail booking diversion options for community corrections violators who are primarily struggling with behavioral health issues. DOC indicated interest in contracting with King County if its clients could also be diverted to the WW space, rather than being confined in a state prison for a short period of time. Because King County eliminated its contract with DOC at the beginning of the pandemic, a new agreement would need to be negotiated if King County was interested in pursuing this kind of a partnership. Additional analysis is needed to understand the implications of expanding side door use to DOC for King County, including implementing a full cost recovery model.

**Existing Programs and Services:** Stakeholder discussions included emphasis on utilizing existing available and planned behavioral health crisis diversion programs and whether the County's focus should be on better utilizing those programs. They also raised the questions of and why and how the WW location would be different from those programs and services. Discussions included the following points:

- King County residents benefit from increased service options for individuals who could be charged with non-violent, misdemeanor offenses especially when the individual's activities are related to behavioral health conditions. Expanding services provided in the WW could address some of this need. However, side door services may be duplicative of other facilities expected to open soon, including the ORCA Center and STAR Center operated by DESC and the Crisis Care Center for the Seattle/Central Zone.
- Law enforcement should be encouraged to consider a greater use of RCW 10.31.110 as an alternative to arrest, to transport persons in need to a crisis stabilization unit or crisis relief center, refer to a designated crisis responder for evaluation and initial detention and /or refer the individual, upon agreement, to voluntary participation in outpatient treatment. The enhanced WW services could help facilitate such utilization by law enforcement.
- Given that the WW is currently contracted to provide shelter and behavioral health services, enhancing the space to increase capacity for the diverted population and amending the DESC existing contract could potentially yield economies of scale for the current contractor (DESC), and King County. Further analysis is needed to identify specific economies of scale opportunities.

### **Secure vs. Non-Secure Consideration**

Most stakeholders coalesced around the concept that the side door facility should be a non-locked (or non-secure) site. Legal concerns were raised by some stakeholders about a using a locked site for individuals who were not being held in custody because individuals remanded for involuntary services at a locked site would either need to be detained for involuntary treatment or booked in the jail for cause.

This is an area that requires further analysis, with cascading impacts on space, staffing, programs, and costs. Notably, a locked side door facility in the WW would require staffing by DAJD corrections staff, resulting in higher operational costs.

Some raised the concern of using a locked space in the WW would expand the use of secure detention and would work against the goals of diversion from jail and alternatives to secure detention. Stakeholders noted that research that shows confinement does not help persons in crisis and often exacerbates behavioral health issues and can lead to negative outcomes.<sup>10</sup> Confinement is associated with increased mental health problems and is ineffective in stabilizing persons in crisis. Rather, evidence-based crisis stabilization and community support services are recommended to help those in need.<sup>11, 12</sup>

### **Feasibility of co-locating services with the shelter currently occupying the West Wing**

Facility limitations for existing useable space in the current first floor shelter footprint do not allow for co-locating of the shelter with side door services while assuring adequate service and separation of the populations served by each function. As reported by DESC, the shelter beds operate at 95 percent capacity. While one or two beds may be available at any one time, consistent with the National Registry of Evidence Based Practices, the mixing of the shelter population and persons in acute crisis is not a best practice. DESC reports that shelter clients do not have sobriety requirements and bringing persons in crisis into a shared space is contraindicated.

It is feasible for the existing storage space to be renovated for use as a non-secured space. It could serve up to 16 adult males for the provision of voluntary side door type services. Though the storage space is essential for shelter clients and operations DESC is open to exploring storage alternatives.

**B. A discussion, in collaboration with the behavioral health and recovery division, of the types of services that could be provided on-site, including assessments, therapy, medication assisted treatment, and case management, and how those services might be administered through existing or new alternatives to detention and diversion programs, and consideration of whether currently available on-site services and case management at the site could be used as a shared resource for the homeless shelter and "side door";**

### **Types of Services**

The side door option that would expand the footprint and capacity of the shelter space that currently occupies the first floor of the WW is outlined in this and subsequent subsections of this report. The side door option in expanded space would coordinate with and support existing crisis services in the County rather than expanding to the upper floors of the WW or eliminating the DESC shelter.

In discussion with Behavioral Health and Recovery Division of DCHS, the types of services that are best suited for diversion may be eligible for Medicaid and provided on-site, through a contracted, licensed

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<sup>10</sup> Petersilla, Joan (2003) When Prisoners Come Home. New York: Oxford Press

<sup>11</sup> Vera Institute of Justice. (2021). *Beyond Jails: Community-Based Strategies for Public Safety*. New York City. <https://www.vera.org/beyond-jails-community-based-strategies-for-public-safety>

<sup>12</sup> Quandt, K.R. (2021, May 13). Incarceration Can Lead to Lasting Damage to Mental Health. *Prison Policy Initiative*. <https://www.prisonpolicy.org/blog/2021/05/13/mentalhealthimpacts/>

behavioral health provider. These services that could be covered under Medicaid include behavioral health assessments, individual/group therapy, medication assisted treatment, and case management.<sup>13</sup>

Conversations with DESC indicate DESC interest in continuing to provide the existing shelter services and are open to further conversations about adding additional services and beds if additional services are added to the WW footprint. Otherwise, further analysis is needed to determine whether a new contractor could accommodate the additional occupants and services.

#### **Administration of Services through Existing or New Alternatives to Detention**

A function of the case management services and individual assessments, provided by the side door contractor, would be to work with law enforcement, referral sources and other local providers to triage participants and provide. Such services also include direct, a warm handoff and transport to one of the many existing spaces and services in King County that would be best prepared to address the behavioral health needs of the proposed side door population, based on availability. These functions are similar to those of the planned Crisis Care Centers described above.

Below are service options available for this population.

**The King County Crisis Solution Center** was originally designed as an alternative to jail booking for persons in crisis. The facility is comprised of two programs: The Crisis Diversion Facility (CDF) and Crisis Diversion Interim Services (CDIS). Law enforcement doesn't need a referral to do a drop off at the Crisis Solution Center.

- **The Crisis Diversion Facility (CDF)** program accepts referrals from first responders including KCSO, SPD, and all other local city law enforcement agencies in King County. In addition, local fire department medical response units, County Designated Crisis Responders (DCRs), Hospital emergency departments (EDs), King County Emergency Service Patrol and Seattle Community Assisted Response and Engagement (CARE) may also make referrals. The CDF provides crisis stabilization services, with a capacity of 16 stabilization beds, for up to 72 hours of service. The CDF maintains a minimum 4:1 client to staff ratio and has 24 x 7 access to medical staff. In 2024, an average of 11 beds were occupied at any one time.
- **Crisis Diversion Interim Service** accepts referrals only from the CDF and maintains capacity for 30 interim respite beds with a maximum length of stay of 14 days.

The Crisis Solution Center has reported that law enforcement is currently underutilizing existing crisis diversion programs. It provides three days of services, followed by 14 days of voluntary stay-stabilization.

**The Crisis Care Centers Initiative**, approved by King County voters in April 2023, began in 2024 to create a countywide network of five crisis care centers (CCCs).<sup>14</sup> They are intended to be a service entry point

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<sup>13</sup> Services provided at the current WW shelter include behavioral health treatment, housing counseling, and employment services, and case management services which may include medical and mental health wrap-around care. Medication for opioid use disorder (MOUD) is not provided.

<sup>14</sup> <https://kingcounty.gov/en/dept/dchs/human-social-services/community-funded-initiatives/crisis-care-centers-levy>

for individuals and family members seeking behavioral health treatment and for law enforcement and other first responders as a diversion from emergency rooms and jail. These centers are envisioned to restore and expand mental health residential treatment beds and strengthen the community behavioral health workforce.

The nine-year levy also aims to promote continuity of care by linking 988, mobile crisis teams, and other behavioral health resources to support people's recovery. Persons in crisis including those with low-level criminal behavior are appropriate referrals. Post-crisis follow up can include additional support for up to 90 days in community with a link with behavioral health outpatient providers. Connections Health Solutions has been selected to operate the CCC for the North Crisis Response Zone at its facility in Kirkland. The CCCs will provide walk-in, behavioral health and urgent care. The Executive is currently considering a potential site for the Central Response Zone (Seattle) in the Capitol Hill neighborhood that could open as early as 2027.

**King County Sheriff's Office Therapeutic Response Team** is a progressive approach to law enforcement public safety which integrates mental health professionals with specially trained KCSO deputies to form co-responder teams with responsibilities that include de-escalation, crisis intervention, service referrals, and support for treatment processes.<sup>15</sup>

**King County Designated Crisis Responders** are called to meet with persons in a behavioral Health crisis at any location to evaluate the individual for involuntary treatment under RCW 71.05.153. Depending on the crisis, a person can be detained for up to 120 hours. Before being detained, typically individuals must be transported to a local emergency department for medical clearance with the support of law enforcement and the local ambulance service. Law enforcement involvement is authorized by RCW 71.05.153, but ambulance providers often require it as a precursor for providing transportation services. Once medical clearance is established by the local emergency department the remaining of the 120 hours could be served at an Evaluation & Treatment or Secure Withdrawal Management and Stabilization facility.

**The ORCA Center**, a new DESC service, will be opening in fall 2025 in the DESC Morrison space, which is located in downtown Seattle, across from the King County Courthouse, just a few blocks from the KCCF.<sup>16</sup> Funding will come from multiple sources, including King County, and will serve persons with opiate overdoses with a 24-hour model of care for induction, and referral to services. Referrals can come from first responders. Twelve Medicaid funded beds will be available for persons enrolled in Medicaid.

**The DESC's STAR Center** (Stability Through Access and Resources) provides time limited, 24/7, behavioral health-focused non-congregate shelter. Participants may access services on a case-by-case basis for the amount of time necessary to achieve stabilization. Services focus on unsheltered adults facing significant untreated and undertreated challenges related to mental health and substance use disorders. The center will be located at Third Avenue and Cherry Street in downtown Seattle and will provide accommodation for up to 85 people nightly.

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<sup>15</sup> <https://kingcounty.gov/en/dept/sheriff/courts-jails-legal-system/sheriff-services/therapeutic-response-unit>

<sup>16</sup> <https://www.desc.org/orca-center-will-provide-quick-stabilization-and-resources-following-overdose/>

**The Sobering Center** provides a safe space for people to sleep off the effects of acute alcohol or drug intoxication or opiate overdose.<sup>17</sup> DCHS is securing a permanent location for a new sobering center in Seattle's SODO neighborhood. Expected to open in early 2026, this center will be available 24/7 to meet the growing needs of our community and connect more people to treatment, lifesaving interventions, and a path to recovery. It will be operated by Pioneer Human Services and be able to serve up to 40 people at a time.

**C. Projection of the number of people likely to be served by the "side door" and the capital and operating resources that would be needed to implement the plan.**

PSB staff estimates that by adding 12-16 additional single beds in the renovated storage space on the first floor of the WW, with an average length of stay of five days, it is anticipated the side door services could accommodate 600-800 admits per year. The five-day stay estimate is based on the assumption that participants would be referred to other programs and services outside of the WW. Longer lengths of stay would reduce the numbers served.

Commensurate with the existing DESC contracted shelter services for 40 beds costing \$1.1M annually, PSB estimates an annual operating cost for additional beds and required service coordination and case management with community-based providers would be \$1.5 million per year. According to the BHRD, programmatic costs would increase with services such as withdrawal management or administration of medications for opioid use disorder. Detailed side door programmatic design would inform and potentially increase these costs.

For initial planning purposes only, King County Facilities Management Division of the Department of Executive Services provided a rough order of magnitude estimate of \$700,000 for enhancements to the WW storage space for this work. This estimate does not include start up materials, furnishings or staff support infrastructure, or storage and laundry replacement.

**D. Identification of potential funding sources to implement the plan, including use of the \$2,000,000 expenditure reserve in the Mental Illness and Drug Dependency Fund set aside for supporting changes to the future use of the west wing; and**

The 2025 financial plan for the MIDD Fund currently includes a \$2 million reserve that is set aside to support the future use of the WW. See Appendix A. Expenditures of MIDD revenue must align with the broad spending restrictions of the MIDD sales tax, which is for programs and services for people living with or at risk of behavioral health conditions. This reserve is subject to an Expenditure Restriction in the Adopted 2025 Annual Budget (Ordinance 19861) limiting this \$2 million of the MIDD fund to "... solely support changes to the west wing..."

PSB estimates that most of the build out, start up, and first year of contracting costs of a 16-bed, first floor WW side door program could be funded by the \$2 million reserved in the MIDD Fund. Leveraging Medicaid reimbursement for services would also help fund programming costs.<sup>18</sup> However, because Medicaid funding does not cover the full cost of providing services, it is likely additional revenue would

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<sup>17</sup> <https://www.desc.org/star-center/>

<sup>18</sup> DCHS notes that when a behavioral health bed isn't being used, local funding covers the gap between Medicaid and the total cost to operate.

be needed to sustain the program over time. Final design of side door programming will determine costs and revenue options.

## **E. Identification of the timeline and next steps to implement**

During the development of this report, two subject areas were identified by stakeholders which require further analysis. Analysis on the two topics directly impact development of a plan for use of the WW as an area to provide alternatives to secure detention services via a side door program. Because these two areas need further analysis, it is not possible to include a specific timeline to implement a plan for the side door program in this Proviso response.

The topics for further work identified as next steps are summarized below:

- *Legal/statutory feasibility analysis on developing and implementing an involuntary, secure side door program.* While this report notes that most stakeholders consulted for the Proviso response coalesced around creating a voluntary side door program, some interested parties maintain that the side door program should be explored a locked facility implemented as secure alternative to jail.

The decision to implement a secure facility sited at the KCCF has cascading impacts, including such items as the potential to increase construction and ongoing operating costs and the potential need to relocate the non-secure shelter program.

Further analysis is needed in this area to inform policy decisions around secure v. non-secure side door program.

- *Consider the concentration of human services downtown Seattle and Pioneer Square.* Some stakeholders have noted that the area around KCCF in downtown Seattle/Pioneer Square neighborhood has a high concentration of human services. Given the existing space constraints of the WW, its current use as a shelter, and the potential additional services offered through a new Crisis Care Center on Capitol Hill along with other new programs and forthcoming services, policymakers and stakeholders may wish to examine the concept of locating a side door program in the downtown Seattle Pioneer Square neighborhood.

These next steps should be undertaken in collaboration with stakeholders, the County Executive, and the King County Council.

## **V. Conclusion**

The creation of a 16-bed, non-secure, 24/7 side door alternative to jail booking could provide voluntary diversion pathway for individuals with behavioral health needs engaging in non-violent misdemeanor-level behaviors may be feasible on the first floor of the WW.

While this program could be supported by reserved MIDD funding and also by Medicaid reimbursements, additional funding would likely be needed since Medicaid funds do not cover the full cost of providing services, and future reductions of Medicaid funding are expected. At the same time,

the County and its partners offer several existing and anticipated future services supporting a voluntary diversion pathway for individuals with behavioral health needs that could be more effectively utilized.

This report identifies two areas for further work to inform policymaker decisions around developing and implementing a side door program: legal feasibility analysis for creating a secure alternative to jail and location of a side door program outside of the downtown Seattle/Pioneer Square area. Decisions on these matters impact facility design and costs along with staffing, programmatic, and operational costs. These next steps should be undertaken in collaboration with stakeholders, the County Executive, and the King County Council.

## **VI. Appendix A MIDD Financial Plan**

MIDD Monitoring /1135 Financial Plan April 2025

Category	2023-2024 Revised Budget	2023-2024 Actuals	2025 Actual	2025 Adopted	2025 Estimated	2026-2027 Projected	2028-2029 Projected
<b>Beginning Fund Balance</b>	<b>57,330,129</b>	<b>57,330,129</b>	<b>47,804,488</b>	<b>47,158,736</b>	<b>47,804,448</b>	<b>22,276,625</b>	<b>5,981,327</b>
<b>Revenues</b>							
Local Sales Tax	182,122,607	183,736,289	13,633,946	93,782,511	93,172,177	192,603,763	202,942,807
Other/Interest	5,000,000	5,295,785	375,965	769,143	1,050,000	1,758,421	859,200
General Fund Transfer						-	-
<b>Total Revenues</b>	<b>187,122,607</b>	<b>189,032,074</b>	<b>14,009,911</b>	<b>94,551,654</b>	<b>94,222,177</b>	<b>194,362,184</b>	<b>203,802,007</b>
<b>Expenditures</b>							
Salaries, Wages & Benefits	28,428,550	26,744,872	4,658,292	16,207,395	16,207,395	32,061,136	33,818,086
Supplies	257,134	133,898	10,994	141,019	141,019	294,447	314,617
Contracted Services	139,574,660	116,642,471	16,074,668	77,908,030	77,908,030	127,667,040	136,412,232
Intergovernmental Services	2,853,454	2,668,528	4,273,440	1,353,296	1,353,296	2,981,953	3,380,342
Interfund Transfers	43,880,202	36,642,812	3,302,856	25,448,460	25,448,460	53,136,418	56,776,263
Transfer to Behavioral Health Fund	15,500,000	15,500,000	1,990,588	7,191,800	7,191,800	15,016,488	16,045,118
Cascade Hall	3,800,000	225,134				-	-
<b>Total Expenditures</b>	<b>234,294,000</b>	<b>198,557,715</b>	<b>30,310,838</b>	<b>128,250,000</b>	<b>128,250,000</b>	<b>231,157,482</b>	<b>246,746,658</b>
<b>Estimated Under expenditure</b>	<b>(5,200,000)</b>			<b>(8,500,000)</b>	<b>(8,500,000)</b>	<b>(20,500,000)</b>	<b>(22,000,000)</b>
<b>Other Fund Transactions</b>							
<b>Total Other Fund Transactions</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>Ending Fund Balance</b>	<b>15,358,736</b>	<b>47,804,488</b>	<b>31,503,561</b>	<b>21,960,390</b>	<b>22,276,625</b>	<b>5,981,327</b>	<b>(14,963,324)</b>
<b>Reserves</b>							
Expenditure Reserve (60 days)	16,974,742	16,546,476	18,219,340	18,219,340	16,275,484	19,263,124	20,562,221
Future use of West Wing	2,000,000	2,000,000	2,000,000	2,000,000	2,000,000		
Sobering Center Allocation			2,800,000	2,800,000	2,800,000		
Out-year Capital RFP Reserve			5,000,000	5,000,000	5,000,000		
Cascade Hall Reserve	3,700,000	3,700,000	1,800,000	1,800,000	1,800,000		
<b>Total Reserves</b>	<b>22,674,742</b>	<b>22,246,476</b>	<b>29,819,340</b>	<b>29,819,340</b>	<b>27,875,484</b>	<b>19,263,124</b>	<b>20,562,221</b>
Reserve Shortfall	7,316,006	-	-	7,858,950	5,598,859	13,281,797	35,525,545
<b>Ending Undesignated Fund Balance</b>	<b>-</b>	<b>25,558,012</b>	<b>1,684,221</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>

**Financial Plan Notes**

All financial plans have the following assumptions, unless otherwise noted in below rows.

Out-year revenue and expenditure inflation assumptions are consistent with figures provided by PSB's BFPA guidance.

Revenue Notes:

Estimated and projected revenues reflect the updated revenue forecast per King County Office of Economic and Financial Analysis (OEFA) as of April 2025.

Expenditure Notes:

2023-2024 Estimated reflects updated planning assumptions.

2023-2024 Biennial-to-Date Actuals reflect revenues and expenses posted through 12/31/2024.

2025 Adopted reflects 12/2/2024 Council Adopted Budget.

2026-2027 Projected includes adjustments to back out one-time items.

Reserve Notes:

The Rainy Day Reserve represents 60 days of estimated expenditures.

Sobering Center Allocation reserves for out-year spending of the \$5.6M total allocated to the Sobering Center in the 2023-2024 2nd Omnibus.

Out-year Capital RFP Reserve is for out-year spending of the \$10M total allocated to community capital projects in the 2023-2024 2nd Omnibus.

Cascade Hall Reserve is for unspent funds for the Cascade Hall facility that will be needed for maintenance and repairs.

Last Updated 7/11/2025 by DCHS Staff using data from PBCS and BFPA assumptions. To correct versoin sent on June 5, 2025.



## King County

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July 17, 2025

The Honorable Girmay Zahilay  
Chair, King County Council  
Room 1200  
C O U R T H O U S E

Dear Councilmember Zahilay:

Pursuant to Ordinance 19861, Section 54, Proviso 2, please find enclosed the required Proviso response on use of the west wing of the King County Correctional Facility (KCCF) as an area to provide alternatives to secure detention services and a proposed Motion that would, if approved, acknowledge receipt of the plan.

As required, the Proviso response includes discussion of the feasibility and advantages of using all or a portion of the west wing of the King County Correctional Facility to provide a "side door" alternative space to bring people with behavior health needs arrested for non-violent misdemeanor offenses, as an alternative to booking them into jail, including consideration of whether the space should be secure, and the feasibility of co-locating the facility with the homeless shelter currently occupying the west wing. The document describes input from the Behavioral Health Division of the Department of Community and Human Services (DCHS) on the types of services that could be provided on-site. It includes a projected number of individuals who could be served, along with initial estimated capital and operating resources needed. A discussion of funding resources is included.

Currently, the first floor of the KCCF west wing is a shelter for unhoused individuals, operated by the Downtown Emergency Service Center (DESC). The Department of Adult and Juvenile Detention (DAJD) utilizes floors two – seven for resident housing and jail operations. The enclosed report explores the potential to renovate and repurpose storage space used by DESC for the first-floor shelter to create side door services. With renovation, this storage space could be repurposed to provide beds for up to 16 adult males for a 24/7, voluntary, side door program. Because the storage space is essential for shelter operations, repurposing it while keeping the shelter would require finding alternative space for client storage and program supply or reducing the number of shelter beds.

To inform the development of this Proviso response, Office of Performance, Strategy, and Budget (PSB) staff convened individual and group stakeholder discussions with representatives from DAJD, DCHS, the King County Sheriff's Office (KCSO), Prosecuting Attorney's Office (PAO), Department of Public Defense (DPD), Seattle Police Department (SPD), the Seattle Mayor's Office, State Department of Corrections (DOC), the courts, and diversion programs. In these discussions, many partners expressed concerns about making the side door program secure or involuntary. They also shared concerns about and losing the existing functioning shelter beds. The side door concept outlined in the enclosed Proviso response reflects feedback from the engaged stakeholders.

The Proviso response also identifies two subject areas raised by stakeholders for further analysis, each of which impact side door program design and facility use. Because additional information is needed on these areas, the Proviso response does not include a timeline for implementation due the need for further analysis.

The first area for additional work involves conducting a legal/statutory analysis of the development and implementation of an involuntary, secure side door program. While the Proviso response notes that most stakeholders consulted coalesced around creating a voluntary side door program, some interested parties hold that the side door program should be a locked facility implemented as secure alternative to jail. Further analysis is needed in this area to inform policy decisions around the side door program.

The second area for further analysis is consideration of the concentration of human services downtown Seattle and Pioneer Square. Some stakeholders have noted that the area around KCCF in downtown Seattle/Pioneer Square neighborhood has a high concentration of human services. Given the existing constraints of the west wing outlined in the enclosed document, its use as a shelter, and the potential additional services offered through a new Crisis Care Center on Capitol Hill, policymakers and stakeholders may wish to reexamine the concept of locating a side door program in the downtown Seattle Pioneer Square neighborhood.

Next steps outlined in the response include further analysis of these two areas which should be undertaken in collaboration with stakeholders, the County Executive, and the King County Council.

Thank you for your consideration of this Proviso response and proposed Motion.

If your staff have questions, please contact Diana Joy, Chief of Administration, Department of Adult and Juvenile Detention at 206-263-2769.

The Honorable Girmay Zahilay

July 17, 2025

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Sincerely,

A handwritten signature in black ink, appearing to read "Karan Gill", written over a horizontal line.

for

Shannon Braddock

King County Executive

Enclosure

cc: King County Councilmembers

ATTN: Stephanie Cirkovich, Chief of Staff, King County Council

Melani Hay, Clerk of the Council

Karan Gill, Deputy Executive, Chief of Staff, Office of the Executive

Stephanie Pure, Council Relations Director, Office of the Executive

Allen Nance, Director, DAJD

Steve Larsen, Deputy Director, DAJD

Diana Joy, Chief of Administration, DAJD

Kelly Rider, Director, DCHS



## King County

### Metropolitan King County Council Law and Justice Committee

#### STAFF REPORT

<b>Agenda Item:</b>	7	<b>Name:</b>	Leah Krekel-Zoppi
<b>Proposed No.:</b>	2025-0206	<b>Date:</b>	September 3, 2025

#### SUBJECT

A motion acknowledging receipt of an independent monitoring report on confinement of juveniles in county detention facilities as required by a proviso in the 2025 Budget.

#### SUMMARY

The Council included a proviso in the 2025 Budget requiring the Executive to engage an independent monitor to review the use of solitary confinement for youth in detention, a continuation of independent monitoring related to the County's implementation of Ordinance 18637 which placed restrictions on the use of solitary confinement of youth. This proposed motion would acknowledge receipt of the independent monitors' report.

The transmitted report covers the period between April 1, 2024 – March 31, 2025. The report notes that the challenges faced by the Department of Adult and Juvenile Detention (DAJD) discussed in previous reports persisted during this reporting period, including a larger population of youth and longer stays, staffing shortages, and more youth booked on serious charges. An additional challenge noted in the report was the loss of the Juvenile Division staff person responsible for data quality assurance.

According to the report, the number of incidents of restrictive housing at the juvenile detention facility increased compared to the previous reporting period, as did the number of assaults directed towards staff members. An area of progress noted by the independent monitors was a decrease in the average duration of time youth spent in restrictive housing. In addition, restrictive housing incidents involving aged out young adults in adult detention facilities decreased compared to the previous reporting period, however, the monitoring team noted concern around a practice of assigning residents to cool down periods in confined visitation booths without access to reading material.

The independent monitoring team reviewed previous recommendations around clarifying unintended consequences in the code definition of prohibited solitary confinement, improving behavior management strategies, correcting inconsistencies in descriptions of how a youth's behavior poses an imminent and significant risk of physical harm, and improving restrictive housing documentation. Additionally, the monitoring team made a new recommendation to provide youth in adult detention with reading materials during cool down periods.

## **BACKGROUND**

**Juvenile Detention in King County.** The King County Department of Adult and Juvenile Detention's (DAJD) Juvenile Division has operated the County's juvenile detention system since 2002. Under state law<sup>1</sup>, King County is required to operate a detention facility for juvenile offenders. The Juvenile Division also operates court-ordered alternatives to secure detention programs.

King County's juvenile secure detention facility is located in the Judge Patricia H. Clark Children and Family Justice Center (CCFJC). The County's average daily population (ADP) of youths in secure detention was 55 in 2024.<sup>2</sup> The facility provides a health clinic, juvenile programming including a gymnasium, food services, volunteer services, family visitation, behavioral health services provided by Ryther, regular and special education provided by Seattle School District, and a library managed by King County Library System.

The CCFJC houses youths ages 12 to 17 awaiting adjudication in King County Juvenile Court and ordered to secure detention. In addition, beginning in 2018, the Executive directed through Executive Order for all youth under age 18 charged as adults to be housed at the CCFJC.<sup>3</sup> The average length of stay for juveniles is 21.2 days for youth charged as juveniles and 276.8 days for youth charged as adults.<sup>4</sup>

Whether a youth who is arrested is admitted into secure detention is based on a screening process performed by Juvenile Court Juvenile Probation Counselors, who determine whether the youth meets the detention intake screening criteria. The criteria are intended to keep youth out of detention if Juvenile Court determines they can safely return home or be placed in a community-based residential care facility. Therefore, most juveniles in detention are being held for offenses categorized as serious or violent offenses.

King County adopted the Juvenile Justice Operational Master Plan in 2000, adopting a policy to emphasize prevention, intervention, and alternatives to the use of secure detention for juvenile offenders. As a result, even as King County's overall population has grown, the number of youths arrested, charges referred, charges filed, and youths held in secure detention has declined significantly, including a 61 percent reduction since 2010 in the number of youths in detention in King County.<sup>5</sup>

As part of its juvenile detention reform efforts, King County participates in the Juvenile Detention Alternatives Initiative (JDAI), which is a national juvenile justice improvement initiative geared towards changing how detention is used for youth. The County became a formal JDAI site in 2004 and uses JDAI standards for its programs and detention.

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<sup>1</sup> RCW 13.04.135

<sup>2</sup> [2024-12-kc-dar-scorecard.pdf](#)

<sup>3</sup> King County Executive Order "Youth Charged as adults to be housed at the Youth Services Center," November 2, 2017

<sup>4</sup> 2024 averages according to [2024-12-kc-dar-scorecard.pdf](#)

<sup>5</sup> Updated data from the September 2023 Care and Closure Progress Report, pg. 21

**Use of Solitary Confinement for Youth.** Solitary confinement is a form of imprisonment in which the person is isolated from human contact, often with the exception of members of staff. Solitary confinement can also be called room confinement, segregated housing, protective custody, restrictive housing, restricted housing, time out, restricted engagement, close confinement, special management unit, administrative detention, non-punitive isolation, temporary isolation, or other terms.

JDAI detention facility standards prohibit the use of room confinement for reasons other than as a temporary response to behavior that threatens immediate harm to a youth or others. The standards reflect the advice of dozens of practitioners and nationally recognized experts that room confinement should not be used for discipline, punishment, administrative convenience, or other reasons.<sup>6</sup> Further, the Council of Juvenile Correctional Administrators reports that isolating or confining a youth in their room should be used only to protect the youth from harming themselves or others and if used, should be for a short period and supervised.<sup>7</sup>

**Restricting the Use of Solitary Confinement in King County.** In December 2017, the King County Council adopted Ordinance 18673 which banned solitary confinement for youth except in specific limited circumstances.<sup>8</sup> This legislation had three elements.

The first element created King County Code Chapter 2.65, banning the use of solitary confinement for youth detained by King County “except as necessary to prevent significant physical harm to the juvenile detained or to others when less restrictive alternatives would be ineffective,” regardless of the facility in which the youth is held. The ordinance defines a “juvenile” as a youth held in the juvenile detention facility or a young adult over age 18 held in the adult detention facility for a matter committed when they were under age 18. The ordinance defines “solitary confinement” as 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. The ordinance further notes that using different terminology for this practice does not exempt a practice from being considered solitary confinement.

Secondly, the ordinance requires DAJD’s Juvenile Division to ensure that all juveniles detained in any King County detention facility are given reasonable access to the defense bar, juvenile probation counselors, social service providers, and educators in a timely manner.

Finally, the ordinance required that the Executive appoint an independent monitor or monitors who have expertise in juvenile detention operations and corrections, officer safety and security, and trauma-informed behavioral modification practices to monitor and report on the implementation of the ordinance.

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<sup>6</sup> JDAI Juvenile Detention Facility Assessment, pp. 177-180.

<https://assets.aecf.org/m/resourcedoc/aecf-juviledetentionfacilityassessment-2014.pdf#page=103>

<sup>7</sup> The Council of Juvenile Correctional Administrators, Toolkit: Reducing the Use of Isolation, Council of Juvenile Correctional Administrators, March 2015

[Home | The Council of Juvenile Justice Administrators \(cjaa.net\)](http://www.cjaa.net)

<sup>8</sup> Ordinance 18637, adopted December 21, 2017.

**State Prohibition of Solitary Confinement for Detained Youth.** In 2020, Washington State enacted legislation prohibiting solitary confinement of detained youth as punishment,<sup>9</sup> which became effective as state law on December 1, 2021. The law defines different confinement scenarios including “solitary confinement,” “room confinement,” and “isolation,” and establishes restrictions on the use of such practices including the circumstances, conditions, and duration they can be used, and requiring check-ins every 15 minutes during the confinement. The law required the state Department of Children, Youth, and Families (DCYF) to develop a model policy which detention facilities within the state, including King County DAJD, are required to adopt or else notify DCYF of how and why the facility's policies and procedures differed from the model policy.

The state law includes restrictions beyond those contained in county code, prompting the Juvenile Division to change policies, effective December 1, 2021, to eliminate use of “time outs” and “cool downs” of up to two hours. DAJD’s restrictive housing policy was also revised to require staff to establish a reintegration plan for any youth who remained in restrictive housing for more than four hours within a 24-hour period.

State law requires DAJD to collect and report data related to restrictive housing in order for DCYF to compile and publish statewide data, prompting changes to DAJD’s data collection and data sharing.

**Juvenile Division Restrictive Housing Policy and Behavioral Management Approach.** In response to enactment of Ordinance 18673, DAJD’s Juvenile Division established a Restrictive Housing policy, which was then updated in December 2021 to comply with the new state law. In compliance with county code and state law, the policy states that, “restrictive housing for punitive purposes is explicitly prohibited,” and that restrictive housing is prohibited unless the youth poses a risk of physical harm and there are no less restrictive alternatives available. Juvenile Division's policy states that all youth held in restrictive housing must have access to:

- Clothing;
- A mattress and bedding;
- A toilet and sink at least hourly;
- Necessary mental health services; and
- Reading material, paper, writing material, envelopes, and treatment material (except in cases of concern for self-harm as determined by medical and mental health staff and detention supervisors).

Each time a youth is placed in restrictive housing, the policy requires the following procedures:

- Documentation of the reason the youth was placed into restrictive housing;
- Safety and security checks every fifteen minutes;
- A supervisory check-in with the youth within two hours, and then every four hours outside of ordinary sleeping periods;
- Evaluation by a medical professional as soon as possible within six hours or before an ordinary sleep period, and at least once per day thereafter;

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<sup>9</sup> Second Substitute House Bill 2277, codified in RCW Chapter 13.22

- Evaluation by and development of a care plan by a mental health professional as soon as possible within four hours; and
- Documentation of the date and time of the youth's release from restrictive housing.

The policy requires that staff provide youth with the goals and objectives the youth must achieve in order to be released. The policy further requires that a youth must be removed from restrictive housing when the youth no longer poses an imminent risk.

A multidisciplinary team of restorative justice coordinators, youth detention staff, supervisors, medical and mental health professionals, and a teacher holds daily meetings during which they review incidents of restrictive housing as well as assess other behavioral support and restorative justice needs for individuals in detention.

The behavioral management approach used at CCFJC includes incentives for meeting behavioral expectations and interventions to respond to inappropriate behavior. The incentive system allows youth to move through a tier system with sustained compliance which results in increasing levels of incentives. Youth who reach the highest tier are rewarded with a later bedtime and other special privileges. Behavioral interventions include verbal de-escalation techniques, restorative work assignments, and, for more problematic behavior, creation of an Individual Development Plan. Juvenile Detention Officers document the activities and location of each youth in the facility every fifteen minutes using a Youth Accountability Checklist.<sup>10</sup>

**Prior Monitor Reports.** The Executive engaged the first independent monitor in accordance with the county ordinance prohibiting solitary confinement of youth, and independent monitoring services began on July 1, 2018.<sup>11</sup> The Council accepted the monitor's first report in December 2018.<sup>12</sup> A second report was issued in January 2019.<sup>13</sup>

In 2019, a new independent monitoring team of Kathryn Olson<sup>14</sup> and Bob Scales<sup>15,16</sup> was contracted to provide reports in compliance with a proviso added to the 2019-2020

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<sup>10</sup> As described in the [Independent Monitoring Team Report April 2022 – June 30](#), pg. 14

<sup>11</sup> Stephanie Vetter, Senior Consultant and JDAI Advisor, Center for Children's Law and Policy, working as a private contractor and juvenile justice expert in the areas of JDAI, the federal Prison Rape Elimination Act, adolescent development, juvenile detention operations and corrections, officer safety and security, and trauma informed behavioral modification practices.

<sup>12</sup> Motion 15256

<sup>13</sup> 2019-RPT0011

<sup>14</sup> Change Integration Consulting, LLC

<sup>15</sup> Police Strategies, LLC

<sup>16</sup> According to the report, the independent monitoring team, "have deep and broad background and expertise in law; the criminal justice system; law enforcement operations, policy, training, labor relations, and community relations; records auditing; advising on data tracking and reporting systems; juvenile justice; reducing racial/ethnic disparities in the criminal justice system; knowledge of PREA and JDAI, trauma informed care, and impacts on policies and practices; restorative justice techniques; and federal, state and local government and criminal justice organizations. They have worked in a wide range of jurisdictions with multiple stakeholders and strive to foster accountability and transparency in the monitoring and reporting process."

Biennial Budget Ordinance.<sup>17</sup> The team's first report covered July – December of 2019.<sup>18</sup> Recommendations in that report included consideration of:

- Whether the King County Council should amend Ordinance 18637 to exclude youth in their room voluntarily or engaged in one-on-one programming from the definition of restrictive housing;
- Enhancing youth activity and restrictive housing tracking forms;
- Creating an exit plan for any youth placed in restrictive housing; and
- Integrating restrictive housing policies and procedures with the Behavior Management System.

A second report covered January – June of 2020.<sup>19</sup> Recommendations in that report included:

- Resetting the Juvenile Division's restorative practices program and developing individual case management plans;
- Documenting specific and thorough details of behavior resulting in restrictive housing;
- Providing more specific information about programs available to AAOs (Adult Age Outs);
- Formalizing informal support services being provided to AAOs; and
- Reinstating education opportunities for AAOs that were interrupted by COVID-19 impacts.

The second report also reiterated the recommendation to create an exit plan for any youth placed in restrictive housing.

Independent monitoring was again required by proviso in the 2021-2022 Biennial Budget and the 2023-2024 Biennial Budget.<sup>20</sup> The report covering July 2020 -June 2021<sup>21</sup> noted the progress that had been achieved by the Juvenile Division and held off making new recommendations because of several major projects the division was undertaking, including transitioning to a new electronic record-keeping system and revising policies to comply with the new restrictive housing state law.

The next report covering July 2021 – March 2022<sup>22</sup> commended the Juvenile Division on expanding evidence-based interventions and developing a case management approach to behavior management that includes individual treatment plans. However, the report also noted a significant increase in incidents of restricted housing during the reporting period, attributed to the challenges of increased incidents of assaults and staffing shortages.

The report covering April 1, 2022 – June 30, 2023,<sup>23</sup> noted that challenges faced by DAJD during the reporting period included staffing shortages that impacted youth's in-

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<sup>17</sup> Ordinance 18835, Section 52, as amended by Ordinance 18930, Section 36, Proviso P8

<sup>18</sup> Motion 15680

<sup>19</sup> Motion 15788

<sup>20</sup> Ordinance 19546, Proviso P1, Section 54

<sup>21</sup> Motion 16086

<sup>22</sup> Motion 16208

<sup>23</sup> Motion 16540

room time and technology changes that led to lapses in documentation. The independent monitoring team provided recommendations to improve documentation and youth safety. The report covering July 1, 2023 – March 31, 2024<sup>24</sup> noted that the challenges faced by DAJD discussed in previous reports persisted during this reporting period, including a larger population of youth and longer stays, staffing shortages that impacted youth's in-room time, and technology changes that led to lapses in documentation. According to the report, the number of incidents of restrictive housing at the juvenile detention facility was comparable to the previous reporting period, and there was a decrease in the duration of time youth spent in restrictive housing. In that report, the independent monitoring team provided recommendations to improve documentation and develop consistent policies for participation in programming and tablet usage.

**2025 Budget Proviso Requirements.** In the process of adopting the 2025 Budget, the King County Council added a proviso<sup>25</sup> that requires the Executive to continue independent monitoring to review the use of solitary confinement in DAJD operations. The proviso requires that:

*Of this appropriation, \$100,000 shall not be expended or encumbered until the executive transmits a report on confinement of juveniles in county detention facilities and a motion that should acknowledge receipt of the report, and a motion acknowledging receipt of the report is passed by the council. The motion should reference the subject matter, the proviso's ordinance, ordinance section, and proviso number in both the title and body of the motion.*

*The report required by this proviso shall cover the reporting period of April 1, 2024, through March 31, 2025, and should build on all prior reports submitted on practices related to the confinement of juveniles as required by Ordinance 18637, Section 6, Ordinance 18930, Section 36, Ordinance 19210, Section 50, and Ordinance 19546, Section 54. The report required by this proviso shall be prepared by an appointed, independent monitor or monitors retained in accordance with Expenditure Restriction ER1 of this section. The monitor or monitors shall include in the report an analysis of compliance with K.C.C. chapter 2.65 and chapter 13.22 RCW, by the department of adult and juvenile detention juvenile division, and the report shall also include, but not be limited to:*

*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;*

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<sup>24</sup> Motion 16661

<sup>25</sup> Ordinance 19861, Section 54, Proviso P3

*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 solitary confinement 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.*

*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.*

*In preparing and completing the report required by this proviso, the monitor or monitors shall consult with stakeholders, including representatives of the King County Juvenile Detention Guild (Department of Adult and Juvenile Detention - Juvenile) representing employees in the department of adult and juvenile detention juvenile division.*

*The executive should electronically file the report and a motion required by this proviso no later than June 30, 2025, with the clerk of the council, who shall retain an electronic copy and provide an electronic copy to all councilmembers, the council chief of staff and the lead staff for the law and justice committee or its successor.*

## **ANALYSIS**

Proposed Motion 2025-0206 would acknowledge receipt of an independent monitoring team report on confinement of juveniles, as required by the 2025 King County Budget. The report, which is Attachment A of the proposed motion, covers the period from April 1, 2024, through March 31, 2025, and was prepared by the monitoring team of Kathryn Olson<sup>26</sup> and Bob Scales.<sup>27,28</sup> Approval of the proposed motion would acknowledge

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<sup>26</sup> Change Integration Consulting, LLC

receipt of the report and release \$100,000 in the DAJD budget to be spent or encumbered.

According to the report, the assessment for the reporting period was conducted through reviewing documents and data analysis; interviewing detained youth and age outs, detention officers, supervisors, and professional staff; attending multi-discipline team meetings and other detention activities; and meeting with the King County Juvenile Detention Guild Executive Board.

**Proviso Requirement A: Challenges, Progress, Setbacks, and Changes.** The independent monitors noted that DAJD faced many of the same challenges as in prior reporting periods, including:

- Staffing shortages,
- Increased average daily population for juvenile detention and adult age outs (AAOs) in adult detention,
- A higher number of juveniles being booked on more serious charges, and
- Longer average lengths of stay for detained youth, particularly for those charged as adults.

The independent monitors noted that those combined challenges impact how frequently restrictive housing is used, how well staff is able to de-escalate conflict among youth, the number of living halls that can be safely staffed, and how much access youth have to education and programming. These factors in turn influence morale for the youth and staff. According to the independent monitors, these factors also impact time available for DAJD staff to document and track restrictive housing incidents.

**New Challenges.** A new challenge noted for this reporting period is that the Juvenile Division data analyst responsible for review and quality assurance of restrictive housing data was no longer with the agency during this reporting period, resulting in less reliable data while new personnel were being hired and trained.

Noted as a significant challenge by independent monitors is the increase in youth threats and assaults towards other youth and staff members. The report states that the percentage of assaults directed at Juvenile Detention Officers (JDOs) increased from 5 percent in the previous reporting to 10 percent during the current reporting period. The report states that JDOs also perceive an increase in disrespectful and verbally abusive treatment of staff. The number of youth assaults on peers also increased during the reporting period.

**Areas of Progress.** The following areas of progress were noted in the report:

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<sup>27</sup> Police Strategies, LLC

<sup>28</sup> According to the report, the independent monitoring team, "have deep and broad background and expertise in law; the criminal justice system; law enforcement operations, policy, training, labor relations, and community relations; records auditing; advising on data tracking and reporting systems; juvenile justice; reducing racial/ethnic disparities in the criminal justice system; knowledge of PREA and JDAI, trauma informed care, and impacts on policies and practices; restorative justice techniques; and federal, state and local government and criminal justice organizations. They have worked in a wide range of jurisdictions with multiple stakeholders and strive to foster accountability and transparency in the monitoring and reporting process."

- Youth Accountability Checklist Integration: At the end of the reporting period the Juvenile Division discontinued the long-time practice of using hard copy Youth Accountability Checklists for recording the location and activity of all detained youth every fifteen minutes. Those routine checks are now integrated into the electronic Jail Management System (JMS), resulting in better accessibility and greater reliability between that data and Restrictive Housing Assessment Checklists.
- Mental Health and Medical Assessments Process Improvement: Juvenile Division implemented a process improvement in documentation of mental health and medical assessments, gaining efficiency by having those assessments entered directly into JMS by Health Clinic staff rather than being sent to Corrections Supervisors for JMS entry.
- Programming Alternatives: The report notes progress in providing programming alternatives for detained youth as well as approval of funding in the 2025 Budget to convert two temporary support positions<sup>29</sup> into permanent positions.
- Reduction of Time Youth Spend in Room Confinement for Modified Programming: Youth spending additional time confined alone in their rooms due to staff shortages has been a significant area of concern raised by advocates, Councilmembers, and previous monitoring reports within the past several years. The monitors noted that there were zero incidents of modified programming other than to accommodate staff breaks in the first quarter of 2025, down from 22 days of modified programming in October 2024.

**Setbacks.** A setback noted by the monitors was the increase in the number of restrictive housing incidents over the past three years. The report does note, however, that the average amount of total time spent in restrictive housing has steadily declined during that same time period.

**Proviso Requirement B: Incidences and Circumstances of Solitary Confinement.** For youth housed at the CCFJC during the reporting period, Table 1 shows the number of incidents where youth were placed in restrictive housing, which totaled 620 incidents during the reporting period. Note that because the transition to electronic documentation of 15-minute youth checks began on March 20, 2025, making it challenging to compare data consistently between the previous and new reporting methods, the independent monitoring team ended data analysis for this report on March 19, 2025, and recommends including data from March 20 – March 31, 2025, in the next report.

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<sup>29</sup> The temporary positions made permanent were a Gang Intervention Specialist and a Community Program Coordinator.

**Table 1: Number of Restrictive Housing Incidents April 1, 2024 - March 19, 2025**

<b>2024 Q2</b>	<b>2024 Q3</b>	<b>2024 Q4</b>	<b>2025 Q1</b>	<b>Total</b>
<b>110</b>	<b>126</b>	<b>161</b>	<b>223</b>	<b>620</b>

The high number of restrictive housing incidents in the first quarter of 2025 reflects the use of restrictive housing to help manage two challenging assaults, each involving a group of six youth and resulting in multiple injuries to staff. Both incidents occurred in February 2025. The total number of restrictive housing incidents in that month was 102, 31 to 76 percent higher than in other months during the reporting period.

The report provides the following table to compare the number of restrictive housing incidents per reporting period. The table illustrates an increase in the average number of restrictive housing incidents per month compared to each of the prior two reporting periods.

**Table 2. Restrictive Housing Incidents for Current and Prior Reporting Periods<sup>30</sup>**

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

Table 3 attempts to remove population variations as a factor in the number of restrictive housing incidents by showing the ratio between the average number of restrictive housing incidents per quarter and the annual ADP. Of note is that beginning in 2022, coinciding with implementation of the new juvenile confinement state law, DAJD began counting all restrictive housing incidents longer than an hour, rather two hours as previously reported. The columns shaded gray represent the years when incidents under two hours are included in the data.

The data in Table 3 indicates a significant increase in both the average daily population (ADP) and number of restrictive housing incidents in the first quarter of 2025. The data also shows that the ratio of restrictive housing incidents to population increased in the first quarter of 2025 compared to previous years. However, the comparison is

<sup>30</sup> DAJD Restrictive Housing Monitoring Report April 1, 2024 – March 31, 2025, pg. 14

incomplete since it includes only one quarter of data for 2025, and the number of restrictive housing incidents can vary significantly from month to month and quarter to quarter.

**Table 3: Trend of Restrictive Housing Incidents Compared to ADP**

	2020	2021	2022	2023	2024	2025 Q1
<b>Restrictive housing incidents (quarterly average)</b>	51	37	82	138	134	223
<b>Average daily population (ADP)</b>	27.3	22.4	34	43	55	61
<b>Ratio</b>	<b>1.9</b>	<b>1.7</b>	<b>2.4</b>	<b>3.2</b>	<b>2.4</b>	<b>3.7</b>

Table 4 shows the circumstances under which restrictive housing incidents occurred during the reporting period.

**Table 4. Circumstances of Restrictive Housing Incidents**

<b>Circumstance</b>	<b>Percentage of incidents</b>
<b>Assault</b>	47%
<b>Disruptive</b>	27%
<b>Threat</b>	14%
<b>Imminent Harm</b>	9%
<b>Unknown</b>	3%

As shown in Table 4, nearly half of the incidents of restrictive housing occurred because the youth involved assaulted another youth or a staff member. Not all incidents of threats or assaults result in restrictive housing, as the code and Juvenile Division policies call for use of restrictive housing only if less restrictive measures are not available.

The report states that independent monitors found inconsistency in the level of detail provided about each incident, making it difficult to determine whether the restrictive housing incidents complied with county code restrictions that limit its use to preventing imminent and significant harm. The report also questions why "imminent harm" is used by JDO staff as a separate category of behavior since it should be a consideration in any use of restrictive housing.

In response to questions from Council staff, DAJD stated that while Juvenile Division does not have definitions of the terms "assault," "threat," and "disruption," they believe that DAJD staff have a common understanding of the terms based on the division's Restrictive Housing policy. DAJD also stated that, "the Department will continue to work closely with the independent monitoring team to clarify terminology and policy, strengthen alignment, and provide additional training sessions for Detention Supervisors and Detention Officers to ensure better consistency and understanding." DAJD also believes the quality assurance process implemented by the Juvenile Division will improve the reliability of behavior descriptions.

Also in response to a question from Council staff, DAJD described how a "disruption" can constitute a threat of "imminent and significant physical harm" consistent with the

code prohibition on the use of solitary confinement for any other reasons. According to DAJD, disruptive behavior that would result in use to restrictive housing is behavior that, based on JDOs' professional judgment and experience, could quickly escalate to physical harm if not addressed promptly. An example given by DAJD was a youth running around a dayroom, ignoring verbal directives, who then goes up the dayroom stairs and threatens to jump.

**Proviso Requirement C: Duration of Solitary Confinement Incidents.** In tracking the duration of a restrictive housing incident, the Juvenile Division tracks the total amount of time a youth spends in their cell related to that incident before fully rejoining the general population. This means the data often reflects combined intervals of time rather continuous time a youth spends in their cell. Particularly for restrictive housing incidents that take longer to resolve, youth will cycle in and out of their cell during their time on restrictive housing status. For example, when an incident involves multiple youths within the same living unit, this can result in what is termed "split programming" where the involved youth alternate between programming and restrictive housing in different intervals until they reach a resolution that allows them to safely interact.

The average duration of restrictive housing events during the reporting period was 302 minutes, or five hours, representing a one hour decrease in the average duration from the prior reporting period.

Table 5 shows a comparison of the average duration of time of restrictive housing incidents in the prior reporting periods. The data shows a downward trend in average duration of restrictive housing incidents over the past three years.

**Table 5. Average Duration of Incidents for Current and Prior Reporting Periods**

Reporting Period	Average Duration of Restrictive Housing Incidents	Annual Decrease
April 1, 2022 – June 30, 2023	444 min.	NA
July 1, 2023 – March 31, 2024	360 min.	19%
April 1, 2024 – March 19, 2025	302 min.	15%

According to the report, approximately 14 percent of the restrictive housing incidents lasted one hour. Approximately 41 percent of the restrictive housing incidents had a total duration of two hours or less. In 65 percent of the restrictive housing incidents, youth were released from restrictive housing status within a total duration of less than four hours.

The report also provided data, shown in Table 6, on the amount of time a youth initially spent in restrictive housing before being released for group programming, even if that youth later returned to restrictive housing for an unresolved safety issue. As shown in Table 6, in 31 percent of incidents, youth were initially released within 30 minutes or less, and in 83 percent of incidents, youth were initially released within 45 minutes or less.

In response to Council staff questions, DAJD provided information that there were seven restrictive housing incidents during the reporting period, representing one percent of total restrictive housing incidents, where a youth was not released for programming

within four hours of initially being placed in restrictive housing. According to DAJD these incidents involved extenuating circumstances such as multiple assaults or incidents occurring within a short time period, a youth refusing to leave for programming, and a youth refusing to be searched for contraband.

**Table 6. Time in Restrictive Housing Before Release for Group Programming**

<b>Less than 15 minutes</b>	<b>15 minutes</b>	<b>30 minutes</b>	<b>45 minutes</b>	<b>90+ minutes</b>
0.8%	11.3%	19.5%	51.9%	16.5%

***Circumstances of Restrictive Housing Incidents Lasting More than Four Hours.***

The proviso required the independent monitors to identify and evaluate incidents of restrictive housing exceeding four hours. Although in 99 percent of incidents the involved youth did not spend four hours consecutively in restrictive housing, in 216 incidents youth were in restrictive housing status for a total duration of four or more hours over one or more days. This represents 35 percent of the restrictive housing incidents during the reporting period. In 62 percent of such incidents, the restrictive housing was imposed in response to an assault. In the remaining cases, it was due to threats or disruptions.

The average duration of total time in restrictive housing for the incidents exceeding four hours was 10 hours and 45 minutes, with the longest incident lasting 39 hours over several days. Note that county code states that DAJD's Restrictive Housing policy should limit the duration of solitary confinement to no more than four hours in a twenty-four-hour period,<sup>31</sup> whereas DAJD is measuring the duration of time a youth spends in restrictive housing related to one event, even if the youths' restrictive housing status occurs intermittently over multiple 24-hour periods.

**Proviso Requirement D & E Supervisor and Health Professional Reviews.** In an excerpt provided by the independent monitors that was unintentionally left out of the report (see Amendment 1), the monitors discussed the proviso requirement to review the documentation of supervisory review before<sup>32</sup> the use of solitary confinement. The monitors stated that data reliability issues contributed to difficulties identifying when supervisory review did not occur for incidents exceeding two hours. The monitoring team stated that while they were not able to perform a data analysis on supervisory review without the expenditure of significant time and resources, they are, "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 youth in confinement."

The available data indicates medical assessments were documented as taking place in 34.2 percent of restrictive housing incidents, and mental health assessments were documented as taking place in 38.7 percent of the restrictive housing incidents. This documentation rate is similar to the documentation rate from the previous reporting period.

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<sup>31</sup> K.C.C. 2.65.020

<sup>32</sup> While the proviso requirement requires review of documentation of supervisory review "before" use of solitary confinement, King County code says that DAJD's Restrictive Housing policy should include "a requirement that any use of solitary confinement be subject to review by supervisors" without reference to the review being "before" the use of solitary confinement.

For restrictive housing incidents exceeding four hours, mental health assessments were documented as having occurred 58.8 percent of incidents and medical assessments in 65.7 percent of incidents. The monitoring team noted the difficulty of analyzing the mental health and medical assessment data for compliance since law and policy require them to be completed within four and six hours respectively, and many restrictive housing incidents last less than four hours or, if the total duration exceeds four hours, the youth “rarely remain in restrictive housing for hours at a time.”<sup>33</sup>

**Proviso Requirement F: Access to Programing and Necessities.** As noted above, Juvenile Division provided data showing that youth involved in restrictive housing were able to return to group programming within 45 minutes 83 percent of the time. If a youth does not attend a school class due to being in restrictive housing, teachers typically provide an instructional packet. However, Juvenile Division’s reporting practices do not include documenting whether a youth in restrictive housing has access to an instructional packet or not.

The report also notes that approximately 40 programs were available for youth detained at the CCFJC as of the first quarter of 2025. The monitoring team noted observing program providers using a trauma-informed approach to communication with youth.

An area of improvement from the previous reporting period, noted by the independent monitors, is that the facility library has been restored to good order and “appears organized, well stocked, and welcoming,”<sup>34</sup> as opposed to the disarray reported last year.

The report states that while interviewed youth state that they have access to reading materials, both books and on their tablets, during restrictive housing, Corrections Supervisors documented that youth had access to reading materials in 59 percent of incidents. This represents a 14 percent increase since the last reporting period. The reading material access documentation procedure in JMS, which was implemented in 2022, requires Corrections Supervisors to select a drop-down menu and check “yes” or “no.” The report states that because Corrections Supervisors check on youth multiple times and make notes about their interaction with the youth, they may not be selecting the reading access drop down menu for each check in.

County code and state law also require access to clothing, mattress and bedding, medication, toilet and sink at least hourly, necessary mental health services, and writing material. All youth in detention at CCFJC have a mattress, bedding, toilet, sink, and writing material in their rooms unless there is concern for self-harm. Access to medication and mental health services is captured under the documentation of mental health assessments.

**Proviso Requirement G: Demographic of Youth in Solitary Confinement.** The report provides demographic information showing that youths aged 15, 16, and 17 were involved in a significant share of restrictive housing incidents during the reporting period as compared to younger individuals.

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<sup>33</sup> *DAJD Restrictive Housing Monitoring Report, April 1, 2024 – March 31, 2025*, pg. 28

<sup>34</sup> *DAJD Restrictive Housing Monitoring Report, April 1, 2024 – March 31, 2025*, pg. 44

The report also provides data showing that, of the restrictive housing incidents during the reporting period, 11 percent involved females and 89 percent involved males.<sup>35</sup> This is a small overrepresentation of females compared to the population during the reporting period.

The monitoring team also compared the race and ethnicity of youth involved in restrictive housing incidents to the race and ethnicity of the ADP and found that Black youth were overrepresented in restrictive housing incidents and Hispanic youth were underrepresented.

**Reporting on Additional In-Room Time.** During the COVID-19 pandemic and the staffing shortages in the years coming out of the pandemic, youth advocates and Councilmembers raised concerns about the amount of time youth were confined to their room during time they would otherwise be in programming. In response, the independent monitoring team began reporting on information about time youth spent in what the Juvenile Division refers to as “modified programming.” Modified programming occurs due to reasons unrelated to youths’ behavior, such as staff shortages, teacher shortages, COVID quarantine, and facility issues. Typically, staff breaks would be covered by other staff, and youth programming would not be affected, however, when Juvenile Division does not have enough staff to cover legally required staff breaks,<sup>36</sup> youth are returned to their rooms during staff breaks, resulting in additional in-room time and disruption to regularly scheduled programming.

During this reporting period, the amount of time youth spent in modified programming was reduced significantly, from an average of two hours per month during the past reporting period to an average of 1 hour and 17 minutes per month. During the final quarter of the reporting period, youth spent no time in modified programming.

**Reporting on Adult Age-Outs (AAOs).** The information in the previous sections applied to youth housed at the juvenile detention facility at the CCFJC. Code requirements around solitary confinement conditions also apply to AAOs, or residents in adult detention who are being detained on a matter that occurred while they were under age 18. The report states that for AAOs detained in adult detention during the reporting period, there were only 11 incidents of restrictive housing involving five AAOs compared to 33 incidents involving ten AAOs during the prior reporting period.

It is not clear based on the documentation available that the incidents involving AAOs were in response to imminent threats of harm, and the independent monitors note that restrictive housing assessments were not completed in eight of 11 incidents. All incidents exceeded four hours.

The independent monitors noted a practice being used at the King County Correctional Facility (KCCF) where AAOs are placed in visitor booths for a cool down period. The AAO Restrictive Housing policy allows for AAOs whose behavior presents a security issue to be placed in a cool down for up to two hours. Because AAOs housed in

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<sup>35</sup> DAJD categorizes gender based on the youth’s gender identification.

<sup>36</sup> Federal labor law requires employers to provide employees with two 15-minute breaks and one 30-minute break during an eight-hour shift.

communal cells cannot be isolated in their rooms like youth at CCFJC, KCCF has been using visitor booths as an alternative isolated space for cool downs. However, the monitors note that the booths are approximately nine square feet, and “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.”<sup>37</sup>

The report notes that the level of programming and in-class educational opportunities at the CCFJC are not available to AAOs in adult detention, but that Seattle Public School teachers provide educational packets to the youth based on their individualized education goals and meet with them one-on-one approximately once per week. According to the report, despite less educational support, all AAOs interviewed had completed or were in the process of completing the work to achieve their high school diplomas. AAOs also have access to programming via individual tablets.

The independent monitors did note, however, that according to interviews AAOs who were confined to visitor’s booths for cool down periods did not have access to reading materials or school-related materials during those times. Cool down periods are not defined as Restrictive Housing in the AAO Restrictive Housing Policy; however, the independent monitors recommend that DAJD should consider providing AAOs access to reading and educational materials during cool down periods.

**Proviso Requirement H: Progress Implementing Recommendations.** Beginning on page 54 of the report, the monitoring team provides a list of all recommendations since 2019 and the implementation status. Of the 29 recommendations, DAJD has completed 13, 14 are in progress, and two recommendations were withdrawn by the independent monitors.

Two of the recommendations that remain to be completed are directed at the King County. These recommendations are to address potential unintended consequences in how prohibited restrictive housing is defined in code, particularly in regards to youth in their rooms voluntarily, a single female in custody, and one-on-one programming between a JDO and youth who is not yet ready to safely integrate with peers.

Some of the key recommendations highlighted in the report that are directed at DAJD include:

- Improving behavior management strategies: In progress. Recently, DAJD convened a Behavior Management Workgroup that meets weekly and has submitted proposals to Juvenile Division leadership for consideration.
- Correcting inconsistencies in descriptions of how a youth’s behavior poses an imminent and significant risk of physical harm: In progress. The monitoring team states that all monitoring reports since 2019 have raised issues around inconsistencies in this area, which is key for evaluating whether DAJD staff is complying with restrictive housing prohibitions. The report states that DAJD continues to provide training and support to supervisors, and restrictive housing events are reviewed weekly to ensure compliance.

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<sup>37</sup> DAJD Restrictive Housing Monitoring Team Report, April 1, 2024 – March 31, 2025, pg. 36

- Exploring making living hall assignments based on age and developmental stage: In progress. The Juvenile Division planned to implement a housing classification system that considers age and developmental stage after the conclusion of the 2024-2025 school year.
- Improving restrictive housing documentation and realizing the full potential of JMS: In progress. Juvenile Division has implemented new JMS reports to verify that required checks and assessments have been completed. Additionally, short cuts have been implemented to simplify data entry.
- Implementing electronic room check technology: Completed. This was implemented in March 2025.
- Improving AAO access to education and programming opportunities: In progress. DAJD is exploring using tablets to allow residents to learn about and request in-person program offerings.

**Proviso Requirement I: New Recommendations.** The report includes one new recommendation, which is that AAOs have access to reading materials during cool down periods, due to being in a confined space for up to two hours and possibly longer.

**Proviso Requirement J: Certification of Documentation.** A new requirement added in Proviso P3 is that the monitoring team certify that at least 90 percent of restrictive housing incidents were appropriately documented in terms of the number, circumstances, and duration of incidents; completion of supervisory review and medical and mental health assessments; and access to education, programming, and ordinary necessities. The monitoring team stated that the 90 percent documentation standard was not met during the reporting period.

The report documented DAJD's explanation for not meeting the compliance requirements, stating that DAJD takes the matter seriously, and that DAJD is confident that medical and mental health assessments are being completed while youth are in restrictive housing. However, DAJD states that, "the processes required to document restrictive housing placements are labor-intensive and time-sensitive," and that, "This documentation competes with other critical operational duties such as training, coaching, direct supervision of detention operations, and assisting juvenile detention officers in de-escalation efforts." During the reporting period, DAJD implemented a process improvement that reduced the data entry burdens on Corrections Supervisors, and introduced daily, weekly, and monthly reviews of restrictive housing documentation. According to Executive staff, the Juvenile Division is hopeful that the changes will improve documentation compliance.

The report also states, "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."

**Responsiveness to Proviso Requirements.** The report appears to be responsive to the proviso requirements.

### **AMENDMENT**

Amendment 1 would replace Attachment A, the King County Department of Adult and Juvenile Independent Monitoring Team Report on Implementation of Ordinance 18637 Restrictive Housing from April 1, 2024 – March 31, 2025, with an updated report. The updated report adds a section on pages 11 and 12 that was provided by the independent monitoring team to address proviso requirement D, related to supervisory review of solitary confinement. This section was inadvertently omitted from the original transmittal. The added section was summarized in the “Proviso Requirement D & E Supervisor and Health Professional Reviews” subsection of this staff report.

### **INVITED**

- Allen Nance, Director, Department of Adult and Juvenile Detention
- Chuck Parkins, Division Director, Juvenile Detention, Department of Adult and Juvenile Detention
- Kathryn Olson, Independent Monitor

### **ATTACHMENTS**

1. Proposed Motion 2025-0206 (and its attachment)
2. Amendment 1 (and its attachment)
3. Transmittal Letter



**KING COUNTY**  
**Signature Report**

ATTACHMENT 1  
1200 King County Courthouse  
516 Third Avenue  
Seattle, WA 98104

**Motion**

**Proposed No. 2025-0206.1**

**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, the 2025 Annual Budget Ordinance, Ordinance 19861, Section 54,  
6 Proviso P3, requires the executive to transmit a report on the confinement of juveniles in  
7 county detention facilities, accompanied by a motion that should acknowledge receipt of  
8 the applicable report, and

9 WHEREAS, the report was to be transmitted no later than June 30, 2025, and  
10 cover the period of April 1, 2024, through March 31, 2025, and

11 WHEREAS, Ordinance 19861, Section 54, Proviso P3, provides that \$100,000  
12 shall not be expended or encumbered until the executive transmits the report and a  
13 motion acknowledging receipt of each report is passed, and

14 WHEREAS, upon passage of the motion, \$100,000 shall be released for  
15 expenditure or encumbrance, and

16 WHEREAS, the council has acknowledged receipt of the this report transmitted  
17 by the executive;

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

19 The receipt of the independent monitoring report on the confinement of juveniles  
20 in county detention facilities, entitled King County Department of Adult and Juvenile

- 21 Detention Independent Monitoring Team Report, Attachment A to this motion, is hereby  
22 acknowledged in accordance with 2025 Annual Budget Ordinance, Ordinance 19861,  
23 Section 54, Proviso P3.

KING COUNTY COUNCIL  
KING COUNTY, WASHINGTON

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Girmay Zahilay, Chair

ATTEST:

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Melani Pedroza, Clerk of the Council

APPROVED this \_\_\_\_ day of \_\_\_\_\_, \_\_\_\_.

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Shannon Braddock, County Executive

**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

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

Kathryn Olson  
Change Integration Consulting, LLC  
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and  
Bob Scales  
Police Strategies, LLC  
206.915.8683

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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 team<sup>1</sup> 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,<sup>2</sup> 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.<sup>3</sup> 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.

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

K.C.C. Chapter 2.65 prohibits the restrictive housing<sup>4</sup> of youth in King County's detention facilities, except when based on the youth's behavior and restrictive housing is necessary to prevent imminent

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

<sup>2</sup> 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."

<sup>3</sup> Ordinance 18637 § 6; Ordinance 19546, § 54, Proviso 3.

<sup>4</sup> 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.

and significant physical harm to the youth or others and less restrictive alternatives were unsuccessful.<sup>5</sup>

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.<sup>6</sup> RCW 13.22 provides limits on the use of room confinement that extend beyond the mandates of K.C.C. Chapter 2.65, necessitating that the Juvenile Division bring its restrictive housing policies and practices into compliance.<sup>7</sup>

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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.

<sup>5</sup> 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.

<sup>6</sup> 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.

<sup>7</sup> 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

"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.<sup>8</sup>

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).
- 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.

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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.

<sup>8</sup> 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.

- 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.<sup>9</sup> 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 Hall<sup>10</sup> 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:

- 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;

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<sup>9</sup> 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.

<sup>10</sup> 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.

- 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.<sup>11</sup> 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.

### 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

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<sup>11</sup> 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.

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.

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.<sup>12</sup> 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.

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

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<sup>12</sup> 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.

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.<sup>13</sup> 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.

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<sup>13</sup> 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.

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.

**1.1 DAJD Juvenile Division  
Restrictive Housing Incidents for Current  
and Prior Two Reporting Periods<sup>14</sup>**

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

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

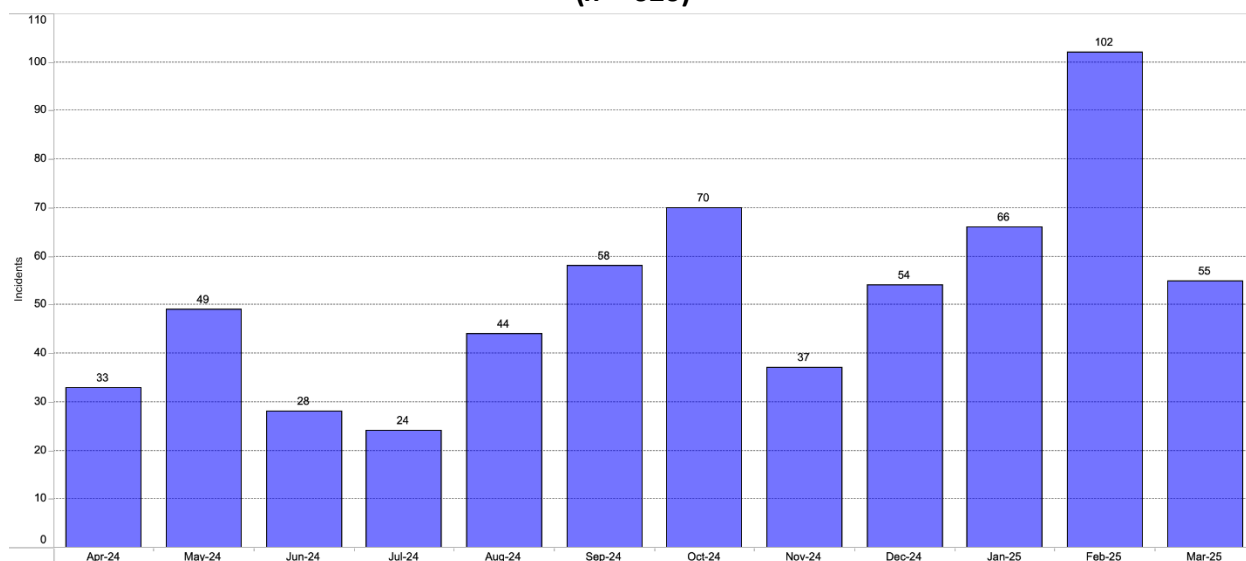
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<sup>14</sup> RCW 13.22 became effective in December 2021, providing additional regulation of the use of confinement and isolation of youth in detention facilities. The conditions under which a youth can be isolated pursuant to RCW 13.22 are more stringent 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.

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, 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)**

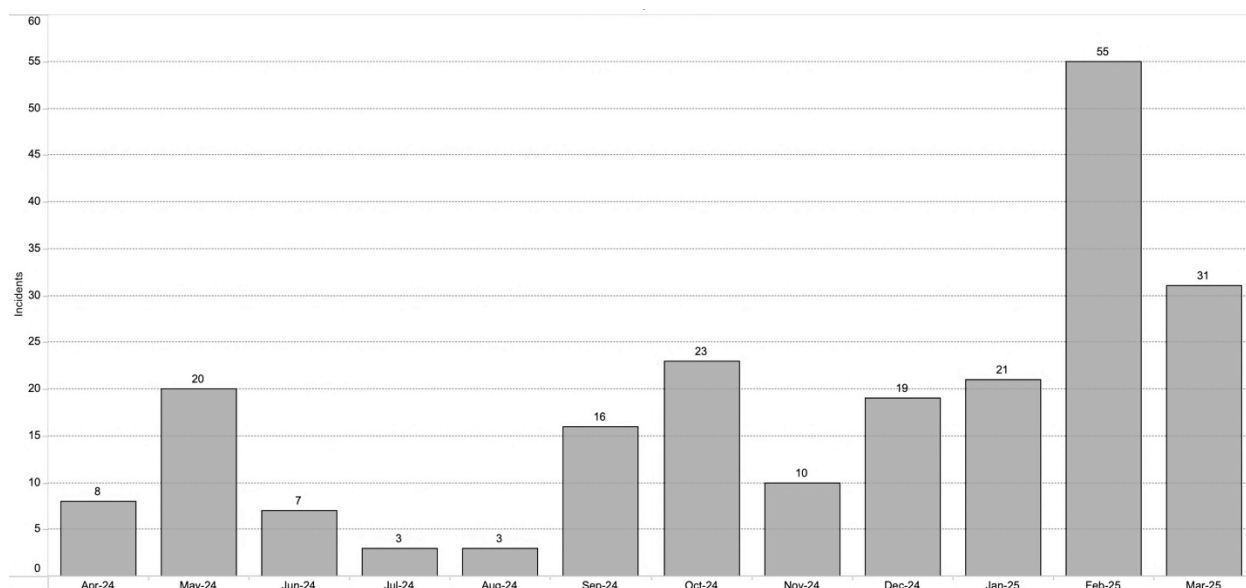
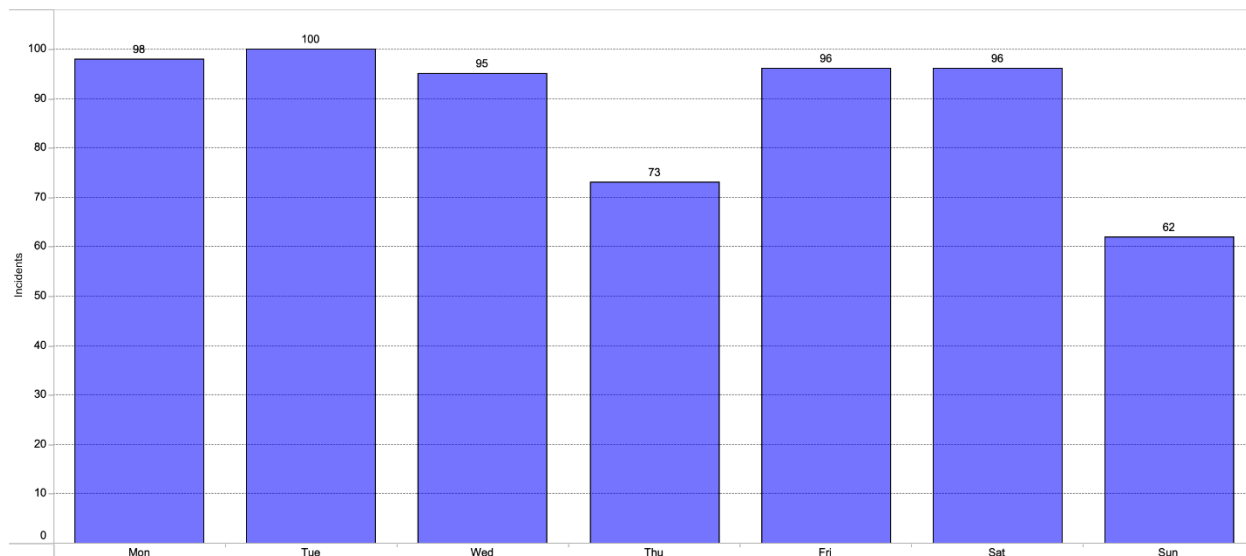


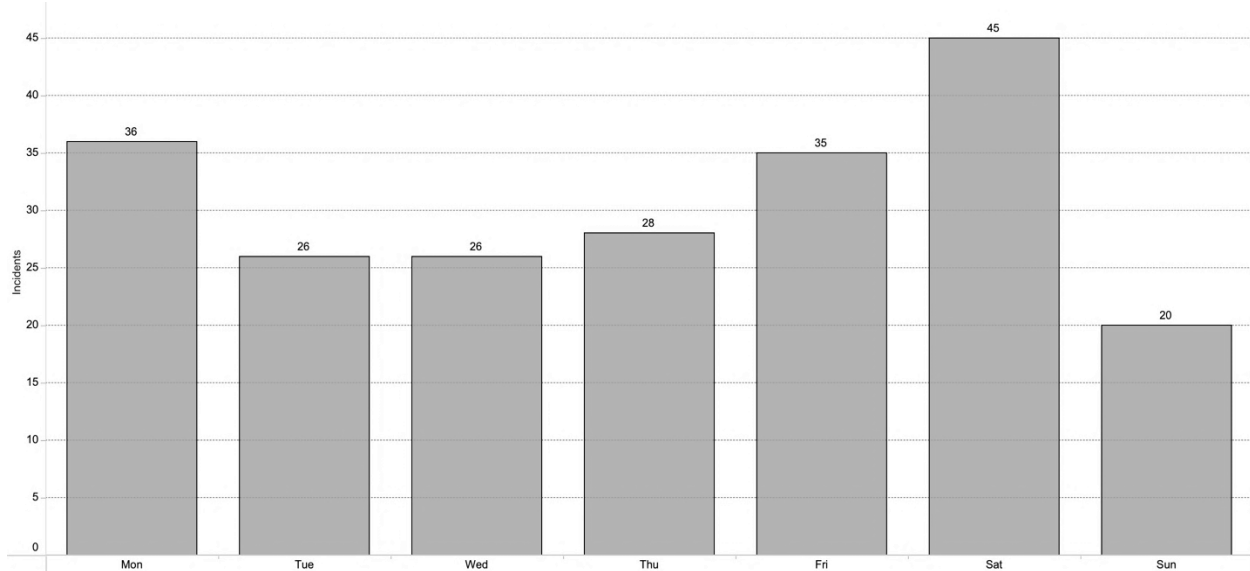
Figure 1.3 also illustrates a significant increase in February 2025 of restrictive housing incidents exceeding 240 minutes (4 hours). Given the number of youth from one living hall involved in recurring events leading to restrictive housing in February, as discussed above, split programming, individual 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)**



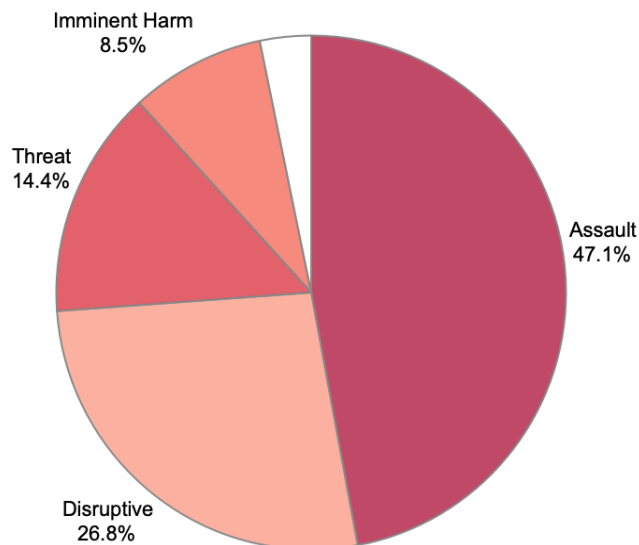
During the prior monitoring review period, the highest number of incidents leading to restrictive housing occurred on Fridays and Saturdays. In comparison, for the period April 1, 2024 - March 19, 2025, the highest number of restrictive housing incidents arose on Tuesdays. However, there is little variation 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%

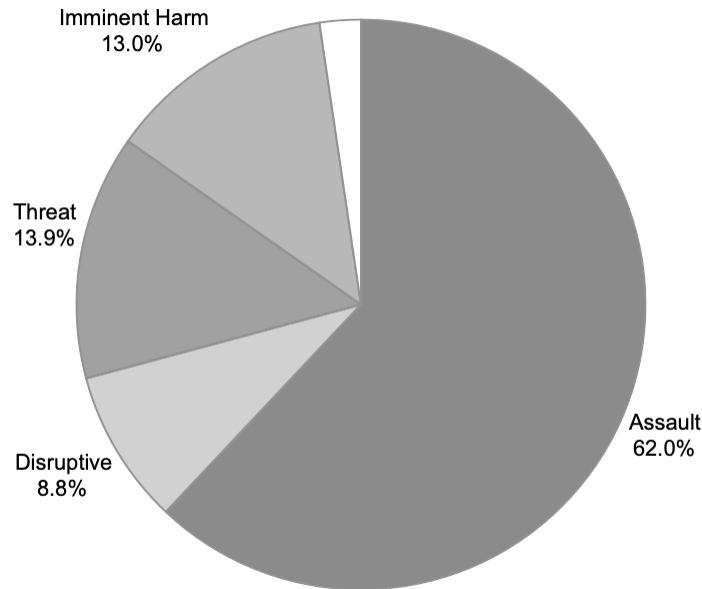
While the *type* of juvenile behavior that requires a restrictive housing response (i.e., assault, threat, disruptive) is nearly always documented, there was inconsistency as to the level of detail provided about each incident, though this generally improved in recent months. The detail is important 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,"<sup>15</sup> 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.

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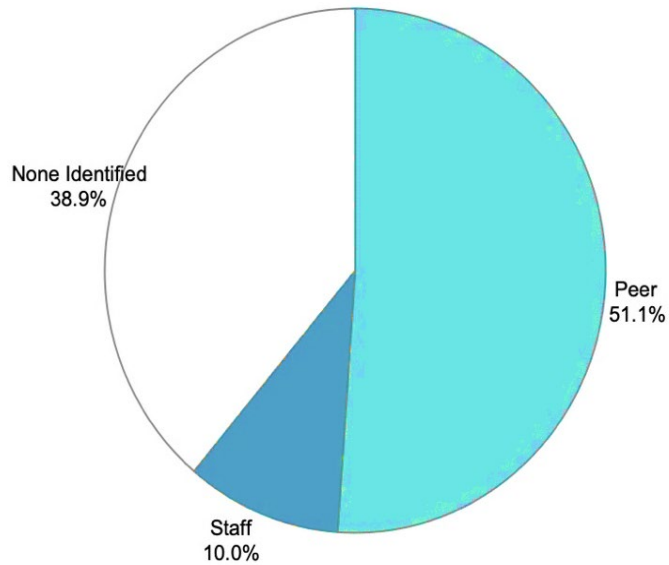
<sup>15</sup> K.C.C. Chapter 2.65.020.

**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)**

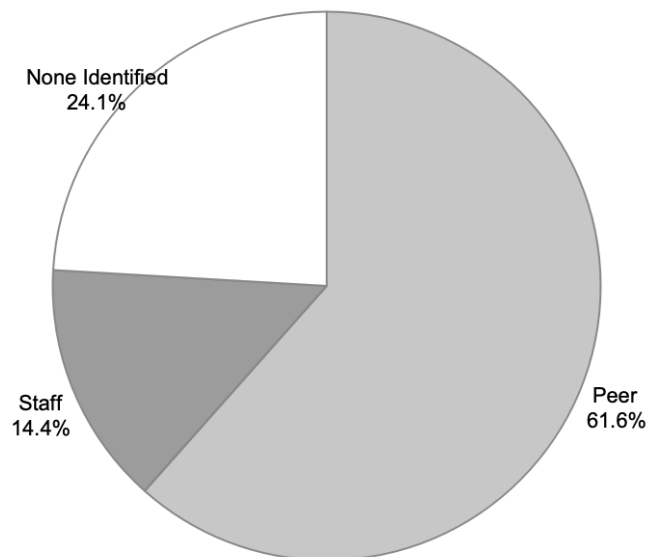


Similar to the data reported above for all restrictive housing incidents, restrictive housing events of 240+ minutes was most often necessary due to juveniles engaging in assaultive behavior, which accounted for 62% of these incidents. Disruptive behavior leading to restrictive housing of 240+ minutes 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)**



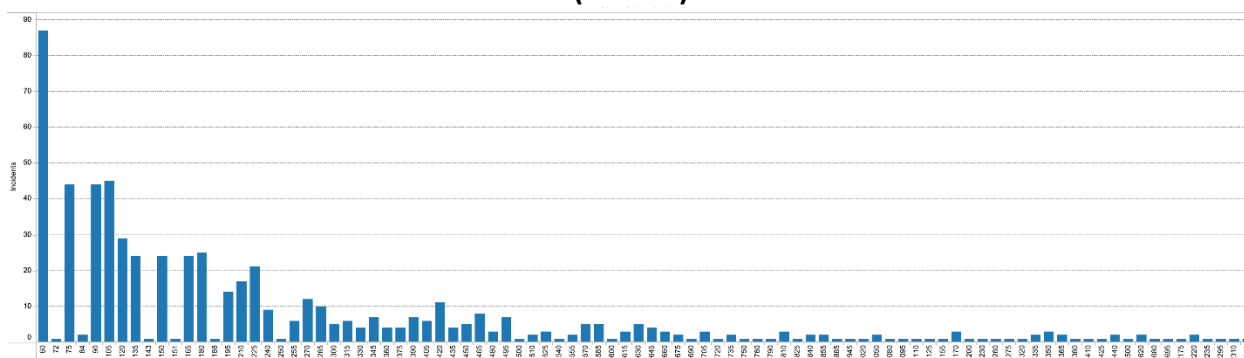
**1.10 DAJD Juvenile Division**  
**April 1, 2024 - March 19, 2025**  
**Youth in Restrictive Housing for 240+ Minutes**  
**Youth Instigating Aggressive Incidents - Victim Type**  
**(n = 216)**



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)**



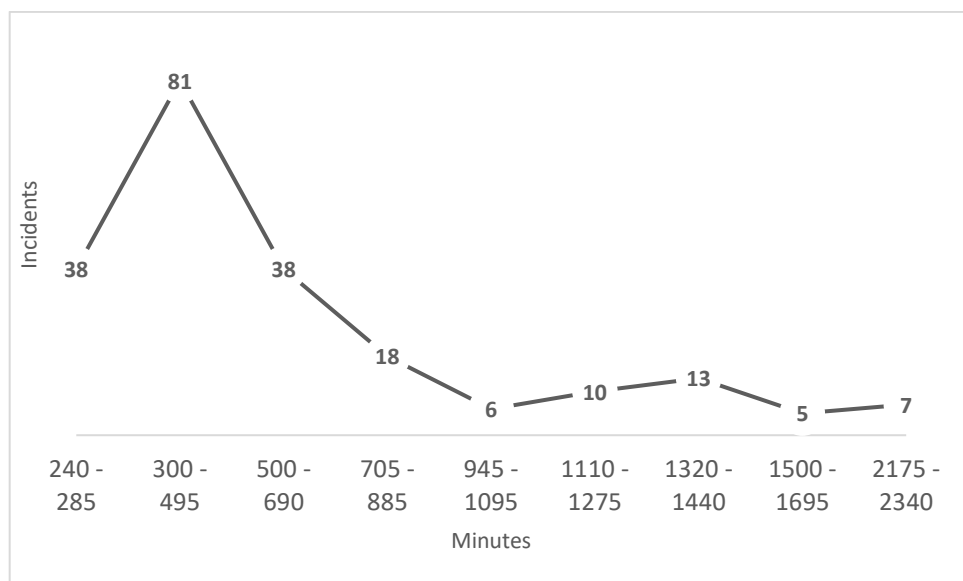
As has been the case in all reviews of restrictive housing data, the higher the number of minutes in restrictive housing, the fewer the number of youth confined for those lengthier periods of time. The average number of minutes a youth spent in restrictive housing for the period April 1, 2024 - March 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

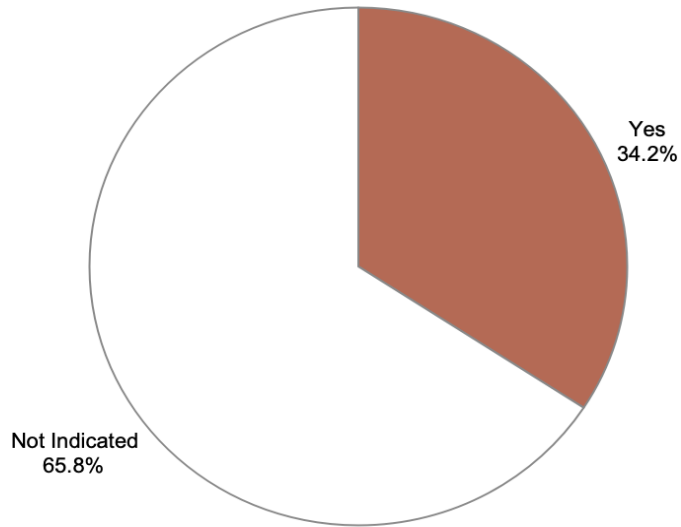
Figure 1.13 builds on the information presented in Figure 1.2, which considered the number of restrictive housing incidents by month. Adding information on the number of youth involved and average time in restrictive housing by month, February 2025 continues to stand out as representing an unusually 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)**

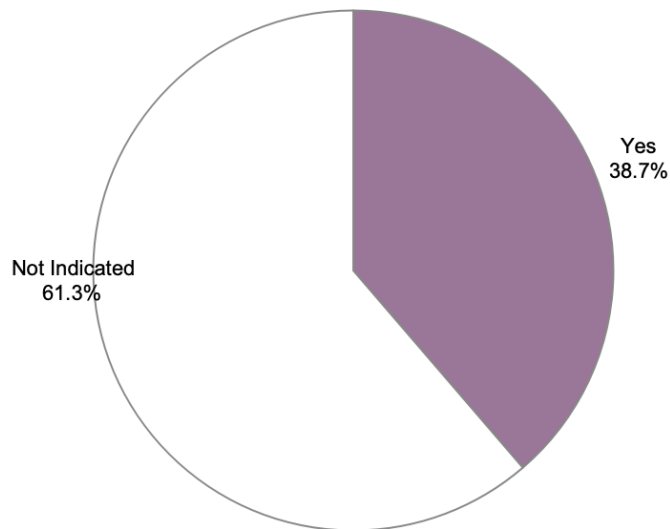


With regards to restrictive housing of 240+ minutes, which ranged from 240 to 2340 minutes, other than some small variation in the time frames presented in Figure 1.14, the higher the number of minutes in restrictive housing, the fewer the number of incidents leading to youth confined for lengthier periods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

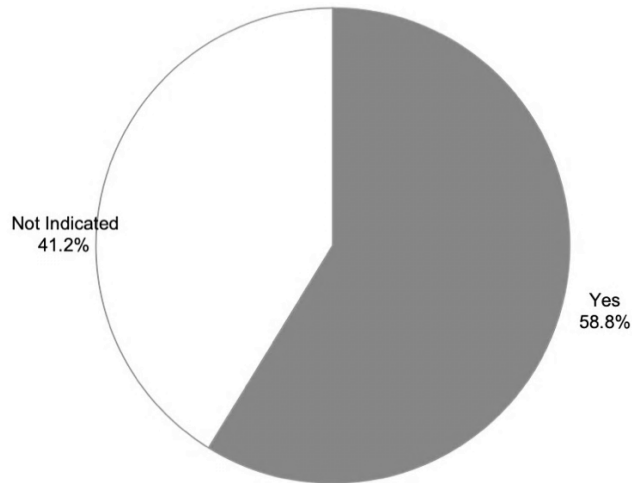
**1.15 DAJD Juvenile Division**  
**April 1, 2024 - March 19, 2025**  
**Mental Health Assessments for Youth in Restrictive Housing**  
**(n = 620)**



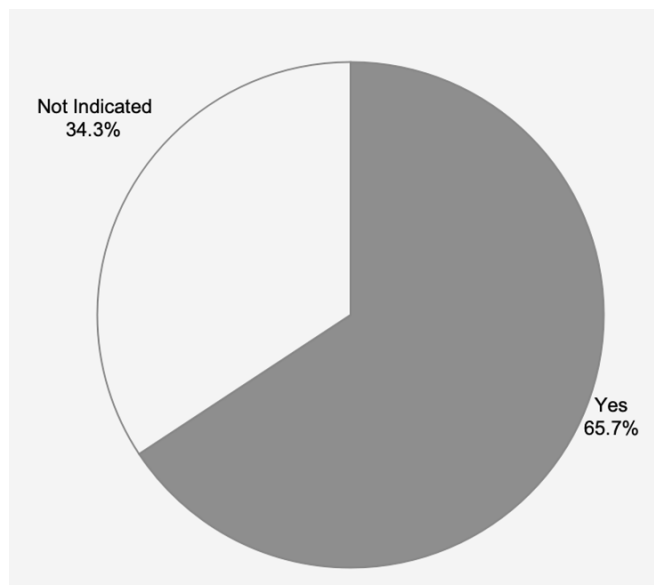
**1.16 DAJD Juvenile Division**  
**April 1, 2024 - March 19, 2025**  
**Medical Assessments for Youth in Restrictive Housing**  
**(n = 620)**



**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.

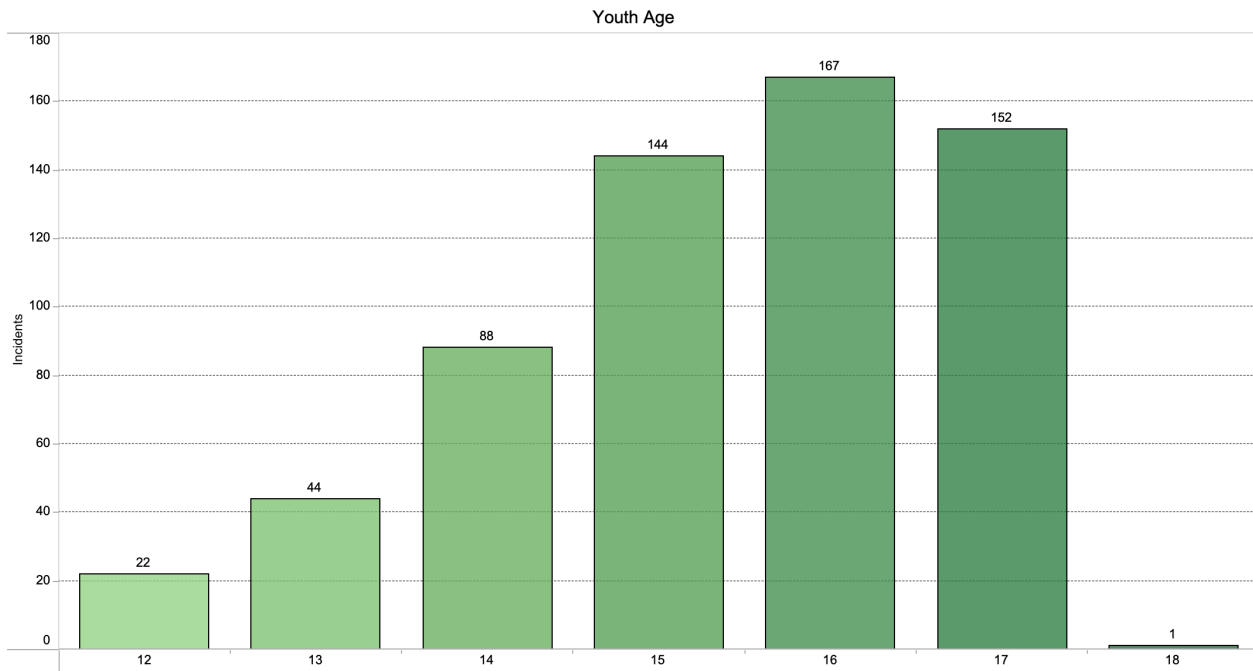
When considering all restrictive housing incidents, the percentage when mental health checks were not documented increased slightly, from 63% during the reporting period June 1, 2023 - March 31, 2024, to about 66% during the current monitoring review period. However, the number of incidents when medical 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.

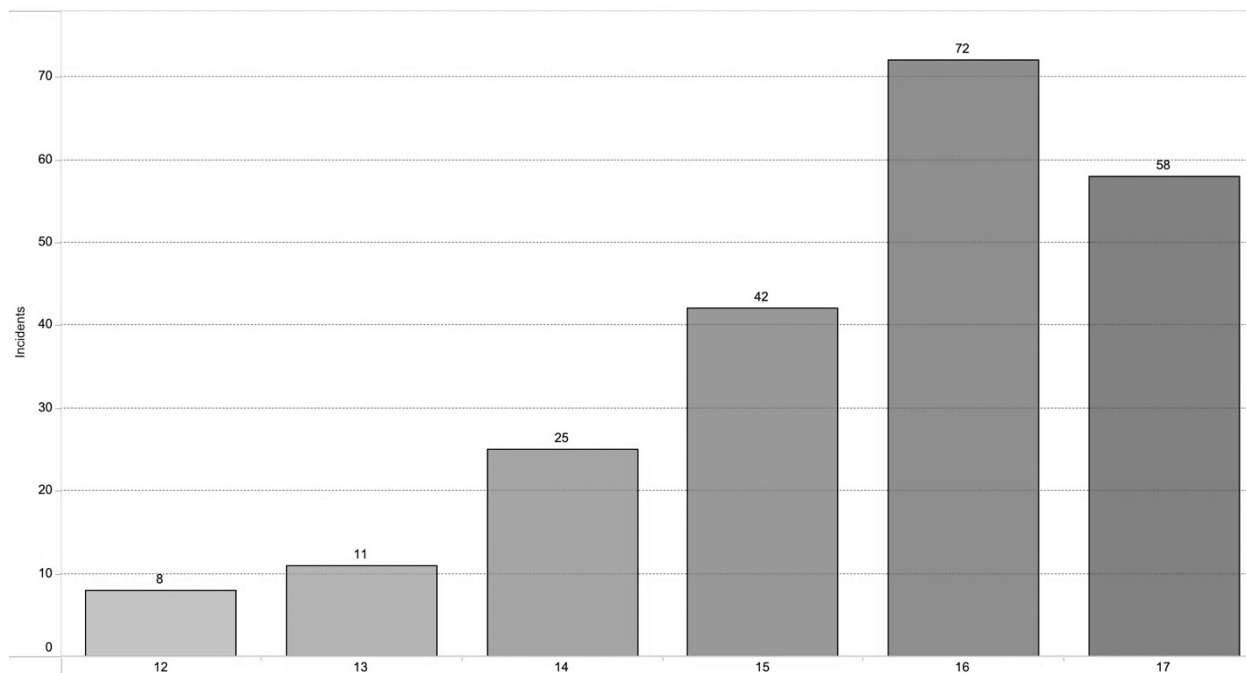
In any case, mental health and medical providers are visiting the living halls throughout the day, dispensing medication, checking on juveniles in restrictive housing, and counseling other youth. For example, medical staff indicated that they are in each living hall at least twice/day in order to distribute 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)**



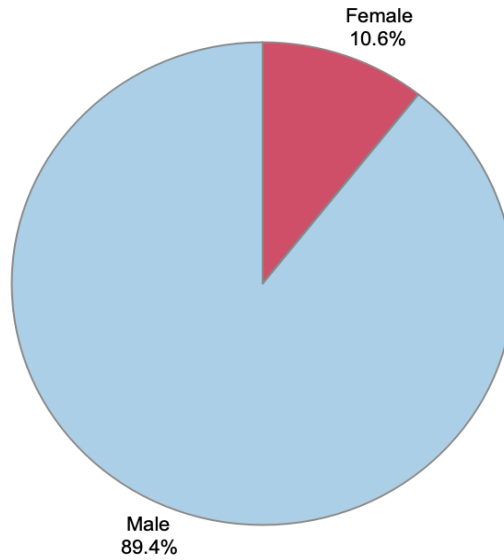
**1.20 DAJD Juvenile Division**  
**April 1, 2024 - March 19, 2025**  
**Youth in Restrictive Housing for 240+ Minutes**  
**Age of Youth in Restrictive Housing Incidents**  
**(n = 216)**



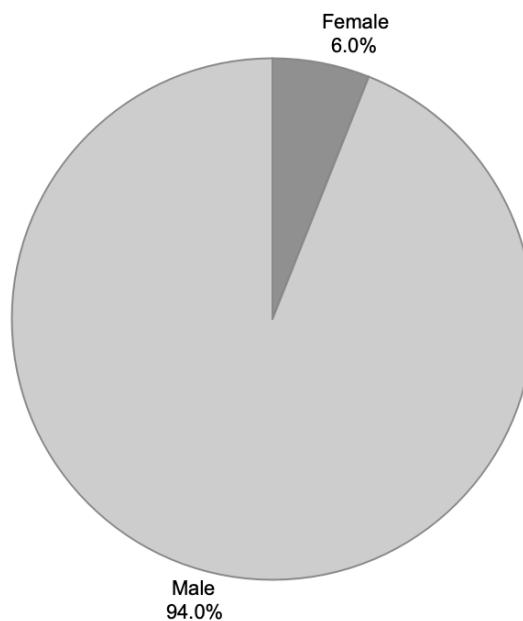
In the last report, most incidents leading to restrictive housing involved 16 and 17 year old youth. During the current reporting period, particularly in regard to all restrictive housing events, 15 year old juveniles joined the 16 and 17 year olds, representing a significant percentage of youth participating 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.

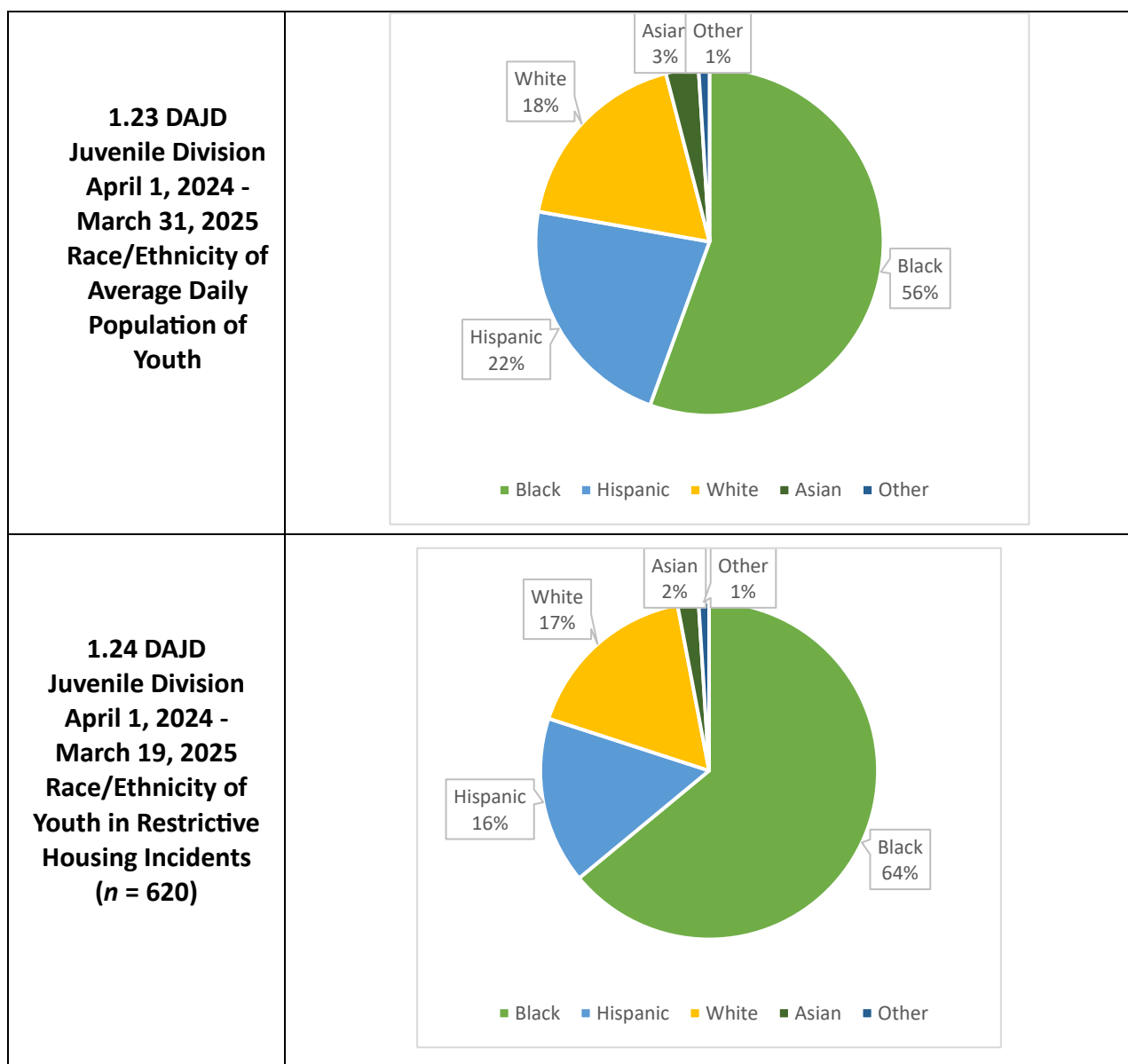
**1.21 DAJD Juvenile Division**  
**April 1, 2024 - March 19, 2025**  
**Gender of Youth in Restrictive Housing Incidents**  
**(n = 620)**



**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)**



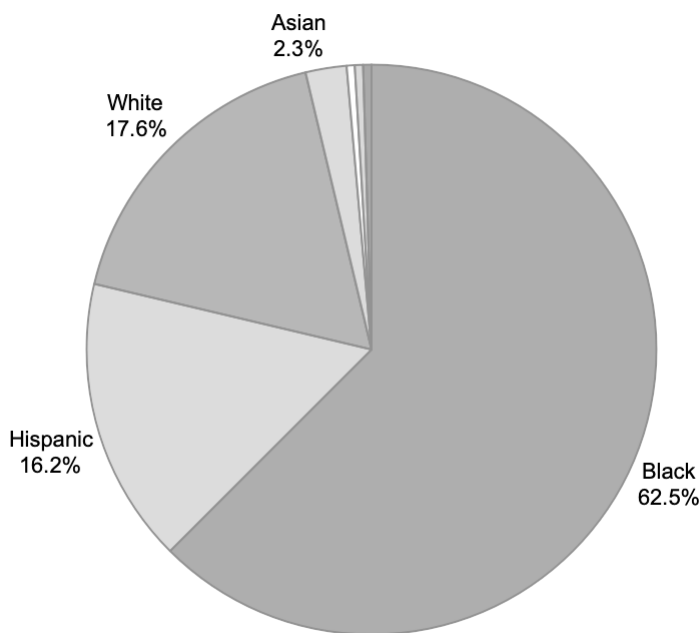
During the months April 1, 2024 - March 19, 2025, 91.2% of the ADP detained at CCFJC were males and 8.8% were female. Thus, females were slightly over-represented in the population of all youth assigned to restrictive housing - 10.6% versus their 8.8% ADP representation - and males were slightly under-represented. 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.<sup>16</sup> 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.

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<sup>16</sup> 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.<sup>17</sup> 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.<sup>18</sup>

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.<sup>19</sup> 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 this data to monitoring team, DAJD indicated that it would redouble efforts to stress the

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<sup>17</sup> 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.

<sup>18</sup> 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.

<sup>19</sup> These instances of AAO restrictive housing are detailed in the July 1, 2021 - March 31, 2022, monitoring report.

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.<sup>20</sup>

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.

**2.1 DAJD Adult Divisions**  
**April 1, 2024 - March 31, 2025**  
**Adult Age-Out (AAO) Restrictive Housing Incidents**

AAO	Date	Duration <sup>21</sup>	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. . <sup>22</sup>

<sup>20</sup> 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.

<sup>21</sup> Some of the AAO restrictive housing incidents were recorded in hours and others by the number of days involved.

<sup>22</sup> Use of a visitation booth for a Cool Down Period is discussed below.<sup>23</sup> 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

	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."<sup>23</sup> 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 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.<sup>24</sup> 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)

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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.

<sup>23</sup> 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.

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.<sup>25</sup> 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.

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<sup>25</sup> 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.

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.

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.<sup>26</sup> 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.<sup>27</sup> 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

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<sup>26</sup> 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.

<sup>27</sup> 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.

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."<sup>28</sup> 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, 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.<sup>29</sup>

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.

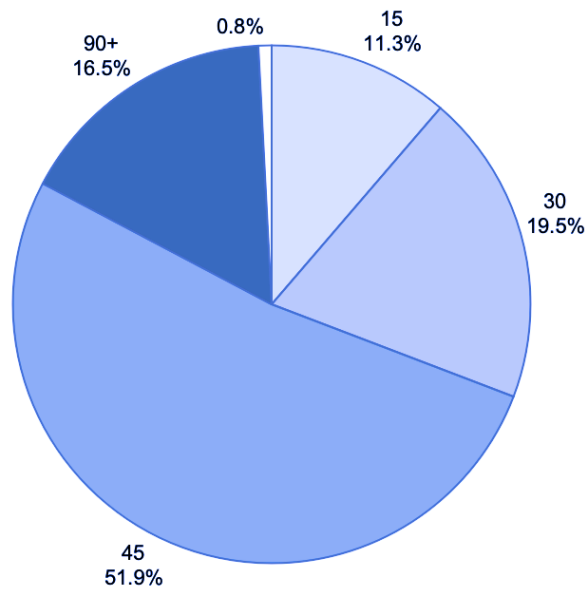
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<sup>28</sup> National Commission on Correctional Health Care (NCCHC). (2021). *Restrictive Housing in Juvenile Settings* (Position statement, endorsed by the American Academy of Pediatrics and the Society for Adolescent Health and Medicine). <https://www.ncchc.org/position-statements/restrictive-housing-in-juvenile-settings-2021/>

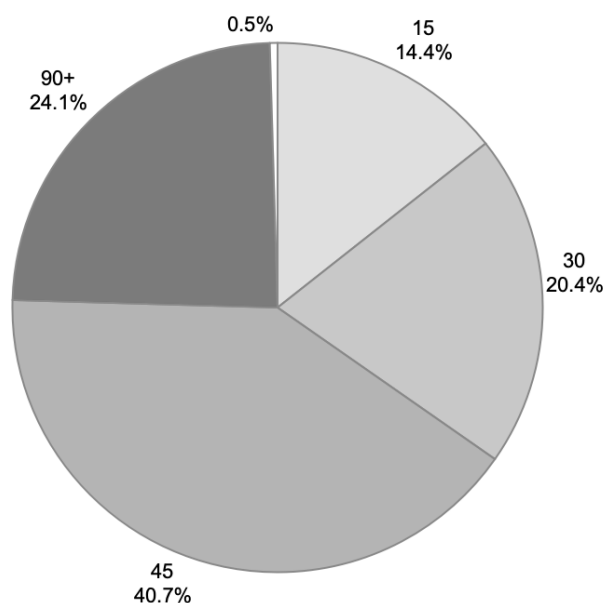
NCCHC recommended other restrictive housing alternatives, indicating juvenile facilities should: have policies requiring safe, trauma-informed, and developmentally sensitive behavioral management; train staff and provide resources to utilize therapeutic strategies, such as de-escalation techniques, one-on-one 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.

<sup>29</sup> Council also provided funds supporting a permanent position for the Gang Intervention Specialist.

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



**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.<sup>30</sup>

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 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.

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<sup>30</sup> During the COVID pandemic, the need to quarantine was another factor that resulted in modified programming at different points.

**3.4 DAJD Juvenile Division  
April 1, 2024 - March 31, 2025  
Modified Programming<sup>31</sup>**

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	

<sup>31</sup> 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.

Total # of Hours		15.53
Average # of Hours/Month		1.29

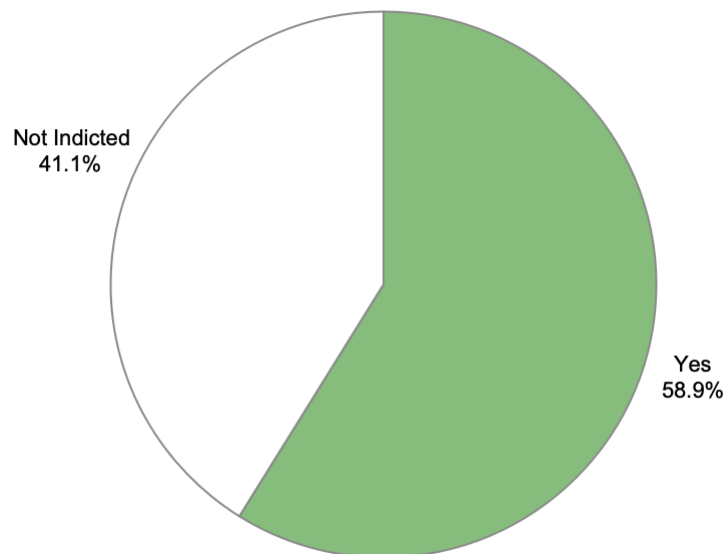
Modified programming began to taper off in late 2024 and, as can be seen in table 3.2 above, youth programming was not impacted aside from the designated periods when youth return to their rooms for staff breaks. Because modified programming can be especially impactful for youth assigned to restrictive 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.

#### 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)**

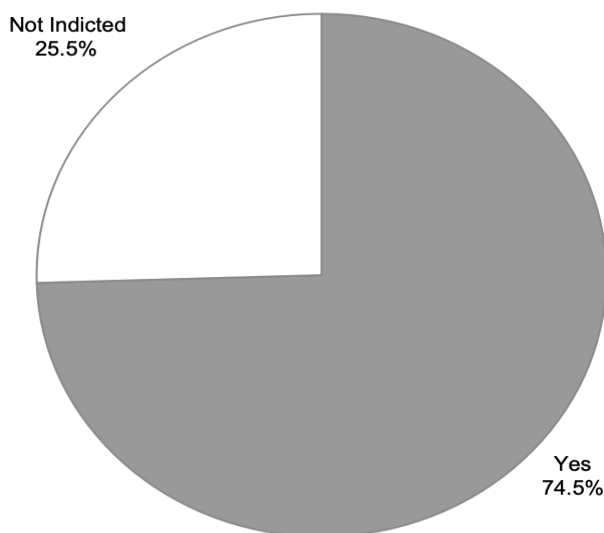


Figure 3.5 above represents the percentage of all incidents in which Corrections Supervisors documented access to reading materials for youth in restrictive housing during the current monitoring review period, while Figure 3.6 illustrates the percentage of incidents of 240+ minutes duration where access 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,<sup>32</sup> 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.<sup>33</sup> 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.

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<sup>32</sup> 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.

<sup>33</sup> 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.

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)

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.<sup>34</sup> 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

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<sup>34</sup> Attachment A, Independent Monitoring Team Report: April 1, 2024 - March 31, 2025, Status of Restrictive Housing Monitoring Recommendations (Updated June 11, 2025).

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 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.

	A	B	C
1		ATTACHMENT A, INDEPENDENT MONITORING TEAM REPORT: April 1, 2024 - March 31, 2025	
2		STATUS OF RESTRICTIVE HOUSING MONITORING RECOMMENDATIONS (Updated June 11, 2025)	
3	Report	Recommendation	Status
4	July - December 2019		
5	1.1	Update the Adult Divisions Inmate Information Handbook to align its housing and classification scheme with current policy on restrictive housing and review the Handbook to ensure there are no other outdated references to the use of “restrictive housing” terminology. An alternative approach would be to provide AAOs with an addendum at the time they receive a copy of the Handbook, explaining the differences in the use of the phrase “restrictive housing” in adult facilities as compared to the Juvenile Division.	<b>Completed:</b> DAJD amended its handbook to include the Adult Age-Out Inmate Handbook Information summary, which includes basics such as a summary of behavior standards, restrictive housing, the transfer of incentive awards earned in the Juvenile Division to use for commissary purchases, requests for medical, mental health or dental services, programming and educational opportunities, and other topics.
6	1.2	Consider replacing the term “restrictive housing” with “room confinement,” which is the term used by the Juvenile Detention Alternatives Initiative (JDAI) in referring to the involuntary placement of a youth alone in a cell, room, or other area, that may only be used as a temporary response to behavior that threatens immediate harm to the youth or others.	<b>Recommendation withdrawn:</b> Terminology used in the Ordinance and by DJAD does not always align with that found in related federal and state laws, and there does not appear to be an obvious way to resolve language differences.
7	1.3	DAJD should consider whether the current list of 21 codes in the Youth Accountability Checklist is so detailed that it creates confusion for Juvenile Detention Officers.	<b>Completed:</b> Electronic security checks and movements were fully implemented as of March 17, 2025. That and other practices with the Jail Management System (JMS) will minimize the number of codes required to be entered by the JDOs. Previous notes indicated “in progress,” though this recommendation initially was marked Completed in 2022, based on an understanding that the electronic room check system would be implemented alongside JMS, minimizing the number of potential codes. Since that did not occur, a recommendation to implement electronic room checks was made in the April 2022 - June 2023 Monitoring Team Report. Once the electronic room check system is in place, this recommendation can again be marked as Completed.
8	1.4	The Juvenile Division Restrictive Housing Assessment Checklist could be enhanced with a visual graphic of the different levels of review and timing for each and by adding space for medical and mental health professionals to provide written comment on their assessments. Also, it would be useful for the JDO, supervisor, and medical and/or mental health professionals to meet at some point to discuss their individual assessments and the need for continued restrictive housing.	<b>Completed:</b> The new “checklist” has been built in JMS to replace the paper form. It does not include a visual graphic but does provide additional guidance for users and places for more thorough notes by all parties. Regarding the second part of the recommendation, a new Multidisciplinary Team meets on a daily basis to discuss intervention options for individual youth demonstrating problematic behavior and reintegration plans for any youth in restrictive housing.
9	1.5	Explanations on the Juvenile and Adult Divisions’ restrictive housing checklists concerning behaviors, statements, or conditions that support restrictive housing should clearly state how they pose an imminent and significant threat of physical harm to the youth, AAO, or others, and any unsuccessful less restrictive alternatives.	<b>Completed:</b> The Adult and Juvenile Divisions each implemented improvements and updates to the youth and Adult Age-Out (AAO) restrictive housing documentation process. The new documentation processes expanded upon the information gathered during a restrictive housing event. These and other improvements are included in the electronic JMS that has been implemented and supported by other changes such as implementation of the Multidisciplinary Team, with on-going reviews to improve documentation and processes.

	A	B	C
10	1.6	In order to meet the goal of reintegrating youth into the general population as early as appropriate after placement in restrictive housing, the Juvenile Division should require that a plan be developed providing explicit steps to be taken to help facilitate a youth's exit from restrictive housing. The point in time after restrictive housing has been initiated and the staff person(s) responsible for developing a plan should be built into any procedural change.	<b>Completed:</b> The Juvenile Division has created a process that requires identification of restrictive housing goals and objectives from the outset, which are reviewed by the MDT and frequently communicated to the involved youth. Reintegration plans are mandatory if a youth is in restrictive housing over four (4) hours, though reintegration is contemplated in setting the initial goals and objectives and options are discussed in MDT meetings.
11	1.7	As DAJD continues to develop data analytic capabilities with the JMS and behavior responses involving restorative practices, it would be useful to consider how Cool Down periods are used and fit into the larger Behavioral Management System in the Juvenile Division.	<b>Recommendation withdrawn:</b> Originally, the plan was to follow-up as JMS was implemented to better understand electronic room check record keeping and reporting under new system, including the use of cool down periods. However, DAJD has discontinued the use of cool downs as being inconsistent under Chapter 13.22 RCW, a new Washington State law on the use of confinement and isolation of detained youth.
12	1.8	Ordinance 18637's prohibitions on restrictive housing apply when a juvenile is voluntarily or involuntarily in their room. Standards under the Juvenile Detention Alternative Initiative define restrictive housing based on the involuntary placement of youth in a cell or room alone in response to behavior that threatens immediate harm to the youth or others. It is recommended that DAJD explore the feasibility of advocating this perspective with the King County Council and stakeholders.	<b>In progress - Current update:</b> While significant progress was made during the previous reporting period, the ordinance revisions were not moved forward beyond the Law & Justice Committee. Councilmembers have expressed interest in revisiting ordinance revisions and DAJD remains open to discussions. Previous notes: While DAJD is in agreement with this recommendation, a review and possible action by King County Council is required to implement this recommendation. Update - During the July 2023 - March 2024 evaluation period, significant progress was made in considering possible amendments to Ordinance 18637, including with regards to the issue of voluntary/involuntary room assignment. Final changes are still under deliberation.
13	1.9	As the DAJD considers the prior monitor's recommendation to determine how privileges and points earned at CFJC could be transferred to the jail, the Department should identify individuals from the Adult Division to work with those previously named in the Juvenile Division, and set target start and completion dates for the team working on this issue.	<b>Completed:</b> As of early 2021, a process was put into place allowing for the transfer of incentive awards earned in the Juvenile Division to be used for credit in an Adult Divisions commissary. The Adult Age-Out Inmate Handbook Information addendum noted in recommendation 1.1 provides an explanation on transfer amounts.
14	1.1	It is recommended that DAJD appoint individuals from the Adult and Juvenile Divisions to explore how family members might be accommodated in the transition process when juveniles turn 18 and are transferred to an adult facility, and set target start and completion dates for the review.	<b>Completed:</b> As of early 2021, DAJD put into place a framework and format for family engagement as youth are transitioning between the juvenile and adult facilities. The two divisions collaborated on the new process which allows for youth to determine if they would like a parent/guardian to participate, as well as the ability to bifurcate transition sessions to allow the youth to ask questions without their guardian present, if desired. The Psychiatric Services Manager meets with youth transitioning to the adult facility to discuss continuity of medical and behavioral health care. The Juvenile Division coordinates with the Adult Divisions MDT Sergeant who acts as a liaison to AAOs, to schedule meetings ahead of the transfer date.
15	1.11	DAJD should consider whether an explicit integration of restrictive housing policy with the Behavior Management System would more accurately reflect behavior response expectations and practices in the Juvenile Division.	<b>Completed:</b> Reintegration plans and reintegration goals/objectives are started immediately once a youth is placed in restrictive housing and are reviewed during the mandatory assessments and in daily MDT meetings. An updated visual "flow chart" showing how incentives, behavior response forms, and reintegration plans integrate with restrictive housing would still be useful.

	A	B	C
16	1.12	To the extent current resources are available and as DAJD continues to develop data analytic capabilities with the JMS, it is advised that the DAJD seek ways to do more data analysis of the use of alternative behavior responses, including restorative practices, under the new Behavior Management System.	<b>In progress - Current update:</b> Nine new reports were created to verify that checks have been completed by the appropriate staff (supervisor, mental health, medical and the director). Previous notes: DAJD agrees that dashboard capabilities in JMS will help produce operational reports that will link datasets from behavior response forms, reintegration plans, rooms checks, restrictive housing forms, and information on incentives and levels achieved. Once linked, data analytic capacities will expand, per the recommendation. Update - Though some datasets are now linked through JMS, others are not and the system's data analytic capacities are still being explored with the datasets that are linked.
17	1.13	DAJD should consider ways it could structure efforts to reduce restrictive housing and continue in its development of the new behavior management program around a central principle or approach that connects policies, practice, and culture.	<b>In progress - Current update:</b> The Division recruited members for a Behavior Management Workgroup dedicated to improving current behavior management strategies. Additional members joined during this reporting period. The workgroup meets weekly and has submitted several proposals to Division Leadership. Previous notes: DAJD continues to develop policies and practices that revolve around goals that include the reduction in use of restrictive housing and development of alternative intervention options when youth demonstrate problematic behavior. With Zero Youth Detention and the plan to close the juvenile facility, the mission of the Juvenile Division and its role with juveniles in the criminal justice system will need to be clarified. Update - Care and Closure has replaced the Zero Youth Detention initiative and the Juvenile Division is working to identify evidence-based practices to increase programming for behavior management.
18			
19	January - June 2020	Recommendations re: DAJD Restrictive Housing Policies and Related Materials	Status
20	2.1	In completing all documentation related to a restrictive housing event, continue to encourage specific and thorough details that support a decision that a youth's behavior created a risk of imminent and significant physical harm.	<b>In progress - Current update:</b> Training and ongoing support has been provided to the Correction Supervisors to ensure that the specific behaviors leading to restrictive housing are documented. Restrictive housing events are reviewed weekly to ensure compliance using the newly built Power BI reports. Previous notes: This recommendation is supported through multiple layers – providing the youth with goals and objectives to reintegrate into group programming requires the JDO to identify a specific risk, as well as articulate to the youth what they need to achieve to demonstrate the risk has been removed. Documentation reviewed during the monitoring process shows continual improvement in providing the necessary details. As processes are folded into JMS, it will be important to determine that the necessary information continues to be provided. Update - During the July 2023 - March 2024 evaluation period, continuing inconsistency was noted regarding the identification of specific behaviors leading to restrictive housing assignments. Training and policy enforcement with Corrections Supervisors is viewed as key.

	A	B	C
21	2.2	Continue to develop an approach of using an explicit reintegration plan when a youth is in restrictive housing. To the extent such a plan exists in medical or mental health assessment notes, determine whether other staff members are aware of the plan and the benefits of including it in the restrictive housing documentation.	<b>Completed:</b> This recommendation is similar to 1.6 above. The Juvenile Division has created a process that requires identification of restrictive housing goals and objectives which are reviewed by the MDT and frequently communicated to the involved youth. Reintegration plans are mandatory if a youth is in restrictive housing over four (4) hours, though reintegration is contemplated in setting the initial goals and objectives and options are discussed in MDT meetings.
22		Recommendations re: the Juvenile Division's Behavior Management System	Status
23	2.3	While it appears that the Juvenile Division remains committed to building a culture dedicated to restorative principles, a reset of sorts would be useful at this time, to clarify the place of restoration practices in the larger set of interventions available and appropriate to use with individual youth in the juvenile facility. While the Juvenile Division continues to face a variety of challenges, providing direction to staff and demonstrating commitment about how restorative practice goals fit with other priorities would be beneficial.	<b>Completed:</b> There has been a reset given changes mandated by HB2277, discontinued use of Restoration Hall, the introduction of <i>The Carey Guides</i> , development of the MDT which meets daily, the growing use of individualized case management, reintegration plans, and other tools to address problematic behavior and support the emotional and social growth of youth in detention.
24	2.4	Given the low numbers of youth in the juvenile facility at this point, the Juvenile Division should consider using a more individualized case management model, involving all staff in the process so there is a consistent theme of working with each youth. A case management approach will be facilitated by the Jail Management System and EPIC system, which will support individualized and continuing care.	<b>In progress:</b> An individualized case management approach is being put into practice and will continue to be developed as a second Restorative Justice Coordinator is hired to help facilitate the process. Update: Completed - The low ADP at the CCFJC at the time this recommendation was made is no longer the case, as ADPs have increased significantly. Also, the Juvenile Division has adopted the MDT approach to conducting a daily review of youth detained at CCFJC, particularly those who are assigned to restrictive housing or exhibiting behavioral issues that are becoming more problematic and discuss alternative approaches.
25		Recommendations re: the Tracking of Restrictive Housing Data	Status
26	2.5	Because the Ordinance, as written, defines restrictive housing to situations when one-on-one programming may be required by court-ordered separation of detainees, is necessary if a single female is in the juvenile facility, and may be a preferred therapeutic intervention in helping a youth do restorative problem solving or a step towards reintegrating a youth to the unit, the independent monitors respectfully propose that the Ordinance be amended to address such unintended consequences. (Similarly, in the July – December 2019 report, the suggestion was made that youth voluntarily spending time alone in their rooms for limited periods should not fall under the restrictive housing definition, in line with JDAI standards.)	<b>In progress - Current update:</b> While significant progress was made during the previous reporting period, the ordinance revisions were not moved forward beyond the Law & Justice Committee. Councilmembers have expressed interest in revisiting ordinance revisions and DAJD remains open to discussions. Previous notes: Review and possible action by King County Council is required, though the new Washington State law on room confinement, Chapter 13.22 RCW, potentially allows for some situations where one-on-one programming is necessary, such as when there is only one female detainee, and makes impermissible other situations when DAJD previously relied on one-on-one programming to help a youth self-regulate and prepare to reintegrate with their peers. During the July 2023 - March 2024 evaluation period, significant progress was made in considering possible amendments to Ordinance 18637, including with regards to the issue of voluntary/involuntary room assignment. Final changes are still under deliberation.
27		Recommendations re: Adults Divisions' Programming and Access to Education and Services	Status

	A	B	C
28		2.6 In the Adult Divisions, the kite form used by AAOs to express interest in education opportunities or request a program or service would be easier for an AAO to use if it provided more specific information about what is available at any given time. While this would require the Programs office to update relevant kite communications, providing more information up front for AAOs would help facilitate and might encourage use of education and program opportunities in KCCF and MRCJ, without implicating the cost prohibitive changes in programming recommended by the prior monitor.	<b>In progress - Current update:</b> Over the last year, computer tablets were made available in the adult facilities and 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 AAOs to submit an educational or programming request and for both the Department and inmates to update information and communicate more quickly and efficiently. Previous notes: The Adult Age-Out Inmate Handbook Information addendum provides basic information on requesting educational and programming opportunities, and youth report they are taking advantage of options to continue their education. Programs staff are to talk with youth about services within 72 hours of transfer to the Adults Divisions, though the range of programs available at any given point is not communicated effectively in written materials.
29		2.7 DAJD's Adult Divisions should explore the feasibility of formalizing AAO support services by utilizing the resources available through the MDT initiative on reduction of restrictive housing generally in the adult jail facilities. Given that the AAO average daily population has decreased significantly, and education and programming opportunities are limited or not available at all during this time of COVID-19, there is an opportunity to bring individually focused, trauma-informed services to AAOs, some of whom would have recently benefitted from such an approach in the juvenile facility. As with the previous recommendation, and particularly given the small number of AAOs currently in the jail population, this recommendation could be explored without a commitment of significant resources.	<b>Completed:</b> The low ADP of AAOs in the Adult facilities at the time this recommendation was made no longer is the case, as ADPs have increased the past couple of years. Also, the Adult Divisions uses an approach of identifying all AAOs on a daily basis at each facility to assist with tracking them, along with the services of a Sergeant who meets regularly with AAOs to advise them on navigating the jail system and avoiding conflict with other inmates. Previous notes: In progress- The AAO ADP has increased over the past year making it harder to move toward realizing this recommendation. However, the MDT Sergeant responds to unique AAO needs and AAOs reported that they could get medical attention and medications, as needed, and that there are psychiatric check-ins, though not the regular counseling provided in the Juvenile Division.
30		2.8 Given the uncertainty as to how long COVID-19 restrictions on in-person education will continue, the Adult Divisions should reconsider whether there are any steps that can be taken to support any AAO's interest in continuing to work towards a high school diploma or GED.	<b>Completed:</b> All 9 AAOs in the King County Correctional Facility in May 2022 had completed or were in process of completing their diploma or GED. It is not clear if the Adult Divisions took affirmative steps to encourage youth to complete their educational requirements or if the lack of interest in pursuing an education as noted in a previous report was temporary.
31			
32	July 2020 - June 2021	No new recommendations, as DAJD rolls out JMS, brings Juvenile Division restrictive housing policies in compliance with RCW 13.22 (which addresses some earlier recommendations), and implements use of "The Carey Guides," an alternative behavioral response tool.	
33			
34	July 2021 - March 2022	No new recommendations. List of recommendations through June 2020 was updated to reflect which had been implemented, which were no longer relevant, and where DAJD disagreed with recommendations. The Status column above reflects these outcomes.	
35			
36	April 2022 - June 2023	Recommendation	Status
37		3.1 The system used to document restrictive housing in JMS should be made more user friendly, involving as few steps as possible to complete the task without compromising the information sharing function. Correctional Supervisors and other employees should have an opportunity to share ideas about ways to improve the data entry process.	<b>In progress - Current update:</b> Dashboards were created in JMS for the supervisors and Chiefs to ensure that assessments are completed on time. Short cuts were also identified to simplify data entry and to help with accuracy. Previous notes: Division staff are working closely with JMS Administrators to develop shortcuts and dashboards to simplify data entry and ensure Supervisors are aware when assessment documentation is due. The Juvenile Division has recently worked with the JMS developers to make some data fields required to ensure data entry is accurate and consistent.

	A	B	C
38	3.2	The Chief of Operations or someone of comparable authority should review JMS documentation of restrictive housing events each day to ensure all information expected has been entered and appears correct. This was happening when the entire process was done by paper and there is a continuing need for this level of oversight.	<b>In progress - Current update:</b> The proposed quality assurance process includes a daily review of assessment completion by shift, weekly by the Chief and monthly by the data analyst. Previous notes: Along with the shortcuts and dashboard underdevelopment to ease data entry for Corrections Supervisors, JMS reports and dashboards are under development for faster and more consistent quality assurance. Whether the Chief of Operations should resume reviewing the forms is under consideration.
39	3.3	DAJD should install the electronic door lock system that it purchased for CCFJC living units. The system would automatically record time in room and assist with the tracking of youth activities, reduce the need to use the hard copy Youth Accountability Checklist, and produce electronic data that could more easily be associated with and analyzed alongside JMS data. See Recommendation 1.12 and comments re: status.	<b>Completed:</b> Electronic security checks and movements were fully implemented as of March 17, 2025. Previous notes: In progress - The Juvenile Division is exploring electronic room check technology. Division leadership has conducted site visits and met with vendors to understand the capabilities and if the possible vendors are able to meet the Division's documentation and data reporting needs.
40	3.4	The idea of setting up living halls based on the age and developmental stage of each detainee should be explored, with input from representatives from throughout the facility.	<b>In progress - Current update:</b> The Division is planning to implement a new classification model which will house youth by age and developmental stage in June 2025 when the current school year ends. Previous notes: The Juvenile Division is reviewing its current method and factors taken into account for living hall assignment and is researching alternative approaches, including consideration of factors that might result in reducing conflict between youth and the assignment to restrictive housing that can result. The Division is also developing a Housing Classification policy.
41			
42	July 2023 - March 2024	Recommendation	Status
43	4.1	Ensure that all staff, but Supervisors in particular, are aware of efforts being made to develop shortcuts and dashboards to simplify JMS data entry and the rationale behind making some data fields required.	<b>Completed:</b> Training has been provided to the Supervisors to help with monitoring the requirements thru dashboards and reports. These reports and dashboards have been developed specifically for supervisors and others who are responsible for restrictive housing oversight. Ongoing JMS support is available thru a designated staff person to provide on-going support related to JMS.
44	4.2	In developing an approach that makes attendance mandatory for some programs and with input from JDOs and Supervisors, continually evaluate which programs, both in and outside the living halls, should be compulsory, on an individual or facility-wide level.	<b>In progress:</b> The Juvenile Division has made programs mandatory outside of the living hall, however, the Division is still developing the final approach to determine which programs within the living hall should/should not be compulsory.
45	4.3	In developing a programming schedule, consider the importance of providing consistent, predictable programming throughout the week, but especially during periods of time that are otherwise unstructured, such as on weekends.	<b>In progress:</b> When reviewing the program applications for the program expansion RFP process, priority was given to organizations who could provide programming on the weekends. Furthermore, the Division has implemented a pilot program with a 2nd Recreation Coordinator Thursday-Sunday afternoon and evenings. The Division will review performance metrics such as use of force and behavior data to determine if the 2nd position has had a positive impact operationally.
46	4.4	With input from JDOs and Supervisors, develop a strategy to ensure that youth return their tablets when required to do so.	<b>In progress:</b> DAJD is in agreement that youth should not have access to tablets when classes are in session. Detention Supervisors can turn off individual tablets temporarily if a student's tablet is causing a distraction.
47			
48	April 2024 - March 2025	Recommendation	Status

	A	B	C
49	5.1	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).	

August 20, 2025

[L. Krekel-Zoppi]

Sponsor: Jorge Barón

Proposed No.: 2025-0206

**1 STRIKING AMENDMENT TO PROPOSED MOTION 2025-0206, VERSION 1**

2 Strike "Attachment A. King County Department of Adult and Juvenile Detention  
3 Independent Monitoring Team Report Implementation of Ordinance 18637 Restrictive  
4 Housing, April 1, 2024 - March 31, 2025" and insert "Attachment A. King County  
5 Department of Adult and Juvenile Detention Independent Monitoring Team Report  
6 Implementation of Ordinance 18637 Restrictive Housing, April 1, 2024 - March 31,  
7 2025, Updated August 20, 2025"

8 **EFFECT prepared by Leah Krekel-Zoppi: Replaces the report with an updated**  
9 **version that includes information in response to proviso requirement D that was left**  
10 **out of the original report.**

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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## 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 team<sup>1</sup> 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,<sup>2</sup> 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.<sup>3</sup> 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.

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

<sup>2</sup> 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."

<sup>3</sup> 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 housing<sup>4</sup> 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.<sup>5</sup>

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.<sup>6</sup> RCW 13.22 provides limits on the use of room confinement that extend beyond the mandates of K.C.C. Chapter 2.65,

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<sup>4</sup> 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.

<sup>5</sup> 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.

<sup>6</sup> 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.<sup>7</sup>

"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.<sup>8</sup>

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).

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<sup>7</sup> 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.

<sup>8</sup> 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.<sup>9</sup> 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 Hall<sup>10</sup> 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:

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<sup>9</sup> 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.

<sup>10</sup> 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.<sup>11</sup> 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.

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<sup>11</sup> 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,<sup>12</sup> including identification of the number of incidents exceeding two hours when supervisory review did not occur and an evaluation of each incident.<sup>13</sup> 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

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<sup>12</sup> 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.

<sup>13</sup> 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.<sup>14</sup> 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.

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<sup>14</sup> 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.<sup>15</sup> 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.

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<sup>15</sup> 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 Periods<sup>16</sup>**

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

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).

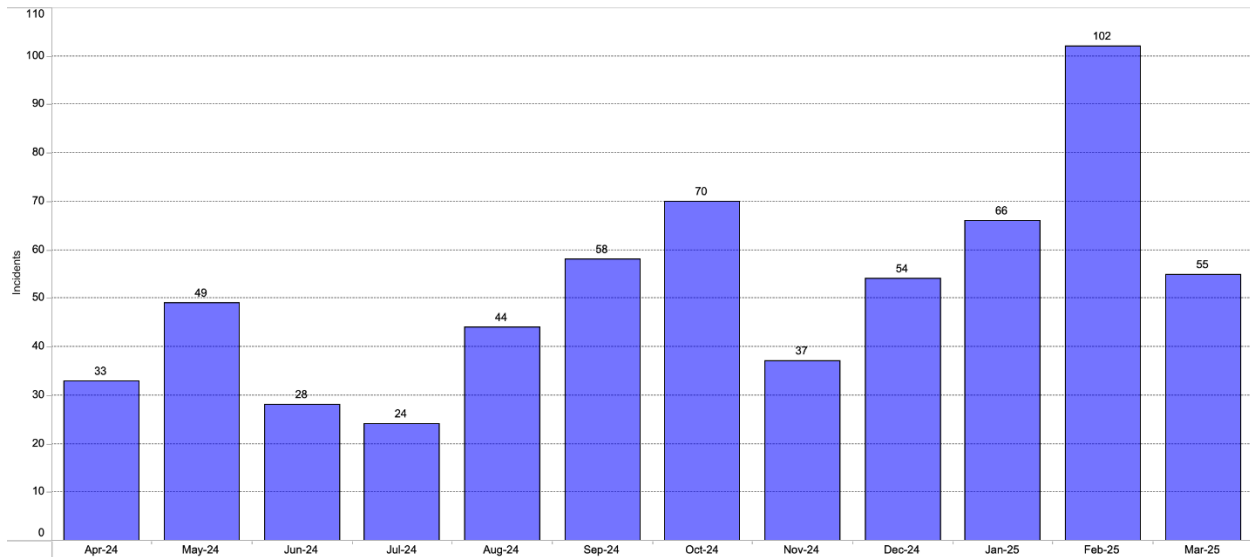
In reviewing the data, regular sleep and rest times were sometimes erroneously included when calculating a youth's total time in restrictive housing, though it was not possible to measure the extent of the error. Only restrictive housing incidents lasting 60 or more minutes are reported and,

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<sup>16</sup> 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)**

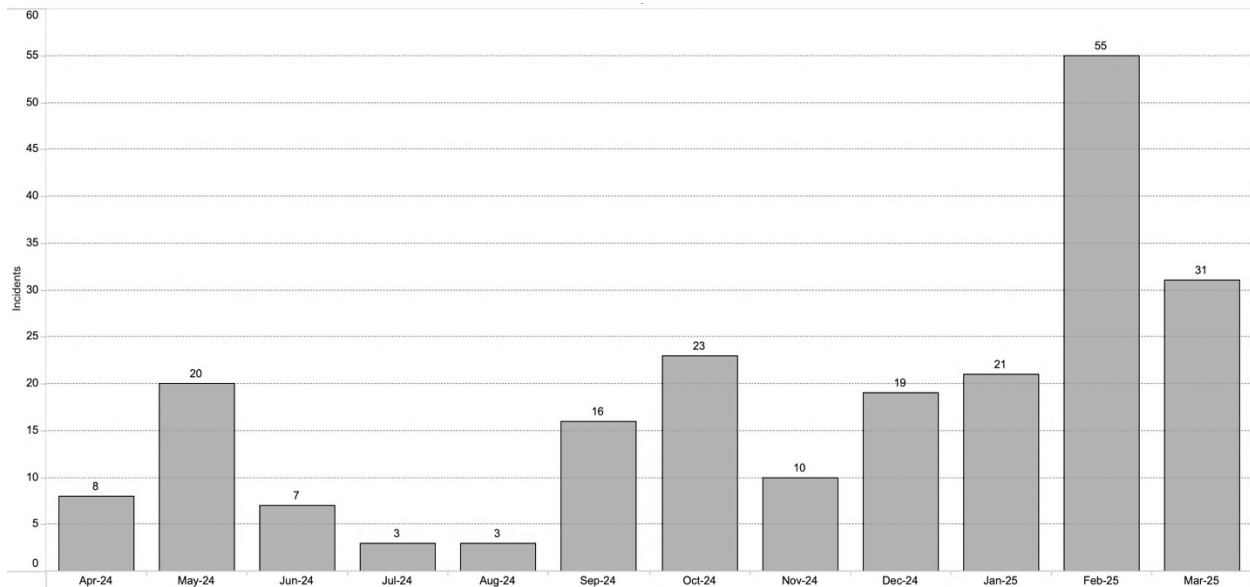
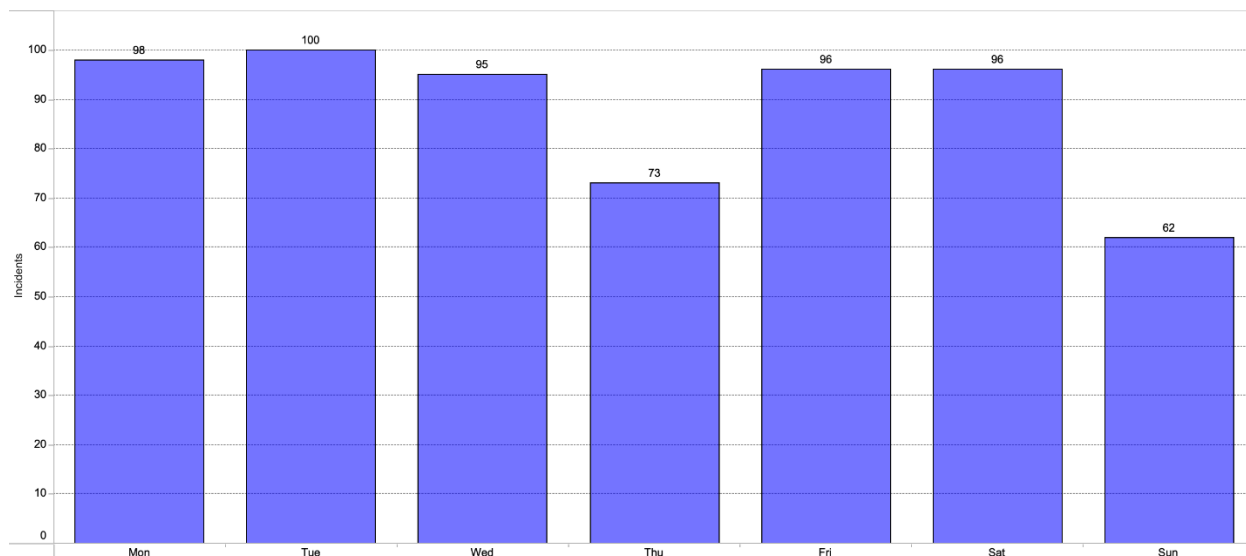


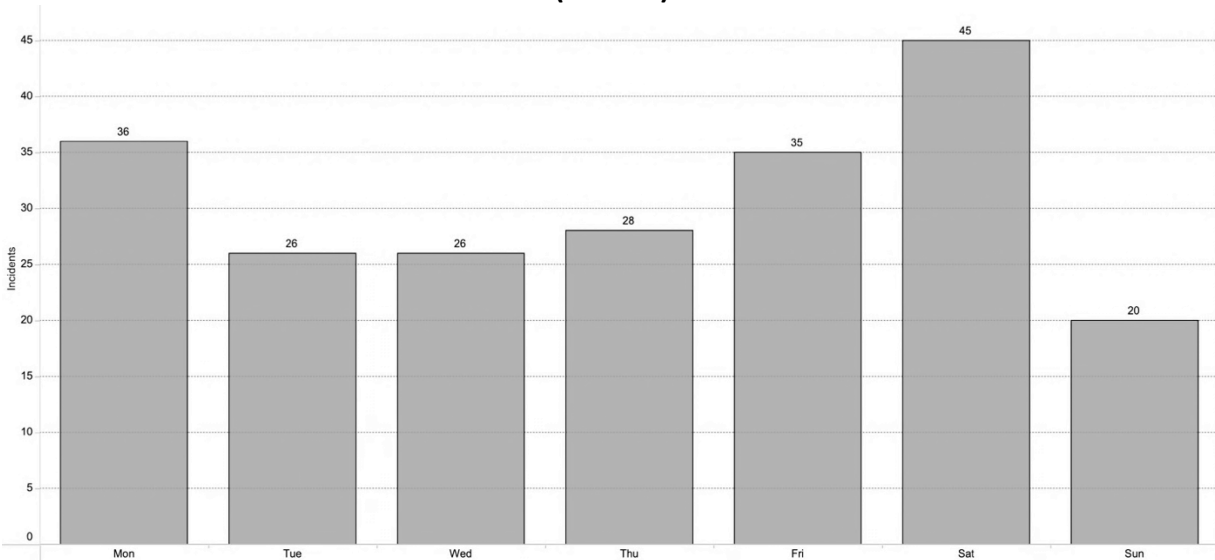
Figure 1.3 also illustrates a significant increase in February 2025 of restrictive housing incidents exceeding 240 minutes (4 hours). Given the number of youth from one living hall involved in recurring events leading to restrictive housing in February, as discussed above, split programming, individual 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)**



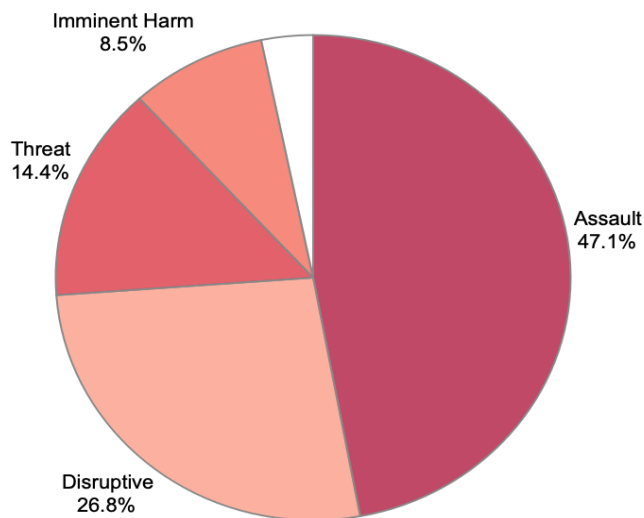
During the prior monitoring review period, the highest number of incidents leading to restrictive housing occurred on Fridays and Saturdays. In comparison, for the period April 1, 2024 - March 19, 2025, the highest number of restrictive housing incidents arose on Tuesdays. However, there is little variation 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%

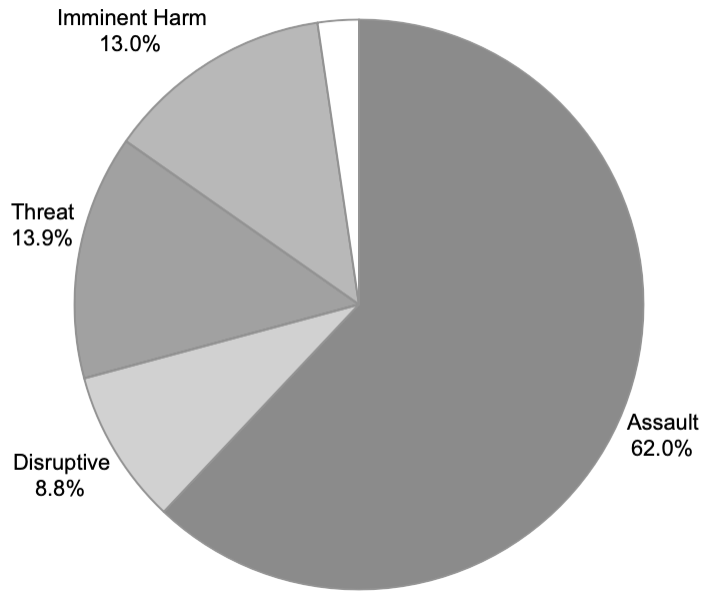
While the *type* of juvenile behavior that requires a restrictive housing response (i.e., assault, threat, disruptive) is nearly always documented, there was inconsistency as to the level of detail provided about each incident, though this generally improved in recent months. The detail is important 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,"<sup>17</sup> 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.

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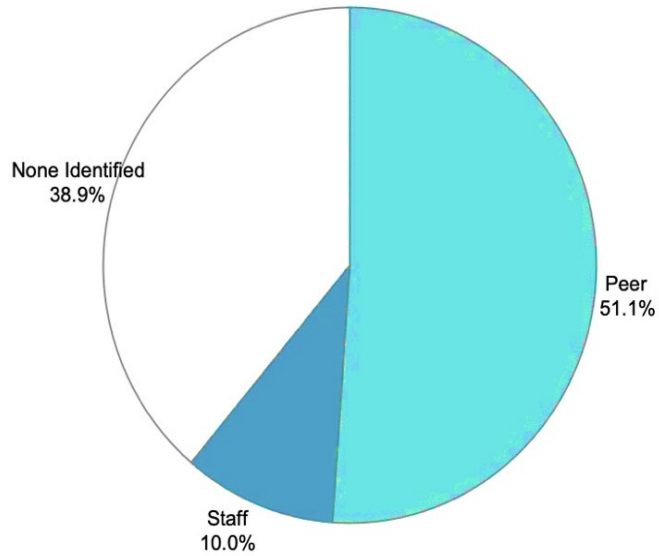
<sup>17</sup> K.C.C. Chapter 2.65.020.

**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)**

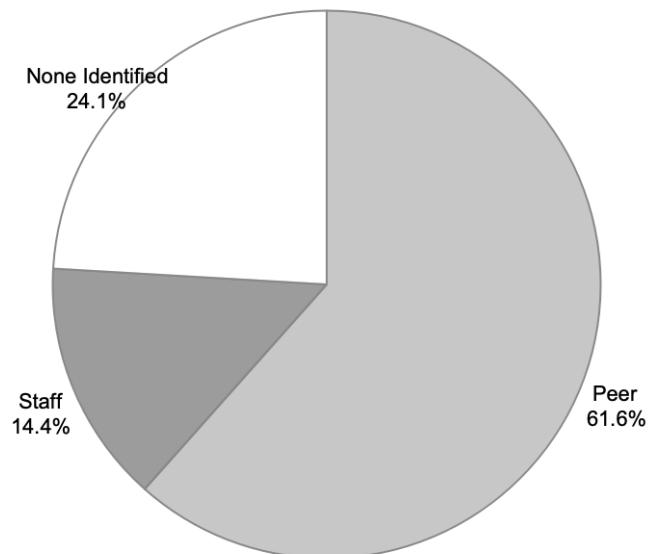


Similar to the data reported above for all restrictive housing incidents, restrictive housing events of 240+ minutes was most often necessary due to juveniles engaging in assaultive behavior, which accounted for 62% of these incidents. Disruptive behavior leading to restrictive housing of 240+ minutes 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)**



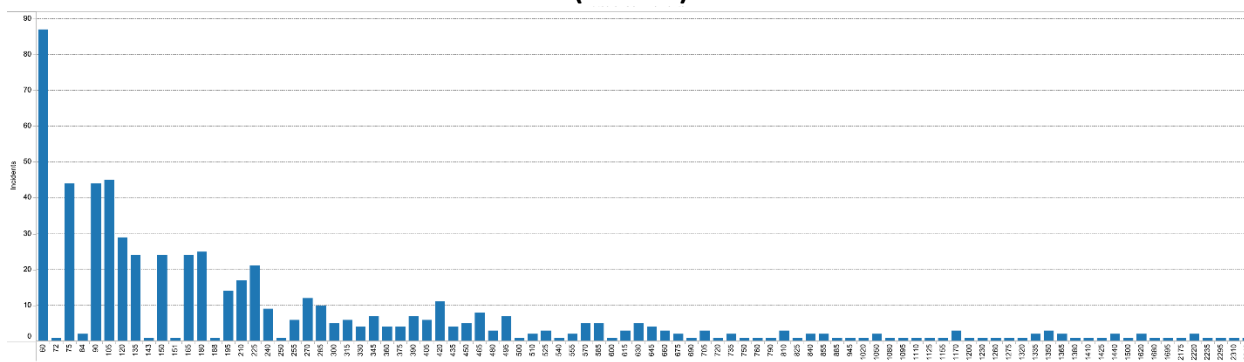
**1.10 DAJD Juvenile Division**  
**April 1, 2024 - March 19, 2025**  
**Youth in Restrictive Housing for 240+ Minutes**  
**Youth Instigating Aggressive Incidents - Victim Type**  
**(n = 216)**



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)**



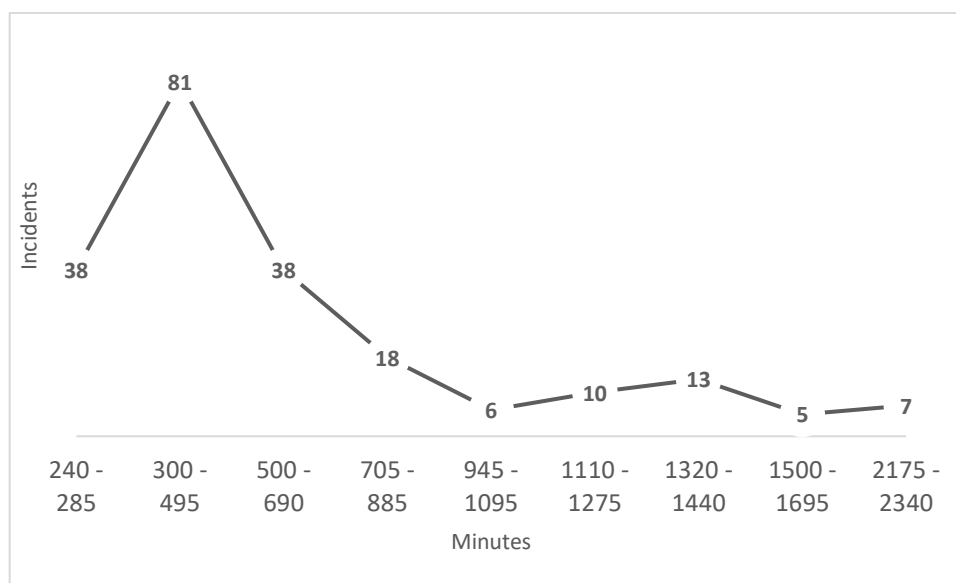
As has been the case in all reviews of restrictive housing data, the higher the number of minutes in restrictive housing, the fewer the number of youth confined for those lengthier periods of time. The average number of minutes a youth spent in restrictive housing for the period April 1, 2024 - March 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

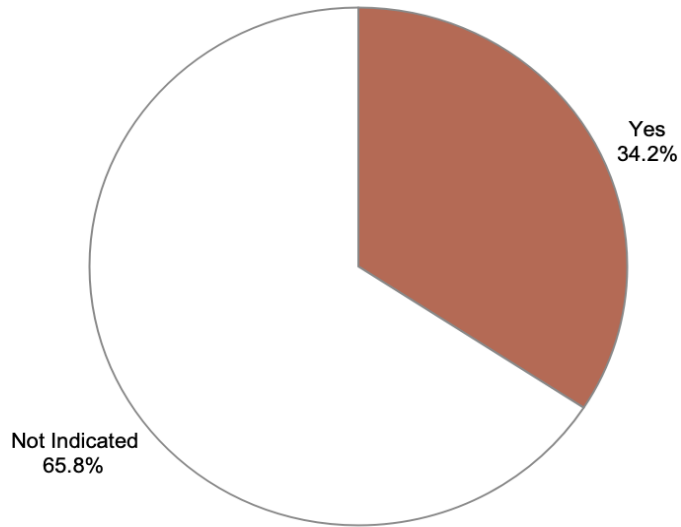
Figure 1.13 builds on the information presented in Figure 1.2, which considered the number of restrictive housing incidents by month. Adding information on the number of youth involved and average time in restrictive housing by month, February 2025 continues to stand out as representing an unusually 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)**

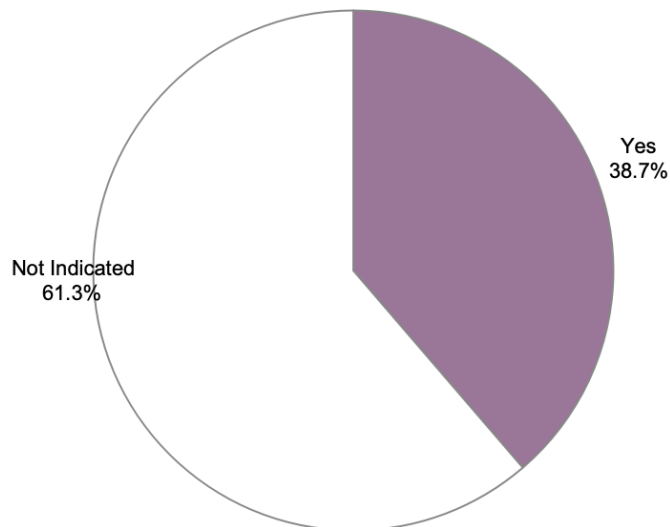


With regards to restrictive housing of 240+ minutes, which ranged from 240 to 2340 minutes, other than some small variation in the time frames presented in Figure 1.14, the higher the number of minutes in restrictive housing, the fewer the number of incidents leading to youth confined for lengthier periods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

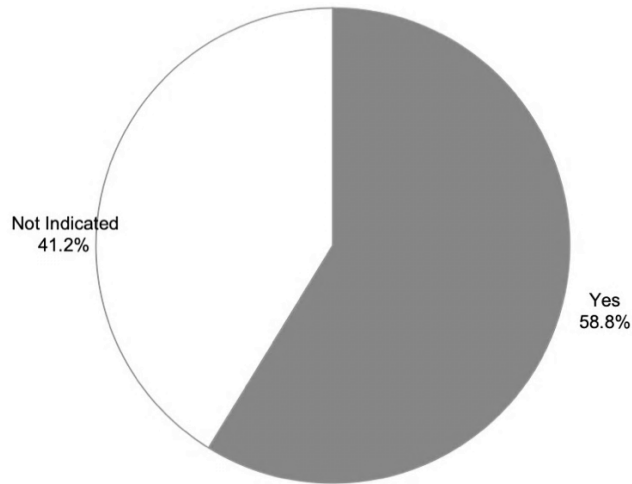
**1.15 DAJD Juvenile Division**  
**April 1, 2024 - March 19, 2025**  
**Mental Health Assessments for Youth in Restrictive Housing**  
**(n = 620)**



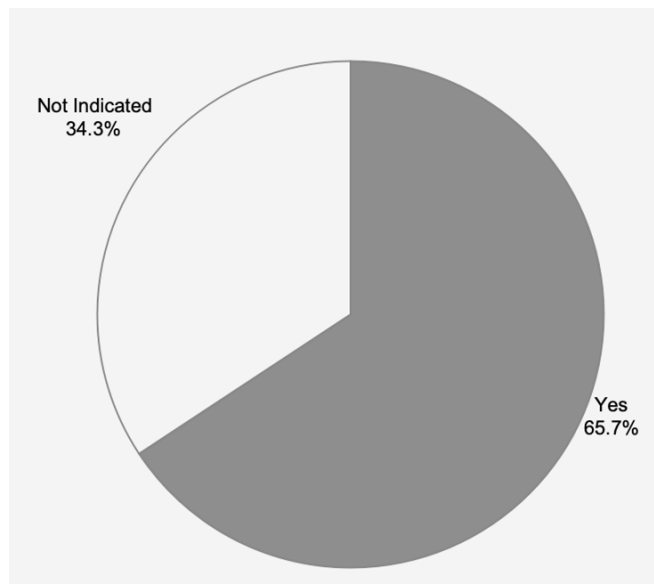
**1.16 DAJD Juvenile Division**  
**April 1, 2024 - March 19, 2025**  
**Medical Assessments for Youth in Restrictive Housing**  
**(n = 620)**



**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.

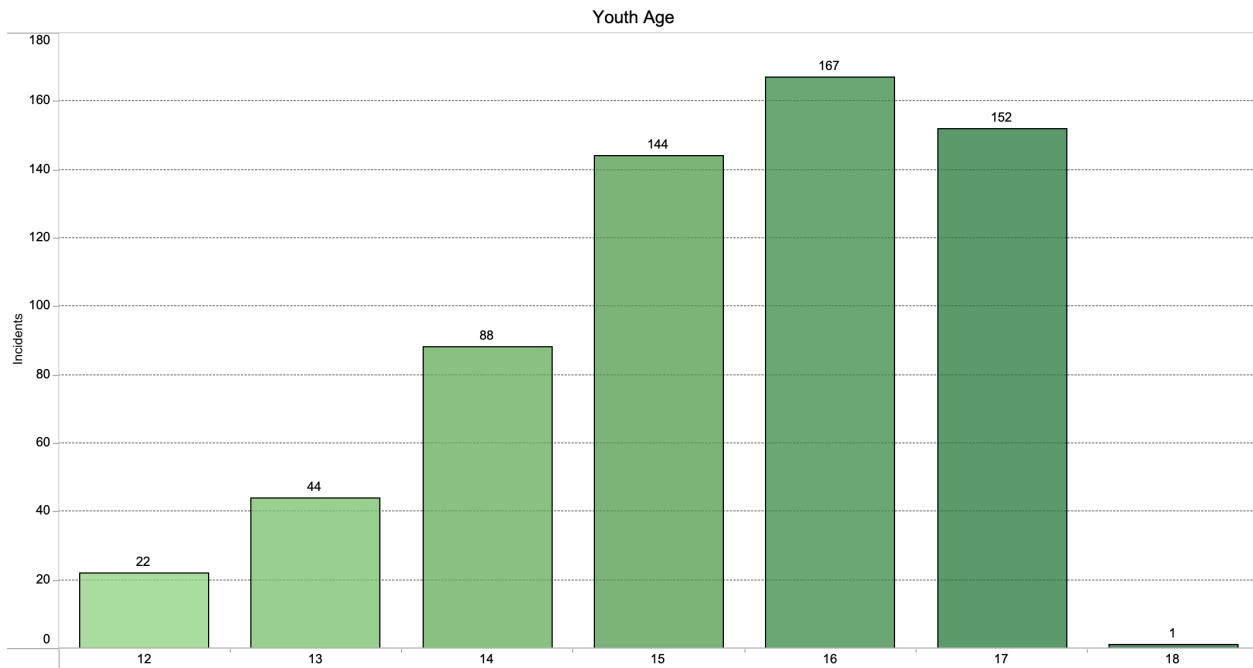
However, the percentage of mental health and medical checks documented is based on all restrictive housing incidents reported between April 1, 2024, and March 19, 2025, or all that exceeded 240 minutes, not just those incidents when an assessment was required. Thus, if a youth was in restrictive housing 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

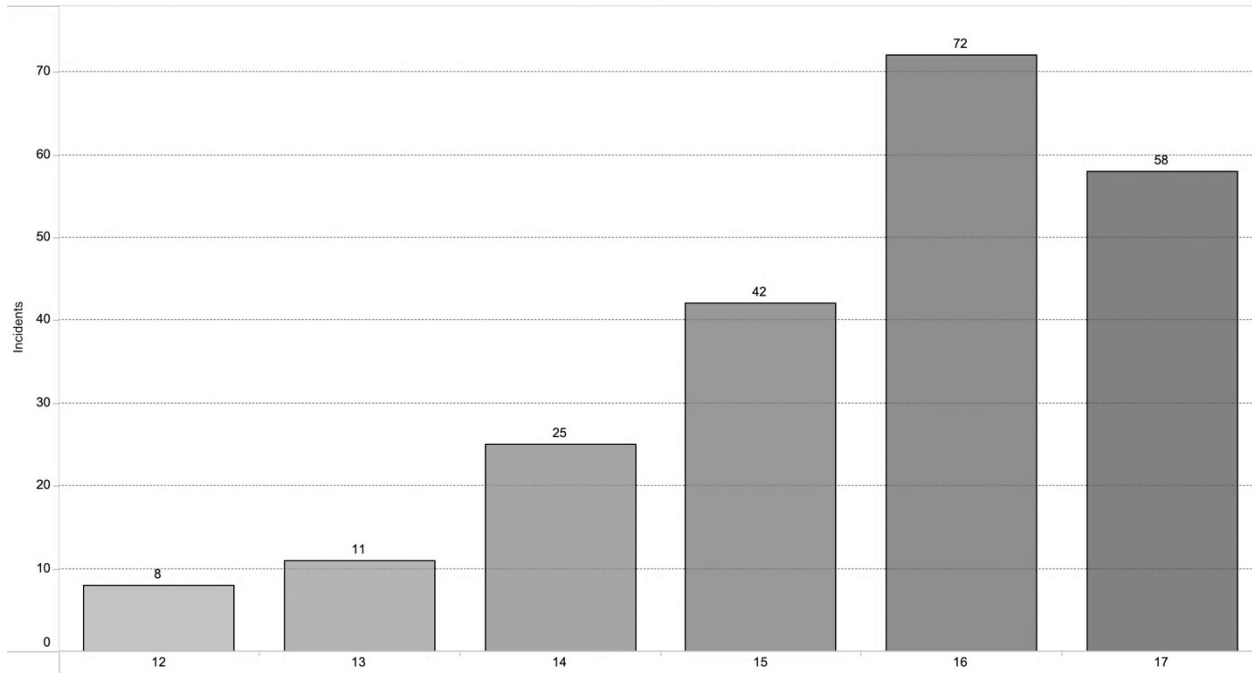
information about the mental health and medical checks, it is hoped that more accurate data regarding these checks will be documented going forward.

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)**



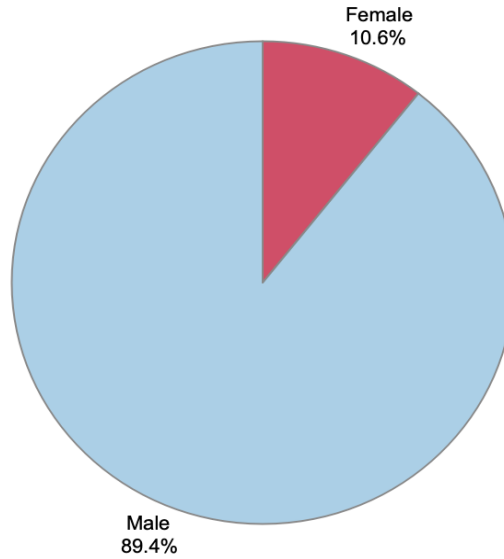
**1.20 DAJD Juvenile Division**  
**April 1, 2024 - March 19, 2025**  
**Youth in Restrictive Housing for 240+ Minutes**  
**Age of Youth in Restrictive Housing Incidents**  
**(n = 216)**



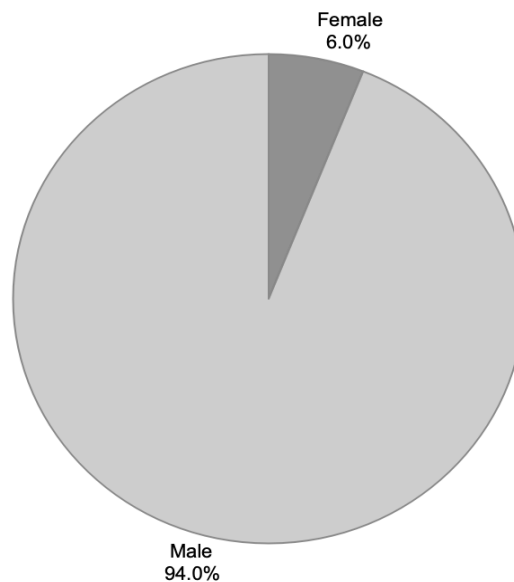
In the last report, most incidents leading to restrictive housing involved 16 and 17 year old youth. During the current reporting period, particularly in regard to all restrictive housing events, 15 year old juveniles joined the 16 and 17 year olds, representing a significant percentage of youth participating 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.

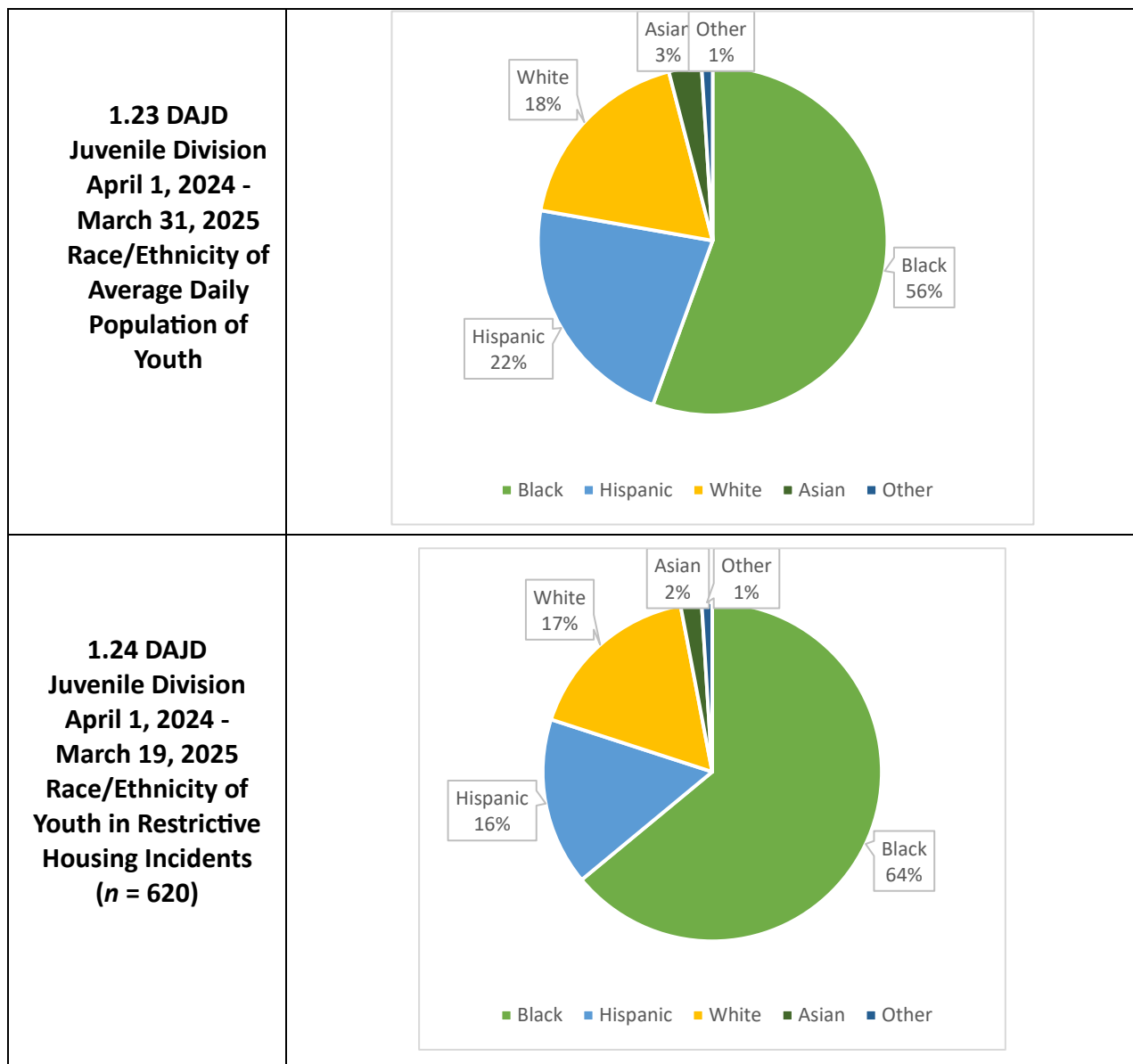
**1.21 DAJD Juvenile Division**  
**April 1, 2024 - March 19, 2025**  
**Gender of Youth in Restrictive Housing Incidents**  
**(n = 620)**



**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)**



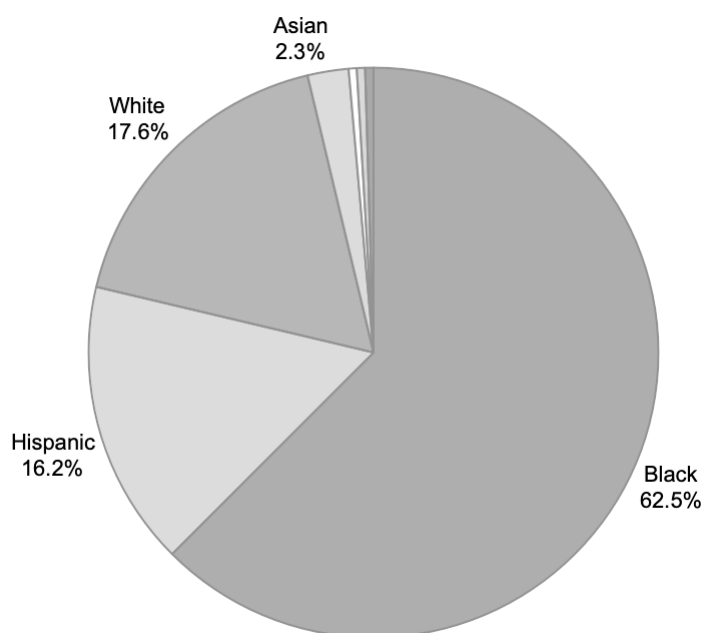
During the months April 1, 2024 - March 19, 2025, 91.2% of the ADP detained at CCFJC were males and 8.8% were female. Thus, females were slightly over-represented in the population of all youth assigned to restrictive housing - 10.6% versus their 8.8% ADP representation - and males were slightly under-represented. 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.<sup>18</sup> 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.

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<sup>18</sup> 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.<sup>19</sup> 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.<sup>20</sup>

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.<sup>21</sup> 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

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<sup>19</sup> 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.

<sup>20</sup> 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.

<sup>21</sup> 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.<sup>22</sup>

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.

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<sup>22</sup> 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 <sup>23</sup>	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. . <sup>24</sup>
	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."<sup>25</sup> 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

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

<sup>24</sup> Use of a visitation booth for a Cool Down Period is discussed below.<sup>25</sup> 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.

<sup>25</sup> 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.<sup>26</sup> 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.<sup>27</sup> 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.

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<sup>27</sup> 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.<sup>28</sup> 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.<sup>29</sup> 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."<sup>30</sup> 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,

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<sup>28</sup> 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.

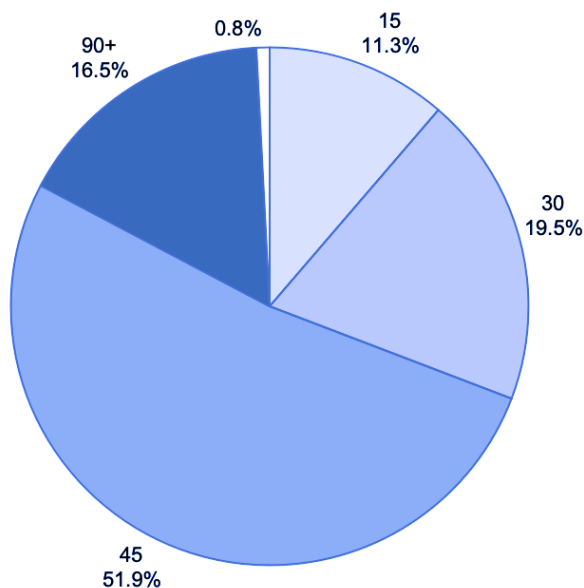
<sup>29</sup> The educators also believed that DAJD cannot turn off tablets remotely, which they thought would help with tablet management concerns. Juvenile Division staff indicated to the monitoring team that they actually can control tablet access remotely, and it might be helpful to relay that information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

<sup>30</sup> 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.<sup>31</sup>

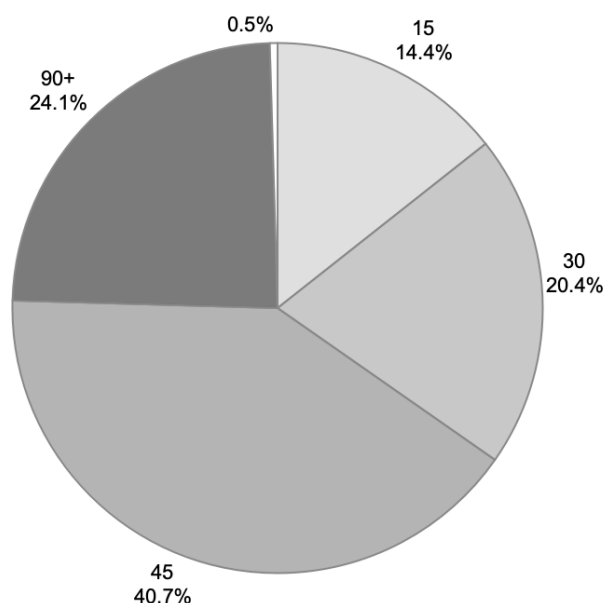
The Community Program Coordinator initially worked to identify a variety of programs appealing to different kinds of interests, facilitated the contracting process and background checks for service providers, and addressed scheduling, space, and other operational needs for programming. While these are 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)**



<sup>31</sup> 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.<sup>32</sup>

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

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<sup>32</sup> 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 Programming<sup>33</sup>**

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.

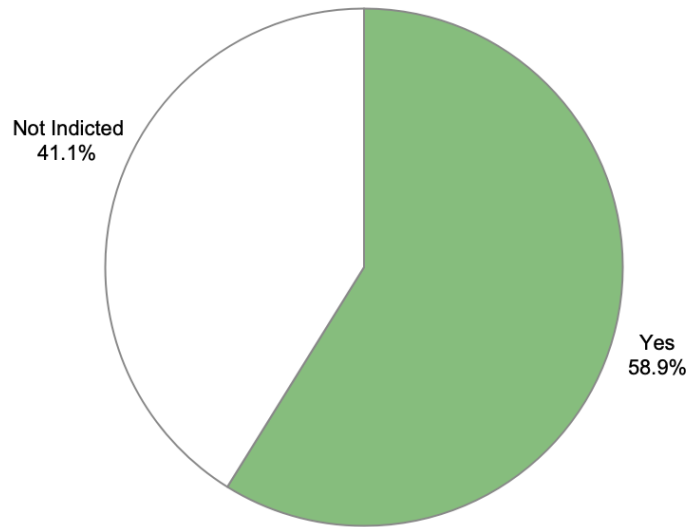
<sup>33</sup> Table 3.2 reflects the number of days each month when youth programming time was reduced due to short staffing, in addition to the designated periods when youth return to their rooms for staff breaks.

#### 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)**

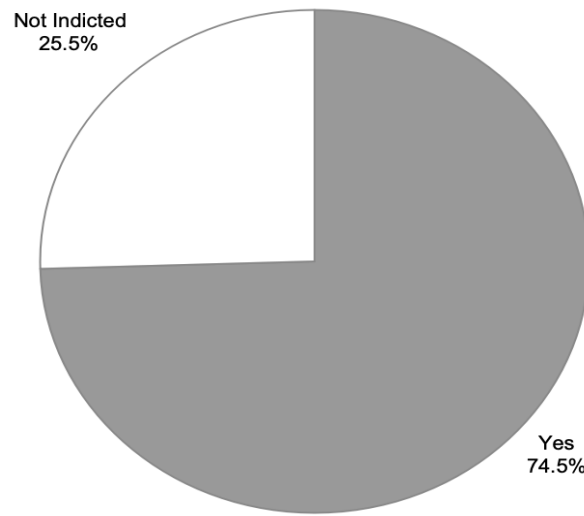


Figure 3.5 above represents the percentage of all incidents in which Corrections Supervisors documented access to reading materials for youth in restrictive housing during the current monitoring review period, while Figure 3.6 illustrates the percentage of incidents of 240+ minutes duration where access 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,<sup>34</sup> 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.<sup>35</sup> 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)

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<sup>34</sup> 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.

<sup>35</sup> 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.<sup>36</sup> 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

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<sup>36</sup> 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.


**King County**

**Shannon Braddock**  
King County Executive

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June 30, 2025

The Honorable Girmay Zahilay  
Chair, King County Council  
Room 1200  
C O U R T H O U S E

Dear Councilmember Zahilay:

As called for by Ordinance 19546, Section 54, Proviso P1, this letter transmits the seventh King County Department of Adult and Juvenile Detention (DAJD) Independent Monitoring Report required by Ordinance 19861, Section 54, P3. Also included is a proposed Motion that would, if approved, acknowledge receipt of the report. The enclosed report covers the period of April 1, 2024, through March 31, 2025.

This report is the next installment of reports related to the confinement of juveniles in County facilities. The last report, submitted to the Council in June 2024, detailed DAJD's progress in leveraging the capabilities of the Jail Management System to collect and document information about restrictive housing. It discussed how staffing shortages and the increased average daily populations impacted the documentation process. It also included an update on the Independent Monitoring Team's previous recommendations.

This report discusses several challenges facing DAJD, including a rising average daily population, significant increases in length of stay due to delays in court resolution, and an increase in the number of youths presenting with complex and challenging behaviors. These factors contributed to a rise in assaultive incidents targeting both staff and youth, thus signifying an increase in restrictive housing (RH) events. Despite the increase in assaultive behavior, the average length of RH event decreased in this reporting period. The report also discusses how staffing turnover in the Juvenile Division impacted data analysis while highlighting improvements made to the data entry processes, staffing levels, and youth programming opportunities. It also includes operational improvement recommendations from the monitoring team.

The Honorable Girmay Zahilay

June 30, 2025

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Thank you for your consideration of this report and proposed Motion.

If your staff have any questions, please contact Diana Joy, Chief of Administration, Department of Adult and Juvenile Detention, at 206-263-2769.

Sincerely,

A handwritten signature in black ink, appearing to read 'Shannon Braddock', with a stylized flourish at the end.

for

Shannon Braddock  
King County Executive

Enclosure

cc: King County Councilmembers

ATTN: Stephanie Cirkovich, Chief of Staff, King County Council  
Melani Hay, Clerk of the Council

Karan Gill, Deputy Executive, Chief of Staff, Office of the Executive

Stephanie Pure, Council Relations Director, Office of the Executive

Allen Nance, Director, Department of Adult and Juvenile Detention

Steve Larsen, Deputy Director, Department of Adult and Juvenile Detention

Diana Joy, Chief of Administration, Department of Adult and Juvenile Detention