

44157

Utah Council on Criminal Justice Administration
Project on Criminal Justice
Standards and Goals

CORRECTIONS

THE STATE INDUSTRIAL SCHOOL

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Approved by
Utah Corrections Task Force and
Utah Council on Criminal Justice Administration
255 South 3rd East
Salt Lake City, Utah 84111

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STATE OF UTAH
OFFICE OF THE GOVERNOR
SALT LAKE CITY

NGJRS

GALVIN L. RAMPTON
GOVERNOR

DEC 13 1977

ACQUISITIONS

Dear Citizens:

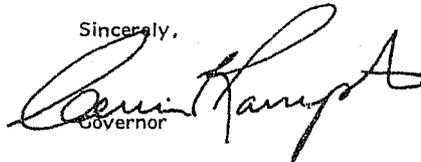
This pamphlet is one of a series of reports of the Utah Council on Criminal Justice Administration. The Council's five Task Forces: Police, Corrections, Judicial Systems, Community Crime Prevention, and Information Systems, were appointed on October 16, 1973 to formulate standards and goals for crime reduction and prevention at the state and local levels. Membership in the Task Forces was drawn from state and local government, industry, citizen groups, and the criminal justice profession.

The recommendations and standards contained in these reports are based largely on the work of the National Advisory Commission on Criminal Justice Standards and Goals established on October 20, 1971 by the Law Enforcement Assistance Administration. The Task Forces have sought to expand their work and build upon it to develop a unique methodology to reduce crime in Utah.

With the completion of the Council's work and the submission of its reports, it is hoped that the standards and recommendations will influence the shape of our state's criminal justice system for many years to come. Although these standards are not mandatory upon anyone, they are recommendations for reshaping the criminal justice system.

I would like to extend sincere gratitude to the Task Force members, staff, and advisors who contributed something unknown before--a comprehensive, inter-related, long-range set of operating standards and recommendations for all aspects of criminal justice in Utah.

Sincerely,


Governor



THE STATE INDUSTRIAL SCHOOL

This report was published by the
Utah Council on Criminal Justice Administration with the
aid of Law Enforcement Assistance Administration funds.

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What is the Utah Council on Criminal Justice Administration (UCCJA)?

In 1968 the Omnibus Crime Control and Safe Streets Act was passed resulting in the creation of the Law Enforcement Assistance Administration (LEAA) in the U.S. Department of Justice. The act required the establishment of a planning mechanism for block grants for the reduction of crime and delinquency.

This precipitated the establishment of the Utah Law Enforcement Planning Council (ULEPC). The council was created by Executive Order of Governor Calvin Rampton in 1968. On October 1, 1975, the council was expanded in size and redesignated the Utah Council on Criminal Justice Administration (UCCJA).

The principle behind the council is based on the premise that comprehensive planning, focused on state and local evaluation of law-enforcement and criminal-justice problems, can result in preventing and controlling crime, increasing public safety, and effectively using federal and local funds.

The 27-member council directs the planning and funding activities of the LEAA program in Utah. Members are appointed by the governor to represent all interests and geographical areas of the state. The four major duties of the council are:

1. To develop a comprehensive, long-range plan for strengthening and improving law enforcement and the administration of justice . . .
2. To coordinate programs and projects for state and local governments for improvement in law enforcement.
3. To apply for and accept grants from the Law Enforcement Assistance Administration . . . and other government or private agencies, and to approve expenditure . . . of such funds . . . consistent with . . . the statewide comprehensive plan.
4. To establish goals and standards for Utah's criminal-justice system, and to relate these standards to a timetable for implementation.

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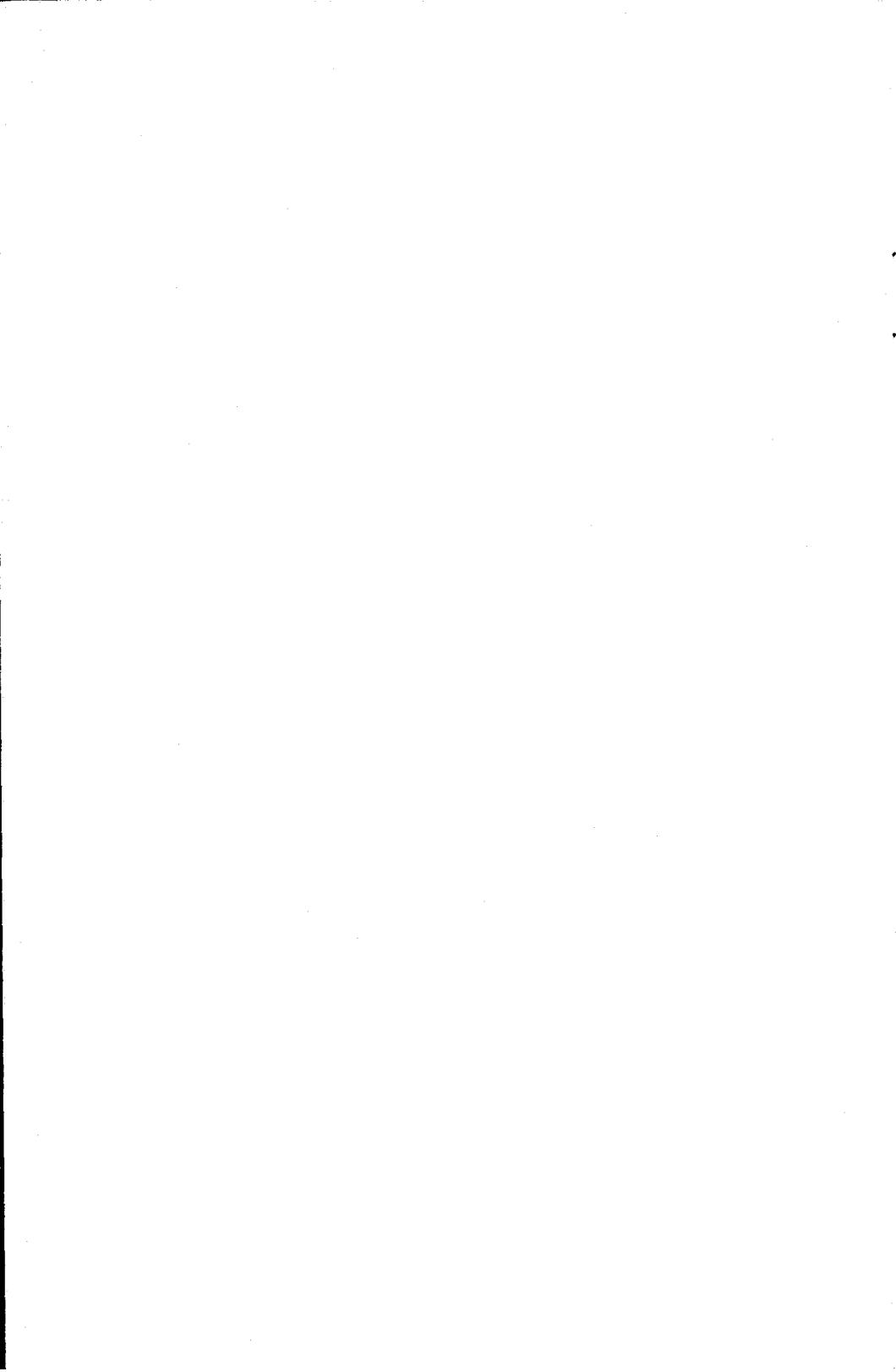
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INTRODUCTION

Early in the development of the nation, the problem of children who committed crimes had to be dealt with. At first they were placed in jails. The sight of children in a filthy jail incensed pioneer prison reformers. They advocated the development of institutions for children which have been identified by a variety of names—house of refuge, reformatory, training school, industrial school, reform school, etc.

The first facility in America was the House of Refuge located in New York, established in 1825. The early juvenile institutions were as oppressive and forbidding as the adult institutions. By today's standards they were basically punitive; although they also had a rehabilitative purpose.

Gradually the character of the juvenile institutions changed from a daily routine of study discipline emphasizing security to a primarily educational and vocational training program with security not a major concern. The first facilities were massive buildings with large populations. Newer institutions are being built with cottages designed to house less than 60 persons (often with an apartment for cottage staff), school and vocational training buildings, gymnasium, etc. on a campus plan. Exterior security varies, but most have no artificial barrier between them and the community. There are some fences, but usually no towers. Space is the primary barrier. The institutions are located both in rural and urban areas.

From the beginning, the juvenile institutions have cared for more than just the juvenile criminal offenders. They also admitted the "wandering street arab, picked up by a town constable, and the willfully disobedient child, turned over by distraught parents . . . It's administrators expressed no fears about a possible miscarriage of justice and were disinclined to bring the protections of due process to these minors. A good dose of institutionalization could only work to the child's benefit."¹ There is now a movement to limit the types of children who are institutionalized and in some groups to close all juvenile institutions. The Supreme Court is steadily providing the child caught in the juvenile justice system more due process rights.

¹Philadelphia House of Refuge, *Fifth Annual Report* (Philadelphia, 1833), 4.

Utah has only one institution, the Utah State Industrial School, which is located in Ogden and was established in 1896. The school operates as a co-educational institution. A child may not be committed solely on grounds of neglect or dependency. He may be held at the school only until his nineteenth birthday when he must be discharged. The school receives children from the federal system and other states through the Interstate Compact on Juveniles. Utah also has the compact to place children who cannot function at the school in an institution in another state.

The ten standards concerning the State Industrial School focus on the buildings, purpose, social environment, education and vocational training programs, programs for girls and other types of special offenders, religious programs, recreation programs, and the counseling program at the school. Each standard as adopted is given in the following pages followed by the current Utah system as it relates to the standard and a suggested method to implement the standard.

STANDARD 11.1 PLANNING NEW JUVENILE INSTITUTIONS

No new juvenile institutions should be built in Utah. Any plans for major building construction at the State Industrial School should be postponed until the need for additional buildings or replacement buildings is shown to be necessary, based on the school population. Additional factors that should be considered when evaluating the need for additional buildings at the school are found in Standard 8.1, "Total System Planning."

After the decision has been made to build an additional or replacement building, the following factors should be considered in designing the building:

1. The purpose of the physical plant.
2. The number and composition of the staff and students that will be using the facility. It should be small enough to allow appropriate security considerations without excessive regimentation, surveillance equipment, or repressive hardware.
3. Provisions for:
 - a. Privacy and personal space;

- b. Minimization of noise;
- c. Reduction of sensory deprivation;
- d. Encouragement of constructive student-staff relationships;
- e. Adequate utility services;
- f. Dignified visiting facilities;
- g. Individual and group counseling areas;
- h. Recreational areas both inside and outside.

4. The following areas ought to be evaluated and designed for the whole school:

- a. Medical and hospital facilities;
- b. Recreational facilities both inside and out;
- c. Educational, vocational training, and workshops designed to accommodate small numbers of students and to facilitate supervision.

UTAH STATUS AND COMMENTS

There is an informal plan maintained which concerns new buildings at the State Industrial School and renovations in the current buildings. The factors outlined in the standard are informally used in decisions made concerning buildings at the school. Existing buildings generally meet the provisions of paragraph 3. There are separate buildings on campus for educational, vocational training, workshops (i.e. arts and crafts buildings), recreational, and medical purposes. A hospital is nearby for those children requiring more care than can be provided in their infirmary. Each cottage has provisions for visiting and counseling activities, and renovations are planned to improve those now available. There is also provision for space for other programs not suggested in the standard.

METHOD OF IMPLEMENTATION

This standard would require administrative decisions and planning concerning the need for new buildings and planning new buildings decided upon.

**STANDARD 11.2
MODIFICATION OF STATE INDUSTRIAL SCHOOL**

The State Industrial School should undertake immediately a five-year program of reexamining the existing buildings on campus and planning for a continuing long-range renovation program. Once the plan is developed, it should be reexamined at least every five years. Such a reexamination and planning effort should consider:

1. The purpose of each building.
2. The number and composition of those staff and students who will be using the building.
3. The building should have provision for:
 - a. Adequate security without excessive regimentation, surveillance equipment, or repressive hardware.
 - b. Privacy and personal space, where appropriate.
 - c. Minimization of noise.
 - d. Reduction of sensory deprivation.
 - e. Encouragement of constructive student/staff relationships.
 - f. Dignified and informal visiting area, where appropriate.
 - g. Adequate utility services.
 - h. Individual and group counseling areas, where appropriate.

UTAH STATUS AND COMMENTS

There does not appear to be any regular review of the physical plant at the school. As it becomes evident that a building needs to have major renovations or be replaced, it is reviewed, and plans made for submission to the legislature for money to accomplish it. Presently, there are no plans for new buildings at the school, and one building is not being used. They are currently

reviewing the possibility of renovating two buildings and abandoning one.

METHOD OF IMPLEMENTATION

This standard would require administrative decisions and planning concerning the need for and planning of new buildings.

STANDARD 11.3 APPROPRIATE USE OF STATE INDUSTRIAL SCHOOL

Since it is unrealistic to expect that the State Industrial School will be abandoned, the administration of the school, the administration of the Department of Social Services, and the Juvenile Court judges should:

1. Decide what type of children the school should serve.
2. Plan alternative programs for those children not to be served by the school.
3. Set a policy of not committing children who do not fit the criteria decided above at the school and divert them to the alternate program. Sentencing should follow the guidelines agreed upon.

UTAH STATUS AND COMMENTS

There is no evidence of a collaborative planning effort to determine the legitimate role of the school. The school accepts any child legitimately committed to it by either the Utah Juvenile Court or Federal Court. It is further complicated by the use of observation commitments for sixty days. No one has formally evaluated the appropriateness of the several types of commitments to the school, although it was mentioned in both the *Beaser Study* and the position paper of the Citizen Advisory Board of the school. (The *Beaser Study*, conducted by HEW at the request of the governor, is a comprehensive report of the Utah juvenile justice system.)

METHOD OF IMPLEMENTATION

This standard would require planning and coordination of the agencies mentioned.

STANDARD 11.4 SOCIAL ENVIRONMENT

The State Industrial School should regularly examine and revise its policies, procedures, and practices to foster a social setting at the school that will stimulate offenders to change their behavior and to participate on their own initiative in programs intended to assist them in reintegrating into the community. The following should be addressed in such a reexamination:

1. The institution's organizational structure should permit open communication and provide for maximum input in the decision-making process.

- a. There should be a functioning Student Council all the time.
- b. A student newspaper and magazine similar to that in any high school should be developed and supported.
- c. The management principles discussed in Chapter 2, "Correctional Management," should be followed, including the use of an ombudsman.

2. The correctional agency and the institution should make explicit their correctional goals and program thrust.

- a. To the school staff using the principles in Chapter 3, "Manpower Development and Training," and Standard 2.1, "Professional Correctional Management."
- b. By program evaluation as described in Standard 2.2, "Planning and Organization."
- c. To the public through an intensive public relations campaign using the media extensively.
- d. The school administration should be continuously concerned with relevance and change.

3. The school should adopt policies and practices that will preserve the individual identity of the inmate and normalize the school setting.

- a. Each student should be involved in program decisions affecting him.
- b. Students should be identified by name and social security number, if they have one. A special school number should be assigned only when the child does not have a social security number.
- c. Rules governing personal appearance should reflect respect for individuality and allow for cultural and subcultural trends, including rules covering hair length, beards, and mustaches; providing length of hair, etc., does not interfere with security and health practices.
- d. Students should be allowed to continue wearing personal clothing appropriate for the activity (e.g., school, work activity, church, etc.). When replacement clothing is necessary, the child should be allowed his choice of colors, styles, etc.
- e. Visits at the school should be held in an environment conducive to healthy relationships between offenders and their families and friends.
- f. Students in the appropriate phase should be allowed home furloughs to maintain emotional involvement with their family.
- g. Telephone privileges, including reasonable provisions for long-distance calls, should be extended to all students.
- h. No limitation should be imposed upon the amount of mail students may send or receive.

4. The school should make provision for the unique problems faced by minority offenders and take these problems into consideration in practices and procedures.

- a. Subcultural groups should be formally recognized and encouraged.

- b. Ethnic studies courses should be provided in a regular curriculum.
- c. Staff members representative of minority groups in the institution should be hired and trained.
- d. Minority residents of the community should be involved actively in institution programs.

5. The school should actively develop the maximum possible interaction between community and school, including involvement of community members in planning and in intramural and extramural activities. Detailed information on how to meet this can be found in Chapter 7, "Community Resources for Corrections," Standard 3.5, "Employment of Volunteers," and the rest of this chapter as it pertains to each subject.

6. The school should apply only the minimum amount of security measures, both physical and procedural, that are necessary for the protection of the public, the staff, and inmates; and its disciplinary measures should emphasize rewards for good behavior rather than the threat of punishment for misbehavior.

- a. Committed offenders initially should be assigned the least restrictive custodial level possible, as determined by the classification process.
- b. Only those mechanical devices absolutely necessary for security purposes should be utilized.
- c. School regulations affecting student movements and activities should not be so restrictive and burdensome as to discourage participation in program activities and to give offenders a sense of oppression.
- d. Standard 12.12 concerning "Disciplinary Procedures" should be adopted, including the promulgation of reasonable rules of conduct and disciplinary hearings and decisions respecting the rights of students.
- e. An incentive system should be developed to reward positive behavior and to reinforce desired behavioral objectives.
- f. Security and disciplinary policies and methods should be geared to support the objective of social

reintegration of the offender rather than simply to maintain order and serve administrative conveniences.

UTAH STATUS AND COMMENTS

The State Industrial School generally meets this standard. The following two sections of the schools' Administrative Manual (as follows) gives a general overview of the school's operating philosophy.

Section 101—Philosophy

The goals and objectives of the State Industrial School are:

1. To help each youngster become a law abiding citizen through programs designed to bring about positive changes in behavior.
2. To provide each youngster the necessary education and training so that he may become a self-supporting, contributing member of society.
3. To help each youngster through self-awareness programs to realize his potential for a happy, satisfying life.

Section 102—Modifying Behavior

The principles and concepts employed at the Industrial School assume that: 1) behavior is learned, and 2) that it is controlled and maintained by its consequences. The environmental control available at the Industrial School is considered invaluable in fostering and maintaining the growth of students committed to its care. Desired behavior is positively reinforced while inappropriate and unwanted behavior results generally in the omission or withdrawal of rewards. Students are taught that they are centrally involved in the behaviors they emit, and the privileges and rewards they receive are governed by their actions. The various living units are united in their efforts to establish reasonable and clearly defined criteria which the student must meet to progress in his program, and ultimately to earn his release from the institution.

The following addresses each paragraph of the standard as stated:

1. There seems to be open communication between the staff and students in general.

- a. There is a student council operating most of the time. However, this is hampered by the mobility of the student population, especially those children committed for a sixty-day observation period. The *Beaser Report* makes the following observations concerning it:

"The image of the student council differs greatly among staff and students. Its responsibility and authority are not always understood by those being served or those serving on the council." (page 140).

"Every opportunity should be taken to strengthen the area of responsibility of the student council and to make certain that both staff and students understand the role of the student council." (pp. 149 and 150).

- b. A student newspaper was started in 1974.
- c. Participatory management is addressed in **Standard 3.7, "Participatory Management," Standard 2.1, "Professional Correctional Management,"** and **Standard 2.3, "Employee-Management Relations."** (See the pamphlets on "**Correctional Management**" and "**Manpower and Training.**") The *Beaser Report* notes, "It would be helpful if a device could be used which would involve all staff in reaching such a decision. However, the practicalities of such an exercise have not been explored." (page 137—the decision concerns the direction of the institution.) The report also recommends that the superintendent should make greater efforts to meet with staff units to solicit their thoughts and ideas to bring about a better interpersonal and more cohesive communication system within the school. (page 146). Also suggested is expansion of the practice of inviting the president of the student council to attend meetings of department heads. (page 150). The use of an ombudsman is addressed in **Standard 2.3, "Employee-Management Relations,"** Paragraph 6. Utah does not technically have a correction's ombudsman.

2. Generally, the school meets the provisions of this paragraph. The pamphlets on "**Correction Management**" and "**Manpower and Training**" give further details on subparagraphs a and b.

- c. There is not a public relations campaign at the school and there are no policies concerning this topic. The amount of public relations that the school does have is inadequate. If a group wishes to tour the facility or have a speaker from the school, one of the staff members will provide it. However, most of the public relations activities are at the request of an outside group rather than the school going to the group on their own initiative. This tends to produce a great deal of cynicism concerning the school.
 - d. When the staff was asked, in connection with another standard, what is the school going to be like five years from now, the answer was the status quo., with some modifications but no big changes. This indicates that the school is not as concerned with relevance and change as could be expected.
- 3a. The student does have some input in classes and vocational programs, and in deciding what he would like to do after completing high school (i.e., job, college, etc.), provided he has earned off campus privileges. Generally, the school meets this paragraph.
- b. Students are generally identified by name. However, students and staff both have a number which must be included on reports as detailed in Section 310 of the Administrative Manual.
 - c. *Section 315, Clothing* states: "Students should have ample opportunity to learn cleanliness and neatness, and should be encouraged and assisted in developing pride in personal appearance." Although this is in the section concerning clothing, the philosophy would extend to other areas of personal appearance. There is no written policy that concerns personal appearance. The school meets this paragraph.
 - d. Sections 315 and 316 of the Administrative Manual states that the student is allowed to wear his own clothing. Although there are no uniforms, the child receives clothing from the school if needed.
 - e. Visiting hours are Saturday and Sunday from 1:00 to 4:00 p.m. Parents may also visit their children after school hours during the week. The school prefers

that visiting be conducted on holidays and weekends and not during school hours. The student may visit in the cottage, outside on the lawn, or, if at an appropriate phase, go off campus with his or her parents.

- f. Home furloughs are allowed to those qualified, depending on their phase. Home furloughs are considered one of the privileges for good behavior.
 - g. Telephone calls are also earned privileges at the ratio of one per week. Students are allowed to make telephone calls to their immediate family if there is an emergency. The child may receive calls from his parents at any reasonable time. For calls inside Utah, the WATS line is used.
 - h. There is no limitation on the amount of mail that a child may send or receive with one exception. A parent may request that his child not correspond with a specific person. If the request seems reasonable, the child will be informed and the mail held. Mail is scanned both on the way in and out for contraband, escape plans, etc. The school provides postage for outgoing mail.
- 4a. Most of the students do not appear to be concerned about a group identity as suggested in this paragraph. The school tries to minimize cultural differences and is somewhat anti-AIM. The federal correctional system has placed a number of children that were involved in the American Indian Movement (AIM) incident at Wounded Knee and they identify with that group. Some of the other Indians identify with their tribe. The school does not meet this paragraph.
- b. There are no ethnic studies courses provided.
 - c. **Standard 3.2, "Recruitment from Minority Groups,"** supports this paragraph.
 - d. There is very little involvement of the minority community at the school. The school would like more of this type of volunteer activity at the school, especially a "responsible Indian group."

5. The school feels that by controlling the environment it can better control the behavior of the student. They are careful about how they allow their students to interact with outside groups, although encouraging appropriate interaction with the community. (For further information refer to the pamphlet on "Community Resources for Corrections" and Standard 3.5, "Employment of Volunteers.")

6. The program at the school is a behavior modification program with very little security hardware. The school generally meets this paragraph.

- a. There are two types of classification at the school. The phase program provides gradually increasing privileges and a way for the child to work his way out of the school. There are two cottages set aside for special types of children. Unit A is for the younger boys, and Unit F is for those children who are older and more of a problem, generally runaways. Girls live in cottages separate from the boys but participate in all the programs on a coeducational basis. No child is housed in Unit F when first committed to the school.
- b. Mechanical devices are not generally used for security purposes. There are, of course, locks in some areas. Walkie-talkies are used by staff to keep track of the students as they move around on campus and when looking for runaways. The only fence on the campus is used to separate the camps from a field and is not for security purposes.
- c. *The State Industrial School Administrative Manual* has several sections concerning security and student movement. Section 402 gives the officer-in-charge responsibility for the movement of students on-campus and provisions for off-campus movement. He is given assistance as needed by the security drivers (Section 403). Section 406 specifies that students cannot move about the campus by themselves or in groups without permission from the officer-in-charge. Section 409 requires that the current roster be kept with a notation where a student not present is. When a student changes status, such as cottage assignment, caseworker change or active supervision, a student transfer form is prepared and copies routed to

the appropriate people. Although the regulations are quite restrictive, they do not limit student movement to the point where it is burdensome or discourages participation in program activities.

- d. The *Administrative Manual* has several sections that concern the disciplinary procedures of the school. Some are noted below.

Section 205, Corporal Punishment prohibits corporal punishment and regulates the use of physical encounters. Section 311 describes the use of the security unit or isolation. The procedures for placing a student involuntarily in isolation is described in Section 312. Sections 306 and 307 describe the reporting system—when and how to use it.

- e. The school meets this paragraph. The whole treatment program is based on reinforcement of positive behavior by an incentive "privilege" system.
- f. The State Industrial School attempts reintegration of the offender rather than simply maintaining the institution.

METHOD OF IMPLEMENTATION

This standard can be met by an administrative policy decision of the State Industrial School administration. The school's administration is already meeting or exceeding most of this standard. Periodic review and updating of their administrative manual, perhaps with the advice of someone from the Attorney General's Office, will allow them to fully meet this standard.

STANDARD 11.5 EDUCATION AND VOCATIONAL TRAINING

The State Industrial School should reexamine immediately its educational and vocational training programs to insure that they meet standards that will individualize education and training. These programs should be geared directly to the reintegration of the offender into the community. It is recognized that techniques and practices for juveniles may be somewhat different from those required for adults, but the principles are similar.

1. The State Industrial School should have a comprehensive, continuous educational program for students.
 - a. The educational department of the school should establish a system of accountability to include:
 - (1) An annual internal evaluation of achievement data to measure the effectiveness of the instruction program against stated performance objectives.
 - (2) An appraisal comparable to an accreditation process, employing community representatives, educational department staff, and inmate students to evaluate the system against specific objectives. This appraisal should be repeated at least every three (3) years.
 - b. The educational curriculum should be developed with student involvement. Individualized and personalized programming should be provided.
 - c. The educational department should have at least one learning laboratory for basic skill instruction. Occupational education should be correlated with basic academic subjects.
 - d. In addition to meeting State certification requirements, teachers should have additional course work in social education, reading instruction, and abnormal psychology. Efforts should be taken by the school to recruit teachers who are certified to teach exceptional children, have experience teaching inner city children, and have expertise in educational technology.
 - e. The education department should make arrangements for education programs at local colleges where possible, using educational opportunities programs, work-study programs for continuing education, and work-furlough programs.
 - f. The educational department should have a guidance counselor (preferably a certified school psychologist) and a student personnel worker. School records of juveniles should be available to these persons at the time of commitment.

- (2) Work sampling and tool technology programs;
 - (3) A program of study concerning the world of work and job readiness.
- g. In order to choose possible career lines to be presented to the students, the following factors should be considered:
 - (1) Vocational needs analysis of the student population.
 - (2) Job market analysis of existing or emerging occupations.
 - (3) Job performance or specification analysis, including skills and knowledge needed to acquire the occupation.
- h. The vocational training programs provided that go beyond work sampling should have a set of measurable behavioral objectives appropriate to the program. These objectives should comprise a portion of the instructor's performance evaluation where appropriate. The instructor should not be penalized for not accomplishing an objective when no student realistically could have accomplished it, although such objectives could continue to be pursued.
- i. Vocational instructors should be licensed or credentialed under rules and regulations for public education in the State or jurisdiction.
- j. Active inservice instructor training programs should provide vocational staff with information on the latest trends, methods, and innovations in their fields.
- k. Class size should be based on a ratio of 12 students to one teacher.
- l. Equipment should require the same range and level of skills to operate as that used by private industry.
- m. The State Industrial School advisory committee should address on a regular basis, with the help of experts involved in labor and management as needed, the development of the vocational program.

- n. Private industry should be encouraged to provide job opportunities to State Industrial School students either on a work release basis or after release on an aftercare status.
 - o. The school should seek active cooperative programs and community resources in vocational fields with community colleges, federally funded projects such as Job Corps, Neighborhood Youth Corps, and Manpower Development Training Act programs and private community action groups.
 - p. On-the-job training and work release or work furloughs should be used to the fullest extent possible.
 - q. An active job placement program should be established to help residents find employment related to skills training received.
3. Features applicable to both educational and vocational training programs should include the following:
- a. Emphasis should be placed on programmed instruction, which allows maximum flexibility in scheduling, enables students to proceed at their own pace, gives immediate feedback and permits individualized instruction.
 - b. A variety of instructional materials—including audio tapes, teaching machines, books, computers, and television—should be used to stimulate individual motivation and interest.
 - c. Selected offenders should participate in instructional roles.
 - d. Community resources should be fully utilized.
 - e. Correspondence courses should be incorporated into educational and vocational training programs to make available to students specialized instruction that cannot be obtained in the institution or the community.

- f. **Credit should be awarded for educational and vocational programs equivalent to or the same as that associated with these programs in the free world.**

UTAH STATUS AND COMMENTS

The State Industrial School has an elaborate, intensive educational and vocational training program. The emphasis is on bringing the students up to the educational level at which they should be based on their age (e.g., 17-year olds at the eleventh grade level, etc.). Vocational training is directed toward work sampling and preparing those who are old enough (generally 17 and 18) to enter the work world upon release. Education has the highest priority of all the programs at the school. With this background, the standard will be addressed paragraph by paragraph:

1. The State Industrial School has a comprehensive, educational program for its students consistent with their needs. It generally does not extend beyond a high school graduation level, since few, if any, of its students are on that level. Because the school keeps children only until their 19th birthday, educational programs above high school are seldom needed. If educational services beyond high school are necessary, SIS can contract with Weber State College or a vocational training program in Ogden for the particular student to attend.

- a. The school evaluates its program on an annual basis. Since the school receives funds from Title I of the Elementary and Secondary Education Act, there is an outside evaluation from that source on an annual random basis. The State Board of Education has in the past evaluated the school both on its own initiative and by invitation (most recently in 1969, 1972, and 1973). This is not a regular event. Students are tested when they enter the school and again just before their release. They may also be tested, if necessary, between these two times. A recommitted student may or may not be retested, depending on how long he has been away from the school. The pre- and post-tests are used to evaluate the school's programs and change them accordingly.
- b. The school program is very close to a regular high school program with the exception that it is somewhat more individualized and personalized. This is

facilitated by small classes. The student is involved in setting his own curriculum only as it concerns elective classes.

- c. The school has a learning laboratory for their remedial math and reading programs. Occupational education is correlated with the basic academic subjects.
- d. The teachers at the school all have their State Teaching Certificate. These must be renewed every five years, which requires some extra coursework. Teachers at SIS usually take coursework in sociology, psychology, etc. Approximately 25% of the teachers have Special Education Certificates. Many have been teaching at SIS for a long time.
- e. As mentioned earlier, the school contracts with Weber State College or vocational training programs in the Ogden area for their students when needed. The student would participate on a study-release basis. However, this type of program is not used very often because most of their students are high school age. Work-study and work-furlough programs are available, although not used very often for the same reason.
- f. The education department does not yet have a guidance counselor, although they are planning to hire one. They do not have a student personnel worker. The school generally has access to the child's school records at the time of commitment, and tests them at arrival for academic achievement.
- g. Social and coping skills are included in the SIS curriculum, although not necessarily identified as such. Consumer and family life courses have been offered at SIS in the past. Since the number of students has decreased, many of these skills are now taught in the health classes.
- h. As mentioned earlier, the school's emphasis is to bring the students to the educational level at which they should be based on their age.
- 2a. Since most of SIS' students are teenagers who will be returning to school rather than entering the world

of work, vocational training is not as high a priority as educational goals. The vocational training goals are generally directed at work sampling rather than preparation for the labor market. The vocational program has been hurt by the declining school population.

- b. The vocational training courses offered have been designed in short intensive training modules as the standard suggests. However, students often are at the school only long enough to complete one short course.
- c. The vocational training program has been designed as an enrichment of the educational program rather than an independent program. The main emphasis is on bringing the child up to grade level through remedial classes, where necessary. Of course, the overall goal is for every child to graduate from high school, whether from SIS or the school in the area when paroled. Vocational training classes off campus are used as a privilege for good behavior. This expands the variety of programs available and enhances the reintegrative goals of the school.
- d. The vocational programs at SIS are designed as a work sampling program. The program a child follows is designed for his individual needs with his cooperation. The school used the Ogden Skills Center to offer a large variety of programs.
- e. There are very few on-the-job training programs available at the school. However, if a child wishes to participate, an opportunity will be developed for him, if possible. The child receives \$2 per hour for the time spent in such a program. However, the child may only have \$1.00 with him at any time. The remainder is placed in a savings account for him.
- f. SIS is oriented toward a work sampling and prevocational and orientation course. Students do not stay at the school long enough to finish a vocational course in one area.
- g. Since the vocational training program is oriented toward a work sampling program, the courses offered

are based on those occupations that are generally considered open, such as auto mechanics, carpentry, etc., rather than the needs of the students. Since the school allows some of their students to attend the Ogden Skills Center for vocational training, they use the courses offered there. This makes it possible to offer a wider variety of courses than would otherwise be possible. With the exception of basic proficiency in reading, writing, and mathematics, there is not a job specification analysis or job performance rating. An informal job market analysis has been done.

- h. The vocational training programs do not have a set of measurable behavioral objectives as suggested by this standard. However, the students may not complete the course and achieve the objectives prior to being returned home.
- i. The teachers in the vocational training programs have the standard Secondary Education Certificate. They may or may not have additional coursework and/or certificates.
- j. Vocational training instructors do not receive in-service training concerning their field except as they develop on their own through college courses or training seminars they may become aware of. However, the school does have an in-service training program for the whole staff oriented toward general institutional programs and problems.
- k. Class size at the school averages 8.4 students per teacher. Utah exceeds this standard. Classes may range from 5 to 20.
- l. Generally, the equipment at SIS is comparable to that in private industry. The vocational training building and equipment is new.
- m. The SIS Advisory Committee reviews the vocational program, but not on a regular basis as suggested in the standard.
- n. Private industry does not have vocational training programs at SIS. Yet, the school does invite some private industries to the school for short periods to acquaint

the student with possible career lines. For example, they have invited the dental industry to talk about dental hygienists.

- o. SIS uses the resources of other agencies wherever they can. Vocational Rehabilitation has provided some funds and job placement services to SIS pupils who qualify. The school receives some funds from the State Board of Education as do all schools in the state, especially in terms of specialized classrooms. As mentioned earlier, some students are allowed to attend the Ogden Skills Center. Weber School District awards high school diplomas to those graduating at SIS under Weber Adult High School, Buena Vista Campus. There is also an arrangement where some students attend Weber High School on a study-release basis. Weber State College has also been used for some children on a study-release basis. Neighborhood Youth Corps, Job Corps, and Manpower Development Training Act money have not been used at the school. ESEA Title I has also been used as explained earlier. Generally, this part of the standard is met.
- p. Off-campus, on-the-job training, and work-release are available, but they are not used often since most children will be returned home if they are able to handle this type of freedom. Also, most of the students are not old enough to benefit from such a program.
- q. There is a job placement program at the school, although inadequate. Vocational rehabilitation provides most of these services in conjunction with the after-care workers. The majority of the students have no need for this service and it is not emphasized enough for improvement.
- 3a. The programs in use allow flexibility in scheduling and are tailored to the individual. Programmed instruction is used as the standard suggests.
- b. SIS uses a variety of instructional materials.
- c. Some students are used as tutors of other students at the school, as the standard suggests.

- d. As noted in Paragraph 2, a variety of community resources are used to enhance both the educational and vocational training programs.
- e. Brigham Young University offers correspondence courses to students at SIS.
- f. Credit earned at SIS may be transferred to any school in Utah upon the student's request. Those who finish their high school course while at SIS receive a diploma from Weber Adult High School, Buena Vista Campus, in the Weber School District.

SUMMARY

SIS has a very high priority on educational programs with a lower priority on vocational training programs. Generally, SIS meets the standard as written.

METHOD OF IMPLEMENTATION

The State Industrial School has emphasized education and vocational training. In many ways, they exceed the standard. In order to achieve those areas of the standard not being met, the State Industrial School administration may need to revise some administrative policies and/or priorities.

STANDARD 11.6 SPECIAL OFFENDER TYPES

The State Industrial School should reexamine immediately their policies, procedures, and programs for the handling of special problem offenders—the addict, the recalcitrant offender, and the emotionally disturbed, and implement substantially the following:

1. The commitment of addicts to correctional institutions should be discouraged, and correctional administrators should actively press for the development of alternative methods of dealing with addicts, preferably community-based alternatives. Recognizing, however, that some addicts will commit crimes sufficiently serious to warrant a formal sentence and commitment, the State Industrial School must experiment with and work toward the development of institutional programs that can be related

eventually to community programs following their placement or release and that have more promise in dealing effectively with addiction.

- a. Specially trained and qualified staff should be assigned to design and supervise drug offender programs, staff orientation, involvement of offenders in working out their own programs, and coordination of institutional and community drug programs.
- b. Former drug offenders should not be precluded from recruitment and trained as change agents to provide program credibility and influence offender's behavior patterns.
- c. In addition to the development of social, medical, and psychological information, the classification process should identify motivations for change and realistic goals for the reintegration of the offender with a drug problem.
- d. A variety of approaches should provide flexibility to meet the varying needs of different offenders. These should include individual counseling, family counseling, and group approaches.
- e. Programs should emphasize "alternatives" to drugs. These should include opportunities to affiliate with cultural and subcultural groups, social action alliances, and similar groups that provide meaningful group identification and new social roles which decrease the desire to rely on drugs. Methadone and other drug maintenance programs are not appropriate in institutions.
- f. The major emphasis in institutional programs for drug users should be the eventual involvement of the users in community drug treatment programs upon their placement or release.
- g. Research and experimentation should be an indispensable element of institutional drug treatment programs. Priorities include:

- (1) Development of techniques for the evaluation of correctional therapeutic communities.
- (2) Development of methods for surveying inmates to determine the extent of drug abuse and treatment needs.
- (3) Evaluation of program effectiveness with different offender types.

2. The State Industrial School should make special provisions other than mere segregation for students who are serious behavior problems and an immediate danger to others.

- a. The classification process should be used to attempt to obtain an understanding of the recalcitrant offender and to work out performance objectives with him.
- b. A variety of staff should be provided to meet the different needs of these offenders.
 - (1) Staff selections should be made through in-depth interviews. In addition to broad education and experience backgrounds, personal qualities of tolerance and maturity are essential.
 - (2) Continuous on-the-job staff evaluation and administrative flexibility in removing ineffective staff are needed to meet the stringent demands of these positions.
 - (3) The student of the special unit should participate regularly in recreation, school, training, visiting, and other appropriate programs.
- c. Recalcitrant offenders who are too dangerous to be kept in the general institutional population should be housed in a unit of not more than 26 individual rooms providing safety and comfort.
 - (1) Good surveillance and perimeter security should be provided to permit staff time and efforts to be concentrated on the offenders' problems.

- (2) No individual should remain in the unit longer than is absolutely necessary for the safety of others.
- (3) Wherever possible the inmate of the special unit should participate in regular recreation, school, training, visiting and other appropriate programs. Individual tutorial or intensive casework services should also be available.
- (4) Medication, including tranquilizers, where required, should be dispensed by prescription; and will in every case, wherever possible, be dispensed by a pharmacist as required by state law and administered by a registered nurse, a licensed practical nurse, or a supervised medical assistant. Caution must be exercised to insure that misuse of medication does not happen by alteration of dosage or medication or administration to someone other than to whom it was prescribed.

- d. Procedures should be established to monitor the programs and services for the recalcitrant offenders, and evaluation and research should be conducted by both internal staff and outside personnel.

3. The State Industrial School should provide for the psychiatric treatment of emotionally disturbed offenders. Psychotic offenders should be transferred to mental health facilities. The school's treatment of the emotionally disturbed should be under the supervision and direction of an appropriately trained professional with the availability of psychiatric consultation.

- a. Program policies and procedures should be clearly defined and specified in a plan outlining a continuum of diagnosis, treatment, and aftercare.
- b. A diagnostic report including a physical examination, medical history, and tentative diagnosis of the nature of the emotional disturbance should be developed. Diagnosis should be a continuing process.

- c. There should be a program plan for each offender based on diagnostic evaluation; assessment of current needs, priorities, and strengths; and the resources available within both the program and the correctional system. The plan should specify use of specific activities; for example, individual, group, and family therapy. Need for medication, educational and occupational approaches, and recreational therapy should be identified. The plan should be evaluated through frequent interaction between diagnostic and treatment staff.
- d. All psychiatric programs should have access to a qualified neurologist and essential radiological and laboratory services, by contractual or other agreement.
- e. In addition to basic medical services, psychiatric programs should provide for education, occupational therapy, recreation, and psychological and social services.
- f. On transfer from diagnostic to treatment status, the diagnostic report, program prescription, and all case material should be reviewed within two working days.
- g. Within four working days of the transfer, case management responsibility should be assigned and a case conference held with all involved, including the offender. At this time, treatment and planning objectives should be developed consistent with the diagnostic program prescription.
- h. Cases should be reviewed each month to reassess original treatment goals, evaluate progress, and modify programs as needed.
- i. All staff responsible for providing service in a living unit should be integrated into a multi-disciplinary team and should be under the direction and supervision of a professionally trained staff member.

- j. Each case should have one staff member (counselor, teacher, caseworker, or psychologist), assigned to provide casework services. The psychologist or caseworker should provide intensive services to those offenders whose mental or emotional disabilities are most severe.
- k. Reintegration of the offender into the community or program from which he came should be established as the primary objective.
- l. When an offender is released from a psychiatric treatment program directly to the community, continued involvement of a trained therapist during the first six months of the patient's reintegration should be provided, at least on a pilot basis.

UTAH STATUS AND COMMENTS

The Juvenile Court has a general philosophy of appropriately referring the child to the custody requirement most appropriate for the child. As a result, the State Industrial School does not receive many children whose problems are drug addiction, alcoholism, or psychiatric. They are generally referred to a more appropriate agency.

There are two ways that a child may be diagnosed as having one of these special problems. Since most children that are considered for placement at the school are well known to the court and have previously been placed on probation or some other sentence, short of commitment to the school, they may have been tested or these problems became evident at the time. These children would be placed or referred to an appropriate agency at that time.

The Juvenile Court has, for those children of whom it is not sure, a second option to commit the child to the State Industrial School for a sixty-day observation period. During FY 1973, 69 boys and 26 girls were committed to the school for a sixty-day evaluation. At the end of that time, the child is returned to the court with a recommended program for him or her, upon which the court then acts. The State Industrial School staff are not particularly happy with this program, since it tends to disrupt the school's

long-term treatment objectives. The *Beaser Report* recommended in December 1971 that the practice of sixty-day observation commitments be stopped and an alternate diagnostic program be developed elsewhere.

The types of special offenders are addressed as follows:

1. The State Industrial School has no special program for alcohol and drug addicts. The feeling of the staff is that all students have these problems and the best way to treat them is through the general counseling and group sessions. However, most of the children with these problems are screened before being committed to the school and are more appropriately referred. Those committed with these problems are generally committed for other offenses. A child may participate in a drug or alcohol treatment program either before or after commitment at the school.

2. The recalcitrant offender is the only special offender group for whom the State Industrial School has established a special program. The security unit, "F" has been established in a separate cottage—a dorm facility with three lock-up rooms. There are plans for remodeling the unit and providing individual rooms. The windows have screens over them to keep contraband out. School is taught within the cottage, which averages 23 students. The program has three phases and the child has the ability to earn "good time". When a student receives 90% or better on a rating, he earns a draw from a gumball-marble machine. If in the third phase and draws black, he is out with good time. If older and graduated, he can get credit for a home visit. Students also have a variety of other draws possible.

Students are placed in unit "F" for (1) assault, (2) runaway or (3) 12-hour lock-up for disruptive behavior. If a student is afraid of leaving, he may attempt a runaway to be put back in the program. Few leave the institution directly from unit "F". Children in unit "F" do not participate in recreation with other units. School is broken into three intensive learning groups. Tranquilizers and other medicines are not used. They are allowed company.

3. Psychotic children are generally committed to the youth unit at the State Hospital in Provo. If a child committed to the State Industrial School needs psychiatric help, he will be provided

it, depending on his needs, by the unit coordinator or the school psychiatrist. However, most children with psychiatric problems are never received at the institution. The mental health system in Utah meets paragraphs 3 (a) through (l).

METHOD OF IMPLEMENTATION

This standard can be implemented through administrative policy.

STANDARD 11.7 GIRLS AT THE STATE INDUSTRIAL SCHOOL

Through research, the State of Utah should undertake a comprehensive evaluation of the female juvenile offender. Utah should determine differences in the needs between male and female offenders and implement differential programming.

UTAH STATUS AND COMMENTS

In FY 1973 the State Industrial School had a total of 47 girls and 178 boys admitted to the school. Of the girls, 26 were admitted for the sixty-day observation program. The capacity for girls at the school, without overcrowding, is 75. The program for girls is the same basic program as that for boys.

The State Industrial School is a coeducational facility. With the exception of housing and some sex related classes and activities, boys and girls have the same program. The school occasionally has dances, as a privilege, and other activities to promote the development of social skills with the opposite sex. With the exception of some jobs that are usually male or female (e.g., home economics teacher, nursing, carpentry, etc.), the staff is not assigned according to sex. One problem is the lack of proper male and female models for the children to learn their sex roles.

METHOD OF IMPLEMENTATION

The Department of Social Services and the Juvenile Court should coordinate the development of such a research effort.

STANDARD 11.8 RELIGIOUS PROGRAMS

The State Industrial School should immediately adopt policies and procedures to insure the development of a full range of religious programs. It should maximize the opportunities of each student to pursue his own religious beliefs or preferences, or if he chooses to, no religious program. In order to do this, the administration of the State Industrial School should:

1. Develop an adaptive attitude toward the growing numbers of religious sects and beliefs and provide reasonable assistance to their practice.
2. Encourage community representatives of religious organizations to participate and provide religious services to the students at the school.
3. Designate one person, either a staff member or a volunteer coordinator, to coordinate the religious programs available to students at the school, and insure that the religious rights of the students will be protected.

UTAH STATUS AND COMMENTS

The State Industrial School provides a religious program for those students who wish to participate. A chart published in the Youth Services Planning Project 1972 lists the following religious composition at the school:

| | |
|--------------|-----|
| LDS | 57% |
| Catholic | 25% |
| Baptist | 6% |
| Other | 2% |
| Unaffiliated | 10% |

A Catholic Priest from the Judge Memorial High School in Salt Lake, and three Catholic Sisters, assisted by lay members,

hold regular Catholic services each Sunday with Communion, Mass, and Confession. During the week, a Catholic Sister offers full-time Catholic instruction and counseling for the Catholic students.

The L.D.S. Church holds regular Sunday School services with a full staff of teachers. Seminary and religious counseling programs for L.D.S. students are also held during the week. A principal and two full-time instructors and counselors are provided to do this work.

Sunday services are provided for the Protestant students through one of the local churches each Sunday morning. There is no person designated to coordinate the religious program at the school.

METHOD OF IMPLEMENTATION

The administration of the State Industrial School will need to devise an administrative policy pertaining to this standard.

STANDARD 11.9 RECREATION PROGRAMS

The State Industrial School should develop and implement immediately policies and practices for the provision of recreation activities as an important resource for changing behavior patterns of offenders.

1. The school should have a full-time, trained, and qualified recreation director with responsibility for the total recreation program of that facility. He also should be responsible for integration of the program with the total planning for the offender.

2. Program planning for every offender should include specified information concerning interests and capabilities related to leisure-time activities.

3. Recreation should provide ongoing interaction with the community while the offender is incarcerated. This can be accomplished by bringing volunteers and community members into the institution and taking offenders into the community for recrea-

tional activities. Institutional restriction in policy and practice which bars use of community recreational activities should be relaxed to the maximum extent possible.

4. The range of recreational activities to be made available to inmates should be broad in order to meet a wide range of interests and talents and stimulate the development of the constructive use of leisure time that can be followed when the offender is reintegrated into the community. Recreational activities to be offered inmates should include music, athletics, painting, writing, drama, handicrafts, and similar pursuits that reflect the legitimate leisure-time activities of the citizens.

5. The group living supervisors should be encouraged and helped by the recreation director to develop activities for the children in their unit.

UTAH STATUS AND COMMENTS

The recreational program at the State Industrial School is directed toward athletics, although other activities are available. The school has a recreation director, but many of the recreational activities are planned and directed by the group living supervisors.

Addressing the standard paragraph by paragraph, the following can be said:

1. The school has one male recreation director, who works from 12 noon to 8 p.m. He teaches physical education for the school during the afternoon and is the school coach. He has been able to recruit a female physical education major at Weber State College, who is willing to volunteer her time to provide some physical activities for the girls. There is not a female physical education teacher, and the male physical education teacher is filling this role for the girls. SIS does not completely meet this paragraph.

2. Recreational program planning, as described in this standard, is not provided. However, each student has the opportunity to choose from the alternative activities provided. Some recreational activities are offered as privileges for good behavior.

3. SIS takes its students into the community for recreational activities, generally on a privilege basis. However, the community generally is not invited to the school for recreational

activities, such as intramural sports. The school does not belong to any athletic leagues, since they do not meet the leagues' criteria. The school does have school-wide teams that play other school teams and groups that wish to play against them. Students selected to play on this team need not be in any special phase. This part of the standard is partially met.

4. The variety of recreational activities for the girls is somewhat limited. A heavy emphasis is placed on athletic activities. Recently, a new gym building has been added to the school. The cottages take turns scheduling it in the evening for team sports. The cottages also have an intramural sports program, competing with each other.

Arts and crafts projects are developed and supervised in the school program. The group living supervisors have the responsibility to develop and supervise many of the recreational activities, including unit parties and outings. Movies are shown on Saturdays but are not supervised by the recreation director.

The *Beaser Report* of 1971 recommended that SIS should support a broader concept of recreation and social recreation which has a carryover in the community. Although team sports are enjoyable, they form only a fraction of what should be a total recreational program at an institution of this type. The report also recommended that a female recreation staff member should be hired. However, changes have not occurred since the report was issued.

METHOD OF IMPLEMENTATION

Administrative policy decisions can implement this standard. The school probably would need to reallocate some funds to implement paragraph 1. The rest can be implemented by slightly changing priorities.

STANDARD 11.10 COUNSELING PROGRAMS

The State Industrial School should begin immediately to develop planned, organized, ongoing counseling programs in conjunction with the implementation of Standard 11.4, "Social

Environment," which is intended to provide a social-emotional climate conducive to the motivation of behavioral change and interpersonal growth.

1. Three levels of counseling programs should be provided:
 - a. Individual, for self-discovery in a one-to-one relationship.
 - b. Small group, for self-discovery in an intimate group setting with open communication.
 - c. Large group, for self-discovery as a member of a living unit community with responsibility for the welfare of that community.

2. The school's organization should support counseling programs by coordinating group living, education, work, and recreational programs to maintain an overall supportive climate. This should be accomplished through a participative management approach.

3. The State Industrial School should have a full-time counseling supervisor responsible for developing and maintaining an overall institutional program through training and supervising staff and volunteers. An advanced degree with training in social work, group work, and counseling psychology should be required. Each unit should have at least one qualified counselor to train and supervise non-professional staff. Trained ex-offenders and para-professionals with well-defined roles should be used.

4. Counseling within the school should be given high priority in resources and time.

UTAH STATUS AND COMMENTS

The overall treatment method at the State Industrial School is a behavior modification program. All other programs, including counseling, are designed to contribute to the child's rehabilitation through that program.

Upon admittance to the school, each student is assigned to a caseworker or unit coordinator who establishes a counseling relationship with him and his family, and monitors his behavior while at the institution. A psychological examination and school

achievement tests are given to measure his emotional and academic status.

After the tests are completed, the unit coordinator or case-worker (in cooperation with the school coordinator), works out a plan with the student for attendance in academic, vocational, and pre-vocational classes.

The behavior modification program is based upon the "learning model," which is designed to reinforce good behavior and performance, and extinguish or eliminate unacceptable behavior. Many privileges are available to students on an earned basis. A student may move from one phase to another with each progressive phase offering greater privileges.

The counseling services at SIS include:

Clinical procedures such as individual psychotherapy, group discussions, group therapy, individual case work sessions, psycho-drama, role playing and conjoint family therapy. Any family may be involved with these services if deemed important to the rehabilitation of the youngster. Two full-time and two part-time clinical psychologists and six social workers provide these services in addition to evaluation and consultation services to administrative personnel, treatment teams, and other departments within the institution.

Based on this information, it can be concluded that the school generally meets this standard. The following addresses the standard, paragraph by paragraph.

1. All three levels of counseling are provided to students, as needed. Depending on the need of the student, he may receive different types and amounts of counseling services. The unit coordinator, clinical psychologists, and group living supervisors all participate.

2. As described above, the main treatment modality is behavior modification; with all other phases of the program, including counseling services, contributing to that program. The school meets the standard, although it does not have the kind of participatory management that this standard suggests.

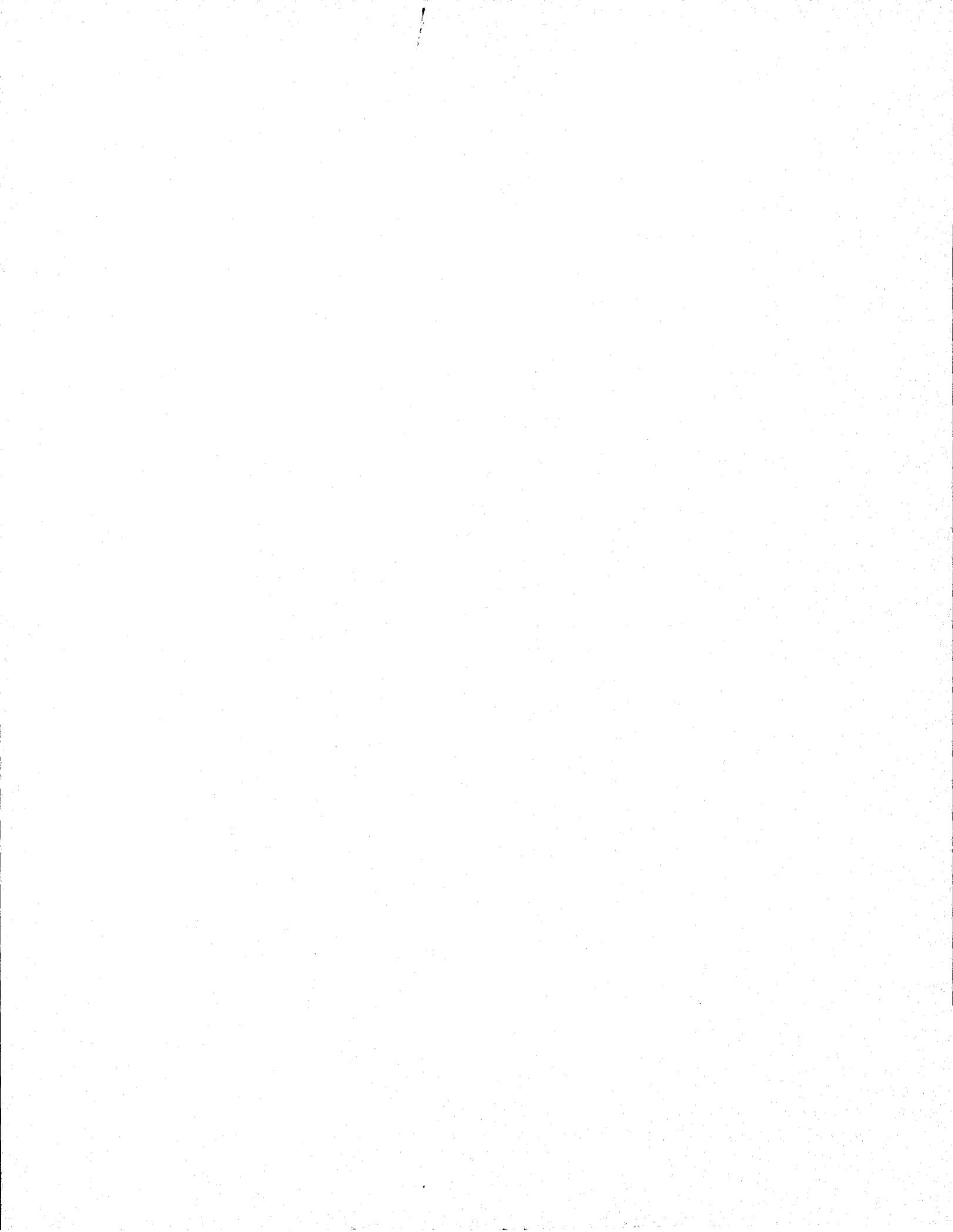
3. 2½ psychologists and psychiatrists are available to those children who need their specialized counseling skills. Each unit coordinator has administrative and counseling duties for a

cottage, and most have either an MSW, a master's degree in a related field, or are working toward one. The group living supervisors have some counseling duties and generally have bachelors' degrees. Volunteers and students from Weber State College are sometimes used under the supervision of the professional staff, generally in a paraprofessional role that has been well defined. Ex-offenders are used only if they qualify for the position.

4. Counseling is not a high priority at the school. It is used only as it relates to the behavior modification program. However, counseling services are available to those who need them.

METHOD OF IMPLEMENTATION

With the exception of participatory management and Paragraph 4, the school already meets or exceeds this standard. A change in priorities will be necessary to implement the remaining two areas.



END