
Testimony Supporting S.B. 880: An Act Increasing Fairness and Transparency in the Criminal Justice System

Testimony Supporting H.B. 7387: An Act Concerning the Discretionary Transfer of Juveniles to the Regular Criminal Docket

Testimony Supporting Sections 2 and 6 of H.B. 7389: An Act Concerning Confidentiality in the Case of a Discretionary Transfer of a Juvenile's Case to the Regular Criminal Docket and Implementing the Recommendations of the Juvenile Justice Policy and Oversight Committee

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Judiciary Committee
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Senator Winfield, Representative Stafstrom, Senator Kissel, Representative Rebimbas, and esteemed members of the Judiciary Committee:

I am testifying today on behalf of Connecticut Voices for Children, a research-based child advocacy organization working to ensure that all Connecticut children have an equitable opportunity to achieve their full potential. Thank you for providing this opportunity to voice our support for a number of juvenile justice reforms contained within these bills today as well as to raise some technical concerns.

Connecticut Voices for Children supports S.B. 880, which requires public reporting on prosecutorial data, because it will illuminate where racial bias may lead to disparities in pre-trial treatment and sentencing and it will strengthen the procedural justice of Connecticut's justice system. We recommend including reporting on a victim's race and including language for de-identified reporting on juveniles.

We support H.B. 7387, which would allow courts to offer youth opportunities to complete court-ordered classes and programs and favorably consider completion of these programs when deciding if juvenile cases should be transferred to adult court. Connecticut Voices for Children supports efforts to move more youth out of the adult justice system, but we suggest including language that would make this process less likely to contribute to disparate treatment of Black and Brown youth.

Finally, we support Sections 2 and 6 of H.B. 7389. Section 2 would remove 16 and 17 year old youth from the jurisdiction of the Department of Corrections, and Section 6 would implement the recommendations of the Office of the Child Advocate pertaining to suicide, solitary confinement, behavioral health programming, family engagement, and use of force against youth in conditions of confinement. We recommend adding language to create an appropriate planning period, collaborative structure, and funding prior to moving youth out of the Manson Youth Institute and the York Corrections Institute. We also recommend adopting the specific recommendations language from the Office of the Child Advocate's report within section 6 to ensure that agencies fully comply with these recommendations.

[Support for S.B. 880: An Act Increasing Fairness and Transparency in the Criminal Justice System](#)

S.B. 880 would mandate that Connecticut’s Division of Criminal Justice collect and publically report on prosecutorial data including defendant demographics such as race, age, residence, and gender; defendants’ alleged offense; pretrial determinations; sentencing decisions; diversionary offerings; plea deal offerings; and defendant financial responsibilities including court fees and restitution. **Connecticut Voices for Children supports public reporting on this data because it will allow Connecticut to detect points of racial bias within our justice system, and transparent data reporting will strengthen the procedural justice of our justice system.** Additionally, we urge the committee to expand the bill’s language to include reporting on the race of the victim and to mandate the collection of this information within juvenile proceedings and to mandate the reporting of this data using responsible practices to protect the identity of juveniles.

There are disparate racial outcomes in almost every state of prosecutorial decision-making.¹ Prosecutors are more likely to offer plea bargains to white defendants than to Black or Brown defendants, and this is especially true for low- and mid-level offenses.² When defendants are offered plea bargains, prosecutors are more likely to lower the charges of the plea bargain for white defendants than Black or Brown defendants, which is correlated with defendants serving shorter sentences.³ Black defendants were more likely to be denied bail than white defendants,⁴ and Black defendants who were placed on bail tended to have the bail set higher than white defendants, making bail less accessible to Black defendants.⁵ Even when adjusting for factors such as prior offenses, race remained a significant predictive factor in outcomes.⁶ **Furthermore, the race of victims plays an important factor in how prosecutors treat defendants, so we urge the committee to include reporting on this data within the bill language.** Prosecutors are more likely to charge a defendant with an offense if a victim is white than if a victim is a person of color.⁷

Lack of transparency in how defendants are treated by legal systems including the police and prosecutors undermines the public’s perception of procedural justice⁸—that is, the belief that the process of resolving disputes is fair, unbiased, and treats persons involved with dignity. When legal systems have high levels of procedural justice, the public is more likely to participate in crime prevention programs⁹ and offenders are less likely to recidivate,¹⁰ both of which improve public safety. **Publically reporting on how individuals are treated at each stage of the legal process will improve the transparency of Connecticut’s legal system, and in so doing improve perceptions of procedural justice, which will lead to increased public safety.**

There is evidence that when youth perceive the legal system to be fair and legitimate, they are less likely to reoffend.¹¹ **We urge the committee to include the collection of data on prosecutorial decisions in juvenile proceedings and responsible reporting of this data.** It is important to protect youths’ identities when reporting this data, and that can be done through responsibly practicing data suppression techniques such as those used by the State Department of Education. However, the state could use this data to identify points at which racial bias influences pre-trial treatment and sentencing outcomes and work to reduce these disparities in outcomes for Black and Brown youth. Engaging in this process of increased transparency and improvement will have additional benefits of reducing youth recidivism and increasing community engagement in youth crime reduction.

Support for H.B. 7387: An Act Concerning the Discretionary Transfer of Juveniles to the Regular Criminal Docket

H.B. 7387 would mandate that courts to offer juveniles and families the opportunity to participate in a class or program prior to holding a hearing to determine whether a case should be transferred from the juvenile docket to the adult docket. If the juvenile completes the selected class or program, the court may consider

the successful completion as a positive factor when determining whether the case should remain in juvenile court. **Connecticut Voices for Children supports offering appropriate therapeutic treatments and programs to children and their families prior to transferring juveniles to adult court.** We believe Connecticut should create mechanisms to decrease the transfer of youth to adult court for three reasons:

1. Adult courts are not equipped to provide children with therapeutic, developmentally-informed services to help them become productive adults; because
2. Youth who spend time in adult prisons are more likely to recidivate than youth who spend time in juvenile prisons, therefore making this policy one that negatively impacts public safety; and because
3. Black and Brown children are disproportionately more likely to be transferred to adult prison than white peers, making it a policy that perpetuates racism within our court system.

The practice of charging young people as adults gained momentum during the 1990s when “Tough on Crime” was the prevailing philosophy.¹² This is not the philosophy endorsed by Connecticut, which has been nationally acknowledged for its “strong commitment to invest in alternatives to detention and incarceration, improve conditions of confinement, examine research, and focus on treatment strategies with evidence of effectiveness” (p. 1).¹³

Connecticut’s Juvenile Justice Policy and Oversight Committee has consulted with world-renowned researchers on adolescent development and behavior including Dr. Elizabeth Cauffman, Dr. Lawrence Steinberg, and Dr. Edward Latessa. These experts overwhelmingly agree that adolescence is a time of rapid brain development and changing maturation. A longitudinal study commissioned by the federal Office of Juvenile Justice and Delinquency Prevention (OJJDP) and conducted by Dr. Steinberg and Dr. Cauffman followed 1,354 juvenile offenders for a duration of seven years; about 40 percent of the participating youth were classified as “high frequency offenders” and charged with seven or more antisocial acts during the course of the study. At the end of the study, the researchers found that “the vast majority of juvenile offenders, even those who commit serious crimes, grow out of antisocial activity as they transition to adulthood” (p. 1).¹⁴ Less than ten percent of the youth followed continued offending into their twenties. The researchers attribute this drastic decline in the propensity to engage in antisocial behavior in adulthood to better impulse control, better ability to delay gratification, and decreased susceptibility to peer pressure—all of which develop with age.

Furthermore, national research shows that the majority of youth in the justice system have a diagnosed mental illness, traumatic brain injury, developmental delay, and/or emotional disturbance.¹⁵ We know that Connecticut follows this national trend: in 2017, every single boy admitted to the Connecticut Juvenile Training School had more than one psychiatric diagnosis.¹⁶

The U.S. Department of Justice has found that mental health services for incarcerated individuals are often inadequate,¹⁷ and this is particularly true when children and adolescents are incarcerated in the adult system.¹⁸ The adult criminal justice system does not capitalize on youths’ maturing brains and ability to develop prosocial behaviors when given therapeutic rehabilitation and supportive services.

We have noted that the adult system is not effective in rehabilitating youth and does not provide adequate mental and behavioral health services. For these reasons alone children who enter the adult system as opposed to the juvenile system are more likely to continue engaging in antisocial behaviors. However, confinement in adult prison or jail can turn children into serious criminals because they are far more likely to interact with older criminals who are at high-risk for recidivism. The Centers for Disease Control (CDC) finds that young people charged as adults are 35 percent likelier to be rearrested than those who are tried as juveniles.¹⁹ For this reason, the CDC—like Connecticut Voices for Children—recommends against

transferring youth to the adult justice system. **It is inappropriate to incarcerate youth in adult prisons, and Connecticut should be working to ensure that fewer children are tried as adults. We appreciate that H.B. 7387 continues to work to decrease the number of children tried as adults.**

Adult courts simply cannot meet the developmental needs of youth and young adults.²⁰ We acknowledge that it is easier to understand why this is true of young people who engage in low-level offenses or only offend once. Just because a youth commits several offenses or commits a serious offense does not change the fact that they are still developing and need supports that are appropriate for their individual path of social and emotional development.

The juvenile justice system is a far better place to try and sentence youth who commit repeat and serious offenses as it offers the supports that they need. Research shows that while youth who persist in committing crimes throughout their young adulthood tend to have lower levels of psychosocial maturity, most repeat offenders, as they grow and develop, stop offending by adulthood.²¹ This means that interventions to reduce youth offending must facilitate the development of psychosocial maturity and not introduce them to adult offending behaviors and patterns. Juvenile courts are better equipped to meet the needs of repeat young offenders and ensure that they receive the supports that they need to become engaged members of their communities.

Finally, discretionary transfer of youth to adult court increases racial and ethnic disparities within the criminal justice system. Psychologists find that white viewers perceive Black children to be older than they are and less childlike than white peers.²² Viewing Black children as older also influences the degree to which people—including judges—see them as less innocent and more culpable.²³ These psychological findings help to explain why almost 90 percent of children tried as adults are children of color.²⁴ **We request that the Committee consider integrating two changes into H.B. 7387 to ensure that a practice of asking children and families to complete classes or programs does not inadvertently perpetuate racial disparities. This suggestion is twofold:**

1. **Change the word “may” in line 148 to “shall” so that judges consider completion of a class or program as a positive outcome for Black and Brown youth in addition to white youth.**
2. **Add language to ensure that if a child or family fails to complete an offered class or program, this information is not considered negatively when balancing the best interest of the child and the public.** As discussed above, in almost all cases, a juvenile is more likely to receive appropriate therapeutic services that reduce recidivism in juvenile court than in adult court. We seek to ensure that failure to complete a particular program is not punished through loss of other programming.

Support for Sections 2 and 6 and Suggestions regarding H.B. 7389: An Act Concerning Confidentiality in the Case of a Discretionary Transfer of a Juvenile’s Case to the Regular Criminal Docket and Implementing the Recommendations of the Juvenile Justice Policy and Oversight Committee

Section 2 of H.B. 7389 removes youth under the age of 18 years old from the jurisdiction of the Department of Correction, which Connecticut Voices for Children supports. As this year’s report from the Office of the Child Advocate overwhelmingly shows, the services and supports offered to youth in adult correction facilities are inadequate and in some cases inhumane.²⁵ However, we would like to voice concerns regarding the provisions of H.B. 7389 that would implement this policy including details pertaining to the timeline, jurisdiction, and funding.

Sections 3 and 4 of H.B. 7389 would change the general statutes so that as of January 1, 2020, no boys who are sixteen or seventeen years old may be incarcerated at the John R. Manson Youth Institution, and no girls who are sixteen or seventeen years old may be incarcerated at the York Correctional Institution. Section 5(r) of H.B. 7389 requires that the Juvenile Justice Policy and Oversight Committee create a plan for handling youth currently incarcerated in adult facilities and fiscal recommendations by July 1, 2021. The language within these sections mandates that youth be moved out of adult facilities *six months prior* to when there is a plan or fiscal resources in place. This will, in effect, recreate what happened when the Connecticut Juvenile Training School closed and youth were moved to inappropriate facilities because the Judicial Branch had not been given adequate time and money to set up new facilities.

Further, H.B. 7389 contains no language about which agency will assume jurisdiction over these youth or funding associated with creating new facilities for these youth. Presumably, the Judicial Branch will assume jurisdiction for these youth. In 2017, when the General Assembly mandated that care for justice-involved youth transfer from the Department of Children and Families to the Court Support Services Division (CSSD) of the Judicial Branch, CSSD requested over \$25 million from the legislature to implement this mandate and expand services for the children now in their care.²⁶ The final FY 2019 Revised Budget appropriated CSSD \$16.9 million, only two-thirds of what they requested and over \$3.5 million less than the cost of operating CJTS in 2017.²⁷ With this \$16.9 million, CSSD has been able to secure contracts for two staff-secure facilities. They have been unable to secure a contract for a hardware-secure facility, and instead they have fashioned sections of the detention centers in Bridgeport and Hartford to house their highest-risk youth. However, detention centers are not created for long-term living. They do not have appropriate outside space for youth to exercise and spend time in nature. They also will not have enough beds for the youth currently housed at Manson and York because the REGIONS-Secure Programs running out of the detention centers have space and staffing for 12 youth in each facility.²⁸ Although CSSD plans to continue working to secure a contract for a hardware-secure facility, three small community facilities are not nearly enough to house high-risk adjudicated youth and youth charged with adult offenses.

We suggest that the Committee revise the language within H.B. 7389 to ensure that the Department of Corrections, the Court Support Services Division, the Office of Policy and Management, and the Legislature have appropriate time, collaborative structure, and fiscal resources to create a smooth transition of youth from the Department of Corrections to another agency.

We would also like to applaud the Committee for including Section 6 of this bill, which works to implement the Office of the Child Advocate's suggestions to improve conditions of confinement in all agencies. These recommendations include screening and services for persons at-risk of suicidal behavior, solitary confinement, family visitation, use of force, and addressing educational and mental health concerns. However, the **Office of the Child Advocate made a number of very specific recommendations about each of these issues, and we suggest including this specific language within H.B. 7389.**

Connecticut Voices for Children is particularly concerned regarding the lack of language defining solitary confinement. Without comprehensive language, it is too easy for agencies to call extended times without social interaction a "loss of recreation" or "in-cell programming" (p. 14).²⁹ Late adolescence is a time of active psychosocial development during which social relationships take a primary role in guiding youth development, and it is a time during which youth can experience tremendous growth in empathizing and caring for others.³⁰ The primary importance of socialization to this developmental phase puts youth in solitary confinement at increased risk for suicide and developing or aggravating mental health conditions over and above the risk this practice imposes on adults.³¹ This practice is so inhumane and harmful to youth

that we suggest ensuring that the Committee include language within H.B. 7389 to close potential loopholes and workarounds that would allow agencies to continue this practice.

Additionally, the Office of the Child Advocate recommends prohibiting the use of chemical agents on children and youth, and Connecticut Voices for Children suggests including this specific recommendation within H.B. 7389. Currently, Department of Correction's policies permit using chemical agents such as pepper spray and tear gases on youth, and the Office of the Child Advocate identified multiple examples of youth at the John R. Manson Youth Institute being subjected to these chemicals to make youth more compliant.³² Especially in cases where a young person has an allergy or asthma, use of these chemicals may be life-threatening. At best, use of these chemicals is painful and traumatizing.

Thank you for this opportunity to testify in support of S.B. 880, H.B. 7387, and sections 2 and 6 of H.B. 7389. Thank you also for considering recommendations to strengthen the language within these bills to ensure that youth involved with Connecticut's justice system are treated fairly, humanely, and have opportunities to return to their communities having received the therapeutic interventions they need to be thriving, productive citizens. I can be reached with any questions at lruth@ctvoices.org or (203)498-4240 x 112.

¹ Besiki Kutateladze et al. (2012). *Do Race and Ethnicity Matter in Prosecution?* The Vera Institute. Retrieved from: <http://www.vera.org/sites/default/files/resources/downloads/race-and-ethnicity-in-prosecution-first-edition.pdf>

² Berdejo, C. (2017). *Criminalizing Race: Racial Disparities in Plea Bargaining*. Boston College Law Review, 59. Retrieved from: https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3036726

³ Lynch, M. J., & Patterson, E. B. (1991). "Bias in Formalized Bail Procedures" in *Race and Criminal Justice*. New York: Harrow and Heston.

⁴ *Ibid.*

⁵ Berdejo, C. (2017). *Criminalizing Race: Racial Disparities in Plea Bargaining*. Boston College Law Review, 59. Retrieved from: https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3036726

⁶ Besiki, K. & Andilorio, N. (2014). *Race and Prosecution in Manhattan*. The Vera Institute. Retrieved from: <http://www.vera.org/sites/default/files/resources/downloads/race-and-prosecution-manhattan-technical.pdf>

⁷ Sorenson, J. & Wallace, D.H. (1999). *Prosecutorial Discretion in Seeking Death: An Analysis of Racial Disparity. in the Pretrial Stages of Case Processing in a Midwestern County*, Justice Quarterly 16 (3), 559-578.

⁸ Schafer, J. (2013). *The role of trust and transparency in the pursuit of procedural and organisational justice*. Journal of Policing, 8. Retrieved from:

https://www.researchgate.net/publication/263339861_The_role_of_trust_and_transparency_in_the_pursuit_of_procedural_and_organisational_justice

⁹ Reisig, M. D. (2007). Procedural justice and community policing: What shapes residents' willingness to participate in crime prevention programs. *Policing: A Journal of Policy and Practice*, 1(3), 356-369.

¹⁰ Tyler, T. R. (2006). Psychological perspectives on legitimacy and legitimation. *Annu. Rev. Psychol.*, 57, 375-400.

¹¹ Cavanagh, C., & Cauffman, E. (2015). Viewing law and order: Mothers' and sons' justice system legitimacy attitudes and juvenile recidivism. *Psychology, Public Policy, and Law*, 21(4), 432-441.

¹² Austin, J., Johnson, K. D., & Gregoriou, M. (2000). *Juveniles in Adult Prisons and Jails: A National Assessment*. Washington, DC: Bureau of Justice Assistance; Bureau of Justice Statistics Prison and Jail Inmates at Midyear Series; Bureau of Justice Statistics Prisoner Series; Strom, K. J. (2000). *Profile of State Prisoners under Age 18, 1985-1997*. Washington, DC: Bureau of Justice Statistics.

¹³ Mendel, Richard. "Juvenile Justice Reform in Connecticut: How Collaboration and Commitment Have Improved Public Safety and Outcomes for Youth." The Justice Policy Institute (2013). Retrieved from:

http://www.justicepolicy.org/uploads/justicepolicy/documents/jpi_juvenile_justice_reform_in_ct.pdf

¹⁴ Steinberg, Lawrence, Elizabeth Cauffman, and Kathryn C. Monahan. (2015). "Psychological Maturity and Desistance from Crime in a Sample of Serious Juvenile Offenders." Office of Juvenile Justice and Delinquency Prevention Juvenile Justice Bulletin. Retrieved from: https://www.cga.ct.gov/app/tfs/20141215_Juvenile%20Justice%20Policy%20and%20Oversight%20Committee/20160218/Dr.%20Elizabeth%20Cauffman%27s%20Pathways%20and%20Maturity%20.pdf

¹⁵ Washburn, J. J., Teplin, L. A., Voss, L. S., Simon, C. D., Abram, K. M., & McClelland, G. M. (2008). Psychiatric disorders among detained youths: a comparison of youths processed in juvenile court and adult criminal court. *Psychiatric services*, 59(9), 965-973.

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- ¹⁶ Connecticut Juvenile Training School Advisory Board. (2018). Report to the Commissioner of the Department of Children and Families. Retrieved from: <https://portal.ct.gov/-/media/DCF/CJTS/pdf/CJTS-Annual-Report-2018.pdf?la=en>.
- ¹⁷ United States Department of Justice. (2011). Department of Justice Activities Under the Civil Rights Institutionalized Persons Act: Fiscal Year 2010. Washington DC: United States Department of Justice. Online. Available: http://www.justice.gov/crt/about/spl/documents/split_cripa10.pdf.
- ¹⁸ Davis, Antoinette, Andrea Gentile, & Caroline Glesman (2016). "No Place for Youth: Girls in the Adult Justice System." U.S. Department of Justice National Institute of Corrections. Retrieved from: <https://s3.amazonaws.com/static.nicic.gov/Library/032648.pdf>.
- ¹⁹ Hahn, Robert et al. (2007). "Effects on Violence of Laws and Policies Facilitating the Transfer of Youth from the Juvenile to the Adult Justice System." Center for Disease Control and Prevention Morbidity and Mortality Weekly Report. Retrieved from: <https://www.cdc.gov/mmwr/preview/mmwrhtml/rr5609a1.htm>.
- ²⁰ Lambie, I., & Randell, I. (2013). The impact of incarceration on juvenile offenders. *Clinical Psychology Review*, 33(3), 448-459. Retrieved from: https://s3.amazonaws.com/academia.edu.documents/50072460/j.cpr.2013.01.00720161103-15835-1nmkgq1.pdf?AWSAccessKeyId=AKIAIWOWYYGZ2Y53UL3A&Expires=1552338165&Signature=JajQHZx8jjWnmSCBxHUSxmrAedk%3D&response-content-disposition=inline%3B%20filename%3DThe_impact_of_incarceration_on_juvenile.pdf.
- ²¹ Steinberg, Lawrence, Elizabeth Cauffman, and Kathryn C. Monahan. (2015). "Psychological Maturity and Desistance from Crime in a Sample of Serious Juvenile Offenders." Office of Juvenile Justice and Delinquency Prevention Juvenile Justice Bulletin. Retrieved from: https://www.cga.ct.gov/app/tfs/20141215_Juvenile%20Justice%20Policy%20and%20Oversight%20Committee/20160218/Dr.%20Elizabeth%20Cauffman%27s%20Pathways%20and%20Maturity%20.pdf.
- ²² Goff, P. A., Jackson, M. C., Leone, D., Lewis, B. A., Culotta, C. M., & DiTomasso, N. A. (2014). The essence of innocence: Consequences of dehumanizing Black children. *Journal of personality and social psychology*, 106(4), 526.
- ²³ Epstein, R., Blake, J., & González, T. (2017). "Girlhood interrupted: The erasure of Black girls' childhood." *Center on Poverty and Inequality at the Georgetown University Law Center*. Retrieved from: <https://www.law.georgetown.edu/news/press-releases/Black-Girls-Viewed-As-Less-Innocent-Than-White-Girls-Georgetown-Law-Research-Finds.cfm>.
- ²⁴ Eberhart, Jennifer L. (June 5, 2012). "The Race Factor in Trying Juveniles as Adults." *The New York Times*. Retrieved from: <https://www.nytimes.com/roomfordebate/2012/06/05/when-to-punish-a-young-offender-and-when-to-rehabilitate/the-race-factor-in-trying-juveniles-as-adults>.
- ²⁵ Office of the Child Advocate. (2019, January 16). *Incarcerated/Detained Youth- An Examination of Conditions of Confinement*. State of Connecticut. Retrieved from: https://www.ct.gov/oca/lib/oca/v4/Conditions_of_Confinement_final_January_2019.pdf
- ²⁶ Carroll III, Judge P. (2018, February). Public Testimony submitted to the Appropriations Committee. Retrieved from: <https://www.cga.ct.gov/2018/appdata/tmy/2018HB-05035-R000220-Carroll%20III,%20Judge%20Patrick%20L.,%20Chief%20Court%20Administrator-Judicial%20Branch-TMY.PDF>
- ²⁷ Connecticut Juvenile Training School Advisory Board. (2018). Report to the Commissioner of the Department of Children and Families. Retrieved from: <https://portal.ct.gov/-/media/DCF/CJTS/pdf/CJTS-Annual-Report-2018.pdf?la=en>
- ²⁸ Rogerge, G. (2018, October 18). *Juvenile Justice Policy and Oversight Committee*. Presentation by the Judicial Branchy to the Steering Committee, Legislative Office Building, Hartford, CT. Retrieved from: https://www.cga.ct.gov/app/tfs/20141215_Juvenile%20Justice%20Policy%20and%20Oversight%20Committee/20181018/JJP OC%20Oct.%2018th%20PP.pdf
- ²⁹ John R. Manson Youth Institution. (2013). *Inmate Handbook*. Connecticut Department of Correction. Retrieved from: <https://www.law.umich.edu/special/policyclearinghouse/Documents/CT%20-%20Manson%20Youth%20Inst.%20Inmate%20Handbook.pdf>
- ³⁰ Stang, J., & Story, M. (2005). Adolescent growth and development. *Guidelines for adolescent nutrition services*, 1-8.
- ³¹ Gallagher, L. A. (2014). More Than a Time Out: Juvenile Solitary Confinement. *UC Davis J. Ju. L. & Pol'y*, 18, 244-266.
- ³² Office of the Child Advocate. (2019, January 16). *Incarcerated/Detained Youth- An Examination of Conditions of Confinement*. State of Connecticut. Retrieved from: https://www.ct.gov/oca/lib/oca/v4/Conditions_of_Confinement_final_January_2019.pdf