From: Chiancone, Janet
To: Bryant, Lynn (JMD); Scarborough, Angela;
Subject: FW: Public comments re Reinstatement of OJJDP form CJ-14
Date: Tuesday, October 20, 2009 12:57:14 PM

Comments for Federal Register Notice on CJ-14 (CJRP)

From: Judith Storandt [mailto:judith.storandt@ndrn.org]
Sent: Tuesday, October 20, 2009 12:56 PM
To: Chiancone, Janet
Subject: Public comments re Reinstatement of OJJDP form CJ-14

NATIONAL DISABILITY RIGHTS NETWORK
Protection & Advocacy for Individuals with Disabilities

October 20, 2009

Janet Chiancone, Research Coordinator
Office of Juvenile Justice and Delinquency Prevention (OJJDP)
Office of Justice Programs
U.S. Dept. of Justice
810 7th Street, NW.
Washington, DC 20531.

Re: Comments re Reinstatement of OJJDP Census of Juveniles in Residential Placement,
DOJ Office of Justice Program, OMB Number 1121-0218

Dear Ms. Chiancone.

Thank you for forwarding to me Forms CI-14 & CJ-15 -- the Census of Juveniles in Residential Placement and the Juvenile Residential Facility Census. The information gathered using these census forms can be helpful for a variety of purposes.

Under "Section 1 – GENERAL INFORMATION" in Form CJ-14, question #5 asks for information about "type of residential facility," and then lists 10 categories to select from

including an “other” category (question #13 in the CJ-15). The form itself does not offer any definitions for those categories, and none are provide in any instructions on how to fill out the forms.

In July 2009, I contacted researcher Melissa Sickmund by email to inquire about the definitions used, and she confirmed that these forms allow facilities to self-designate as type of facility based on their own criteria. She acknowledge that many facilities like to call themselves a “residential treatment center” even when they do not provide any form of residential treatment.

This lack of uniformity is unfortunately. It reduces the significance and usefulness of the data. It is NDRN’s recommendation that the CJ-14 and CJ-15 be revised to provide appropriate definitions for each of the facility-type categories.

I appreciate the problem of states having different nomenclature for the types of juvenile justice (JJ) facilities that exist in their jurisdictions. Nonetheless, that is not an insurmountable problem. Working definitions for these different types of facilities could be crafted by reference to: the OJJDP Glossary, the JJDP Act, the American Correctional Association Glossary, and other commonly used definitions. I would be willing to serve on a work group to assist in drafting definitions for this purpose.

OJJDP’s consideration of these comments is most appreciated.

Sincerely,

Judie Storandt

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