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2014 Monitoring Visit to Fox Valley Adult Transition Center

Fox Valley Adult Transition Center (ATC) (Fox Valley) is located in Aurora, Illinois, about 40 miles outside of Chicago. It is a minimum-security female facility and the only female ATC, or work release center, within the Illinois Department of Corrections (IDOC).



Vital Statistics:

Population: 130
Rated Capacity: 100
Operational Capacity: 130
Average Age: 36
Population aged 50 or older: 18%
Cost per Inmate (FY 2012): \$17,250
Average Length of Stay: 18 months
Convicted in Cook County: 24%
Convicting Offense: 16% Class X, 39% Class 1, 26% Class 2, 12% Class 3, and 7% Class 4 felonies.
Population by Race: 65% White, 30% Black, 4.5% Hispanic, and <1% Other
Source: IDOC, February 2014

Key Observations

- Through work in the community and structured activities, Fox Valley provides women with the opportunity to stabilize and restructure their lives around lawful employment.
- About 20% of Illinois' female prisoners meet the basic eligibility requirements for work release. However, Fox Valley, the only ATC for women within IDOC, makes up less than five percent of female IDOC bedspace.
- JHA was impressed by the integration of Fox Valley with the local community.
- The wrap around approach to individualized services and support provided to the women at Fox Valley is based on active case management and a structured program that provides clear expectations, goals, and privileges.

2014 Monitoring Visit to Fox Valley Adult Transition Center

Executive Summary

In 2012, when Illinois proposed closing several Adult Transition Centers (ATCs), JHA stated that these centers are ultimately more effective at rehabilitation than prison, and that Illinois needed more ATCs, not fewer.¹ Led by Illinois State Representative Linda Chapa LaVia, Fox Valley successfully fought back against the 2012 proposed closure.² Administrators noted that the facility continues to benefit from community and local legislature support. Volunteers and other community members provide many critical services and supports to women at the facility, and Fox Valley residents, in turn, work and provide community service in the area.³ As Fox Valley is the only female ATC, women come to the facility from all over the state, but staff can help these women transition to parole sites in Aurora if they want to stay there, regardless of whether or not it is the committing county. This too demonstrates the integration and support of the facility and its residents in the community.

ATCs allow minimum-security non-violent incarcerated individuals, determined to be eligible based on state law, to serve the final six months to two years of their sentences in a community-based, work release setting. Generally about 55% of incarcerated women are incarcerated for non-violent property or drug crimes, compared to 35% of men, making women more likely to be deemed eligible for a community release setting.⁴ During the visit administrators explained that because about half of incarcerated women in IDOC are minimum-security and about half have to serve less than a year, they would estimate that about 50% of the female IDOC population are at least screenable for an ATC setting.

¹ This report is based on a monitoring visit conducted on February 20, 2014 and ongoing communications. IDOC officials and administrators reviewed and fact-checked a draft of this report and it was last discussed with JHA on July 22, 2014. No factual substantive changes have been made since that time prior to publication. All statements of opinions and policy recommendations herein are JHA's unless otherwise stated. See also JHA's 2013 publication *How JHA's Prison Monitoring Works*, available at www.thejha.org/method.

² See e.g., Lulay, S. "Protestors to Quinn: Keep Aurora Adult Transition Center open" *The Beacon-News*, March 15, 2012, available at <http://beaconnews.suntimes.com/news/11316185-418/protesters-to-quinn-keep-aurora-adult-transition-center-open.html#.U3pjLXbN58F>. The number of ATCs within IDOC has been reduced to just four (down from a high of 15 in 1986). Currently, there are 958 beds in ATCs available in Illinois, representing less than two percent of IDOC bedspace. For more information about IDOC ATCs, see JHA's 2014 report of Crossroads ATC for men in Chicago, which is operated by contractor Safer Foundation, available at www.thejha.org/publications; see also Young, J. "Why Illinois needs work release," *Illinois Times*, June 14, 2012, available at <http://illinoistimes.com/article-10133-why-illinois-needs-work-release.html>. Historically JHA has not focused our work on this population because ATC residents, while still in state custody, have far more contact with the outside world than typical prisoners.

³ Administrators reported Fox Valley's volunteer base is nearly 70 active volunteers who provided almost 4,000 hours of their time and over \$20,000 in donations in FY13, up from 3,000 hours and \$15,000 of donations in FY12.

⁴ See e.g. National Research Council, Jeremy Travis and Bruce Western, Editors, *The Growth of Incarceration in the United States: Exploring Causes and Consequences* (2014), p. 170. Available at www.nap.edu/catalog.php?record_id=18613. For more information regarding characteristics of IDOC's female population see David E. Olson, Gipsy Escobar, & Loretta Stalans, Illinois Criminal Justice Information Authority, *An Examination of Admissions, Exits and End-of-the-Year Populations of Adult Female Inmates in the Illinois Department of Corrections, State Fiscal Years 1989-2010*, (June 2011), available at http://www.icjia.state.il.us/public/pdf/ResearchReports/female_inmate_report_062011.pdf.

In fact, in reviewing the draft report, IDOC reported that as of May 31, 2014, 788 women—27% of a population of about 2,917 incarcerated women in IDOC—had less than six months left to serve; therefore, they would be too short on time for ATC placement.⁵ However, IDOC reported that even still about 20%, 595 women, were estimated to meet the basic eligibility requirements for ATCs. Yet Fox Valley, the only ATC for women within IDOC,⁶ makes up less than five percent of female IDOC bedspace. The waitlist for Fox Valley at the time of the February 2014 JHA visit was reported to be 28 women, and is currently 30. When JHA inquired why the waitlist numbers are so low, IDOC responded “*eligibility alone doesn’t mean suitability. Each eligible offender is considered separately, not using mere eligibility.*” JHA has observed throughout IDOC that low numbers of available placements mean that waitlists often do not accurately capture demand.

JHA hears from many female inmates in IDOC that they want the opportunity for work release. Women who do make it to Fox Valley, for the most part, recognize that this is a rare privilege within IDOC and a much preferable place to do their time than the female prisons, Logan and Decatur Correctional Centers.⁷ Fox Valley administrators commented that they try to give women tools to be independent and they stressed the importance of work release for women who must not only learn self-sufficiency but who must often also figure out how to legally provide for their families.⁸ They noted programming at Fox Valley is not just about finding a job but providing other individualized help that will facilitate reentry, such as assisting women with obtaining State IDs and connecting women with community resources like substance abuse treatment, or domestic abuse or sexual assault survivor groups.

Inmates at Fox Valley are referred to as “residents.”⁹ As residents demonstrate responsibility they are given more earned privileges and freedom to interact with the community and prepare for reentry within a structured environment. Administrators stated that they teach boundaries that aid women upon reentry. Residents can earn leaves to spend time at home with their families. One important factor that JHA believes contributes to the successes of ATCs is that at these facilities, unlike IDOC prisons, counselors are able to actively engage in case management for residents due to having more reasonable caseloads and they make plans for the resident’s reconnection to the community.

⁵ Out of those women with less than six months left to serve, some may still be suitable for a non-prison less restrictive security setting, such as home electronic detention.

⁶ IDOC also contracts for eight beds at the Women’s Treatment Center (WTC) in Chicago (<http://www.womentreatmentcenter.org/>), where women may live with their young children. The placement criteria for women to go to the WTC is the same as for Fox Valley plus a need for substance abuse treatment, and women with children under five years old are prioritized. JHA was told that mostly women step-down to the WTC from Decatur, but some women have been transferred from Fox Valley.

⁷ See JHA reports on these facilities at www.thejha.org/publications. JHA’s report on Logan as a female facility since the closure of Dwight Correctional Center in 2013 is forthcoming.

⁸ Incarcerated mothers are more likely than incarcerated fathers to have lived with their children. See e.g. National Research Council, Jeremy Travis and Bruce Western, Editors, *The Growth of Incarceration in the United States: Exploring Causes and Consequences* (2014), p. 261. Available at www.nap.edu/catalog.php?record_id=18613. Fox Valley, like other female IDOC facilities, takes advantage of the services of CLAIM (Chicago Legal Aid for Incarcerated Mothers, <http://www.claim-il.org/>) to help women resolve child custody and other family law issues.

⁹ JHA supports this language distinction as it fits with rejecting the notion that a person is defined by committing offense.

JHA continues to recommend that IDOC implement the mandated evidence-based Risk Assets Needs Assessment (RANA) screening tool, SPIn,¹⁰ which will permit IDOC to consider the risks, needs, and strengths of individuals in its population and correspondingly reconsider classifications and funding allocations to promote successful reentry.¹¹ Proper implementation of SPIn necessitates hiring more counselors to assess and manage all IDOC inmates. In review of this draft report IDOC acknowledged that due to funding and staffing issues RANA is on hold.

Meanwhile, research suggests that limited correctional agency resources are in fact better allocated to higher risk offenders, e.g., it may be more important to provide transitional services to those who may have the most difficult time transitioning.¹² With this in mind, JHA advocates reframing ATCs as step-down facilities for appropriate inmates within two-years of parole and expanding capacity and eligibility. This is no small task and will require proper implementation of evidence-based risk assessment, changes to laws, and reallocation of resources. However, the size of the task does not mean that it cannot be undertaken. Other states have used such methods to successfully reduce recidivism and their prison populations, as Illinois must do.¹³ Front end diversion, sentencing credits, and electronic detention, not ATCs, are likely more appropriately used as incentives for low level, low-risk inmates, who do not show as great a benefit, and even may display a detriment, from intensive programming.¹⁴

This report addresses: **Alternatives for Low-Risk Inmates** and **Fox Valley ATC: Successes, Eligibility, Level System, Budgeting, Employment, Education, Living Conditions, Transportation, Healthcare, Substance Abuse Treatment, Resident Perspectives, and Staffing.**

Recommendations

- JHA recommends that the IDOC adopt more individualized assessment, case management, and reentry planning at all facilities, as successfully modeled in ATCs. To do so, more counselors and training will be required.

¹⁰ IDOC stated that the current classification system, ARCS (“Automated Receiving and Classification System”), (which has been around since late 1990’s and relies upon self-reported information regarding medical, psychological, substance abuse and some criminal histories) goes into social and family history, but not to the extent that SPIn would. ARCS will be reportedly folded into Offender-360, which has yet to be implemented at facilities (see <http://www.microsoft.com/en-us/news/press/2013/feb13/02-13illinoiscjspr.aspx> describing Offender-360, describing the new system, and http://qctimes.com/news/local/government-and-politics/illinois-prison-visiting-hours-affected-by-computer-switch/article_8c191e7b-dfa0-5105-aefd-cf7e64ed9f81.html, announcing a planned facility computer switch to the new system in June 2014, which was subsequently called off). IDOC officials have informed JHA that additional staff training in Offender-360 is necessary prior to roll out.

¹¹ The Illinois Crime Reduction Act of 2009 mandates adopting a risk assessment tool, 730 ILCS 190. See also, JHA’s special report *Reforming Illinois’ Prison System from the Inside Out*, available at <http://www.thejha.org/rp>.

¹² See e.g., the federal National Institute of Corrections’ (NIC) eight principles of effective intervention, available at, <http://nicic.gov/theprinciplesofeffectiveinterventions>.

¹³ See e.g. The Council of State Governments Justice Center, *Reducing Recidivism: States Deliver Results*, (June 2014), available at http://csgjusticecenter.org/wp-content/uploads/2014/06/ReducingRecidivism_StatesDeliverResults.pdf.

¹⁴ See e.g. Christopher T. Lowenkamp, Paula Smith, and Kristen Bechtel, *Reducing the Harm: Identifying Appropriate Programming for Low-Risk Offender*, Corrections Today, (12/1/07), available at: <https://www.aca.org/publications/pdf/Lowenkamp.pdf>.

- We continue to recommend that IDOC reevaluate who may be best served in ATCs through evidence-based risk assessment, and consider using ATCs as step-down housing for appropriate inmates within two years of parole, and maximize utilization of lower cost alternatives for low-risk inmates.
- JHA believes that IDOC should actively facilitate inmates obtaining identification documents necessary to obtain State IDs at all facilities as part of reentry planning.
- Illinois must support the increased use of ATCs system-wide in order to reduce recidivism through critically important reentry assistance.

Alternatives for Low-Risk Inmates

Considering that ATCs currently house low-level non-violent offenders, many women at Fox Valley over the past year received Supplemental Sentencing Credits (SSC) allowing them to be released sooner to parole with a maximum possible award of 180 days.¹⁵ SSC created some imbalance at the facility with women leaving earlier than had been previously planned for with programming.¹⁶ Most residents of ATCs would also legally qualify for rarely utilized electronic detention (ED), also sometimes referred to as home detention, where an inmate is released to electronic monitoring prior to her Mandatory Supervised Release (MSR), or parole, date.¹⁷ Staff at Fox Valley expressed some frustration that even women who were doing very well at Fox Valley were being denied ED and that review for SSC at the agency level was at times taking months. Administrators responded that just because a woman does well at Fox Valley does not mean she will be approved for ED and denial reasons could include extensive criminal history, previous parole violations, previous violent crimes, or lack of a viable host site. IDOC responded, “*ED is not appropriate in every case. The ATC “midway” process exists for a reason. If IDOC determined ED to be best for people in ATCs, IDOC would make the judgment to put them on ED.*”

JHA appreciates that IDOC staffing, training, and budget hinder policy implementation. We also acknowledge the low recidivism rate thus far of those receiving SSC is attributable to the significant amount of time IDOC administration spends reviewing records of eligible inmates. However, lack of staff, evidence-based risk assessment tools, and training for this sort of case management, undoubtedly slows this process so that even IDOC’s available tools, like SSC, are

¹⁵ The average award reported was a little more than 114 days (3.8 months) as reported for the first months of the program, IDOC Annual Report for SSC March 2013-September 2013, available at <http://www2.illinois.gov/idoc/reportsandstatistics/Documents/Annual%20Report%20SSC%20March%20Sept%202013.pdf>.

¹⁶ Staff mentioned that many of the women granted SSC had earned their way to the highest privilege level at the facility (approximately 75% of women initially granted SSC at Fox Valley), were easier to supervise than new residents, and were a positive influence or mentors for others. Generally uncertain outdates impact upon the effectiveness of programming. However, as SSC implementation only occurred within the past year, in the future these credits should be more predictable and less disruptive. See IDOC’s statement on SSC at <http://www2.illinois.gov/idoc/news/2013/Pages/NewAdministrativeRuleonSentenceCredit.aspx>.

¹⁷ See 730 ILCS 5/5-8A. A list of inmates released on ED is publically available at <https://www2.illinois.gov/idoc/Offender/Pages/CommunityNotificationofInmateEarlyRelease.aspx>.

not able to be expeditiously used.¹⁸ When IDOC implements risk assessment, it should be able to make this process more effective and efficient. During the July 15, 2014 Joint Committee on Criminal Justice Reform legislative hearing, IDOC's Director indicated in his testimony that he agreed with JHA's assessment stating that SSC is not and can not be optimally used without implementation of risk assessment and more programming opportunities within IDOC.

During the 2012 facility closure hearings, IDOC's proposal was to release ATC residents to ED and to expand use of ED to alleviate crowding resulting from the Dwight Correctional Center closure.¹⁹ As of June 2014, only about 40 people were on ED²⁰ and half of these were women.²¹ IDOC responded that because there is another female facility, they do not believe crowding needs to be alleviated. IDOC stated that after the Dwight closure they had 180 people on ED, but this number has been reduced over the past year because of the implementation of SSC, which began approximately six weeks after the Dwight closure, and stated that as use of SSC grew, need for ED lessened. Yet JHA continues to observe systemic crowding and notes that some women in IDOC, like men, still must at times be temporarily housed in non-standard locations, such as a gym.²²

IDOC stated that they emphasize *“eligibility for ED is not the same as suitability. Most offenders need the housing, structure, job, education, financial training and general transition of adult transition centers. Importantly, at Fox Valley, many women eligible for ED decline it because of placement issues: they secured jobs in the Aurora area but would be released to another home area on ED and possibly lose their jobs. Also, many women feel more secure at the ATC than in the placement neighborhoods they come from. By the time an offender is screened for ED, approved and goes through the three-week required advance notice/waiting period for local law enforcement, they can also be screened for SSC. The “best of the best” get SSC, ED or ATC placement, so we pick what’s most appropriate for each offender from these good options. JHA’s focusing on eligibility ignores suitability. We see many offenders who are eligible for ATCs or ED but they haven’t complied with parole in the past. That is considered when reviewing for ED, ATC, SSC or parole in general.”*

Certainly, the best option for inmates must be individually determined; however, SSC should be given wherever possible and while some women may have a preference for an ATC over ED, there may be another woman who would benefit from that placement more. This is why

¹⁸ IDOC responded that SSC currently takes 6-8 weeks for review and *“The process cannot start until 14 months prior to release. Many months of bridge/monitoring are needed due to the statutory limit on SSC time and IDOC’s need to monitor inmate behavior after notice the SSC awarded. This ensures inmates follow rules, remain in good standing and are good candidates for use of SSC time—and are thus far less likely to jeopardize public safety. IDOC’s current policies for SSC are a big in the program’s success, recognized by JHA. We review every SSC case at multiple levels, culminating with the Chief of Public Safety. We will not take shortcuts to get more awardees on the SSC list and we cannot add more employees in a time of tight budgets. Likewise, IDOC uses ED when it makes the most sense and, yes, when budget allows.”*

¹⁹ See <http://cgfa.ilga.gov/upload/DwightRecommendationforClosure.pdf>.

²⁰ On parole, “electronic monitoring” (EM) is used.

²¹ Female inmates are only 6% of IDOC’s incarcerated population. We note one benefit for to being on ED for a resident once she is prepared to transition (besides being able to live at home with family) might be that the maintenance fee paid to parole is \$15 per week, compared to 20% of her income (up to \$100 per week) at Fox Valley.

²² Please see JHA’s forthcoming report on Logan Correctional Center and this transition from the Dwight closure.

objective, uniform evidence-based risk assessment is needed. JHA foremost advocates for safe reductions to the prison population and we remain concerned about crowded conditions in IDOC. We also remain wary of unquestioned deference to “suitability” considerations, as unlike “eligibility” conditions, which are codified in state law, “suitability” is opaque and not currently rooted in evidence-based risk assessment. While IDOC staff expressed confidence that ED screening staff have clear criteria they follow and JHA appreciates the difficulties some individuals have in securing host sites that can accommodate ED, we have not been told anything further that explains why during the closure hearings all ATC residents would meet the criteria for ED but now do not. If SSC and ED are in fact not proving effective at reducing or managing the population and the agency cannot use these tools to a greater extent, there may be need to put effort into revising eligibility criteria and into alternatives such as more diversion programming to ensure that agency resources are concentrated on high-risk individuals.

Fox Valley ATC

Successes

Most women complete their sentences and parole from Fox Valley after building resources for this transition. Administrators reported that of approximately 230 inmates housed at Fox Valley annually, approximately 87% successfully parole from the ATC, while about 30 are returned to a prison for bad conduct or medical issues (i.e. about 13%). Administrators reported that in calendar year 2013, 22 women were returned to Logan and thus far in 2014, 15 women have been returned.

Women who complete the Fox Valley program are more likely not to return to custody. Fox Valley’s recidivism rate for women who parole from the facility and are returned to IDOC was 22.9%, which is lower than the 47.1% Fiscal Year 2009 (FY09) rate for IDOC overall, and 29.3% rate for FY09 IDOC female inmates.²³ For women who paroled from Fox Valley in FY09, 131 residents exited and 30 women had reentered IDOC custody (22.9%) after the three-year tracking period, of these, 18 women were reincarcerated for a new offense and 12 women were technical parole violators.

Eligibility

Administrators stated general admission criteria for women to Fox Valley includes: less than 24 months to serve, positive adjustment at Logan or Decatur Correctional Centers,²⁴ medical and mental health clearance and stability, no violent charge or history, no pending warrants or orders of protection, no history of escape, being willing and able to participate work release, and potential employability.²⁵ As this is the only female ATC, women from anywhere in Illinois may

²³ IDOC measures recidivism in three-year periods. The 47.1 figure is for inmates released in Fiscal Year (FY) 2009 and tracked for three years, ending FY12. Figures for inmates released in FY10, tracked through FY13, are not yet available.

²⁴ Currently, all Fox Valley residents come to the facility after serving time at an IDOC prison, that is, no one comes directly from IDOC intake.

²⁵ See also 20 Ill. Adm. Code 455.30, which states placement criteria for regular ATC residents includes: not being incarcerated on a sentence for a murder, Class X felony, attempted murder, voluntary manslaughter, kidnapping,

be housed at Fox Valley and there is no restriction based on committing county.²⁶ In addition to typical residents, a few inmates meeting certain eligibility requirements are designated as “permanent parties” at ATCs,²⁷ meaning they are designated to work assignments at the facility. Currently there are seven women housed as permanent parties at Fox Valley, of these, five are assigned as dietary workers, one is an educational tutor, and one is a maintenance worker.

Level System

At Fox Valley a resident earns privileges including Independent Release Time (IRT) and leaves by earning her way through the level system.²⁸ Independent leaves cannot be earned until Level III and a minimum of 90 days at the facility. All resident movement outside the facility must be cleared and there must be a physical address and landline documented for each destination. While on leaves residents must be reachable for spot checks and must be at their host site during curfew hours of 9:50 pm to 6 am. Residents may contact Fox Valley at any time through a toll free number.²⁹ A resident may regress in level if she has major disciplinary tickets. Certain infractions will result in the resident being returned to IDOC custody in a prison. Administrators stated that there were about 180 tickets issued in the prior year and that most resulted in facility-based sanctions such as a building restriction or a level regression. In calendar year 2013, 22 women were returned to custody in an IDOC prison from the facility and thus far in 2014, 15 women have been returned for either conduct or medical issues.

When a resident arrives at Fox Valley she is assigned to a correctional counselor and begins orientation for at least the first seven days at the facility. Administrators reported that women are provided with care packages upon arrival and JHA visited the “boutique” clothing room stocked with donations.³⁰ During orientation formal visits are not allowed, but one member of a resident’s family or a friend may drop off limited funds and approved clothing and hygiene items.³¹ This orientation period familiarizes the resident with the facility’s policies and procedures, staff members conduct various educational modules, and the resident must obtain a State ID.

indecent liberties with a child, or arson; no documented involvement in organized crime activities; no documented large scale narcotics trafficking; being “A” grade; being minimum-security; having no outstanding warrants or detainers; having no acute medical or dental issues; having a positive assessment of risks and needs; having no escapes or attempts for the past 5 years; and, no disciplinary segregation or loss of good time within the 45 days prior to application for ATC placement. However, ATCs do in practice accept some individuals with non-violent Class X felonies (the number calculated by IDOC staff of female inmates meeting basic eligibility requirements for ATC placement, 595, includes such individuals).

²⁶ In fact, some women who go to Fox Valley who are not originally from the area choose to reside nearby when they successfully complete the program because they know the area and have become integrated in a productive way there, which provides a sense of security and stability that aids reentry success.

²⁷ See 20 Ill. Adm. Code 455.30(c).

²⁸ Basics of the level system are set out in 20 Ill. Adm. Code 455.60-80.

²⁹ Residents are not allowed to have cell phones.

³⁰ The boutique offers residents a variety of new and gently used clothing, shoes, and handbags. The boutique is stocked with donated items and is a valuable resource for residents preparing for community outings and job interviews. Administrators noted that residents take great pride in organizing and maintaining the boutique. Donations scheduled in advance may be dropped off or mailed. If you are interested in making a donation, please contact the facility, (630) 897-5610.

³¹ Please check with the facility for current rules.

According to the counselor in charge of helping women at Fox Valley obtain State IDs, about 70-80% of the women are able to get an ID within a short time of arriving there because they have the necessary documents. The other approximately 20-30% of the women face hurdles in locating or obtaining the underlying identification documents. Counselors at Fox Valley are resourceful in helping the women circumvent many of these hurdles; for example, they refer women to the Visiting Nurse Association Health Care Clinic in Aurora that can provide a stamped medical history that is useful in obtaining a social security number, which is a necessary part of getting a State ID. They have also worked to establish relationships with employees at the local Social Security Administrative office and Secretary of State's office, which has proven enormously beneficial to the women because these people are able to provide clear direction and assistance to those who do not initially have all of the necessary documents. Women at the facility use Fox Valley as a residential address. The attention paid to this task by Fox Valley counselors is representative of the common sense approach to helping the formerly incarcerated reintegrate into society that is part of the ATC philosophy. A state ID is important for many reasons, obtaining employment key among them. But frequently the administrative hurdles posed in obtaining an ID can overwhelm those who are not used to being responsible for important personal documents and may not have them or have ever had them. Helping people understand what documents they need and how to get them is incredibly useful. Not just because of the end product, but because it helps them navigate bureaucracy successfully, which is an important and often difficult thing to do. JHA believes that IDOC should aid all inmates in obtaining identification documents prior to release or placement at an ATC.

The resident and counselor must sign off on an orientation checklist before the resident may progress to Level 1, wherein she may partake in other facility programming and begin a job search. Residents remain in Level I for at least twenty-three days, during which time the resident's Individual Program Contract is written and a resident may be allowed one staff supervised outing per week. A resident may begin working during this phase. Correctional counselors review and evaluate each resident's behavior and progress every fourteen days and consider whether the resident can be promoted in level. This level of counselor engagement and positive goal orientation is exceptional within IDOC. In addition to the correctional counselors, an employment counselor who is employed by Prison Release Ministry, Inc., but has an office at Fox Valley, aids residents in job placement and retention. Staff explained to JHA that they help women set realistic goals for employment and discussed some of the challenges women at Fox Valley face in terms of background checks and identification issues with name changes due to marriage or prior aliases. Administrators stressed that the resident's input is pivotal to the counseling experience and helps with ownership and success. Residents must obtain their correctional counselor's consent to make changes in assigned programming, including employment. Failure to do so will result in a Resident Disciplinary Report (RDR or ticket).

To be promoted to Level II, after at least 23 days in Level I, a resident must have at least 35 hours of programming a week, meaning that she is employed and hours in educational or substance abuse classes will also be counted toward the hourly minimum. Also the resident must continue to meet regularly with her counselor to set goals and discuss progress, and not have any major rule infractions for 30 days. If a resident does not have 35 hours a week of programming, she will have an assignment at the facility as a porter and will work as needed at the facility for dietary, cleaning, and other duties. Level II lasts a minimum of 60 days. After 30 days in Level II

residents have an added privilege of being able to attend outside church services with approved volunteers once weekly. Permanent party residents may not be promoted past Level II. Some permanent party residents mentioned to JHA that they would like more trips to the store because they did not have the ability to pick up items while outside the facility for work like the other residents. Staff stated that there are weekly outings to local stores, including Walmart and the Dollar Store, using a facility van (transporting a maximum of eight women at once), and that residents may sign up to go every other week. IDOC stated that more outings would increase expenses and every-other-week is enough to meet the residents' needs, and that such limits help residents realize Walmart and the Dollar Store are not always needed and that saving money is sometimes the best approach.

To be promoted to Level III, a resident must: maintain at least 35 hours of programming a week, be meeting her contract goals, and have no rule infractions for 45 days. Level III lasts at least 30 days and in this phase a resident first may be allowed six hours of Independent Release Time (IRT) per week and one Community Correctional Center Leave (CCCL) of up to 48 hours per month.

To be promoted to the final level, a resident must continue to have at least 35 hours of programming a week for at minimum 45 consecutive days, be meeting her contract goals, have no rule infractions for 45 days, and have completed a special volunteer project involving a minimum of 20 hours of volunteer work. Administrators reported that in total in FY13 Fox Valley residents completed over 7,000 hours of volunteer work in local community social service and faith based agencies, including assembling over 7,000 Easter baskets for needy children in the community including those in the Illinois Department of Children and Family Services (DCFS) foster care system. Other common volunteer activities for residents include assisting at food banks and public functions, such as with event trash pick-up. Currently, an assisted living center is being built next to the facility and administrators commented that this might hopefully result in some future additional volunteer or employment opportunities for residents. Administrators commented that women from IDOC are easier to place in community than men, as they are not perceived as being physical threats.

In Level IV a resident may be allowed twelve hours of IRT per week and four CCCLs of up to 48 hours each per month. A resident may remain in Level IV as long as she is in compliance with her contract goals and continues to display excellent adjustment, which includes adhering to Fox Valley rules and behavior expectations.

Budgeting

One important aspect of ATCs is that they attempt to teach fiscal responsibility. Residents are put on a budget of \$75 weekly (exceptions must be approved), forcing savings from income, and residents must pay a percentage of income as a maintenance fee for cost of living to Fox Valley. Women must account for spending while at the facility with receipts. Residents are not allowed to enter into any credit agreements while at the facility. Budgeting is also used for a resident's financial obligations, which may include: medical, dental, and counseling costs incurred at the facility, court ordered fees, or child support. The maintenance fee is assessed at 20% of net income, not to exceed \$100 per week, but for those in educational programming who are

required to also work maintenance is calculated at 20% not to exceed \$50. Fox Valley administrators reported that FY13 maintenance fees at Fox Valley totaled nearly \$278,000, up from \$248,000 in FY12. Residents' income is held in trust by IDOC at a local bank, Old Second Bank of Aurora. Weekly budgeted funds are issued to women in check form. JHA recommended during the visit that Fox Valley attempt to work out an arrangement so that the women could cash their checks at the bank instead of using a currency exchange, as was practice at the facility. Paying fees for this service unnecessarily seems to encourage poor financial habits. Administrators stated that are seeking to come to an arrangement with the bank to allow women to cash their checks there. Administrators mentioned that more volunteer programming on fiscal topics such as investments would be welcome at the facility.

The ATCs' policy that mandates that residents save a percentage of their income allows them to leave state custody with much needed resources. Administrators stated that one woman set a record by leaving Fox Valley with \$17,000 saved. More typically women are able to leave with enough money to get themselves on their feet and with new marketable skills. Staff stated that while women are at Fox Valley they resent counselors for being strict with budgeting but that then they are appreciated when women leave with a large check. In contrast, most inmates leave IDOC prison custody on Mandatory Supervised Release (MSR), or parole, with very little, perhaps just a bus ticket to a location near their parole site and few dollars. Administrators commented that they believed that budgeting is particularly helpful with women, who generally give and provide to others before themselves, for example paying for a boyfriend's car repair or a treat for a child. Having someone else control their money initially permits women to say no to others (because often the counselor will not allow it as part of the budget) and hopefully leave with empowerment to prioritize needs.

Employment

At the time of JHA's February 2014 visit, 118 women at Fox Valley were employed. Administrators reported they have generally a 98% employment rate of eligible residents, up from 96% reported in FY12. The 30-day job retention rate was nearly 90%. The employment counselor stated that women are strongly encouraged to keep jobs for 30 days. Residents are expected to give employers two weeks notice prior to terminating employment. If a resident is terminated from her job for fault, she will receive a RDR and may be ordered to work as a porter for 30 days before being allowed to look for another job. Administrators noted that women will occasionally grieve discipline or tickets they receive if they are fired; however, in total for the prior year Fox Valley recorded only 20 grievances (with some women filing multiple grievances). Administrators reported that about 35% of residents keep the employment they obtain while at Fox Valley after release, or transfer to a location in their community. They also noted about 20% of the population had never worked a legal job prior to this opportunity. Residents may list IDOC facility work assignments as experience on resumes. The employment counselor noted that something like working in dietary serving approximately 2,000 women at Logan was impressive and relevant. Employers of Fox Valley residents specifically noted by administrators and residents included Suncast Corporation, Portillo's, Grandma's Table, Kraft, and Dunkin Donuts. During the visit, JHA sampled some Dunkin Donuts product made by residents and found it to be of superior quality. Some women work for a temporary placement company. Women at Fox Valley have use of a nearby computer lab for job search use (such as

setting up email, working on resumes, or searching listings) at the Illinois Department of Employment Security (IDES) where staff will monitor the women's computer use. Fox Valley residents are allowed use computers for only work or educational purposes.

Education

Fox Valley administrators told JHA that IDOC inmates who have a Test of Adult Basic Education (TABE) score under 6.0 (and would be subject to Adult Mandatory Adult Basic Education)³² are not placed in ATC settings. Administrators reported about 20% of Fox Valley residents did not have a high school diploma or GED and that women are generally higher educated than men in IDOC. Administrators stated that women without a GED at Fox Valley are encouraged to work towards one. At the time of the February 2014 JHA visit, only four women at Fox Valley were in school, but administrators said there had been up to 11 women enrolled at one time in the prior year. Residents who are students must also be employed for at least 30 hours a week and pay maintenance fees.

There are currently no educational classes conducted onsite. Residents may participate in an ABE class or a GED class facilitated by Waubensee Community College (Waubensee), which is located about 10 miles from the facility. Some women take college classes at Waubensee. Women are generally limited to taking two courses at a time while maintaining other obligations. In FY13 eight Fox Valley residents earned their GED and seven residents took college courses, while in FY12 five residents earned GEDs and 10 residents took college courses. Residents are responsible for any fees for college classes. Administrators stated that residents qualify for financial aid. JHA believes that ATCs would be an ideal place to offer adult online educational enhancement, since residents must schedule school around their work schedules. Currently computers that women can use at the facility are limited to only word processing capacity. Administrators stated because they encourage residents' community involvement they think having residents take classes outside of the facility is a benefit and noted that women can currently take online courses at home on leaves or using a library computer.

Living Conditions

Fox Valley's physical building was built in 1917. The building was a tuberculosis sanitarium prior to becoming a male ATC in 1972 and then transforming to a female ATC in 2000. The building is leased by IDOC from Dolan & Murphy, Inc. of Aurora.³³ While the age of the facility

³² See 20 Ill. Adm. Code 405.50.

³³ In the 2012 closure hearings, closing Fox Valley and releasing residents on electronic detention was estimated by IDOC to result in a FY13 cost saving of \$2,246,200, *see* <http://cgfa.ilga.gov/upload/CorrectionsFacilityClosureSavingsTable04262012.pdf>. However, calculating cost-savings by merely multiplying number of inmates by fiscal year average cost is faulty in many regards - for one, much of the per inmate cost is attributable to labor and in the closure plan staff were to be offered positions at other facilities, potentially resulting in minimal agency labor cost savings. IDOC responded that because the other positions offered were to fill vacancies or Leaves of Absences (LOAs) this did save money because it avoided new hires and eased overtime. For more information about true taxpayer costs of incarceration and where this money is spent, *see* Vera Institute of Justice's 2012 study *The Price of Prisons: What Incarceration Costs Taxpayers*, (finding that for FY10 about 32.5% of the cost of Illinois' prisons, mostly relating to labor benefits, was outside of IDOC's budget), available at <http://www.vera.org/pubs/special/price-prisons-what-incarceration-costs-taxpayers>, as Vera

presents some challenges,³⁴ the building's structure is pleasant with high ceilings that create an open feeling and let in a lot of light. In FY13 the facility was renovated with new light fixtures, a new roof, new windows, and new carpeting. Administrators stated that energy efficiency was prioritized in recent renovations and noted that the new windows have helped with heating expenses and that air conditioning was being reconfigured currently. At the time of the visit, new curtains were being manufactured at Decatur. There is exercise equipment donated by Curves onsite. Pay phones are available for use with call time limits. Staff can monitor pay phone use from the main desk at the entry area. Staff at Fox Valley wear plain clothes and JHA noted a calm and respectful attitude in all observed interactions between residents and staff.

As an older structure, the facility cannot accommodate residents who would be unable to be housed on an upper floor,³⁵ where the two to six person resident rooms are located. JHA appreciated that administrators announced when a male JHA visitor was touring residents' living area and we felt that this facility had appropriate awareness of and sensitivity to cross-gender supervision concerns. We received no staff conduct complaints during the visit, unlike at female prisons where it is common to hear about staff using inappropriate language, etc. Residents are initially assigned to six person rooms, but with seniority they may move to rooms with fewer women. Rooms are required to be "racially balanced." JHA questioned whether this is necessary given that ATC residents are screened for placement to preclude Security Threat Group (STG or gang) affiliation. However, administrators responded that residents state that when there is no one else of their race in the room, they feel isolated, targeted, or picked on, and IDOC stated, "*We believe strongly in equal opportunity and balance, when reasonably possible—though not always an exact balance. The policy of integration is proactive and encourages social growth among all ethnicities.*" The Resident Handbook explains that women will not be moved because they "simply do not get along," as "adult behavior and mutual respect is expected of each resident." This attitude of mutual respect at Fox Valley also appears to extend to resident and staff interactions.

Transportation

Administrators stated that if a resident has limited or no funds to pay for transportation, center staff will transport her. Residents at Fox Valley may make use of the PACE public transit system; however, hours and routes are limited. Although administrators noted that many women like the slower pace of Aurora, the location is suburban and not as connected via public transportation as Chicago. A resident may be approved to work in the Chicago area if she is paid more than \$10.00 per hour for at least forty hours a week, and she has adequate transportation. JHA was pleased to see that Fox Valley recently brought some residents to an IDOC Summit of

notes: "When calculating savings (or costs) that result from reductions (or increases) in a state's inmate population, do not use the per-inmate *average costs* in this report. Instead, use the *marginal cost* per inmate. The marginal cost is the amount that total correctional costs change when the inmate population changes. Using the average costs in this report to calculate savings or costs because of changes in the prison population will result in overestimates." In the 2012 closure proposal IDOC used a marginal cost per inmate of \$5,885. *See* p. 6, <http://cgfa.ilga.gov/upload/DwightRecomendationforClosure.pdf>.

³⁴ For example, administrators noted that there are occasional plumbing issues that are addressed as they come up.

³⁵ However, lower-bunk permits can be accommodated.

Hope reentry event in Chicago, where women were able to connect with area providers.³⁶ Outings for employment or programming requiring more than two hours of travel one-way are discouraged and may not be approved. During the wintertime February 2014 visit it was JHA's impression that several women had to use taxi services to get to and from work, which was relatively expensive. Women are allowed to walk to nearby locations or ride bikes. If a resident wishes to get a ride from someone such as a coworker, the driver must be screened and approved by Fox Valley first. Administrators reported that at the end of 2013, Ride in Kane,³⁷ a reduced fare transportation service for Kane county resident seniors and individuals with low income or disabilities, which had previously been available to residents was no longer working with the facility. Administrators stated that some of their residents who can make upwards of \$30,000 a year do not qualify as low income. However, the loss of this service impacted Fox Valley residents who are employed at locations that are not on public transit routes. Administrators stated at the time of the February 2014 JHA visit that they were working diligently to identify other transportation options. In the past months, the facility has established an agreement with four local transportation services where residents pay a flat rate \$40 a week for up to two rides a day. Another recent development is that Fox Valley has an electronic car, which is used for shorter outings. IDOC stated that the newer transportation options Fox Valley has arranged are getting the women to their jobs and there have been no complaints.

Healthcare

IDOC requires that inmates at ATCs be responsible for their own healthcare.³⁸ Inmates with more serious medical needs at Fox Valley will be evaluated on a case-by-case basis to determine if they would be better served in IDOC custody in a prison where there is healthcare staff onsite.³⁹ At the time of JHA's February 2014 visit, six women at Fox Valley were on psychotropic medications.⁴⁰ Women have higher incidence of mental health problems while incarcerated than men, with the most recently available federal government study finding 73% of women in state prisons had symptoms of a current mental health problem compared to 55% of men.⁴¹ Research conducted by the Illinois Criminal Justice Information Authority (ICJIA) found

³⁶ See Slodysko, B. "Expo offers guidance, support for female ex-offenders," *Chicago Sun-Times*, May 8, 2014, available at <http://www.suntimes.com/news/metro/27318633-418/expo-offers-guidance-support-for-female-ex-offenders.html#.U5CF6nbN58E>. See also, <https://www2.illinois.gov/idoc/communityresources/pages/summitofhope.aspx>.

³⁷ See <http://www.rideinkane.org/>.

³⁸ ATC residents fall outside the purview of the custodial medical care that the state is required to provide to persons incarcerated in prisons. ATC residents are in IDOC custody, yet not, as they live and work in the community, but at the same time are housed and strictly supervised by the state, and are not entitled to freely come and go as they choose. We note, unlike incarcerated individuals, employed ATC residents are taxpayers.

³⁹ Illinois law states that to be eligible for ATCs inmates must: "Have no acute medical or dental problems requiring resolution prior to a transfer." 20 Ill. Adm. Code 455.30(b)(5).

⁴⁰ In contrast, when JHA visited Crossroads ATC, a male facility, we were told that no inmates on psychotropic medications participated. See JHA's 2014 Crossroads ATC report, available at <http://thejha.org/crossroadsatc>.

⁴¹ See Doris J. James and Lauren E. Glaze, Bureau of Justice Statistics, *Mental Health Problems of Prison and Jail Inmates*, (2006), available at <http://www.bjs.gov/content/pub/pdf/mhppji.pdf>. See also, ACLU, *Worse Than Second-Class: Solitary Confinement of Women in the United States*, (April 2014) p. 3, ("Among prisoners in federal facilities, almost fifty percent more women than men have been diagnosed with mental health conditions. And much higher numbers of women in state prisons and local jails are reported to suffer from mental health problems than similarly situated men. Women also report past physical or sexual abuse, as well as other traumas, at a higher rate

based on a random sample of female IDOC inmates, 83% of the woman reported suffering a Post-Traumatic Stress Disorder (PTSD) symptom in the prior month.⁴² ICJIA further reported that roughly 99% of these women had histories of prior trauma or emotional, physical or sexual abuse. IDOC staff report that roughly half of the female population are already on the mental health treatment caseload. Further, as IDOC's female population is reevaluated in relation to ongoing litigation regarding mental health within IDOC,⁴³ findings suggest that many of these women will be found to be Seriously Mentally Ill (SMI).⁴⁴ IDOC took issue with these findings, responding that 22% of its total population receive mental health treatment and stating that they do not believe there is a 33% to 51% gap between those who need treatment and those who are diagnosed and receive it.

Psychotropic medications and other prescribed medications that are controlled substances are maintained by Fox Valley staff and dispense on schedule under supervision. Administrators stated that, as part of residents' transition, the women are encouraged to obtain mental health services in the community. Onsite services at Fox Valley include substance abuse individual and group counseling, as well as didactic mental health groups for issues including effective parenting, emotional regulation (anger management), and Seeking Safety (a gender responsive program for trauma survivors). Onsite groups are open to all residents, but typically have five to eight participants. Staff believed more groups would be welcomed. Women may be able to participate in groups offered in the community, such as sexual assault or domestic violence survivor support groups, as approved by the facility. Administrators reported that a volunteer social worker comes to the facility about twice a month to assess new residents, make treatment referrals, assist with release planning and linkages to community services, and meet with residents in need of additional support.

Fox Valley is across the street from the Presence Mercy Medical Center in Aurora, which is utilized for serious healthcare needs and has a sliding scale fee for those without insurance. Administrators reported in FY13 nearly 200 residents were medically screened and treated at local hospitals. Administrators also stated that they also work with area dental providers who bill on a sliding scale, with one outside provider even providing vouchers for dental treatment to Fox

than their male counterparts.”) Available at <https://www.aclu.org/criminal-law-reform-prisoners-rights-womens-rights/worse-second-class-solitary-confinement-women>.

⁴² See Jessica Reichert, Sharyn Adams, Lindsay Bostwick, Illinois Criminal Justice Information Authority (ICJIA), *Victimization and Help-seeking Behaviors Among Female Prisoners in Illinois*, (April 2010), available at: <http://www.icjia.state.il.us/public/pdf/ResearchReports/Victimization%20and%20help%20seeking%20behaviors%20among%20female%20prisoners%20in%20Illinois.pdf>.

⁴³ *Rasho v. Walker, et al.*, 07-CV-1298 (C.D. Ill). See further discussion of mental health issues in IDOC's female population in JHA's forthcoming Logan monitoring report.

⁴⁴ “For purposes of the lawsuit, a person is defined as SMI if, as a result of a mental disorder as defined in the current edition of the Diagnostic and Statistical Manual of Mental Disorders of the American Psychiatric Association, he or she exhibits impaired emotional, cognitive, or behavioral functioning that interferes seriously with his or her ability to function adequately expect with supportive treatment or services. In addition, the person must either currently have, or have had within the past year, a diagnosed mental disorder, or must currently exhibit significant signs and symptoms of a mental disorder. A diagnosis of alcoholism or drug addiction, developmental disorders, or any form of sexual disorder does not by itself render an individual seriously mentally ill. The combination of either a diagnosis or significant signs and symptoms of a mental disorder and an impaired level of functioning, as outlined above, is necessary for one to be considered SMI.” Notice of Class Action, *Rasho v. Walker, et al.*, 07-CV-1298 (C.D. Ill).

Valley residents. Administrators explained that they have been educating women about the importance of having medical insurance and try to steer women towards employers that offer it, such as Portillo's. Administrators reported that since JHA's February 20th, 2014 visit, they have begun educating Fox Valley residents about enrolling under the Affordable Care Act (ACA) Medicaid expansion.⁴⁵ It is uncertain whether, for purposes of coverage under the ACA, ATC residents are deemed ineligible because they are still in state custody, or whether, like parolees who have returned to communities, they are eligible for coverage.⁴⁶

Substance Abuse Treatment

Currently placement in substance abuse classes is determined based on a woman's court orders. Administrators reported about 20% of the residents partake in substance abuse treatment programming. Individual and group substance abuse counseling at Fox Valley is provided by Breaking Free⁴⁷ in an Illinois Department of Human Services, Division of Alcohol and Substance Abuse (DASA) funded program. The Breaking Free counselor conducts assessments, develops and implements treatment plans, and utilizes community-based organizations as referral sources to supplement treatment plans.⁴⁸

Fox Valley administers random and suspicion-based drug and alcohol tests and currently has a zero-tolerance policy for illegal drug or any alcohol use, even given that most women are of legal drinking age. This is stricter than what JHA heard about as policy at a male IDOC ATC facility, where a minor relapse will not automatically result in a resident being transferred back to a prison.⁴⁹ Administrators explained that because demand for Fox Valley placement is high and this is a good way for someone to do their time, they hold resident conduct to a higher standard. They have found it easier to have a bright line rule to try to avoid substance use issues. Most treatment professionals accept that relapse can be part of a person's substance use disorder, and this sanction is quite severe. IDOC responded, "*The system works. It is a deterrent and it respects those who comply.*" However, Fox Valley reportedly does have some women who have been given permission to return to the facility for a second time, typically during a subsequent incarceration. Currently, administrators reported there are six residents who had been at Fox Valley in the past.

⁴⁵ JHA believes that if residents are required to seek medical care in the community they should be covered by the ACA, if eligible, and that IDOC should assist minimally with education about enrollment, and ideally begin the enrollment process with inmates (if this is found legally permissible by Medicaid officials), as part of reentry preparation for all inmates. IDOC officials reported that they agree and have begun to do so with the pilot programs at some prisons.

⁴⁶ See Factsheet "The Incarcerated & The Affordable Care Act: The Facts in Illinois," available at <http://illinoishealthmatters.org/wp-content/uploads/2013/11/The-Incarcerated-And-the-ACA.pdf>. Note that this does not list ATC custody under any category.

⁴⁷ See organizational information at <http://www.breakingfreeinc.org/>. A Fox Valley resident speaks about this program in the Windy City Live, *After Dark: Moms Behind Bars* series, (7/10/14), available at <http://windycitylive.com/video?id=9541379>.

⁴⁸ Residents are required to pay for substance abuse service fees from services in the community.

⁴⁹ See JHA's 2014 report of Crossroads ATC for men in Chicago, which is operated by contractor Safer Foundation, available at <http://thejha.org/crossroadsatc>.

Resident Perspectives

Residents interviewed during the February 2014 JHA visit shared that Fox Valley helps them as a bridge to the real world and eases their anxieties associated with reentry. One specifically commented that being close to her children is a comfort. Several reported liking their work and being given the opportunity to provide for their families legally. All the women JHA interviewed on the visit were positive about the facility, particularly in contrast to their experiences at IDOC prisons. Many women have been through the county and state systems before. Several residents stated that they believed staff at Fox Valley wanted to help them and believed the programming would work and aid them with successful reentry. As put by one resident, “at Fox Valley they don’t throw us into the water to see if we sink or swim, first they give us floaties to use.” Some women commented that it would be helpful if there were another ATC closer to their homes downstate.

Staffing

Administrators reported that Fox Valley had at the time of the February 2014 visit 22 security staff (including five supervisors), three correctional counselors, and three contractual dietary staff (employed by Aramark Correctional Food Service). Additionally Fox Valley benefits from having independently funded additional services onsite through the employment counselor (who is employed by Prison Release Ministry, Inc.) and substance abuse treatment counselor (employed by Breaking Free) who assist residents at the facility. Two security staff and two supervisor positions were vacant. The ratio of residents to correctional counselors (approximately 43:1) is far better than in IDOC prisons and permits individualized case management. Fox Valley had absorbed some staff due to closures of IDOC and IDJJ facilities in 2013. JHA was fortunate to visit during a staff luncheon celebrating African American History Month and we were able to speak with several staff who were positive about working at the facility, particularly in contrast to working at other prisons with maximum-security population. Administrators reported that since the JHA visit, the Chief of Security position was filled, but stressed that filling key vacancies, including more female security staff,⁵⁰ remains critical.

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⁵⁰ Best correctional practices dictate that female correctional staff perform all direct supervision and bodily searches of female inmates who, by virtue of having histories of trauma and abuse, are particularly vulnerable to retraumatization by incursions into privacy by male correctional staff.

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Since 1901, JHA has provided public oversight of Illinois' juvenile and adult correctional facilities. Every year, JHA staff and trained volunteers inspect prisons, jails and detention centers throughout the state. Based on these inspections, JHA regularly issues reports that are instrumental in improving prison conditions.



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