Process and Outcome Evaluation of Cuyahoga County's Safe Harbor Project

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Introduction

In August of 2016, Rachel Lovell, PhD, and Misty Luminais, PhD, researchers at the Begun Center for Violence Prevention Research and Education at Case Western Reserve University (CWRU), began working with the Safe Harbor Project at the Cuyahoga County Court of Common Pleas Juvenile Division (Juvenile Court)ⁱ. They proposed to investigate how the Cuyahoga County Juvenile Court Safe Harbor Project has been planned and implemented through a process evaluation and to investigate the impact that the Cuyahoga County Juvenile Court Safe Harbor Project has had in achieving its goals of improving the lives of involved youth through an outcome evaluation.

In this research brief, we present the evaluation's key findings and recommendations to inform and improve the Safe Harbor Project's practices and policies and to better serve Cuyahoga County youth who are victims of human trafficking.

Background of the Safe Harbor Project

The Safe Harbor Project began in May of 2015 in the court of Judge Denise Rini to address youth who have been or are at-risk of being trafficked and have a pending criminal charge. In Ohio, there are several courts experimenting with the application of Ohio's Safe Harbor law (ORC §2905.32), including juvenile courts in Summit County (Restore Court) and Franklin County (Empowerment Program), since the law's adoption in June of 2012.

Ohio has followed the lead of the federal government in strengthening penalties against traffickers and allowing some leeway for victims of trafficking accused of crimes. Under the federal statute (22 USC Chapter 78 – Trafficking Victims Protection Act [TVPT]), anyone selling sex under the age of 18 is immediately considered a trafficking victim; no coercion, force, or fraud has to be proved. This means states must grapple with how to apply

the TVPA to their legal frameworks. Ohio's Safe Harbor legislation offers a diversion from court prosecution for crimes tied to a youth's victimization as a victim of trafficking. Youth who are under the age of 16 who are involved in selling sex are automatically classified as trafficked, while 16 and 17-year olds may require some proof of fraud, force, or coercion.

When the researchers began this evaluation, the Safe Harbor Project had been functioning for a little over a year. Over the course of twelve months, we attended advisory board meetings, court hearings, and interviewed key staff involved in the project. Because there are few models of juvenile Safe Harbor courts, each is finding its way forward. In Cuyahoga County, stakeholders in the Safe Harbor Project at the time of this research deliberately decided to forgo state certification through the Ohio Supreme Court as a specialized diversion docket.

Process Map and Outcomes

The processes of the Safe Harbor Project are relatively fluid as the Court explores the best ways to respond to cases with diverse variables. Broadly, the process includes five steps: *Identification, Assessment/intake, Service Provision, Court Supervision,* and *Disposition.* A visualization of the Court's process is included in this report as Appendix A. To create this visualization, researchers focused on how youth move through the process. As Court personnel changed, this map was re-visited to capture Nadiyah Brown's (Safe Harbor Liaison) involvement in the process. Additionally, measurable outcomes for each of these steps has been created and shared with the Court and is included here as Appendix B. Members of the Court staff and advisory board articulated that measuring specific outcomes would better situate the Court to seek further funding and identify points in the process where youth were dropping out.

Key Findings

Issues in Defining "Trafficked"

Assessment is an area of particular concern for advisory board members. There are concerns for the youth's safety, the influence of peers, and the level of trust between the youth and the assessor that affect whether a youth is identified as trafficked. The timing and location of the assessment greatly varies—some youth are assessed in detention, others at their family home, and yet others in an out-of-family placement.

The Court maintains a list of "at-risk" youth who might be victims of trafficking but were either deemed ineligible to participate or eligible but chose not to participate (eligibility is discussed later in this brief). There are a large number of youth who are identified as possibly being victims of trafficking (and in some cases are trafficked) but do not to participate in the Safe Harbor Project. This suggests that either the assessment is not particularly reliable (perhaps due to the setting and time-limited nature of the assessment) or youth are being incorrectly identified and placed on the "at-risk" list.

Cleveland Rape Crisis Center assesses the youth and uses the Loyola Child Trafficking Rapid Screening Instrument to determine possible victims of human trafficking in the Court. The Loyola tool was designed to flag potential victims as part of a larger intake process, and as such, is not very detailed. At the time of this research, Cleveland Rape Crisis Center was exploring other assessment tools that could generate more information in an initial meeting.

Over the course of this research, there were conflicting views on whether a youth must admit to being trafficked, either at a hearing or with members of the Court individually. To the researchers' knowledge, youth were not asked directly whether they had been victimized, but rather, the judge would allude to "risky behaviors" or "doing things that put [the youth] at risk." However, the researchers did not observe this first-hand as we intentionally chose not to

observe youth at initial hearings to lessen any possible volatility introduced by having extraneous observers present.

At the end of the twelve-month study period, the Court decided that the youth did not have to admit to being trafficked, but someone affiliated with the Court must determine that the youth was trafficked. The legal standard to be eligible according to state law is that the Court must "reasonably assume" that the youth had been trafficked.

It is clear that the Court is invested in offering services to as many youth as possible but it must be made clear that placing youth on the docket who do not meet the criteria can actually result in harm as the "trafficked" label carries stigma and may have long-term repercussions. Youth who have been sexually assaulted could benefit from services similar to those offered by the Safe Harbor project but are not appropriate candidates for the docket.

Issues in Defining Success

The definition of success for a youth going through the Safe Harbor Project remains amorphous; different stakeholders hold different views about the goals of the project and expected outcomes for participating youth. Generally, to successfully graduate from the Safe Harbor Project youth must complete the mandates of the Court, such as consistently participate in case management and therapy, attend school consistently, maintain a stable living situation, and no longer engage in "risky behavior." In practice, however, relatively few youth meet this standard, leading to a low successful graduation rate. This is particularly problematic with trafficking dockets as minor victims of trafficking (with and without charges) are substantially different from the population most often served by specialized dockets—court-involved adults with substance-abuse issues.

According to staff and advisory board members, the Safe Harbor Project is positively impacting youth by reducing the frequency and duration of AWOL events ("running away") and sometimes youth are running to safer places than before (a family member instead of a hotel). This type of outcome is

missed by focusing primarily on a graduation rate as the key outcome of success.

Issues with the Carrot and the Stick

Youth must weigh the "rewards" of the program against the "punishments" of the program. Youth who successfully complete the program can have their records expunged immediately rather than waiting for five years or until they reach 23 years old—the "carrot." To be on the Safe Harbor docket, the youth must make an admission to the complaint ("charge")¹, which is held in abeyance upon successful completion of the program. To complete the program, youth must complete the mandates of the Court that often require a great deal of time and attention from parents or guardians of the youth. For some parents/guardians, this is not feasible, leading them to decline participation on behalf of their children. If unsuccessful, the youth can be adjudicated on the complaint that was held in abeyance. In plain English, the youth can be sentenced for the original charge if they do not complete the program. This can be perceived as the "stick."

Youth charged with status offenses (such as unruly or violating curfew) may have little incentive to participate in the Safe Harbor Project, even if they are being trafficked, as the amount of supervision required by the Court greatly exceeds what the youth would generally receive if their case moved forward in a non-specialized docket in Juvenile Court. Additionally, in one instance, it appeared as if a youth was charged with a more serious crime to increase the likelihood of her participation in the Safe Harbor Project.

Although people who work on the Safe Harbor Project believe that the services offered to participants and the possibility of an expedited expungement are improved outcomes for youth already involved in Juvenile Court, some advisory board members recognize that the system itself is punitive rather reformative.

¹ Since the completion of the research period, changes have been made to the initial procedure concerning youth pleaing to a charge prior to initiating services. We are unable to evaluate the effectiveness of this change without further research.

Additionally, at the beginning of the research period, the scope of crimes that could be "safe harbored" was relatively broad, and youth had the possibility of having most, if not all, of their records expunged. Towards the end of the research, the definition of qualifying offenses became stricter, making it more likely that even if trafficking-related offenses were expunged, the youth would still have a record. Additionally, Safe Harbor is only available for minor victims of trafficking who have a current or pending charge. Youth without a current or pending charge are not eligible for the services offered under Safe Harbor, meaning that a large number of victims of trafficking in the community are not receiving needed services.

Issues with Continuity and Duration of Services

Because resources were often in flux due to various funding streams, determining the scope of services available and appropriate to youth was sometimes difficult for both the advisory board and the researchers. This created confusion as to which youth could receive which services, in particular after youth ended their supervision under the Safe Harbor Project, leading to disruptions in services. *In fact, disruption of services is an area of great concern as the Court can only pay for services while youth are under their supervision.* Research has consistently shown that youth who have been trafficked youth need a lot of services for extended periods of time; yet, the Court is only able to keep the youth under their supervision for a maximum of 270 days.

There is tension between wanting youth to be involved in the Safe Harbor Project long enough to benefit from services provided yet short enough that the youth and family do not become dependent on the Court. As one advisory board member stated, "the Court can provide intense and immediate services during that 90 to 270 days, but at the end of that 270 [days], they [the youth] need to be linked with community resources that don't require the Court." These youth have likely been controlled by their traffickers, and stakeholders recognize the danger of the Court stepping into a similar role by controlling what the youth does. At the same time, many people feel that the only way to get the youth services is by mandating them through the Court, either because they are not available in the community or because the youth and their families may not otherwise participate. Many people recognized that empowering youth to make their own choices while supporting them with appropriate services is what will have the most lasting impact. The hope is that the youth will eventually make the best decisions for themselves in situations that have the same or similar triggers that brought them to the Court in the first place.

Issues with Appropriate Placements and Maintaining Placements

Once a youth is identified, placement becomes a key factor in how the youth responds to the interventions offered. Although many stakeholders in the Safe Harbor Project know that placement with family is supported as a best practice for offending youth, there is the sense that this may not be true for victims of human trafficking.

If it is determined that a youth cannot be placed in their home, the options for the Court are limited. One possibility is a long-term placement in a residential treatment center, although Bellfaire JCB was the only institution that had a standing arrangement with the Court at the time. Other long-term placements were on an *ad hoc* basis with other affiliates across Ohio and Pennsylvania. These relied on personal relationships between advisory board members and staff rather than a formalized agreement. Short-term placements were even dicier—sometimes youth would remain in detention while awaiting a spot in a program or would be in shelter care, particularly Carrington. In an interview with a participant in the program, she expressed that she felt unsafe and uncared for at Carrington and general comments made at advisory board meetings indicated that Carrington was a less-thanideal solution to the placement problem. At the end of the research period, the Safe Harbor Project had just received funding for temporary "safe housing" and was exploring options for placements.

Part of the difficulty in placing these youth is that there are restrictions on who can be placed. Many facilities will not accept pregnant girls or youth with

a violent history. There is nowhere with specialized treatment for trafficked boys. Some youth are substance-dependent, which requires yet another level of specialization when treating trauma. The Safe Harbor Project also recognizes that placing trafficked youth together can set up unhealthy relationships and, in some cases, creates a situation that allows youth to be recruited to other traffickers through youth who have not disengaged from the sex trade.

Additionally, many of the youth on the docket go AWOL repeatedly. Previous literature on runaways may offer a useful framework when considering placement in the youth's home, particularly Zide's typology of runaway youth (1992). She outlines four types of runaways: "running to;" "running from;" "thrown out;" and "forsaken." For the latter three categories, placing the youth back in the home they were running from or which they have been alienated from or which can no longer sustain them for economic reasons will probably result in more AWOL instances unless those causes of running away are addressed.

Issues with Diversity

During the researchers' time studying the Safe Harbor Project, no boys or young men were in the program. Although several were assessed and a few even positively identified, none of them chose to participate. The lack of boys and young men in the Safe Harbor Project may stem from several factors: 1) boys and young men are not being identified as being engaged in the sex trade, which would automatically make them eligible, 2) the Safe Harbor Project has been focused on outreach and education in the girl's pod of the detention home and has come to be seen as a "girls' Court," and/or, 3) boys and young men are resistant to how the project is explained to them, particularly the self-identification with being a victim, as a result of larger cultural forces. The trafficking literature suggests that boys and young men, particularly runaways, are a significant portion of the population. Concurrently, the researchers did not observe any discussion of transgender youth who might be trafficked. According to the literature, transgender youth are at an even greater risk of being exploited in the sex trade than their cisgender counterparts and their absence from the docket raises questions. That being said, because it is overwhelmingly girls and young women participating in the Safe Harbor Project, the staff and advisory board are sensitive to the needs of girls and young women and promote gender-specific therapies rather than a cookie-cutter approach that ignores gender differences.

Issues of race were occasionally discussed at advisory board meetings, but there is little information as to how or why African American youth were overrepresented on the docket or on the watch list. Any strategy to reduce the trafficking in youth has to recognize that the circumstances of victims vary dramatically and that there is no one-size-fits-all solution.

Collection of Data Related to Social Networks in Human Trafficking

During the observation period, the advisory board collected data related to social networks in human trafficking detailing how the victims and exploiters are connected to each other. We believe this is important data to collect and analyze. This is a crucial area of inquiry that is almost completely unexplored in the field of human trafficking. As the advisory board recognized, human trafficking functions within social networks so that not all at-risk youth are equally likely to be victims of trafficking. Understanding more about how these networks function can provide key insights for more effective, targeted prevention strategies.

Consistency in Using a Trauma-Informed Approach

The Safe Harbor Project consistently used a trauma-informed approach throughout its process. Although some situations make it difficult to practice this approach, particularly assessment and placement, advisory board members and staff members, by and large, carry out their interactions with the youth in a way that acknowledges their trauma and supports them in their healing. On multiple occasions, the researchers witnessed staff and advisory board members discussing best practices to reduce retraumatization. This included reducing the number of times a youth has to recount their victimization and recognizing that some behaviors are reactions to trauma and not a general disregard for authority. Additionally, training was provided by the Cleveland Rape Crisis Center, and advisory board members often sought out and shared other training opportunities.

As the Safe Harbor Project has become more incorporated into the larger Juvenile Court, advisory board members are expanding training opportunities to other Court staff, including probation officers, detention staff, and law enforcement. This training both raises awareness of human trafficking and, hopefully, gives personnel more tools to deal with any youth impacted by trauma. Advisory board members have seen the shift with law enforcement from treating youth as prostitutes to treating them as victims when they are first encountered, which goes a long way in helping to establish trust with the youth.

As mentioned previously, many of these youth go AWOL repeatedly. The youth who make it successfully through the program have often encountered a turning point in their lives outside of becoming or remaining system-involved. For example, young women who became pregnant were often amenable to services. This supports the idea articulated by several advisory board members, particularly one person who said,

"I think one of the major things that we do with this program that we do well is that whether or not they enter the program, they know where to go whenever they're ready and even if they're eighteen and they're ready, we've been lucky and blessed to have agencies that do cross over work from youth and adult level, so they know that they can turn to any of these agencies at any time. It's just like any other addiction or disease, whenever you're ready to stop, we [...] let them know you have six different agencies that you can call whenever you're ready. You have seventeen different people's business cards you've held at one time or another, whom you can call if you're in trouble or if you just want somebody to talk to or if you need somebody to come get you." Although the Court model focuses on crisis-intervention with immediate needs that can be met in the 270-day maximum, the strength of the Safe Harbor Project may be that it introduces youth to a variety of support systems that will be accessible even beyond Court involvement.

Recommendations

- Clearly define the aims of the Court.
- Further examine whether the Loyola tool is sufficient for identification.
- If possible, reassessment of youth who were not deemed as eligible for the Safe Harbor Project after youth have had a chance to develop a rapport with some member of the Safe Harbor Project or the larger Juvenile Court, whether that be through Cleveland Rape Crisis Center, their probation officer, or someone else.
- Continue to secure extensive resources on a variety of short and longterm placement options, as housing/placement is a key issue with this population.
- Consider developing a parent advocacy component of the program to assist in addressing placement issues.
- Engage the larger community to assist in providing an array of services for youth who are no longer under the supervision of the Court, for youth identified by the Court as "at-risk," and for youth who chose not to participate.
- Continue to refine a "disenrollment" plan for youth, including providing coordinated care services when youth are terminated from the Safe Harbor Project (either successfully or unsuccessfully).
- Regularly analyze collected data on the youth, including outcome data and data on when and why youth proceed or fail to proceed in the process, using the Process Map provided in Appendix A.
- Diversify key outcomes by capturing measurable *milestones* of success instead of "result" outcomes, such as graduation rates. In other words, the outcomes should be able to capture "any positive change." Relatedly, in

dialogue with youth and caregivers, create and share a definition of success that meets family's needs.

- Continue to strengthen collaboration with DCFS and possibly develop Court/DCFS liaisons to coordinate efforts for youth placed in foster care.
- Expand outreach to boys and young men who may be trafficked and educate law enforcement and staff on the signs of trafficking that may differ from girls and young women.
- Expand outreach with the LGBT Center of Greater Cleveland to create and distribute culturally appropriate outreach materials, particularly for transgender youth.
- Continue to explore what is working in other Safe Harbor dockets in the state. For example, Summit County's Restore Court has seen success in their mentoring program.
- Continue the successful collaboration with agencies and individuals that comprise the advisory board. The Court has been particularly successful in reaching out to and collaborating with the Greater Cleveland community, which has positively impacted the Safe Harbor Project.
- Continue to collect data related to the social networks on human trafficking. This is an important area of inquiry that needs further research and analysis.

Conclusion

Remaining an uncertified project of the Juvenile Court allows some flexibility in addressing the needs of youth that may not fit into a particular mold. However, knowing that people do not remain in their positions indefinitely, certification or some other process that solidifies the goals, methods, and outcomes of the Safe Harbor Project could smooth transitions in personnel and make it easier to apply for future funding. Although the Safe Harbor Project has had some success in impacting youth positively, current measures of success do not adequately reflect the impact of the program. The advisory board, which plays such a pivotal role in the development and application of the program, should continue to be an integral part of the process even as law enforcement takes on a larger role, as it was observed they were towards the end of the project. As more is learned about what interventions are effective, specifically for youth in Cuyahoga County, the Safe Harbor Project has the potential to impact much more trafficked youth.

Methodology

Rachel Lovell and Misty Luminais, as the two researchers for this project, attended monthly advisory board meetings from June 2016 until August 2017. They also attended six Safe Harbor hearings, including two graduations. A two-hour focus group with advisory board members was conducted. One-on-one interviews were conducted with key staff. One graduate of the Safe Harbor Project and her guardian were interviewed. All interviews were recorded and transcribed. Transcripts were coded in iterative waves using content analysis as themes emerged. Court documentation of processes were examined and further interviews were conducted with IT staff regarding the tracking needs of the Court.

References

Zide, M. R., & Cherry, A. L. (1992). A typology of runaway youths: An empirically based definition. *Child and Adolescent Social Work Journal, 9*(2), 155-168. doi:10.1007/BF00755230

APPENDIX A

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APPENDIX B

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APPENDIX B

Measuring Outcomes for Youth

Identification Phase

Goal	Objective	Measure	Data Source
Enhance youth	Potential youth identified and	Name/ID of youth referred	Referrals to CRCC
safety and	receive needs	Youth age/DOB	CRCC
reduce	assessment	Race of youth	CRCC
barriers		Gender of youth	CRCC
		Sexual orientation	CRCC
		Youth is possible recruiter	CRCC
		Date referred	CRCC
		Referral source	SH
		Date assessment administered	CRCC
		Days from identification to administration of assessment	CRCC
		If held in DH awaiting assessment, # of days spent in DH waiting for assessment	DH
		Trafficking assessment score (Loyola assessment)	CRCC
		DAIS (Detention Assessment Instrument Score from DH)	DH

Intake Phase

Goal	Objective	Measure	Data Source
		# of youth eligible for SH	SH
youth	diverted to SH	# of youth ineligible for SH	SH
safety and		Date of arrest/case filing	SH

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Goal	Objective	Measure	Data Source
reduce	and social	Type of offense	SH
barriers	services	Offense level	SH
		Type of past adjudications	SH
		Offense level of past adjudications	SH
		Date of SH admittance	SH
		Days from arrest/case filing to SH admittance	SH
		If held in DH waiting for hearing, total # of days in DH	SH
		Initial placement for youth	SH
		Youth's counsel	SH
		Youth's GAL	SH
		Youth's PO	SH
		Youth's DCFS worker	SH
		Youth's case manager (Bellefaire/Abraxis)	SH
	Identified youth are diverted to	51	SH
	appropriate services	Referral provider name (each referral gets a column)	SH
	expeditiously and services	Date of referral (each referral gets a column)	
	are individualized	Total # of referrals made for youth	SH
	Days from identification to referral (each referral gets a column)	SH	
		Days from arrest/case filing to referral (each referral gets a column)	SH
		Referral deemed appropriate	SH

Goal	Objective	Measure	Data Source
		Frequency of services (e.g., weekly, daily, etc.)	SH
		Miles youth must travel to access services	SH
	Engagement	Status update for 2 nd hearing	SH
		Level of engagement of youth at 2 nd hearing	SH
		Status update for 3 rd (4 th , 5 th) hearing	SH
		Level of engagement of youth at 3 rd (4 th , 5 th) hearing	SH
		If change in placement, location of new placement for youth (each placement get new column)	SH
		Date of change in placement of youth	SH

Ongoing/Closing Phase

Goal	Objective	Measure	Data Source
Focus on	Court retains	Youth engaged at 3 months?	SH
Outcomes		Youth engaged at 6 months?	SH
	program	Youth engaged at 9 months?	SH
		Youth went AWOL?	SH
		Date youth went AWOL (each date gets a separate column)	SH
		Possible reason(s) why youth went AWOL (e.g., social media usage, family struggles, etc.)	SH
		Youth missed a court hearing?	SH

Goal	Objective	Measure	Data Source
		Date youth missed court hearing	SH
		Date of disenrollment from SH	SH
		Total days in program (for graduates and unsuccessful)	SH
		Successfully completed?	SH
		Date drug tested	
	unsafe	Results of drug test	
	behaviors	Youth achieved substance- free milestones	
		Youth achieved "lifestyle" free milestones	
		Youth achieved accountability to guardian milestones	
		Youth achieved attending school milestones	
		Youth achieved engaged in job/vocational training milestones	
		Youth achieved medically compliant milestones	
		Youth engaged in parenting classes (if applicable)	
Enhance youth	Collateral consequences	Case resolved without criminal conviction?	
safety and reduce	are reduced for youth	Case resolved with non-jail disposition?	
barriers		Youth held in DH after enrollment in SH?	
		Date youth admitted to DH during enrollment in SH (list all dates)	

Goal	Objective	Measure	Data Source
		Charges sealed and expunged?	
		Which charges sealed and expunged (past and present)	
		Which charges NOT sealed and expunged (past and present)	
		Positive engagement with youth's parent/ guardian	

Abbreviations:

SH – Safe Harbor Program

CRCC – Cleveland Rape Crisis Center

DH – Detention Home (Detention Center)

AWOL – Absent without leave

DAIS – Detention Assessment Instrument Score

Measuring Outcomes for Program Implementation

Goal	Objective	Measure
Enhance youth safety and reduce barriers	Courtroom staff create a safe environment for	
	youth	Name of staff who received training
		Date of training
Individualized treatment/services	Court uses continuum of treatment modalities	modalities and services
	and services that address youth's needs	# of providers per modality or service
		New services developed as needed

Goal	Objective	Measure
Direct engagement of youth	Judge engages in direct interaction with youth	
	Judge explains responsibilities and decisions to youth	mandates and decisions in plain language
		Judge reiterates responsibilities at each status hearing
	Court staff and attorneys engage with	
	youth	Staff reiterate court mandate, goals, and purpose
	Dedicated justice system players and service providers engage with youth	
		Consistent service provider works with youth
Youth accountability	Youth have practical incentives to complete mandates with understanding of existing barriers	<u> </u>
		always or nearly

Goal	Objective	Measure
		always adhered to in practice
	Youth expect sanctions and incentives to match behavior with understanding of entrenched population	graduated incentives
System change	about human trafficking and the dynamics of	Stakeholders regularly
Social service provider engagement		Case review meetings held regularly Case review meetings include central stakeholders
		Case review meetings result in decision- making for each case discussed
Social service provider collaboration	providers collaborate to offer services and assess youth progress/	¥
	compliance	Service providers and supervision agencies informed about hearings

Goal	Objective	Measure
		Clinical case reports routinely delivered to court
Service provider accountability	Service providers accurately and regularly inform court about youths' progress	Clinical case and service reports are timely and accurate Reports include all pertinent information (e.g., details about attendance, participation, compliance, progress) Reports are provided in specified format
	Service providers use a specified and effective program model	Program model is clearly described in provider materials Program has and adheres to an operations manual that reflects program model Program model is supported by literature about treatment efficacy, best- practices, and/or evidence-based practices Participants receive services that correspond to program model
	Court assesses social service delivery	Court verifies licensing and compliance with state requirements

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Goal	Objective	Measure
		Court conducts periodic site visits Court queries youth about experience in social service programs (e.g., survey, exit interview)
		Court addresses participant claims of incident with service providers, as appropriate
Court accountability	Court relies on up-to- date data for case decisions and tracking	Information system includes screening, assessment, participation status, service, and compliance data Court uses linkage agreements to define scope of service, share data and maintain confidentiality
	Court monitors its implementation and outcomes	Participant characteristics, program placement, compliance, and outcome information (i.e. graduates and failures) collected and aggregated at least annually
		Court shares outcomes with justice system stakeholders

Goal	Objective	Measure
	Court coordinated by	Dedicated coordinator/
	single model and point	manager
	person	Court has and adheres
		to an operations
		manual

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