INSUFFICIENT GUIDELINES AND THE LEGAL CONSEQUENCES FOR YOUTH SERVICE BUREAUS

Cynthia B. Rosen Graduate Student Assistant

California Youth Authority
Division of Research and Development
Community Services Research Section

September 1973

## Insufficient Guidelines and the Legal Consequences for Youth Service Bureaus

In 1967, the President's Crime Commission recommended the establishment of neighborhood youth serving agencies as a preventative measure against juvenile delinquency. Since that time, a number of these agencies have been created throughout the nation. This paper will seek to complete my current study of some of the major problems confronted by the Youth Service Bureaus presently in operation in the state of California.

The following discussion is divided into three major subject areas. The first includes a brief review of the concepts suggested in my previous report, entitled "Juvenile Offenders and the Police Dispositional Process." This report deals with the effects of inadequate referral-making criteria upon law enforcement's choice of juvenile dispositions. The next section deals with a shortage of guidelines necessary for proper delineation of Youth Service Bureau policy, as well as other statutory shortcomings that pertain to YSB/law enforcement procedural relationships. Information contained in this portion of the paper is based on interviews with various bureau directors and law enforcement officials throughout the state. Finally, an attempt will be made to evaluate the implications that these legal questions, which result from all the guideline deficiencies, have upon diversion and

the California Youth Service Bureaus.

The Effects of Inadequate Referral-Making Criteria on Juvenile Dispositions

The role of the law enforcement officer undoubtedly makes this individual the leading strategic power in the juvenile dispositional process. In serving as the initial contact point with the justice system, the officer is in a position to decide the course of action to be taken against an alleged youthful offender - a decision that can have profound effects upon the juvenile's future life:

Despite the importance of law enforcement's choice in handling such a situation, few standards have been set for making this decision. It has recently been snown that there is a tendency for the determination to be based upon an arbitrary assessment of the characteristics of each particular youth. Thus, for example, as Edwin M. Lemert suggests, since information of a prior police record is unlikely when the officer is in the field, "...the minor's appearance and demeanor become decisive. Older youths, those with leather jackets, long hair, and shabby clothes, and Negroes are said to be at a disadvantage before a suspicious officer. Truculence, sullenness, posture, and gestures may mark the youth as uncooperative and cause him to be taken into custody." Additional support for such observations is contained in several other empirical studies including those by Adams, Black and Reiss, Goldman, McEachern and Bauzer, Piliavin and Briar, and Sellin and Wolfgang.

Quite obviously, unnecessary detainment can be very harmful to the welfare of a juvenile. These dangers frequently center around the issue of stigmatizing youngsters. An example of this, cited in my previous report, is given by Irving Piliavin and Scott Briar with respect to discriminatory practices toward Negro youths.

Concern is also given to other potential problem areas, such as overcrowding the juvenile justice system. In any case, the most important point to consider is that if we are to upnold the fundamental principles proclaiming justice for each and every individual, it is essential that improvements be made in the criteria used to formulate the dispositional decision as well as by making improvements in the dispositional process itself.

The first problem of can be adequately solved following careful study to develop written standards for regulating law enforcement's decision. Guidelines similar to the ones devised by Sherwood Norman are suggested as a starting point for this purpose. 10

The other question regarding the dispositional process and the preference for diversion away from the judicial system will require strengthening of community resources to assist law enforcement in carrying out its function. As was detailed in my last report, the Youth Service Bureaus presently appear to be the agencies most capable of filling this order. 11

Inadequate Policy Guidelines for YSB/Law Enforcement Diversionary Relationships: A Survey

This brings us to the second area for discussion dealing with the problems created by sparse YSB policy guidelines and statutory ambiguities pertinent to YSB/law enforcement relationships.

The information will be analyzed in accordance with selected responses to a questionnaire I prepared and delivered to various California bureau directors and law enforcement officials affiliated with youth serving divisions. The questions will be discussed separately with contrasting opinions between bureau directors and law enforcement officials being noted where appropriate.

One of the first questions to be considered is whether or not there is a form or contract that must be settled upon before services are rendered to the juvenile and, if so, who must agree to these conditions.

The majority of the YSB responses indicated there was no contract made with any party before services were dispensed. Most of these respondents stressed that a juvenile's involvement with the Youth Service Bureau was entirely voluntary. If the youth did not wish to attend even the first session, ne or she was not obligated to do so. In fact it was suggested that though there may be some sort of agreement between the juvenile and law enforcement, the bureau counselors always informed their clients that they were not required to attend. Aside from this type of law enforcement agreement, some bureau directors suggested that informal verbal agree-

ments were made between the bureau and a juvenile, family, or referring agency (e.g., schools) depending upon the "style of the counselor."

Law enforcement officials tended to believe that there probably did exist some type of agreement, usually an informal verbal one. When written contracts were made, law enforcement respondents felt that they often tended to be invalid yet served their ultimate purpose of giving the juvenile "a sense of security." To clarify this point, one respondent indicated that, though contracts were made with some of the youngsters, law enforcement did not consider itself "as bound to the contract as the kid would be because...the performance of the contract depends on the kid. There is very little requirement that the police act in certain ways."

Following from this question concerning the types of contracts that are made, I asked as an aside <u>if the juveniles not bound by contracts</u> actually continued to use bureau services. The bureau respondents felt that almost all youths did remain with the bureau though a contract might be absent. One director expressed the opinion that, in general, the juvenile's decision of whether to stay or leave depended upon "the quality of the service provided." Law enforcement officials, on the other hand, were more varied in their responses. They seemed a little less inclined to agree that the juvenile would remain under bureau supervision without some sort of contract. It was even suggested that in the case of a law enforcement referral, the youngster probably would not continue to attend

the sessions were it not for the contract acting as an inducement.

The next question dealt with <u>any constraints placed on the juve-nile</u>, either contained in or in addition to a form or contract. All bureaus responded to the effect that no restrictions were made regarding, for example, a required number of visits, the exclusion of those juveniles formerly on probation, nor the indefinite use of bureau services. A prescribed length of time for which services were customarily given was mentioned in most cases, however, the terms were flexible and could be easily extended to suit individual needs. Law enforcement seemed to feel that despite extensive variance, there probably were YSB regulations of compliance including a required number of visits, some exclusion of juveniles formerly on probation to avoid the possibility of a "conflict of interests," and ideally, a prescribed length of time for services to ensure maximum effectiveness.

All sources agreed that no particular actions were taken should a juvenile fail to comply with pre-established regulations. Either the situation would be ignored, a new agreement arranged, or, "if the kid got 'busted,'" the case would automatically be terminated.

A question concerning the amount of follow-up or evaluation of progress or change in a juvenile's behavior turned up a wider range of responses among the bureaus. Some said that there was no follow-up required whatsoever. Any that was made would be solely on the initiative of the individual counselor. One bureau replied that evaluations were being made by the Youth Authority after 3- and 6-months. Another bureau claimed that evaluations

were made by its staff every 3 months along with evaluations made by the Model Cities program. Finally, it was mentioned by some of the bureaus that they took random samplings of the parents' reactions to the program and, in general, any changes the parents noted in their child's behavior. Law enforcement simply responded that there was some follow-up procedure without going into any details of what they might involve.

Both YSB directors and law enforcement officials said that <u>juve-niles may be referred back to the bureau after being discharged</u>. There was also unanimous agreement that <u>responsibility for a case usually</u> resided with one individual, most often the juvenile's counselor.

Near the conclusion of my survey I aggregated several questions into a category titled "Legal Problems." The following responses to these questions reflect the procedural and statutory difficulties specifically pertinent to Youth Service Bureau/law enforcement handling of juveniles.

the time a juvenile is apprenended and the time he or she is referred for assistance to an agency such as the Youth Service Bureau? All of the respondents indicated a great deal of variance in the time duration between apprehension and disposition to an agency. It seemed that the YSB could receive a youngster almost immediately after he or she was apprehended to as much as a couple of weeks after the initial contact had been made. The difference depended upon the criteria of the referring agency.

Is it YSB policy to provide treatment (e.g., medical) without parental consent? This is often one of the more significant legal complications for a service organization similar to the Youth Service Bureau. Very interesting results were shown. Most of the bureaus hesitated to admit any service to minors without the written consent of parents. Nevertheless, specific explanations varied considerably. One source indicated that after the first meeting with a juvenile, parental permission was to be obtained by the youth's counselor. Another bureau director suggested that, even though it was not their policy, services sometimes were rendered to juveniles without any type of parental consent. A third director indicated that his bureau could not provide, for example, medical treatment without the consent of the juvenile's parents. This, however, was not really thought as much of an issue since the bureau worked "very closely with parents" and had, as yet, not received any opposition from them. One actual statement made by a director in reference to this question of whether his bureau gave treatment without consent was a very forthright, "Yes, we do." He continued by stating that this included "any and all" services a juvenile might need while under the bureau's supervision. Law enforcement officials expressed a rather definite "No" response when asked if treatment without consent was YSB policy. One respondent suggested that it was "...only in emergency type situations that you provide medical treatment without the parent's consent because of the liability involved."

right to treatment? If he feels he should be referred to another agency (to receive proper assistance) is there compliance with his request?

An affirmative response was again delivered by each of the individual's I interviewed. Additional clarification of opinion included bureau statements like, "If the agency will receive him...no objections" and "Might suggest it...As a matter of fact...have [suggested a referral]," while law enforcement comments included, "I think if it's reasonable...that there is [compliance] " and "I would say 'yes' with some reservations. It would have to depend on why the youngster came there. If the youngster exhibited any type of suicidal tendencies, or anything like that, ...then the parents should be notified [prior to the issuance of a substitute referral]."

Another question I asked was whether the YSB had to screen out juveniles to avoid an excessive caseload and what the standards were for this screening process. Each of the bureaus indicated that up to now there had not been any screening. As one director mentioned, screening was only to determine the appropriateness of a referral. The other bureau directors did note some sort of provision for an overloaded situation. One YSB was said to maintain a short waiting list for counseling services. It was noted, however, that law enforcement referrals would always be given top priority. Another director described a situation in which the bureau nearly had to start a screening procedure. "We almost got to that

point in the spring when we had sometimes a 7 or 8 day lag in our contacting a client. The caseload subsided, we got another counselor... and we had to write letters to all our agencies that were referring and asked: 'Just send us the ones you've really got troubles with. Think about it before you send them because we're starting to get buried.' But now, with another counselor, were in a little better shape." Law enforcement was of the opinion that a screening process was necessary, especially after the YSB had been operating for a certain period of time. They hoped that standards for selection would be based on "joint criteria," established by the agencies involved, with priority being given to the most critical cases.

The next question I asked was: In referring a juvenile to the YSB - do you think a more formal hearing should be required (to be sure the proper disposition is made)? Except for one law enforcement official, the respondents felt that a more formal hearing was unnecessary when processing juveniles. Generally, it can be summarized that they felt such a process could only serve to delay the delivery of services and to stigmatize the youngster more than ever before. The sole dissenting opinion indicated that a more formal process was needed to eliminate "a haphazard operation" by making the situation clear to all persons involved and to alleviate any legal problems that might arise.

Does the fate of one offender influence the outcome for another or is the type of disposition decided independently (so that,

for example, in the case of two shoplifters, one can be sent to court and the other to an agency like the YSB)? Both bureau directors and law enforcement officials stated that the type of disposition a juvenile received usually depended upon the extent of his or her involvement unless the decision maker had knowledge of the juvenile's involvement in a prior offense.

The next question gave a surprisingly interesting result. The question was: Are juveniles who live in affluent communities given more of an opportunity to avoid contact with the official justice system than those in poorer communities? All respondents, except for the same law enforcement official who dissented earlier in favor of formal pre-dispositional hearings, emphatically answered that the actual situation was as stated. Youths that lived in wealthy neighborhoods, especially if they had well-known or influential parents, received preferential treatment in dispositional handling. The dissenting law enforcement official reluctantly admitted he felt that law enforcement agencies did not "...intentionally put more police in minority or low income areas than they do in the higher income areas...You have to realize that much of your crime is committed... either by these persons or in these areas. The law enforcement agency, in order to protect the rest of the community, has to take certain steps. And so that's one of them...high enforcement."

The next question I asked was: Is court referral the only alternative to the YSB for some juveniles? If so, do you think the YSB is really

voluntary? First of all, a couple bureau respondents felt that court referral was not the only alternative to the YSB for juveniles. In most every instance they thought that the juvenile could be handled by another more suitable option. All other individuals surveyed by this questionnaire agreed with the statement that only court referral was offerred to some youths in lieu of the Youth Service Bureau. Law enforcement officials thought that, therefore, the YSB was not a voluntary choice for the youngster. All other respondents felt that the bureau was still a voluntary agency. Basically the bureau opinions were that the YSB was still voluntary since, as in their own particular agencies, attendance at the Youth Service Bureau was not actually mandatory. As noted earlier, if a juvenile did not wish to come to the bureau even though this was the decided disposition, recourse would not be taken against the youth by the referring agency or, of course, the bureau itself. Thus, in their opinion, the YSB was voluntary to the extent that a youth did not actually have to use its services in any way. One source added, however, that if the youngster did not cooperate with the bureau, the likelihood of being re-referred was very slim for this individual.

Another rather important legal question asked: How confidential is the information received from the juvenile? Can the information be made available to the juvenile or adult court, outside agencies (e.g., police, school), or members of the local community? All YSB's considered that their files were very confidential and could not be

made available to any outside agency unless summoned by court subpoena. Law enforcement was divided on the issue of confidentiality between opinions similar to the one just expressed that bureau files were extremely confidential, and the opinion that files could be obtained rather easily, especially if a number of public agencies were involved in a certain case. More specifically, in relation to this latter belief, it was noted that "...if the Youth Service Bureau is staffed by...public agencies, then...information will only be given in certain instances and for certain reasons."

A question that developed from this last one contemplated whose approval would be necessary for information about a juvenile to be released? The hesitation and diversity of responses (which included prior approval by the bureau director, juvenile, parents or a combination of these faction) indicated to me that there were obviously no definite standards for making such a decision. Thus, if the situation ever arose, the question about who should be consulted prior to the release of any "confidential information" would be left unanswered. Consequently, the outcome could depend upon the discretion of a single individual at that particular moment in question.

Is the juvenile's delinquency proven "beyond a reasonable doubt"

before he or she is sent to the Youth Service Bureau? Who bears this

burden of proof? In every case, the respondents stated that a juvenile's

delinquency was not proven "beyond a reasonable doubt" prior to being

sent to the YSB. It seems that this view of delinquency is contrary to YSB philosophy which seeks to "save" pre-delinquent youths rather than trying to rehabilitate "confirmed criminals." As to who should bear the burden of proof, all sources agreed it was the responsibility of law enforcement and the courts in deciding a youngster's guilt or innocence. Once again, though, such a consideration has absolutely no relevance to the Youth Service Bureau by virtue of the YSB's functional definition.

Another question I asked was: How important are the juris—dictional facts (e.g., did the child commit the act, is he or she neglected, deprived or a truant) if bureau intervention is being contemplated? Basically, the response to this question was that the jurisdictional facts were important to law enforcement or any other agency required to make an appropriate referral. The Youth Service Bureau, however, need not be aware of these facts since they were not actually pertinent to its youth serving function.

A final question to be considered read as follows: Diversion away from the juvenile court is beneficial up to a certain point. Do you feel, though, that the community is still as well protected?

(Is the diversion of dangerous youths a threat to the community)?

One YSB director flatly stated that a community was not as well protected with the diversion of youths away from the court structure. No further substantiation was offerred for this response. In

every other case, bureau directors and law enforcement officials alike still felt that the local neighborhood was as well, and even better protected with the <u>reasonable</u> diversion of juveniles away from the courts. Along with a concern for avoiding stigmatization, they all seemed to feel that rather than trying to ignore a juvenile's problems, it was essential that every effort be taken to deal with them from a straightforward approach so as to eliminate these problem areas entirely. The community would be retter protected with the juvenile's problems solved since his or her desires were no longer being frustrated from their lack of satisfaction. For these reasons, more community based youth serving agencies, such as the California Youth Service Bureaus, are necessary if we are to substantially diminish the problems of youth and, subsequently, to decrease the tremendous number of youth crimes.

Legal Implications of Guideline Deficiencies in Youth Service Bureau/Law Enforcement Relationships

After careful consideration of all the material in the preceding section, it becomes quite apparent that there are a host of potential legal problems with respect to Youth Service Bureau/Law Enforcement associations. Though none of these questions (including those in the last section) can be positively evaluated for their correctness or incorrectness just with our present knowledge, the following

discussion will incorporate some of the more frequently substantiated trends in thought.

Many of the concepts found in this next section were gathered from the Winter 1972 edition of the <u>Law and Society Review</u><sup>12</sup> and the United States Department of Health, Education, and Welfare booklet entitled, <u>Law As an Agent of Delinquency Prevention</u>. 13

One of the most important legal considerations is the importance of fact finding procedures. Is it necessary for the facts of an alleged delinquent act to be determined "beyond a reasonable doubt?"

If so, will bureau staff be required to perform this function? Does it matter if, despite their attempts to help, they do not? It is presumed that any juvenile who denies an offense has the right to go to court to have the matter formally decided. A fact finding process might appear too legalistic in view of the bureau's broadly conceived role. However, interestingly enough, the Task Force Report stresses that an inquiry into the facts should serve as the initial step: "Since the unofficial agencies of the delinquent control system can impose sanctions by referring clients for formal action, the fact finding procedures they employ assume considerable importance." 14

This leads to the question: Does the lawyer have any place in the system's pre-judicial phases? How much legal assistance should be

made available at the bureau stage? Ted Rubin seems to feel that lawyers can contribute greatly by challenging all aspects of the juvenile process. The goal should be "to place legal stress on each part of the system to force each component part to better administer itself. This, in turn, could lead to further screening out and diversion, more appropriate disposition and more effective rehabilitative services."15 Nevertheless, it seems difficult to clarify the function a lawyer would have with regard to the bureau. Should he, on occasion, intervene between his client and the bureau, and attack bureau involvement as unjustified and inappropriate? It is much easier to visualize the role of the lawyer standing between the juvenile and the court. This would be even more likely if statutory criteria for court referral are established so that a lawyer could argue that a child did not come within the legislature's definition, and that the youngster would be much better served by some sort of informal action.

In any case, it remains unclear just how this would be achieved without a formal preliminary hearing since pre-court formalization is precisely what the bureau scheme seeks to avoid. One suggestion made by Rosenneim and Skoler in their discussion of the lawyer's role at intake seems applicable to this issue. They suggest that the lawyer could be valuable at the initial meeting between bureau staff, parents, and child by interpreting the situation to the child and parents. In

this way they would understand and be prepared to accept suggestions as to informal measures. 16 Rosenheim and Skoler also suggest that the lawyer could assist at intake by inquiring into points of law and jurisdiction, and by looking into the sufficiency of the evidence. 17 The same functions could be performed if bureau intervention is being considered.

Two other points should be mentioned regarding the need to protect juveniles involved with the bureau. First, it is important that the time be limited within which the referral or service decision must be made. The Task Force Report did consider this aspect and advised that, if possible, any power of court referral should be decided within 30 days, and certainly before 60 days have lapsed. 18 The Children's Bureau guide favors a limit of 30 days by which time referral back to the initiating agency should be made. A second point deals with the need to specify the maximum period of bureau supervision. The Bureau guide suggests the period of service should not surpass 6 months, though it provides for extension. The same guide indicates that a written agreement should be devised when additional service is being considered.

As far as confidentiality of information is concerned, it must be asked: Should the information be made available if a child subsequently appears before a juvenile or adult court? According to the Children's Bureau guide it "should be inadmissable in any future juvenile court hearing prior to disposition or any criminal court." A child served by the YSB should not have anything that might resemble a record.

Two final problems should be taken into account. As the Task Force forewarns, "Screening...suffers from mass production." Thus, special care must be taken to ensure that serious cases are not overlooked when employing informal dispositions so that the community is not as well protected, and the more intensive assistance required by the juvenile is not given. Furthermore, informal assistance should be delivered immediately. "If the time lapse between apprehension and referral is a matter of days, the subsequent follow-up by a selected community resource may occur at the point when the juvenile and his family have surmounted their initial fear, anger, or regret and concern, and the contact is regarded as an unwelcome reminder of past unpleasantness instead of an avenue of help in a time of crisis."

## Conclusions

Since the time they were first recommended by the President's Crime Commission in 1967, the Youth Service Bureaus have tried to serve as a "substitute, not an alternative," for handling juveniles outside of the judicial system. 22 The use of such informal diversionary techniques are justifiable on several counts including the simple fact that they

diminish the stigma usually associated with such an experience.

Nevertheless, it has been shown in this report that when there is any possibility for such alarming occurrences as, for instance, the diversion of youths who are potentially harmful to society, we must begin to consider the use of guidelines for making the dispositional choice. One need only observe the vast quantity of legal considerations discussed earlier to further confirm this discrepancy in both law enforcement and Youth Service Bureau policy guidelines. In addition, the President's Crime Commission indicates support for these ideas on the state of dispositional and service criteria when it remarks: "Within the official agencies of delinquency control, alternatives to adjudication of delinquents nave tended to emerge haphazardly, as unplanned and unofficial aspects of a community's system...The laws do not provide affirmative guidelines for screening out of the delinquency control system or for selecting measures of restraint or rehabilitation to apply to those so channeled."23

Subsequently, to ensure that a juvenile is referred to the agency most appropriate to his or her needs, and that the juvenile's frustrations are most satisfactorily met by this agency, it is essential that some basic guidelines be formulated. As outlined by the President's Crime Commission Task Force Report, the pre-judicial process should be strengthened in the future by principles that resemble the following: 24

- (1) Pre-judicial dispositions should be made as early as possible in the stages of official agency contact;
- (2) They should be based on stated criteria that are shared with and regularly reviewed by all delinquency control authorities within the community; and
- (3) Whenever attempts are undertaken to render guidance or exert control (as distinct from screening without further action) the pre-judicial handling agency should be alert to coercive possibilities and the dispositions it can render should be effectively restricted.

Only if such actions are taken may we move closer to our ultimate goal of just but effective juvenile dispositions.

## Footnotes

- l. The President's Commission of Law Enforcement and Administration of Justice, <u>Task Force Report:</u> <u>Juvenile Delinquency and Youth Crime</u>, Washington, D. C., 1967, p. 20.
- 2. Edwin M. Lemert, <u>Instead of Court: Diversion in Juvenile Justice</u>, National Institute of Mental Health, Center for Studies of Crime and Delinquency, Chevy Chase, Maryland, 1971, pp. 59-60.
- 3. Thomas F. Adams, Law Enforcement: An Introduction to the Police Role in the Community, Englewood Cliffs, Prentice-Hall, Inc., 1968, p. 180.
- 4. Donald J. Black and Albert J. Reiss, Jr., "Police Control of Juveniles," American Sociological Review, 35, #1 (February, 1970), pp. 63-77.
- 5. Nathan Goldman, The Differential Selection of Juvenile Offenders for Court Appearance, National Research and Information Center, National Council on Crime and Delinquency, Syracuse, New York, 1965, pp. 264-290.
- 6. A. W. McEachern and Riva Bauzer, "Factors Related to Disposition in Juvenile Police Contacts" in Malcolm W. Klein, (ed.), <u>Juvenile Gangs in Context: Theory Research</u>, and Action, Englewood Cliffs, Prentice-Hall, 1967, pp. 148-160.
- 7. Irving Piliavin and Scott Briar, "Police Encounters with Juveniles," American Journal of Sociology, 70, #2 (September, 1964), pp. 206-214.
- 8. Sellin and Wolfgang, in Don C. Gibbons, <u>Delinquent Behavior</u>, Englewood Cliffs, Prentice-Hall, 1970, p. 40.
  - 9. Piliavin and Briar, pp. 447-449.
- 10. Sherwood Norman, The Youth Service Bureau: A Key to Delinquency Prevention, National Council on Crime and Delinquency, Paramus, New Jersey, 1972, pp. 170-171.
- 11. Cindy Rosen, "Juvenile Offenders and the Police Dispositional Process," pp. 22-25.
- 12. J. A. Seymour, "Youth Service Burgaus," Law and Society Review, Winter 1972, pp. 266-272.

- 13. Ted Rubin, Law As an Agent of Delinquency Prevention, U. S. bepartment of Health, Education, and Welfare, Social and Rehabilitation Service, Youth Development and Delinquency Prevention Administration, Washington, D. C., 1971, pp. 16-39.
  - 14. Tack Force Report, p. 11.
  - 15. Rubin, pp. 16-17.
- 16. M. K. Rosenheim and D. L. Skoler, "The Lawyer's Role at Intake and Detention Stages of Juvenile Court Proceedings," Crime and Delinquency, 11, 1965, p. 170.
  - 17. Ibid.
  - 18. Task Force Report, p. 21.
- 19. Children's Bureau, "Guides for Demonstration Projects for Youth Service Bureaus," U. S. Department of Health, Education, and Welfare, Social and Rehabilitation Service, Washington, D. C., 1969, p. 8.
  - 20. Task Force Report, p. 18.
  - 21. Ibid.
  - 22. Norman, p. 25.
  - 23. Task Force Report, p. 20.
  - 24. Ibid., p. 18.

## END

7 Missfirmen