



**Oregon Juvenile Department Directors' Association**  
*Representing Oregon's County Juvenile Departments*  
[www.ojdda.org](http://www.ojdda.org)

## **Concerns Regarding HB 2009 – Impact on Juvenile Detention Education Programs (JDEP)**

The Oregon Juvenile Department Directors' Association (OJDDA) wants to express our growing concerns about House Bill (HB 2009) and the unintended consequences these bills may have on the Juvenile Detention Education Programs (JDEP) located in the county juvenile detention facilities across Oregon. These bills, as written, impose unrealistic and unachievable expectations on JDEP programs, ultimately undermining the stability of these unique classrooms provided to the vulnerable youth in our care.

The JDEP model is unique in that it serves youth in detention settings. Youth placed in detention are often there for short periods of time, and return to schools all across the state. In these environments, Oregon Department of Education (ODE), contracts with educational providers to deliver the services. These contracts are supported by written agreements between the educational providers and the juvenile departments, which clarify the responsibilities and expectations of each party. The proposed changes in HB 2009 would fundamentally alter the current system, potentially making it much harder for us to serve these youth effectively.

In particular, OJDDA is deeply concerned about the following provisions:

### **Section 1 –School District Means; (10) (f) JDEP**

JDEP programs are not their own school district but are part of a larger school district or ESD program. Defining a JDEP as its own District will present many challenges to the ability to operate within the constraints of ODE's current contracts.

### **Section 3 – Performance and Growth Metrics (2) (a) (A-H), (3), (5) (a,b,c)**

The proposed performance and growth metrics do not align with the unique challenges of the JDEP setting. Our youth, who are often there for short periods of time, are often disengaged from the traditional education system due to a variety of barriers, including significant learning gaps, mental health challenges, and behavioral issues. Attempting to apply conventional school district metrics to these short-term, highly individualized educational programs will not provide an accurate reflection of student success or program effectiveness.

### **Section 5 School Boards, Monies Tied to Outcome Measures**

JDEP programs do not have a school board, defining a JDEP as a District will also incur other things like needing to develop a school board for a very small site with only one or two classrooms. Linking funding to outcome measures, especially ones that are not tailored to the specific needs of youth in JDEP settings, would create significant financial strain on these programs. Our youth are often only in custody for an average of 8 days, making it nearly impossible to achieve traditional academic growth metrics in such a short period.

## **Section 8 Intensive Coaching**

Because JDEP's operate within a correctional facility normal coaching techniques will require involvement with the administration of each separate site (11) across the state all of which are run by different county juvenile departments. Because each site houses youth between the ages of 12-17 and the youth all being on different levels developing a coaching plan may present many obstacles.

## **Section – 12 Grant monies only used for:**

JDEP programs don't have many of the things listed which grant monies can be used for including; instructional time, summer programs, before and after school programs. JDEP programs are on a 220 day contract and any activities outside of the classroom are determined by the correctional facility as part of their programming.

## **Section 13 YCEP and JDEP Programs (1) (a)**

Nearly all students in a JDEP program meet the criteria of disadvantaged, on IEP or have experienced academic disparities. JDEP programs don't have Charter Schools because they are not their own district.

## **Section 19 (4) Rigorous Curriculum, data systems, safe environment, school library**

Every student in a JDEP program has their own study based on testing to see where they are at academically. The main goal of a JDEP program is to re-engage youth in the educational process that they have been pushed out of or have chosen to leave themselves for many different reasons but often their behaviors are a response to the trauma they have suffered in their young lives.

## **Section 22 Annual Report (1) (b)**

Having unrealistic metrics and growth targets creates automatic failure for JDEP programs leading to further consequences of a reduction of funding and other corrective measures that will not enhance the program for youth.

## **Section 24 – 2(c) Assessment System, 4(b) A, B, C**

The requirements for frequent assessments, conducted twice per year and annually, are unworkable within the JDEP model. Because youth are only in juvenile detention facilities for a short amount of time conducting scheduled assessments have no value to progress being made within a JDEP program. The testing would rarely be administered to the same youth twice. Many of the youth we serve have educational disabilities, mental health concerns, and unstable living situations. Frequent testing is not only resource-intensive, but it also fails to account for the fact that these youth often need more time and individualized support before meaningful progress can be assessed.

## **Section 26 – 3(c) Adopt Textbooks**

Our students in JDEP programs come from a wide range of educational backgrounds with many of the JDEP classrooms operating as one room school settings. It is impractical to require the adoption of a single set of textbooks, as many of our students are working at very different grade levels, and there is an overrepresentation of youth on Individual Education Plans (IEP). Providing a standardized curriculum for such diverse needs would not be effective or in the best interest of the students.

### **Section 26 – (d) Required Teacher Training**

Requiring teachers to undergo additional training—particularly when it takes them out of the classroom—places further strain on already limited resources. JDEP educators are working in an ever-changing, high-need environment, and it is crucial that they remain in the classroom to meet the needs of the youth. Removing them for training would only detract from the essential work they are doing. This section is very vague on the types of training that would be required, leaving the JDEP programs schedule planning.

### **Section 30 – District Standards**

The application of district standards to JDEP programs is problematic. Juvenile detention education is not a traditional school district setting, and the needs of the youth we serve differ significantly from those in general education. Applying district standards to JDEPs fails to recognize the unique context of juvenile detention and the flexibility required to support these youth in a correctional setting.

### **OJDDA's Request**

We strongly believe that JDEP programs need a set of performance metrics that make sense for the specific environment and student population we serve. Our youth often face numerous barriers to success, including trauma, learning disabilities, mental health challenges, and substance abuse disorders. As a result, they require highly individualized educational services, and traditional academic metrics are not suitable for measuring success in this setting. OJDDA requests that they have representation and feedback in establishing performance metrics.

We respectfully request that JDEP programs be removed from the definition of a school district under HB 2009. Additionally, we propose that a separate workgroup be established, consisting of ODE, JDEP educational staff and county juvenile departments, to develop appropriate metrics that truly reflect the work being done in these short-term, correctional education settings.

In closing, OJDDA believes that the legislature's goal is to improve the outcomes for youth, not to impose additional barriers that make it harder for them to succeed. We urge you to carefully consider the impact of HB 2009 on JDEP programs and to work with us to develop more appropriate solutions that meet the unique needs of the youth we serve.

**For more information please contact:  
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