



IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF FLORIDA  
TALLAHASSEE DIVISION

**FILED**

APR 2 1970

OFFICE OF CLERK  
U. S. DISTRICT COURT  
NORTH. DIST. FLA.

WILLIE CARL SINGLETON, a minor :  
by NEVA SINGLETON, his mother :  
and next friend, et al., :

Plaintiffs, :

vs. :

CIVIL ACTION NO. 963

BOARD OF COMMISSIONERS OF STATE :  
INSTITUTIONS, et al., :

Defendants. :

AMENDED REPLY TO PLAINTIFF'S OBJECTIONS PURSUANT  
TO COURT ORDER

Comes now the State of Florida Department of Health and Rehabilitative Services and files this Amended Reply to Plaintiff's Objections to Defendant's Desegregation Plan for the reason that Page 3 of Exhibit "A" filed on March 27, 1970 contained a scrivener's error and the attached page 3 designated as Exhibit "A" to this pleading should be substituted for the page 3 of Exhibit "A" of the pleading filed on March 27, 1970.

EARL FAIRCLOTH  
Attorney General

P. A. Pacyna  
Assistant Attorney General

Attorneys for Defendants  
The Capitol  
Tallahassee, Florida 32304

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. Mail to the attorney for plaintiffs Earl M. Johnson, 625 West Union Street, Jacksonville, Florida; Jack Greenburg, LeRoy D. Clark and Shelia Rush Jones at 10 Columbus Circle, New York, N.Y., this 1 day of April, 1970.

  
P. A. Pacyna

Mr. P. A. Pacyna  
March 27, 1970

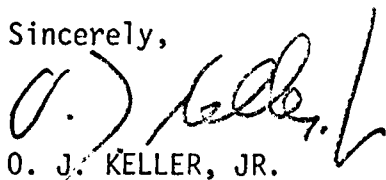
Page Three

staff members, black and white. We are proceeding with staff balancing at a rate consistent with institutional procedures, and at a rate that is not disruptive.

7. We are moving toward a more balanced ratio.

8. The Gilchrist School will operate under the same Equal Opportunity Employment policies outlined in #1. The Gilchrist School is designed for the most disturbed children in the Division of Youth Services, and will provide intensive treatment. Assignment will be based on need, regardless of race. Staff housing will be very limited -- ten to fifteen units, depending on legislative authorization. Eligibility for staff housing will be allotted based on staff position.

Sincerely,



O. J. KELLER, JR.  
Director

OJK:lla  
Enc.

EXHIBIT "A"

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF FLORIDA  
TALLAHASSEE DIVISION

**FILED**

MAR 30 1970

OFFICE OF CLERK  
U. S. DISTRICT COURT  
NORTH. DIST. FLA.

WILLIE CARL SINGLETON, a minor :  
by NEVA SINGLETON, his mother :  
and next friend, et al., :

Plaintiffs, :

vs. :

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BOARD OF COMMISSIONERS OF :  
STATE INSTITUTIONS, et al., :

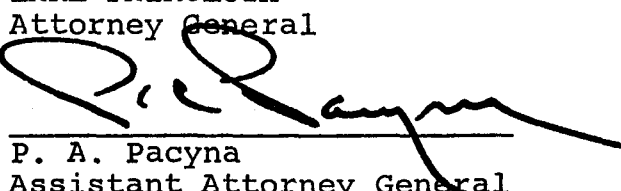
Defendants. :

REPLY TO PLAINTIFF'S OBJECTIONS PURSUANT TO  
COURT ORDER

Comes now the State of Florida Department of Health and Rehabilitative Services and files this reply to Plaintiff's Objections to Defendants' Desegregation Plan as well as the Progress Report currently reflecting the staff, student and activity desegregation previously filed but due to scrivener's error was dated March 24, 1969, rather than March 24, 1970.

Exhibit "A" attached hereto is the reply to Plaintiff's Objections to Defendants' Desegregation Plan and Exhibit "B" attached hereto is the staff, student and activities desegregation progress report previously filed on March 24, 1970.

EARL FAIRCLOTH  
Attorney General

  
P. A. Pacyna  
Assistant Attorney General

ATTORNEYS FOR DEFENDANTS  
The Capitol  
Tallahassee, Florida 32304

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. mail to the attorney for plaintiffs, Earl M. Johnson, 625 West Union Street, Jacksonville, Florida; Jack Greenburg, LeRoy D. Clark and Shelia Rush Jones at 10 Columbus Circle, New York, N.Y., this 27<sup>th</sup> day of March, 1970.

  
P. A. Pacyna

CLAUDE R. KIRK, JR.  
GOVERNOR

STATE OF



FLORIDA

JAMES A. BAX  
SECRETARY

DEPARTMENT OF HEALTH AND REHABILITATIVE SERVICES

DIVISION OF YOUTH SERVICES  
Bureau of Group Treatment — Central Office  
325 East Gaines Street, Tallahassee 32304

OLIVER J. KELLER, JR.  
DIRECTOR

RICHARD L. RACHIN  
CHIEF  
(904) 224-0181

March 27, 1970

Mr. P. A. Pacyna  
Assistant Attorney General  
Department of Legal Affairs  
The Capitol  
Tallahassee, Florida 32304

RECEIVED  
MAR 27 1970  
ATTORNEY GENERAL'S  
OFFICE

Dear Phil:

In response to your letter of March 7, following is a paragraph by paragraph reply to "Plaintiff's Objections to Defendant's Desegregation Plan."

1. Equal Opportunity Employment is the present policy of the Division of Youth Services. We recruit, hire, and promote the best-qualified individual, regardless of color. Our advertising, which is handled through the Division of Personnel and Retirement and through the Florida State Employment Service, states that we are an Equal Opportunity Employer. We recruit from all students in the appropriate subject matter areas in the major educational institutions in Florida. We follow a policy of promoting from within. When a promotion is available, it is advertised to all employees. All persons qualified under the Division of Personnel and Retirement standards are encouraged to apply. The best applicant will be promoted, regardless of race. We do not follow a quota system in employment or promotion policy. The attached personnel turnover figures indicate that it is difficult to hire and retain personnel of any description.

2. The allegation that white and black students are treated differently is without foundation. Treatment is based on behavior.

During the past several months, the Okeechobee School has implemented reality group therapy in its cottages. This new group therapy process causes behavior change through peer pressure, rather than staff counseling and supervision. It provides a means of controlling aggressive behavior other than by isolation with other

"A"

Mr. P. A. Pacyna  
March 27, 1970

Page Two

aggressive individuals. By means of this approach, Bunche Cottage has been integrated already. The remaining four cottages with all black populations will be integrated as the group therapy process proceeds.

3. Same response as #1. Note the personnel turnover figures. With regard to the principals, it is true that for a time there was only one representative of the academic program at staff meetings. That representative was the white principal, who was the senior of the two principals. Experience showed, however, that the single representative provided insufficient communication with the academic program, so the representation was broadened to include both principals.

4. Staff housing at Okeechobee is not reserved for white staff. Staff housing is allocated to those staff members whose jobs make it essential or highly desirable that they live on campus so as to be on call for emergency duty. The allocation is based on the position, not the race of the individual holding the position. Plaintiff fails to mention that there are also staff apartments available at the Okeechobee School, and that these have been allocated to black and white staff members.

There is insufficient staff housing at Okeechobee to make it generally available to all employees. The Division of Youth Services has repeatedly requested, and is again requesting in the 1970-71 legislative budget, additional staff housing. A request is also pending to establish a trailer park on the school grounds. If and when these requests materialize, housing will be made available to eligible employees without regard to race.

5. Black studies are presently part of the social studies curriculum for all students at the Okeechobee School. Haircuts in whatever style the student prefers are allowed for all students, provided the haircuts are of reasonable length.

6. Every effort is being made at the Florida School for Girls, both campuses, to balance the make-up of the staff. The situation differs from that of the other schools, in that the campuses are twelve miles apart. Most of the employees have been in their present posts for a number of years, and live in housing close to the campus where they work. Forced transfers of staff would result in resignations of

Mr. P. A. Pacyna  
March 27, 1970

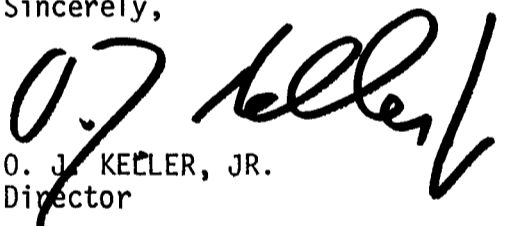
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staff members, black and white. We are proceeding with staff balancing at a rate consistent with institutional procedures, and at a rate that is not disruptive.

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Sincerely,



O. J. KEELER, JR.  
Director

OJK:11a  
Enc.

DEPARTMENT OF HEALTH AND REHABILITATIVE SERVICES  
DIVISION OF YOUTH SERVICES

PERSONNEL TURNOVER FOR MARIANNA

Month-Year Fiscal Year 19 <u>67-68</u>	I Number of Positions Authorized	II Number Employed at Beginning Of Month	III Number Hired During month	IV Number Terminated During Month	V Turn- over Percentage (IV/II)
July 19 <u>67</u>	180	178	9	6	3.4
August 19 "	180	179	6	8	4.5
September 19 "	180	176	18	8	4.5
October 19 "	214	191	24	4	2.1
November 19 "	214	211	3	12	5.7
December 19 "	214	200	9	10	5.0
January 19 <u>68</u>	214	200	9	8	4.0
February 19	214	200	7	8	4.0
March 19 "	214	200	3	4	2.0
April 19 "	214	199	7	8	4.0
May 19 "	214	197	9	11	5.6
June 19 "	214	197	16	8	4.1
TOTAL			120	95	

AVERAGE TURNOVER PER MONTH = 4.1 %

AVERAGE TURNOVER PER YEAR = 48.9 %

DIVISION OF YOUTH SERVICES

PERSONNEL TURNOVER FOR MARIANNA

Month-Year Fiscal Year 19 <u>68-69</u>	I Number of Positions Authorized	II Number Employed at Beginning Of Month	III Number Hired During month	IV Number Terminated During Month	V Turn- over Percentage (IV/II)
July 19 <u>68</u>	220	204	8	8	3.9
August 19 "	229	206	14	12	5.8
September 19 "	244	214	17	8	3.7
October 19 "	244	224	11	3	1.3
November 19 "	244	230	4	4	1.7
December 19 "	297	230	19	9	3.9
January 19 <u>69</u>	298	245	24	6	2.4
February 19 "	298	263	12	5	4.6
March 19 "	298	270	11	10	3.7
April 19 "	298	273	23	11	4.0
May 19 "	298	281	11	7	2.5
June 19 "	298	284	15	18	6.3
TOTAL			169	101	

AVERAGE TURNOVER PER MONTH = 3.7 %

AVERAGE TURNOVER PER YEAR = 43.8 %



DEPARTMENT OF HEALTH AND REHABILITATIVE SERVICES  
DIVISION OF YOUTH SERVICES

PERSONNEL TURNOVER FOR OKEECHOBEE

Month-Year Fiscal Year 19 <u>67-68</u>	I Number of Positions Authorized	II Number Employed at Beginning Of Month	III Number Hired During month	IV Number Terminated During Month	V Turn- over Percentage (IV/II)
July 19 <u>67</u>	187	179	5	3	1.7
August 19 "	187	183	6	9	4.9
September 19 "	187	181	3	5	2.8
October 19 "	187	176	8	6	3.4
November 19 "	187	172	9	7	4.1
December 19 "	187	180	4	2	1.1
January 19 <u>68</u>	187	183	3	9	4.9
February 19	187	174	7	5	2.9
March 19 "	187	177	10	8	4.5
April 19 "	187	181	4	3	1.7
May 19 "	187	182	6	5	2.7
June 19 "	187	183	8	7	3.8
TOTAL			73	69	

AVERAGE TURNOVER PER MONTH = 3.2 %

AVERAGE TURNOVER PER YEAR = 38.5 %

DEPARTMENT OF HEALTH AND REHABILITATIVE SERVICES  
DIVISION OF YOUTH SERVICES

PERSONNEL TURNOVER FOR OKEECHOBEE

Month-Year Fiscal Year 19 <u>68-69</u>	I Number of Positions Authorized	II Number Employed at Beginning Of Month	III Number Hired During month	IV Number Terminated During Month	V Turn- over Percentage (IV/II)
July 19 <u>68</u>	209	Not Available			
August 19 "	209	Not Available			
September 19 "	211	Not Available			
October 19 "	211	197.00	18	11	5.6
November 19 "	211	204.00	22	8	3.9
December 19 "	271.50	218.50	25	8	3.7
January 19 <u>69</u>	271.50	222.50	13	7	3.1
February 19 "	271.50	228.50	13	14	6.1
March 19 "	271.50	227.50	21	11	4.8
April 19 "	271.50	237.50	11	12	5.1
May 19 "	271.50	237.50	8	8	3.4
June 19 "	271.50	231.50	29	11	4.8
TOTAL			160	90	

AVERAGE TURNOVER PER MONTH =  
AVERAGE TURNOVER PER YEAR = 40.5 %