

U.S. DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA
RECD AUG 25 1998
RICHARD T. MARTIN
CLERK

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA

HAYES WILLIAMS, ET AL

CIVIL ACTION NO. 71-98-B

VERSUS

JOHN J. MCKEITHEN, ET AL

AND

IN RE: JUVENILE FACILITIES

CIVIL ACTION NO. 97-0001-B-1

AND

IN RE: TALLULAH CORRECTIONAL
FOR YOUTH

CIVIL ACTION NO. 97-0655-B-1

AND

IN RE: JETSON CORRECTIONAL CENTER
FOR YOUTH

CIVIL ACTION NO. 97-0666-B-1

AND

IN RE: SWANSON CORRECTIONAL CENTER
FOR YOUTH

CIVIL ACTION NO. 97-0667-B-1

AND

IN RE: LOUISIANA TRAINING INSTITUTE
- BRIDGE CITY

CIVIL ACTION NO. 97-0668-B-1

**RESPONSE OF DEPARTMENT OF PUBLIC SAFETY &
CORRECTIONS TO COURT'S AUGUST 10, 1998 ORDER**

On August 10, 1998, this Court directed the Department of Public Safety & Corrections (the "DPSC") to submit a report on the current status of the "priority" issues identified as Exhibits A through K on the August 10, 1998 status conference agenda. The Court also directed the DPSC to report on the status of education services, mental health services and violence at the four secure juvenile facilities.

File New Need

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The attached exhibits respond to the Court's August 10, 1998 Order. Exhibit 1 describes initiatives in the delivery of education services throughout the secure juvenile system as well as the current status of educational services within the four individual institutions. Exhibit 2 is a report on mental health services. Again, this section includes a discussion of systemic mental health issues as well as mental health issues pertaining to the individual facilities. Exhibit 3 describes the current status of violence and investigations of violence within the secure juvenile facilities.

Exhibits A through K contain the DPSC response to the corresponding items on the August 10, 1998 Agenda. There is some overlap between the three issues addressed in Exhibit 1 through 3 and the issues addressed in Exhibits A through K. The areas of redundancy are referenced.

The attached exhibits generally discuss many issues that are addressed in the latest Department of Justice reports. The DPSC will not directly respond to the Department of Justice findings in the attached exhibits. The DPSC takes issue with many of the findings in the Department of Justice reports, but it is not the intent of this document to respond to specific Department of Justice findings.

The DPSC consistently has demonstrated its commitment to improve the State's juvenile correctional system. The wardens of the four secure juvenile facilities and the staff of the DPSC and the individual institutions continue to respond to valid concerns and criticisms raised by the Court's expert, the Department of Justice and others. The wardens and staff of the DPSC and the secure juvenile correctional facilities have made solid progress through perseverance and dedication.

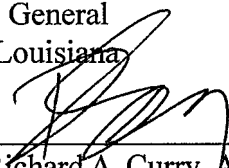
The Department of Justice has recognized major improvements in the area that the Department of Justice originally identified as its greatest concern - allegations of abuse. The early Department of Justice investigations alleged serious staff on offender violence at all four juvenile facilities. *See, e.g.*, DOJ letters dated July 15, 1996 and October 3, 1996. The Department of Justice itself now recognizes that staff violence on juveniles has been dramatically reduced as a result of Project Zero Tolerance and efforts at the individual facilities. *See, e.g.*, DOJ Response to March 10, 1998 Order, p. 3, and Reports of Nancy Ray attached to that Response. The Department of Justice and its consultants also acknowledge significant improvements in other areas of particular concern to the Department of Justice, including, for example, increasing the length of the school day throughout the system (Sheri Meisel, July 6, 1998 Report, p. 6); enhanced PZT rounds, better tracking of PZT investigations, and reduced use of chemical restraints at JCCY (Nancy Ray Report - JCCY, March, 1998, pp. i-ii, 2-6); and increased high school equivalency diplomas, an honor dorm and other positive rewards, increased visitation and recreation, and after care program at SCCY (Nancy Ray Report - SCCY, April, 1998, pp. i, 2-4).

The attached exhibits were prepared predominantly by DPSC staff at the four juvenile facilities and by program staff at DPSC headquarters. The exhibits describe preliminary findings, ongoing and developing initiatives, and plans for future projects within the secure juvenile system. Some of the preliminary conclusions may prove to be erroneous; the initiatives described in these exhibits may further change and develop; and many of the plans for future projects may not be realized in the form in which they are now envisioned. Nevertheless, the exhibits accurately depict

the DPSC's response to these issues. The exhibits reflect the DPSC's determination to continue effecting positive changes within the system.

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CERTIFICATE

I hereby certify that a copy of the above and foregoing has been mailed to all counsel of record, this 25th day of August, 1998.

