



NEW YORK CITY DEPARTMENT OF CORRECTION

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Mr. Gordon Campbell  
Chair  
NYC Board of Correction  
51 Chambers Street  
New York, NY 10007

Request for Variance: Young Adult Housing

Dear Mr. Campbell:

The New York City Department of Correction intends to create housing with age appropriate programming for young adults, ages 18-21 years old, in DOC custody.

In order to house young adults together in the same housing areas, we kindly request that the Board of Correction issue a variance from standard 1-02 (b)(2) that requires male adults ages 19 and over be housed separate from male minors, ages 16-18 inclusive. As you know, because of the change in State Correction Law, 18 year olds can no longer be housed with adolescents (defined as 16-17 year olds) and because of the BOC standard, they cannot be housed with adults, therefore putting 18 year olds into a housing category of their own. This variance will also us to house 18 – 21 year olds together, and provide age appropriate programming.

We believe that the spirit of standard 1-02 (b)(2) was to separate young people from adults in custody. Our approach to creating young adult housing is very much the same. By housing the young adults together we will be able to keep them separate from the adults in our population as they work through the transition out of adolescence. There is research that shows that young people's cognitive development continues until their early- to mid-twenties; however we think that in a jail environment, there is a significant difference between 18 year olds and 24 year olds and after much discussion, have determined to limit young adult housing to those between 18 and 21.

### Background

The Department's plan to house 18-21 year olds in the same location presents an opportunity to provide this group of inmates with services that will have a positive impact on safety, inside and outside of jails. Incarcerated young adults in this age group are disproportionately affected by poverty, homelessness, poor employment prospects, and drug use – all of which contribute to their involvement with the criminal justice system. Preliminary estimates suggest that about 80 percent of 18-21 year olds did not have steady employment before their incarceration and need assistance in order to secure a job upon release.<sup>1</sup> The majority of inmates in this age group do not have a high school degree or equivalency, an estimated 85 percent have substance use histories,<sup>2</sup> and about 9 percent do not have a home.<sup>3</sup> Nearly 45 percent of 18-21 year olds are re-admitted to DOC custody within a year of their release.<sup>4</sup>

### Education

All 18-21 year olds are eligible for school services, although not all attend school. One significant gain we can make by cohorting these young adults together is to incentivize and encourage more young people to attend school each day. In the current environment, we transfer adolescents to school facilities if they are admitted to jails without them.

<sup>1</sup> The employment percentage is based on the proportion of ICAN clients who score high on employment needs.

<sup>2</sup> Youth's Needs and Services / Findings from the Survey of Youth in Residential Placement. Juvenile Justice and Delinquency Prevention. April 2010. <https://www.ncjrs.gov/pdffiles1/ojdp/227728.pdf>.

<sup>3</sup> The homelessness percentage is based on the number of inmates who report a shelter as their address.

<sup>4</sup> A proportion of these inmates are re-admitted on the same charge, rather than for a new offence.

By housing all eligible inmates together, we will be able to make school attendance a natural part of the day, as it is for adolescents, and allow DOE to do targeted recruitment for those who are reticent in enrolling in school. We can also work to provide those inmates who are not interested in high school or high school equivalency education with technical education that they may find more valuable.

**Re-entry**

The I-CAN program gives adult inmates (age 19+) who are at the highest risk of returning to jail a chance to earn their GED, stay sober, get a job and achieve other important milestones. At EMTC, some inmates participate in Workforce 101 workshops, which help them develop job readiness skills and gain employment after release. However, the scope of these initiatives is limited, with just under ten percent of inmates participating in skill-building activities at any given time. Introducing comprehensive reentry services available to all 18-21 year olds in their housing areas will transform the jail environment and help achieve the highest levels of safety in the jails and in New York City's neighborhoods.

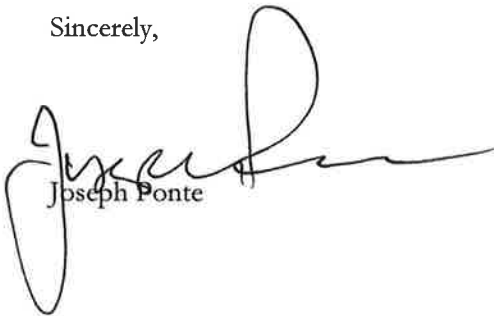
The program will offer daily program services and evidence-based reentry services to 18-21 year olds who stay in custody for at least four days, long enough to get transferred out of new admission housing. Programming will take place daily in the schools and housing areas and will include focus on DOE-provided educational services, vocational and technical educational opportunities, cognitive behavioral therapy and increased access to recreation and related activities. In addition, time during the day will be spent on preparation for reentry by focusing on the areas of greatest need. Research shows that reentry services are most effective when they 1) target inmates' criminogenic needs, or needs that are linked to recidivism, and 2) include jail and community-based components. The proposed program will address inmates' criminogenic needs by focusing on education, job readiness, cognitive behavioral therapy, and family engagement services. Inmates will also participate in athletic activities and creative arts, which reduce tension and promote positive youth development. These core services will be available to all inmates in the housing areas.

**Longer term plans**

We are also in the process of developing programs for inmates who require assistance with housing and substance use, and are interested in vocational skills and intensive job training to develop marketable job skills. This longer term plan may include specialized services in the jails and comprehensive services in the community.

We plan to implement young adult housing immediately upon receiving approval from the Board. Thank you for your consideration.

Sincerely,



Joseph Ponte