

**OKLAHOMA COMMISSION ON CHILDREN AND YOUTH
OFFICE OF JUVENILE SYSTEM OVERSIGHT**

Name and Location of Facility: Comanche County Regional Juvenile Detention Center
Lawton, Oklahoma

Date of Visit: November 8, 2006

Oversight Reviewer: Dana S. Holden, Oversight Specialist

Focus of Visit: Unannounced Visit, 2006

Date: March 21, 2007

General Information

The Office of Juvenile System Oversight (OJSO) conducted an unannounced visit on November 8, 2006, at the Comanche County Regional Juvenile Detention Center, located in Lawton, Oklahoma. The focus of the visit was to assess compliance with established responsibilities and facility policy and procedures regarding the use of room confinement and room restriction. The facility was certified by the Office of Juvenile Affairs (OJA) for twenty-five residents. On the day of the OJSO visit, the census was twenty-five.

Persons Interviewed

- Facility director
- Assistant director

Documents Reviewed

- Files on twenty-five residents
- Room confinement/room restriction log book
- Most recent monitoring report by the OJA Office of Public Integrity

Overview

The OJSO reviewed the OJA monitoring report, dated May 9, 2006. The OJA report cited:

- The three foot rule requires juveniles who are in their rooms to remain behind a blue line, which is painted on the floor. The intent of the rule is to prevent juveniles from banging on, leaning against and having communication with

other residents at their room door. Violations of the three foot rule are defined as a major rule infraction in the juvenile handbook and will result in a room confinement.

- Twenty-six of the twenty-nine randomly selected room restrictions for the months of January 2006 and March 2006 were in excess of the sixty minutes maximum without any documented extension authorized by a supervisor or administrator.

The facility submitted a corrective action plan to the OJA on June 15, 2006. The plan stated, "The facility has changed the policy and procedure regarding violation of the 'three foot rule' that requires residents to remain behind the blue line painted on the floor while in their rooms. The intent of the rule is to keep residents from banging on, leaning against, and having communications with other residents at their room doors. The 'three foot rule' violation has been changed from a major rule violation, which resulted in room confinement to a moderate rule violation, which results in first a written warning and then room restriction for all offenses thereafter."

The OJSO reviewed the files on twenty-five current residents and the room confinement/room restriction log book for July through October 2006. The OJSO also reviewed thirty-four incidents of room confinement. The OJSO noted:

- Eleven residents were placed on room confinement for incidents that did not meet criteria for room confinement.
- The files on twelve residents did not contain proper documentation for room confinement. Lack of documentation included no incident reports, no fifteen-minute check sheets, the log did not list the offenses, and the log did not indicate dates and/or times.
- One resident was kept on room confinement when documentation indicated the resident no longer met criteria for room confinement.
- The files on two residents did not document that administrative review hearings were held to determine whether the residents met criteria to remain on room restriction.
- Documentation indicated that consequences for rule violations were applied inconsistently.

The OJSO reviewed documentation regarding six instances of room restriction. The OJSO found that in all six instances, the residents were kept on room restriction in excess of the sixty-minute time limit and that the rule violations did not meet the criteria for room confinement.

Summary

Issues persist regarding the facility's use of room confinement/room restriction. In oversight reports for the past two years, the OJSO has cited the facility for violations of room confinement/room restriction policies. In addition, the OJA cited the facility for room confinement/room restriction violations in its May 2006 monitoring report. Facility

documentation indicates that room confinement and room restriction may have been used by staff as forms of punishment rather than as behavior management techniques.

Finding

1. Residents were placed in room confinement/room restriction without adequate criteria, and without administrative reviews, as noted above. Office of Juvenile Affairs policy OAC 377:3-13-44, Security and control, (c), (13), Room restriction, and (14), Room confinement, in part, states, "Room restriction is one means of informally resolving minor juvenile misbehavior. It serves a "cooling off" purpose and has a short time period (up to 60 minutes) that is specified at the time of the assignment. Room confinement means locking a juvenile in his/her room when the juvenile has been charged with a major rule violation requiring confinement for his/her safety or the safety of others or to ensure the security of the facility."

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