SB 439 Implementation Guide

Guidance for Senate Bill 439 Implementation:

Ending the Prosecution of Children Under the Age of 12

How did the law change with SB 439?

- ☐ Children under age 12 cannot be prosecuted except for murder or rape, sodomy, oral copulation, or sexual penetration, by force, violence, or threat of great bodily harm.
- ☐ Children under age 12 cannot be arrested or securely detained (with the exception for murder or forcible sex offenses listed above), as no delinquency or criminal court has jurisdiction over them.
- ☐ Counties must develop a protocol for addressing alternatives to prosecution for children under age 12 by January 1, 2020.
  - *Note: juvenile court jurisdiction is no longer permissible starting January 1, 2019. In the meantime, counties should develop an interim plan to address the individual needs of the small number of children who come in contact with law enforcement.*

Guiding Principles for Developing a County Plan

The explicit language of SB 439 provides several guiding principles that are critical for developing effective County Plans that keep with the spirit of the law:

- ☐ Counsel and release should be the default in the vast majority of cases.
- ☐ Responses thereafter should be the least restrictive alternatives through available school, health and community-based services.
- ☐ Any intervention at all should be avoided wherever possible (recognizing the research on desistance that show many youth who exhibit a problematic behavior do better without any intervention than with some).

Likewise, compliance with SB 439 should also ensure that other systems - like education - adopt intervention approaches that support young people and their families by addressing root causes of behavior and reducing reliance on harsh discipline to address youth misbehaviors.

SB 439
Implementation Guide

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Overview of SB 439

In 2018, Governor Brown signed into law SB 439 (Holly J. Mitchell). SB 439 established a minimum age of juvenile court jurisdiction for status and delinquency offenses in California, except in the most serious cases of murder, rape, sodomy, oral copulation, or sexual penetration, by force, violence, or threat of great bodily harm. The intent of SB 439 is to protect children under 12 years old from the harms and adverse consequences of justice system involvement and to encourage more effective alternatives to prosecution.

It also aligns California with the minimum age recommendations of national and international treaties and bodies, including the United Nations Convention on the Rights of the Child, the American Academy of Pediatrics, the American Bar Association, and the National Academy of Sciences, all of which recognize the developmental vulnerabilities of young children in the context of the justice system.

The law specifies that if children ages 11 and younger come into contact with law enforcement, law enforcement officials must release those children to the care of their parent, guardian, or caregiver. This means that children ages 11 and younger may not be arrested, booked, incarcerated, or brought before a judge (with a few exceptions detailed below). The Legislature intends for counties to pursue appropriate measures to serve and protect children as needed, avoiding any intervention whenever possible, and using the least restrictive alternatives through available school-, health-, and community-based services .

It should be noted that this law affects a small number of children who are accused of generally low-level offenses. When children age 11 and younger are referred to the justice system, the vast majority of the cases are dismissed without further formal processing. In 2017, there were only 637 children age 11 and younger who were referred to county probation departments, and there were only 56 children who had a case petitioned in court. Furthermore, system involvement has not been an effective response to address the underlying causes of the behaviors exhibited by children 11 and younger. For those children in need of services, there is a more efficient and less harmful way to connect them to services outside of processing them through the justice system. The law now requires such an alternative.

The section of the law that sets the minimum age for juvenile court jurisdiction at 12 years old went into effect on January 1, 2019. The section of the law that requires each county to create a least-restrictive response protocol for children 11 and younger goes into effect on January 1, 2020.

The law specifies that the County shall develop a process for determining the least restrictive response that may be used instead of, or in addition to the release of the minor to the parent, guardian, or caregiver. Although the County does not have authority over the local law enforcement agencies outside of the County Sheriff's Department, the law requires that the County develop the process and framework that will guide local law enforcement agencies in their interactions with children age 11 and younger. This may also include facilitating MOUs between community-based organizations (CBOs) and law enforcement agencies.

Key Steps for Developing a Plan for SB 439 Implementation

Minimum age of juvenile court jurisdiction is 12.

Develop County Plan

Countywide Plan must be approved.

Right Now

Dismiss Jurisdiction

For children currently involved in the justice system for an offense allegedly committed when they were under the age of 12:

Step 1: Investigate number of children currently on any form of probation (See Appendix D).

Step 2: Investigate number of children detained pre-adjudication in juvenile hall for an offense allegedly committed when child was under the age of 12.

Step 3: If necessary, motion juvenile court to dismiss jurisdiction for children identified in step 1 or step 2.

Step 4: Where relevant, hold immediate detention hearing to release child from juvenile hall to parent or guardian.

Step 5: Identify any needs of children and refer to appropriate community-based organization or county agency that may serve the needs of the child.

Develop Interim Plan

For a child under the age of 12 who comes in contact with the justice system before an approved countywide plan is developed:

Step 1: Identify departments and agencies that law enforcement or school officials may contact when release to parent or guardian is deemed insufficient.

Step 2: Develop an interim plan (see Appendix A and B).

By January 1, 2020

Develop Countywide Plan

The language of SB 439 provides several guiding principles for developing effective county plans that keep with the spirit of the law including (1) Counsel and release should be the default in the vast majority of cases; and (2) Responses thereafter should be the least restrictive alternatives through available school, health and community-based services.

Step 1: Establish committee to develop plan.

Step 2: Set timeline for developing plan.

Step 3: Identify Departments, Agencies, and organizations that should be involved (e.g. police departments, justice system stakeholders, schools, community-based organizations).

Step 4: Map existing programming and services that focus on positive youth development and may be appropriate referrals for young children and families based on best practices.

Step 5: Identify gaps in services and explore new partnerships.

Step 6: Develop protocols on how to respond to children under age 12 who would have otherwise been prosecuted under prior laws.

Step 7: Develop MOU between law enforcement and service providers including county agencies and departments and/or CBOs.

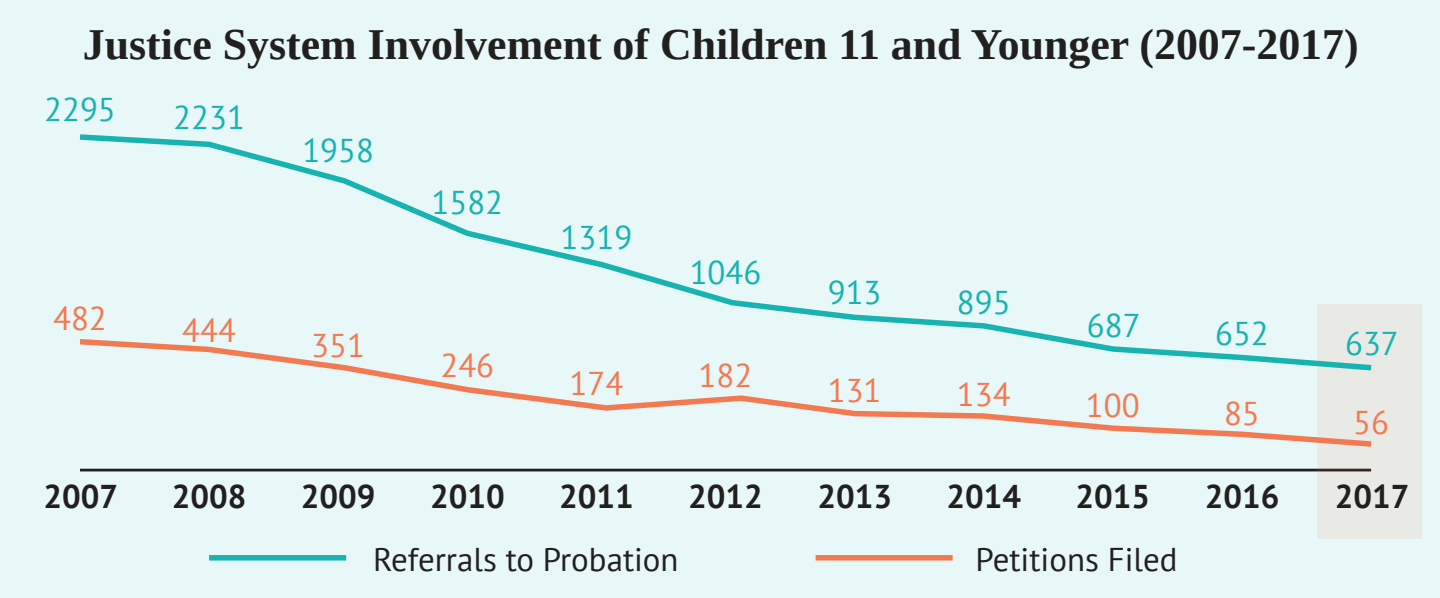
Key Data on Justice System Involvement for Children Under 12 Years Old

To better understand the number of children who will be affected by SB 439, data from the California Department of Justice (DOJ) from 2007-2017 are included below[1]. It should be noted that the number of children under the age of 12 referred to the justice system every year is relatively small and accounts for less than one percent of all justice system referrals. The analysis reveals a dramatic decrease in the number of children under 12 who are referred to the justice system. Referrals to probation decreased by 72 percent and petitions decreased by 88 percent from 2007 to 2017. Importantly, every year, young children of color were significantly more likely to be referred to probation and petitioned.

1 Office of the Attorney General, California Department of Justice (DOJ). (2007-2017). Provided by special request, on file with the authors.

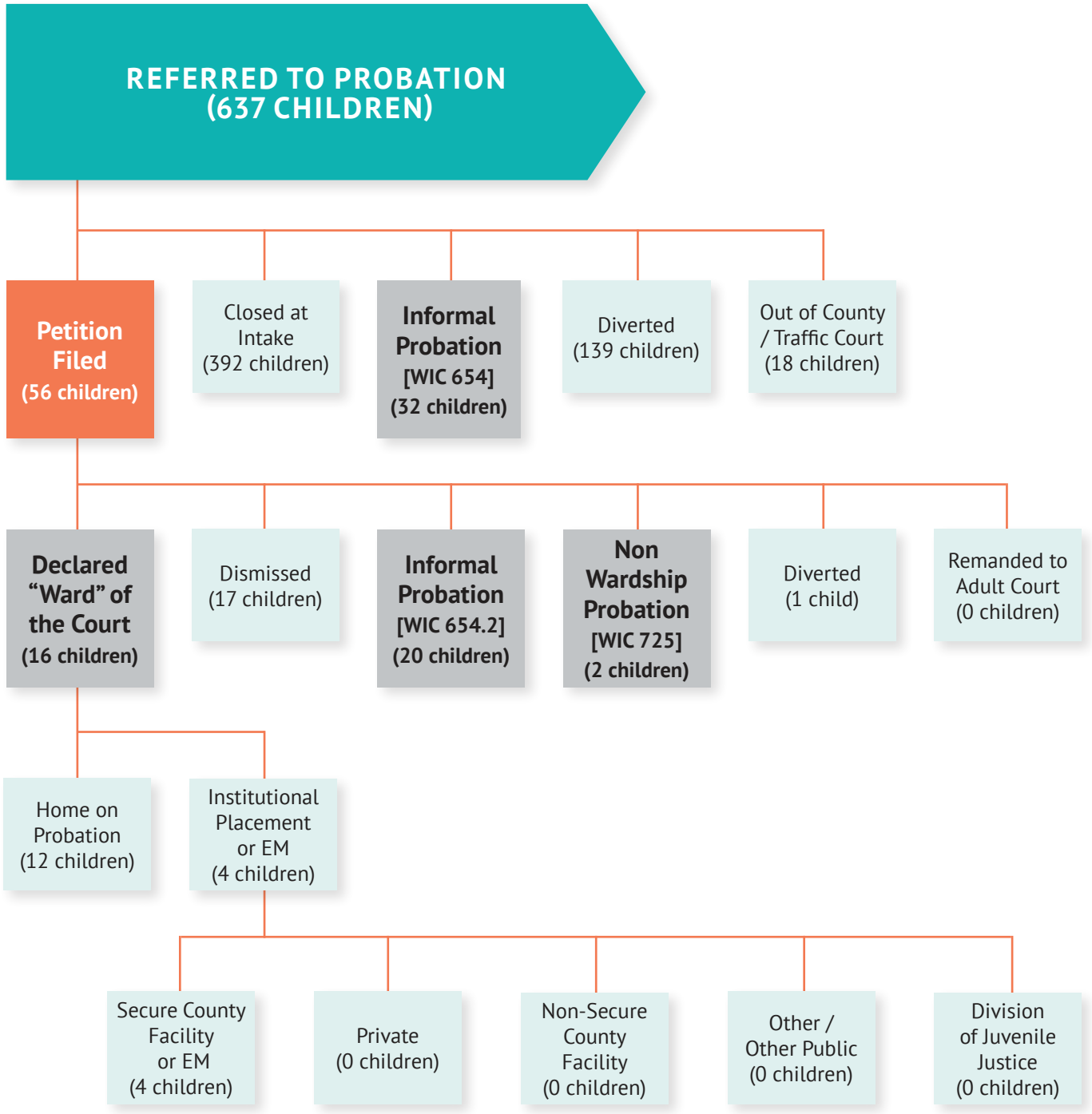
To better understand more recent trends in justice system involvement for children under the age of 12, data are analyzed at key decision-making points in the justice system:

- Referrals to Probation;
- Petitions Filed; and
- Probation Supervision, including:
  - » WIC § 654 Probation (pre-petition informal probation limited to 6 months);
  - » WIC § 654.2 Probation (informal probation limited to 6 months);
  - » WIC § 725 Probation (non-wardship probation limited to 6 months); and
  - » WIC § 602 Wardship Probation.



2017 DOJ Data on Children Under 12 Referred to the Justice System

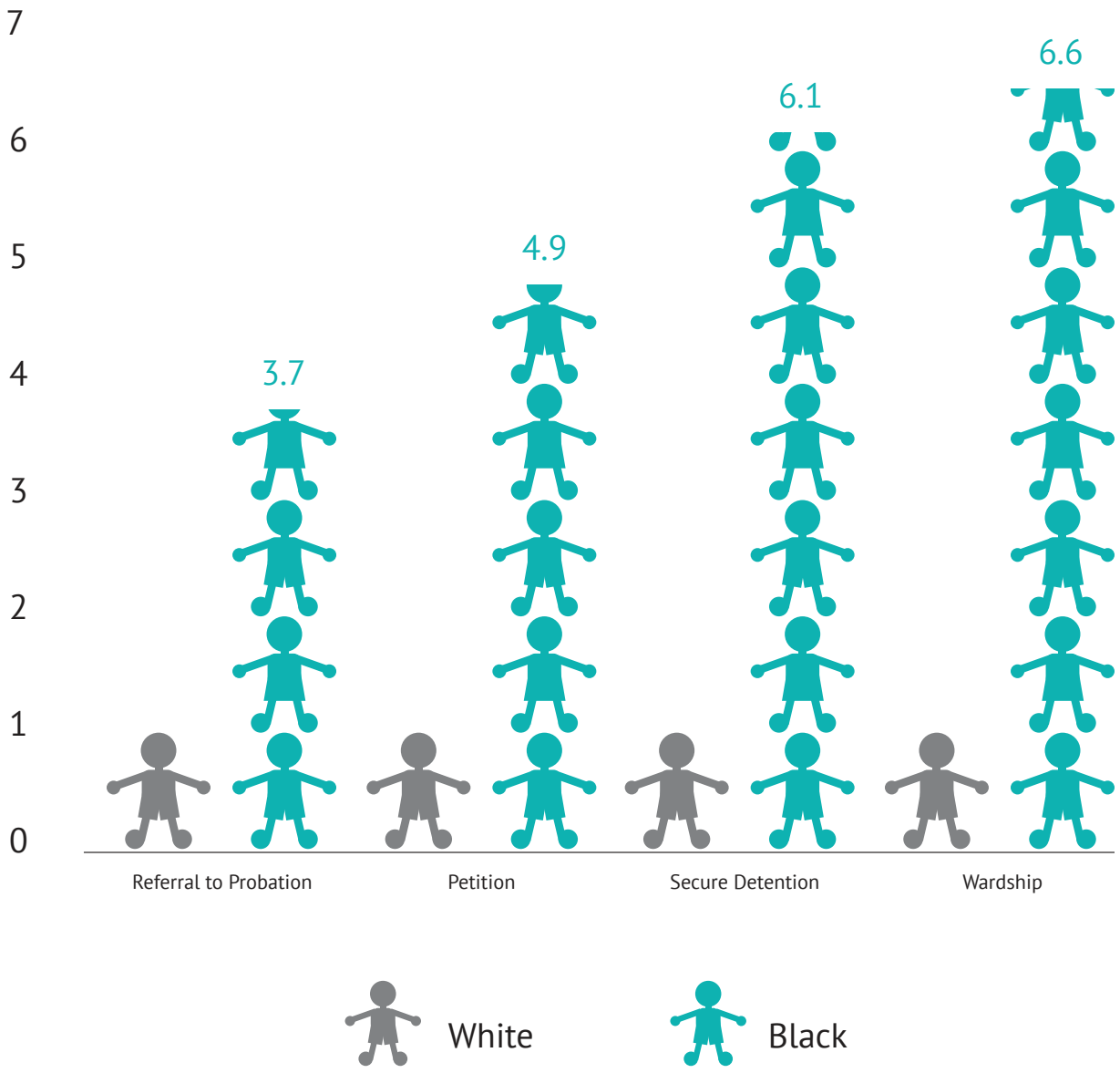
Analysis of 2017 DOJ data revealed that state-wide only 637 children were referred to Probation; 56 had a petition filed; and 70 were under some form of probation supervision, the vast majority of them, informal.



Racial and Ethnic Disparities in Justice System Involvement

Prior to SB 439, young children of color bore the brunt of justice system involvement. For example, from 2007-2017, Black children 11 years old and younger were 3.7 times as likely to be referred to probation; 4.9 times as likely to have a case petitioned in juvenile court; 6.1 times as likely to be securely detained; and 6.6 times as likely to become formal wards of the court.

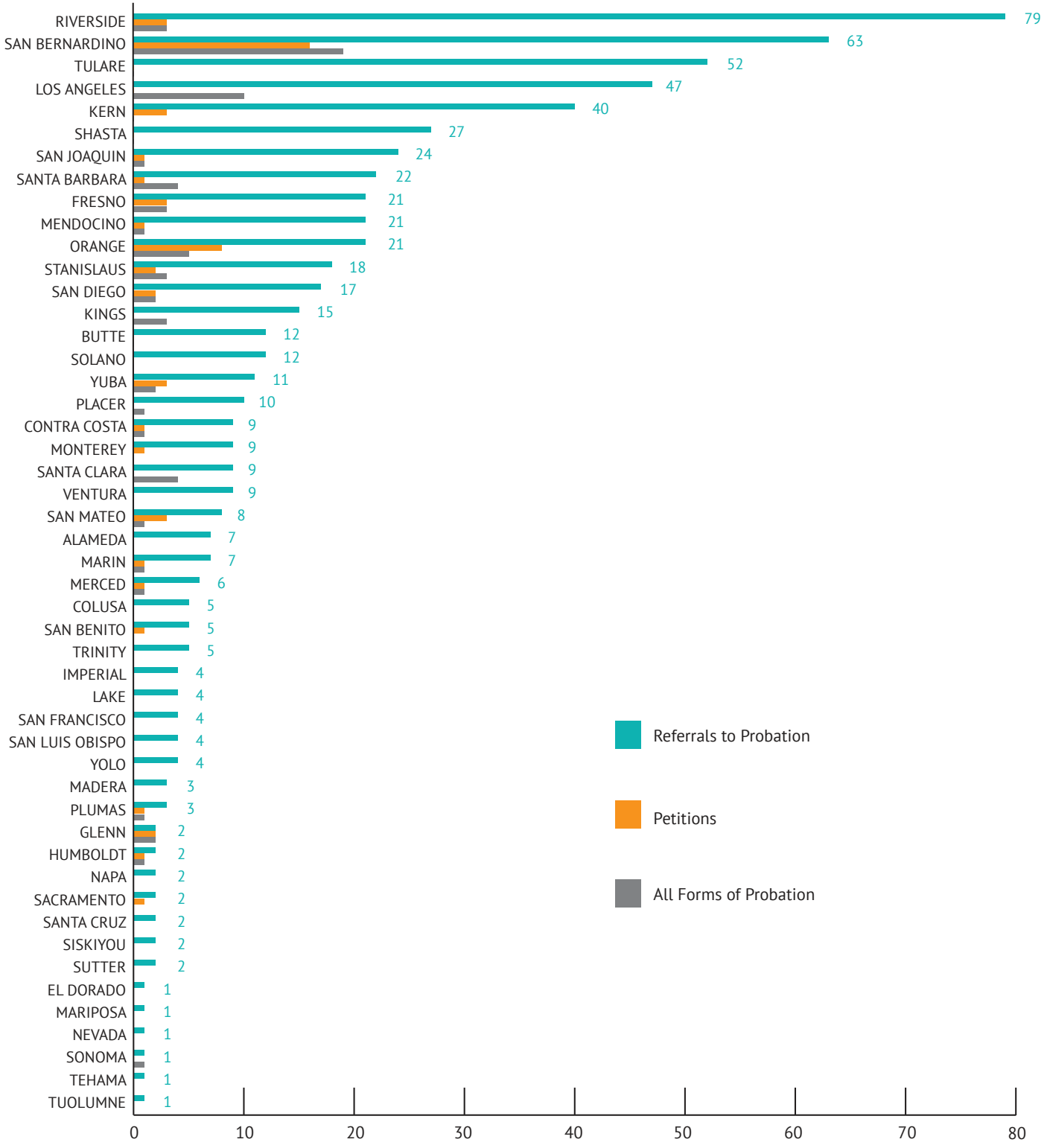
Cumulative Disadvantage for Black Youth
Children 11 and Younger (2007-2017)



SB 439 was passed to ensure that young children are not criminalized and swept into a system that will cause them more harm than good. Data show that many of the youth who are impacted by SB 439 are youth of color. As counties work to implement the law, they must ensure they do not simply shift youth of color from the justice system to another institution or system where they may not experience better outcomes. Local alternatives should be culturally and linguistically responsive and work to keep youth in their families and communities with support to thrive.

Probation Referrals; Petitions; and Probation Supervision (2017)
(Children 11 and Younger)

To ensure counties with the highest numbers of children under the age of 12 referred to the justice system are prepared for SB 439 implementation, the analysis below includes a county breakdown of justice system decision making points referenced above (See Appendix C for more information).



Considerations in Developing a Countywide Plan

Considerations for Law Enforcement Agencies

The County should develop an MOU with law enforcement agencies that provides a framework for how police will handle interactions with children age 11 and younger. MOUs should include:

1. **Contact with children under the age of 12.**
   - Develop a protocol to ascertain child's age.
2. **Referrals for children under the age of 12.**
   a. In the vast majority of cases → Counsel and release to parent, guardian or caregiver.
   b. If the child is in need of services → Establish formal process for selecting the CBOs or government agencies to which children should be referred. A list of qualified service providers should be consulted.
   c. If the child presents as a harm to themselves or others → Follow protocol for temporary Welfare and Institutions Code Section 5585, involuntary commitment under the Lanterman-Petris Short Act.
   d. If the child is a victim of abuse or neglect → Follow protocol for contacting Health and Human Services.
   e. If the physical environment poses an immediate threat to the child's health or safety → Follow the protocol for contacting Health and Human Services.
   f. If the child is missing from another jurisdiction → Follow protocol for contacting National Crime Information Center (NCIS) if there is a missing child report on file.
3. **Restrictions on Data Collection.**
   a. No law enforcement agency shall collect data related to contact with youth under 12.
   b. No information regarding the child's contact with law enforcement should be shared with anyone outside of the parent, guardian, caregiver or service provider.
4. **Training.**
   a. Every law enforcement agent should be trained on the new protocol.

The California DOJ issued an information bulletin for law enforcement agencies on SB 439 compliance. For more information, please contact the California DOJ Division of Law Enforcement.

Sample county alternative to arrest protocol and guidance to police officers should be provided to law enforcement agencies including:

- ☐ Age verification process
- ☐ Transportation only when necessary
- ☐ No questioning
- ☐ No handcuffing
- ☐ Phone calls to parent, guardian, or caregiver
- ☐ Documentation/data sharing with CBO
- ☐ Communication procedure with CBO
- ☐ Referral process to CBO / Government Agency

Considerations for School Districts

Schools districts should be made aware of the new law and receive training on where to refer children whom they may have otherwise referred to law enforcement agencies. Because children age 11 and younger may no longer be processed by the juvenile court system for most offenses, it is recommended that school resource officers (SROs) not be onsite at elementary schools. Teachers, administrators, and all other school personnel (including those SROs still on campus) should undergo training on positive alternatives to arrest. Instead of referring children to law enforcement, schools should refer children to one of their service provider partners, including those run by CBOs, or county or city departments. If none are appropriate for the particular needs of the child, schools should consult the County Alternative to Arrest Protocol to determine which entity is most appropriate to help the child, given the needs of the particular child.

Appendix A:

Los Angeles County Draft Interim Protocol

SB 439 SUPPORT TEAM RESPONSE – TEMPORARY PROTOCOL

Guiding Principles for SB 439 Implementation:

- End arrest, detention and prosecution of children under 12, except in murder and forcible rape cases.
- Avoid interventions wherever possible; counsel and release to family should be the default in the vast majority of cases.
- Responses thereafter should be the least restrictive alternatives through available school, health and community-based services.
- Dependency system intervention should also be sparing.

STEP 1
Police officer has contact with a child

STEP 2
Officer ascertains age using department protocols

STEP 3
If under 12...

Officer contacts family

STEP 4
If under 12, and not counseled/released, officer can take youth into temporary custody if the officer has reasonable cause to believe:

- The child is a victim of abuse or neglect, there is suspicion of abuse and neglect, or is immediate danger of physical or sexual abuse → call DCFS 24/7 hotline: (800) 540-4000
- The child has an immediate need for medical care → take child to the hospital
  Children's Hospital of Los Angeles: 4650 Sunset Blvd, Los Angeles, CA 90027
  UCLA Mattel Children's Hospital: 757 Westwood Plaza, Los Angeles, CA 90095
- The physical environment poses an immediate threat to the child's health or safety →
  Call DCFS 24/7 hotline: (800) 540-4000
  Call FARS (Family Able to Resolve Situations, a family mediation program, open M-F, 9-5): (310) 970-7701
- The child is missing from another jurisdiction and there is a missing child report on file with the National Crime Information Center → Call NCIC 24/7 hotline: (304) 625-2000
- There is an active warrant from another county or state → call LA County Probation: (866) 931-2222
- The child presents as a harm to him/herself or others → follow policies for temporary 5585 involuntary commitment under the Lanterman-Petris Short Act. Protocol can be found at:http://m.policy.dcfs.lacounty.gov/Src/Content/Expedited_Joint_Response.htm

Default: Counsel and Release (refer to community-based services where appropriate)

YDD Diversion

Call 2-1-1

Prevention-After care Networks (call 211 to request)

Additional Communications and Support

STEP 5
Within 48 hours, referring law enforcement agency should report contact and/or referral to ODR: email Judge Peter Espinoza, PEspinoza2@dhs.lacounty.gov

Once youth is referred, systems are assumed to utilize their internal protocols for further responses. For additional support or alternative responses, systems may contact YDD to utilize the on-call SB 439 Support Team for multi-disciplinary assistance.

Appendix B:

Santa Clara County Draft Interim Protocol

SANTA CLARA COUNTY JUVENILE PROTOCOL FOR YOUTH UNDER AGE 12 **

Guiding Principles for SB 439 Implementation:

- End arrest, detention and prosecution of children under 12, except in murder and forcible rape cases. ***
- Avoid interventions whenever possible, counsel and release to family should be the default in most cases.
- Responses should be the least restrictive alternatives through available school-, health-, & community-based services.
- While dependency courts have broad discretion to take jurisdiction over a child, best practices research advises that dependency system intervention should also be sparing, and a last resort.

STEP 1
Law Enforcement has contact with a Child

STEP 2
Law Enforcement ascertains age using department protocols

STEP 3
If Child is under 12

DEFAULT: Counsel and Release (Community-Based Service referrals, where appropriate)

STEP 4
Officer contacts Family

STEP 5
If no Parent, Guardian, or Family Member, call CANC** for Joint Response: (833) 722-5437**

If under 12, and not counseled/released, officer can take youth into temporary custody if the officer has reasonable cause to believe:

- The child is a victim of abuse or neglect. If there is suspicion of abuse and neglect, or there is an immediate danger of physical or sexual abuse → call DFCS 24/7 hotline: (833) SCC-KIDS (722-5437)
- The child has an immediate need for medical care -> take child to the hospital
- Valley Medical Center, 751 S. Bascom Avenue, San Jose, CA 95128
- The physical environment poses an immediate threat to the child's health or safety → Call DFCS 24/7 Hotline: (833) SCC-KIDS (722-5437) to request Joint Response.
- If parents are not immediately available or unwilling to accept the youth, call Bill Wilson Center (408) 243-0222 or (408) 850-6164.
- The child is missing from another jurisdiction and there is a missing child report on file with the National Crime Information Center (FBI) -> Call NCIC 24/7 hotline: (304) 625-2000
- There is an active protective custody warrant from another county or state -> call Santa Clara Juvenile Probation Dept. 408-278- 5818
- The child presents as a harm to him/herself or others -> follow policies for temporary involuntary commitment of a minor (WIC §5585) (§5150 for minors). 72 hour hold.

If Additional Services are needed, call:

Bill Wilson
SOS Crisis Hotline (24/7)
408-278-2585

Community Solutions
SOS Crisis Hotline (24/7)
(South County Only)
408-683-4118

** This document serves as an interim protocol to implement SB 439, (amending WIC §601, §602, and §602.1) as the county develops a long-term protocol by January 1, 2020 as mandated by WIC §602.1(c).

*** If the child is under 12, and accused of murder, forcible rape, forcible sodomy, forcible sexual penetration or forcible oral copulation, law enforcement may take a child into custody pursuant to WIC §625.

**** CANC: Child Abuse and Neglect Center

Appendix C: Offenses Referred and Petitioned for Children Under 12 Years Old (2017)

	Refer to Probation		Petition to Court		
	#	% of total referred	#	% of total Petitioned	% of Referred that were petitioned
Assault and Battery (M)	152	24%	7	13%	5%
Assault (F)	57	9%	12	21%	21%
Runaway (Status)	55	9%	0	0%	0%
Burglary (M)	15	2%	0	0%	0%
Burglary (F)	38	6%	9	16%	24%
Vandalism (M)	52	8%	0	0%	0%
Weapons (M)	26	4%	1	2%	4%
Weapons (F)	24	4%	6	11%	25%
Other Misdemeanor	28	4%	2	4%	7%
Other Felonies	22	3%	4	7%	18%
Arson (F)	21	3%	3	5%	14%
Lewd or Lascivious (F)	21	3%	5	9%	24%
Petty Theft (M)	18	3%	1	2%	6%
Disturbing the Peace (M)	15	2%	0	0%	0%
City/County Ordinance (M)	13	2%	1	2%	8%
Other Sex (F)	11	2%	1	2%	9%
Truancy (Status)	11	2%	0	0%	0%
Marijuana (M)	10	2%	0	0%	0%
Robbery (F)	9	1.4%	1	2%	11%
Other Theft (M)	8	1.3%	0	0%	0%
Trespassing (M)	8	1.3%	0	0%	0%
Theft (F)	5	0.8%	0	0%	0%
Annoying Children (M)	4	0.6%	0	0%	0%
Motor Vehicle Theft (F)	3	0.5%	1	2%	33%
Incorrigible (Status)	2	0.3%	0	0%	0%
Indecent Exposure (M)	2	0.3%	0	0%	0%
Other Status Offenses	2	0.3%	1	2%	50%
Curfew (Status)	1	0.2%	0	0%	0%
Forcible Rape (F)	1	0.2%	0	0%	0%
Joy Riding (M)	1	0.2%	1	2%	100%
Kidnapping (F)	1	0.2%	0	0%	0%
Obscene Matter (M)	1	0.2%	0	0%	0%
Total	**637**	**100%**	**56**	**100%**	**8.8%**

Appendix D: County Data on Children Under 12 Involved in the Justice System (2017)

	Referrals	Petitions	Some form of Probation Supervision	Pre-Petition Informal Probation (WIC 654)	Informal Probation (WIC 654.2)	Non-Ward Probation (WIC 725a)	Wardship (WIC 602)
Statewide	**637**	**56**	**70**	**32**	**20**	**2**	**16**
Alameda	7	0	0	0	0	0	0
Butte	12	0	0	0	0	0	0
Colusa	5	0	0	0	0	0	0
Contra Costa	9	1	1	0	1	0	0
El Dorado	1	0	0	0	0	0	0
Fresno	21	3	3	0	2	0	1
Glenn	2	2	2	0	0	0	2
Humboldt	2	1	1	0	1	0	0
Imperial	4	0	0	0	0	0	0
Kern	40	3	0	0	0	0	0
Kings	15	0	3	3	0	0	0
Lake	4	0	0	0	0	0	0
Los Angeles	47	0	10	10	0	0	0
Madera	3	0	0	0	0	0	0
Marin	7	1	1	0	1	0	0
Mariposa	1	0	0	0	0	0	0
Mendocino	21	1	1	0	1	0	0
Merced	6	1	1	0	0	0	1
Monterey	9	1	0	0	0	0	0
Napa	2	0	0	0	0	0	0
Nevada	1	0	0	0	0	0	0
Orange	21	8	5	0	4	0	1
Placer	10	0	1	1	0	0	0

	Referrals	Petitions	Some form of Probation Supervision	Pre-Petition Informal Probation (WIC 654)	Informal Probation (WIC 654.2)	Non-Ward Probation (WIC 725a)	Wardship (WIC 602)
Plumas	3	1	1	1	0	0	0
Riverside	79	3	3	0	3	0	0
Sacramento	2	1	0	0	0	0	0
San Benito	5	1	0	0	0	0	0
San Bernardino	63	16	19	8	5	2	4
San Diego	17	2	2	0	0	0	2
San Francisco	4	0	0	0	0	0	0
San Joaquin	24	1	1	0	1	0	0
San Luis Obispo	4	0	0	0	0	0	0
San Mateo	8	3	1	0	0	0	1
Santa Barbara	22	1	4	3	1	0	0
Santa Clara	9	0	4	4	0	0	0
Santa Cruz	2	0	0	0	0	0	0
Shasta	27	0	0	0	0	0	0
Siskiyou	2	0	0	0	0	0	0
Solano	12	0	0	0	0	0	0
Sonoma	1	0	1	1	0	0	0
Stanislaus	18	2	3	1	0	0	2
Sutter	2	0	0	0	0	0	0
Tehama	1	0	0	0	0	0	0
Trinity	5	0	0	0	0	0	0
Tulare	52	0	0	0	0	0	0
Tuolumne	1	0	0	0	0	0	0
Ventura	9	0	0	0	0	0	0
Yolo	4	0	0	0	0	0	0
Yuba	11	3	2	0	0	0	2

Appendix E: Law as Amended by SB 439

602.

(a) Except as provided in Section 707, any minor who is between 12 years of age and 17 years of age, inclusive, when he or she violates any law of this state or of the United States or any ordinance of any city or county of this state defining crime other than an ordinance establishing a curfew based solely on age, is within the jurisdiction of the juvenile court, which may adjudge the minor to be a ward of the court.

(b) Any minor who is under 12 years of age when he or she is alleged to have committed any of the following offenses is within the jurisdiction of the juvenile court, which may adjudge the minor to be a ward of the court:

(1) Murder.

(2) Rape by force, violence, duress, menace, or fear of immediate and unlawful bodily injury.

(3) Sodomy by force, violence, duress, menace, or fear of immediate and unlawful bodily injury.

(4) Oral copulation by force, violence, duress, menace, or fear of immediate and unlawful bodily injury.

(5) Sexual penetration by force, violence, duress, menace, or fear of immediate and unlawful bodily injury.

(Amended by Stats. 2018, Ch. 1006, Sec. 2. (SB 439) Effective January 1, 2019. Note: This section was amended November 8, 2016, by initiative Proposition 57.)

602.1.

(a) In order to ensure the safety and well-being of minors who are under 12 years of age and whose behavior would otherwise bring them within the jurisdiction of the juvenile court pursuant to Section 601 or 602, it is the intent of the Legislature that counties pursue appropriate measures to serve and protect a child only as needed, avoiding any intervention whenever possible, and using the least restrictive alternatives through available school-, health-, and community-based services. It is the intent of the Legislature that counties use existing funding for behavioral health, mental health, or other available existing funding sources to provide the alternative services required by this section.

(b) Except as provided in subdivision (b) of Section 602, when a minor under 12 years of age comes to the attention of law enforcement because his or her behavior or actions are as described in Section 601 or 602, the response of the county shall be to release the minor to his or her parent, guardian, or caregiver. Counties shall develop a process for determining the least restrictive responses that may be used instead of, or in addition to, the release of the minor to his or her parent, guardian, or caregiver.

(c) This section shall become operative on January 1, 2020.

(Added by Stats. 2018, Ch. 1006, Sec. 3. (SB 439) Effective January 1, 2019. Section operative January 1, 2020, by its own provisions.)

It is also important to recognize that under existing law, dependency courts have broad discretion to take jurisdiction over youth, including youth under 12, and including in cases where a youth's behavior is beyond parental control but there is no finding of abuse or neglect (In re RT, 2017 CA Supreme Court). That said, research on best practices counsels that dependency system intervention, including removal of children from their home and criminalization of parents and guardians, should be sparing and used as a last resort, and that community-based supports for families are preferred to the dependency system as well.

Notes

The following organizations co-sponsored SB 439 and contributed to this publication:

Anti-Recidivism Coalition

Center on Juvenile and Criminal Justice

Children's Defense Fund - California

National Center for Youth Law

W. Haywood Burns Institute

Youth Justice Coalition - Los Angeles

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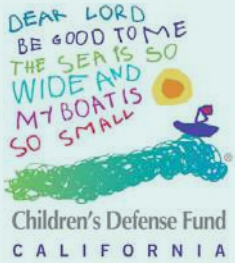

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