Reducing Revocations Challenge

SANTA CRUZ COUNTY ACTION RESEARCH TEAM REPORT

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Santa Cruz County Action Research Team Report

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Executive Summary

The Santa Cruz County Action Research Team, led by Resource Development Associates in partnership with the Santa Cruz County Probation Department, implemented a mixed-methods, multi-phased assessment to explore a wide range of potential revocation drivers including 1) terms and conditions of probation, 2) client behavior, 3) probation officer responses to client behavior, and 4) court dispositions.

Key Findings

In 2019, 1,744 adults were under probation supervision in Santa Cruz County at some point during the year. A majority (83%) of adults under probation supervision were male. Hispanic/Latinx (41%) and Black (5%) individuals were overrepresented in Santa Cruz's adult probation population compared to their county population size (29% and 1% respectively).

Formal Violations and Sentencing Outcomes[1]

- 22% of adults under probation supervision in 2019 were convicted of a formal violation. Among clients with formal violations, 64% had one formal violation,

25% had two violations, and 11% had three or more violations.
- Judges typically agreed with the sentencing recommendations of Probation for formal violations filed with the court. In cases where judges did not agree with Probation's recommendations (24% of cases), more often judges' sentences were less punitive (18%), not more punitive (6%) when compared to Probation's recommendation.
- The majority of formal violations resulted in a jail sentence (72%), and approximately 9% resulted in probation termination. Nearly one-quarter of cases resulted in modified treatment terms and 12% resulted in some other terms being modified.
- 65% of formal violations resulted in tolled time, extending Probation clients' supervision end date. In this way, violations contribute to individuals remaining on probation for longer periods of time, where they continue to be exposed to the risk of being convicted of a formal violation.

Demographic Characteristics and Risk Scores

- Black individuals comprised approximately 1% of the adult population in Santa Cruz, yet represented 5% of the adult probation population and 7% of adults convicted of formal violations in 2019.

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[1] Santa Cruz County defines a formal violation as any violation filed with the Court, rather than handled internally by the Probation Department.

- Because risk scores are determined in part from prior criminal justice contact, utilizing risk to determine outcomes can exacerbate racial disparities and result in Black and Hispanic/Latinx populations further penetrating the justice system. Black and Hispanic/Latinx probation clients also suggested that disproportionate police contact with Black and Hispanic/Latinx individuals contributes to the racial disparities among individuals under probation supervision, as well as higher violation rates among Black individuals compared to all other racial/ethnic groups.
- 33% of adults assessed as high-risk for recidivism and 25% of adults assessed as moderate-risk were convicted of a formal violation in 2019, compared to only 10% of adults assessed as low-risk. Individuals assessed as high and moderate-risk were 3.2 and 2.8 times as likely as individuals assessed as low-risk to be convicted of a formal violation in 2019.

Reasons for Violations

- Nearly 40% of formal violations in 2019 were for technical violations, failures to appear in court, or absconding.
- Among formal violations that were only the result of technical violations, 42% were for failure to report and 36% were related to substance use and program engagement.
- Certain populations may suffer higher rates of violations because of barriers,

needs, biases, and common practices that impact these vulnerable populations more significantly.

- 29% of individuals with specialized drug or alcohol probation terms were convicted of a formal probation violation in 2019, compared to only 11% of individuals without these terms. These individuals were 2.1 times more likely to be convicted of a formal violation than those without specialized drug or alcohol terms.[2]
- Individuals under AB 109 post release community supervision (PRCS) were 2.1 times more likely to be convicted of a formal violation than individuals on formal probation for a felony offense.
- Probation clients had challenges complying with probation terms that do not allow them to carry weapons. In focus groups, several homeless probation clients indicated that they need to carry a weapon as a form of protection. Other clients suggested that almost anything in their possession might be considered a weapon and result in a formal violation.

Probation Officer Experiences and Responses to Noncompliance

- Inconsistencies in the approaches of probation officers impact client experiences, including how officers work with clients, decisions about when to file formal violations, and sentencing recommendations.
- Some clients felt more connected to their probation officers and suggested that

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[2] Individuals with other specialized probation terms associated with mental illness and gang affiliation also had higher violation rates than other individuals under probation supervision.

they could go to them for support and receive appropriate referrals to services. Others described weaker relationships with a more adversarial and less trustworthy dynamic that, in some cases, resulted in failing to report to probation.

- Probation officers utilize discretion when determining whether to file a formal violation, especially for technical violations and/or misdemeanor offenses. The Department's graduated response matrix is used inconsistently by probation officers.
- Some probation officers feel compelled to submit a formal violation if their client is not in compliance with their probation terms. They fear scrutiny if they do not file a violation and the client, especially if they are assessed as high-risk, subsequently commits a serious offense.

Recommendations and Next Steps

Taken together, study findings show that in Santa Cruz County, nearly 80% of adults under probation supervision were successful in 2019. At the same time, the findings point to a need for Santa Cruz County to:

- Develop a greater consensus around the purpose of probation—and ensure that all policies and practices align with the Department's mission—to create more consistency in probation officer approaches.
- Evaluate whether the cost and resources applied to control, detect, and punish failure to report to probation, enroll in or complete programming, and abstain from drug use outweigh their benefits.

- Consider to what extent additional alternatives to incarceration and incentives that promote stability can be expanded to reduce violations.
- Further investigate Black and Hispanic/Latinx overrepresentation among adults on probation, and revocation drivers for these populations.
- Look deeper into how using risk scores to determine responses to violations can exacerbate racial disparities and result in Black and Hispanic/Latinx populations further penetrating the justice system.
- Convene justice system stakeholders to address the systemic issues identified through this work.

As a result of this study, the Santa Cruz County Probation Department is undertaking an examination of its culture, practices, and variations in approaches among probation officers, as well as developing an incentive-based case management pilot for individuals with substance use issues.

Background

Community supervision was designed as an alternative to incarceration; however, revocations have become a significant driver of incarceration. In fact, a nationwide study by the Council of State Governments Justice Center finds that technical violations, such as missing appointments with supervision officers or failing drug tests, account for nearly one in four state prison admissions—gravely disrupting lives and costing states approximately 2.8 billion dollars annually.[3] In recognition of the need to fundamentally transform the approach to probation in the United States, Arnold Ventures and the CUNY Institute for State and Local Governance (ISLG) launched the Reducing Revocations Challenge. The Reducing Revocations Challenge supported action research exploring drivers of revocations in ten jurisdictions across the country to identify new policy and practice solutions aimed at increasing probation successes and reducing revocations that contribute to mass incarceration.

Resource Development Associates (RDA), in collaboration with the Santa Cruz County Probation Department (SCCPD), was selected as one of ten sites to conduct research aimed at identifying revocation drivers and creating policy and practices to reduce revocations. Santa Cruz County (SCC) has consistently demonstrated national leadership by assessing local justice system policies and practices to gain a better understanding of the factors that contribute to justice system involvement and penetration—using this information to reform local policy and practices in alignment with evidence-based and best practices to reduce the justice system's reach while prioritizing public safety. In 1999, SCC became a model site for the Annie E. Casey Foundation's Juvenile Detention Alternatives Initiative (JDAI), which has since been replicated nationwide, saving millions of dollars and resulting in dramatic reductions to unnecessary youth incarceration. More recently, in 2013, Santa Cruz County was chosen as one of three pilot sites nationally to implement the Arnold Ventures pretrial risk-assessment tool.

In addition to conducting internal reviews of justice system policies and practices and implementing justice system reforms, SCC has proactively participated in several research studies to contribute to an understanding of justice system challenges and opportunities. In 2010, SCCPD partnered with the National Institute of Justice on the Research Practitioner Project to focus on the use of risk

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[3] The Council of State Governments Justice Center (2019). *Confined and Costly: How Supervision Violations Are Filling Prisons and Burdening Budgets.* Retrieved from https://csgjusticecenter.org/confinedandcostly/

assessments and probation violation structured decision decision-making grids. In 2017, SCC participated in California Forward's Justice System Change Initiative to assist counties in implementing data-driven strategies that address new and long-standing justice system challenges. While the adult population under SCCPD's supervision has steadily decreased in recent years, lowering from an average daily population of approximately 1,989 adults in 2016 to 1,666 adults in 2018, the Jail Utilization Report found that nearly 50% of the County's average daily jail population was comprised of individuals returning to jail for violations, warrants, or new crimes, and that 23% of repeat jail bookings were not a result of a new crime.

The report also found that the Hispanic/Latinx and Black populations were over-represented at every level in the criminal justice system. Among a number of recommendations stemming from this work, one key recommendation was to "further examine the side door entries (warrants, holds, court commitments and technical probation violations) . . . . to address probation violations and pre-and post-sentence court commitments." The Reducing Revocations Challenge provided SCCPD an opportunity to identify and more deeply understand local revocations drivers, positioning the Department to examine policies and practices they can implement to reduce revocations and increase probation success.

Santa Cruz County Adult Probation Division Overview

SCCPD's Adult Division provides a full spectrum of services operating around three major focus areas – Pretrial Services, Court Coverage and Investigations, and Community-Based Supervision. The Division's Pretrial Unit completes assessments and makes recommendations for release or detention of clients pending criminal charges and provides monitoring to those deemed eligible by the courts to remain in the community. The Investigations Unit conducts pre-sentence and pre-plea investigations and makes sentencing recommendations based on the statutory mandates outlined in the Penal Code and Rules of Court. Central to the Reducing Revocations Challenge research are the Adult Division staff who provide community-based supervision for individuals in Santa Cruz County.

The SCCPD Adult Division is comprised of the Chief Probation Officer, Adult Division Director, and two Assistant Adult Division Directors, in addition to Unit Supervisors, Deputy Probation Officers, and Probation Aides.[4] **Unit Supervisors** are responsible for overseeing a unit of DPOs and hold the responsibility of supervising, training, scheduling, and evaluating their work, in addition to performing more complex and specialized probation casework. Unit Supervisors approve and sign all bench warrant requests and formal violations filed with the court. **Deputy Probation Officers**

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[4] See Appendix A. to review the Santa Cruz Probation Department's Adult Division Organizational Chart.

(DPOs) are sworn officers who provide case management services for a caseload of adults including the referral, supervision, counseling, and rehabilitation of adults on probation. DPOs are responsible for recommending when to file bench warrants and formal violations with the court, including recommended sentences. **Probation Aides** are nonsworn officers who provide similar services as DPOs by assisting in the supervision of adults on probation; however, aides work less independently than DPOs.

Community Supervision Practices

Santa Cruz County's adult population was approximately 220,000 in 2019. Sixty-two percent (62%) of adults identified as White, 29% identified as Hispanic/Latinx, 5% identified as Asian or Pacific Islander, and 1% identified as Black (3% identified as some other race or their race was unknown). SCCPD provided community supervision for 1,744 adults in 2019, among which 47% were White, 41% were Hispanic/Latinx, 5% were Black, and 1% were Asian or Pacific Islander (5% were another race or their race was unknown). Adult Division staff provide community-based supervision for individuals on formal probation, those released from state prison on post release community supervision (PRCS), and those serving the community portion of their local prison sentence (pursuant to penal

code section 1170(h)).[5] Prior to 2011, the PRCS population and individuals sentenced under penal code 1170(h) would have been supervised by state parole, not county probation, and have, by definition, committed offenses considered more serious in nature.

Since Senate Bill 678 was enacted, which established a system of performance-based funding for county probation departments to implement and maintain evidence-based practices (EBPs) in adult felony probation supervision, SCCPD has adopted several EBPs to reduce recidivism with a focus on effective community-based treatment and intervention services. Deputy Probation Officers, who serve as the primary case managers for all individuals under probation supervision, are trained in several EBPs and are expected to use them as often as possible. DPOs utilize the validated Correctional Assessment and Intervention System (CAIS) risk and needs assessment tool to determine individuals' risk for recidivism and make referrals to community providers based on their needs as indicated by the CAIS. DPOs are also expected to utilize Effective Practices in Community Supervision (EPICS), which "is designed to use a combination of monitoring, referrals, and face-to-face interactions to provide [individuals under their supervision] with a sufficient 'dosage' of treatment interventions, and make the best possible use of time to

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[5] The PRCS population and individuals sentenced under penal code section 1170(h) would not have been under the Probation Department's supervision prior to October 1, 2011, when Assembly Bill (AB) 109 Realignment was enacted. This legislation transferred the responsibility for individuals incarcerated in state prisons from the state to the county.

develop a collaborative working relationship."[6] DPOs are trained in motivational interviewing techniques, cognitive behavioral therapy, and trauma-informed approaches. Finally, the Department worked with the Judicial Council of California in 2012 and 2013 to develop and implement a response grid to guide objective decision-making regarding sanctions and rewards for behavior.[7]

In line with the Probation Department's commitment to community-based reentry services, the Department directly funds a host of treatment and intervention services and leverages other funding sources and county services to meet the comprehensive needs of individuals under their supervision. Services are provided by both the County (i.e., Santa Cruz County Health Services Agency and Office of Education) and contracted service providers, and span the following areas:

- Criminal Thinking, Behavior, and Identity
- Educational Programming
- Family Involvement
- Housing Support
- Mental Health Care
- Reentry Planning and Community Support
- Substance Use Disorder Treatment and Recovery Maintenance
- Workforce and Job Placement

In May 2019, Santa Cruz County opened the Probation Service Center (PSC) to co-locate existing services, facilitate access to

additional community resources, and increase communication between multiple system partners. The PSC was developed with extensive involvement from Probation, service providers, and other justice system stakeholders who worked to establish policies and procedures for center operation, as well as cross-training between service types, safety and disciplinary procedures, client case management, and communication among all partners.

Responses to Noncompliance

DPOs and Unit Supervisors are responsible for responding to noncompliance among individuals under their supervision. As noted above, the Department has implemented a response grid to guide responses to noncompliance based on the assessed risk for recidivism and the underlying noncompliant behavior of probation clients. Probation staff are encouraged to utilize the grid and to implement incentives and informal violations (i.e., sanctions imposed by probation staff, without court involvement) prior to filing formal violations (which are filed with the court), whenever appropriate. When a DPO and Unit Supervisor determine a formal violation is the most appropriate action, they can take different steps to file the violation. When the whereabouts of a probation client are known, a formal violation report is typically submitted to the court to calendar a court date or ask for a warrant to be issued. In many

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[6] University of Cincinnati Corrections Institute. (2010). The EPICS Model: Effective Practices in Community Supervision. https://www.uc.edu/corrections/services/trainings/effective_practices_in_community_supervision.html

[7] See Appendix B to review the Santa Cruz Probation Department's Violation Response Grid

cases, individuals remain in custody prior to their violation hearing. In some instances, a temporary authorization is issued for law enforcement to pick up and detain an individual. This is under circumstances when Probation seeks to hold someone in custody temporarily until the court can issue a formal revocation. When the whereabouts of an individual are unknown, Probation asks the court to issue a bench warrant, and once the individual is located a formal violation is filed with the court.

Research Methodology

The Santa Cruz County Action Research Team (ART), led by RDA in partnership with the SCCPD, implemented a mixed-methods, multi-phased assessment to explore a wide range of potential revocation drivers including 1) terms and conditions of probation, 2) client behavior, 3) probation officer responses to client behavior, and 4) court dispositions.

At project onset, RDA worked with SCCPD to develop an internal Steering Committee that served in an advisory capacity and played a key role in supporting data collection and vetting analyses on an ongoing basis. In addition to convening a Steering Committee, the ART also recruited a data entry workgroup (described in greater detail below) that met weekly from July through September 2020. In addition to collecting quantitative data on all formal violations filed in 2019, the data entry workgroup provided rich qualitative information and vetted findings on an ongoing basis. The group included probation leadership, as well as supervisors, probation

officers, and probation aides. By working with probation staff across levels, the Santa Cruz ART is positioned to promote organizational change through leadership from engaged probation staff seeking to develop and integrate policies and practices aimed at reducing revocations.

Data Collection and Analysis

RDA obtained administrative data from Probation's case management system for all individuals under probation supervision at any point in 2019. These data allowed RDA to identify the demographic and case characteristics (including probation terms and conditions) of individuals under supervision during this time. To obtain a deeper understanding of why probation officers filed petitions with the court, RDA conducted a review of a random sample of approximately one-half of all bench warrant requests and formal violation petitions filed in 2019. This review allowed the research team to identify some of the client behaviors that resulted in petitions being filed with the court, and the extent to which petitions were initially filed for technical violations versus new criminal offenses.

As noted above, RDA also worked with SCCPD to form a data entry workgroup that collected data on all formal violations resolved in 2019. These data were used to calculate the formal violation rate for all adults under probation supervision in 2019, and to use descriptive and inferential statistics to identify demographic and case characteristics associated with formal violations. These data also allowed the

research team to obtain a deeper understanding of why individuals were convicted of formal violations and to assess sentencing outcomes for formal violations, by violation type. RDA was also able to utilize these data to assess the proportion of violations that resulted in modified probation terms or jail or prison sentences, as well as whether judges' sentences were more or less punitive than probation officer recommendations.

Finally, RDA conducted interviews and focus groups with probation leadership, staff (i.e., probation officers, supervisors, and aides), and clients to get a better understanding of their experiences with probation, as well as the policies, practices, and processes that either support client success or create challenges for successfully completing probation. RDA conducted a total of three focus groups with 21 probation officers, supervisors, and one probation aide. The supervisors oversaw the mental health, sex offender, pretrial, and general supervision units, as well as the Probation Services Center. The probation officers and aides were responsible for supervising clients classified as low, medium, and high-risk and represented a variety of caseloads, including domestic violence, mental health, sex offender, PRCS, mandatory supervision, and general supervision. The evaluation team also conducted five client focus groups with 18 adults under community supervision. One focus group was conducted

in Spanish and four were conducted in English. Clients represented a variety of caseload types, including felony, PRCS, and general supervision.[8] Some clients were on probation for the first time and had completed one to two years of their supervision term, while other clients had been on probation for five years or more. Clients with longer periods under probation supervision either had multiple simultaneous active cases or had their probation period extended due to violations.

A more detailed description of the data sources used for this research is included in Appendix C.

Data Limitations

As is the case with all real world research, there are limitations to consider. First, data on probation violations were not available from the court. Therefore, RDA did not have access to data on the specific criminal offenses that resulted in formal probation violations. Probation officers developed a dataset, including information that was imperative for the research, by looking up all 2019 formal violations filed with the court in SCCPD's case management system, as well as the Court's. Second, data on incentives and informal sanctions are underreported in SCCPD's case management system and were not able to be used in quantitative analyses. Finally, with regards to the qualitative methods, it is important to keep in mind that qualitative findings represent the perspectives of the

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[8] Some clients did not know their caseload type; therefore, this information was not available for all focus group participants.

individuals that participated in the evaluation activities. While we were able to speak with almost half of the Adult Division's sworn staff, there may be differences between the perspectives of those who chose to participate in interviews and focus groups and those who did not. In addition, due in large part related to challenges surrounding COVID-19, a total of 18 adults under probation supervision participated in remote focus groups. While they represented a variety of caseload types and socio-demographic characteristics, the individuals invited, interested, and able to participate in focus groups are not representative of all adults under probation supervision.

Santa Cruz County Adult Probation Population Overview

The following sections provide an overview of the 1,744 adults under active community supervision in Santa Cruz County at any point in 2019. An additional 344 adults were on probation during this time under bench warrant status – these individuals are not included in the study population.

Caseloads

The Santa Cruz County Probation Department supervises adults on Formal Supervision and AB 109 Supervision. In 2019, a majority of adults under community supervision in Santa Cruz County were on Formal Supervision for a felony (64%) or misdemeanor (17%) offense. Formal Supervision includes general supervision, as well as domestic violence, gang, mental health, and sex offender caseloads.

The remaining 20% were on AB 109 supervision, which includes Mandatory Supervision and PRCS. These individuals were all convicted for felony offenses and would not have been under the Probation Department's supervision prior to October 1, 2011, when AB 109 Realignment was enacted. This legislation transferred the responsibility for some individuals incarcerated in state prisons from the state to the county.[9] Individuals in the AB 109 population previously would have been supervised by state parole, not county probation.

TABLE 1.

2019 Probation Population, by Caseload Type

Caseload Type	Individuals (N=1,744)	% of Population
Formal Supervision - Felony	1,110	64%
Formal Supervision - Misdemeanor	300	17%
AB 109: PRCS	201	12%
AB 109: Mandatory Supervision	133	8%

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[9] The bill was passed in response to the United States Supreme Court's decision in *Brown vs. Plata*, which in 2011 ordered California to reduce its prison population to no more than 137.5% of design capacity within two years because conditions of confinement were unconstitutional due to severe overcrowding, adversely affecting health care and other services across California's prisons.

While caseload sizes vary, intensive/specialized caseloads have the smallest average caseload size. These caseloads include the two AB 109 caseloads (Mandatory Supervision and PRCS), in addition to gang, mental health, and sex offender caseloads. In 2019, the average size of intensive/specialized caseloads was 34. The domestic violence caseloads had an average caseload size of 65, with the average general supervision caseload at 100. For more information about Santa Cruz County Probation's caseloads and organizational structure, see Appendix A.

Demographic Characteristics

As shown in **TABLE 2**, the majority (83%) of adults under probation supervision in Santa Cruz County in 2019 were male. Hispanic/Latinx and Black individuals were overrepresented in Santa Cruz's adult probation population compared to their county population size. Hispanics/Latinx individuals comprised 41% of the probation population but only 29% of the Santa Cruz population. Black individuals comprised 5% of the probation population, but only 1% of the Santa Cruz population.

TABLE 2.

Santa Cruz County and Adult Probation Population Demographic Characteristics

Demographic Characteristics	Adults in Santa Cruz County (N=220,004)[10]	% Santa Cruz County Population	Individuals on Probation (N=1,744)	% Probation Population
Race/Ethnicity				
Black	2,145	1%	92	5%
Asian or Pacific Islander	11,855	5%	16	1%
Hispanic/Latinx	63,305	29%	720	41%
White	136,481	62%	826	47%
Other/Unknown	6,218	3%	90	5%
Gender				
Female	111,792	51%	291	17%
Male	108,212	49%	1,452	83%
Age				
18-24	41,139	19%	158	9%
25-34	33,557	15%	684	39%
35-44	31,870	14%	493	28%
45+	113,438	52%	409	23%

[10] American Community Survey: 2018: ACS 5-Year Estimates Data Profiles.

Length of Time under Probation Supervision

Santa Cruz County probation terms are three years. However, individuals on probation frequently have overlapping probation sentences for different criminal cases. As of December 31, 2019, the median time under probation supervision for individuals in the study sample was just under two and a half years.[11] Within the study population, 112 individuals (6.4% of the population) had probation cases terminated in 2019.

Risk Level

Based on the CAIS, a validated risk and needs assessment tool used to determine risk for recidivism, 33% of the probation population in 2019 was assessed as high risk, 34% was assessed as moderate risk, and 33% of the population was assessed as low risk.

TABLE 3.

2019 Probation Client Initial Risk Level

Risk Score	Individuals (N=1,637) [12]	% of Population
High	545	33%
Moderate	547	34%
Low	535	33%

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[11] Median: 737 days. Min: 1 day. Max: 11,402 days (approximately 31 years).

[12] 107 clients did not have CAIS assessment scores available.

Key Findings

The following sections highlight key findings from Santa Cruz County's action research. First, we provide an overview of formal violations in 2019, followed by an assessment of revocation drivers in Santa Cruz County. Finally, we assess formal violation outcomes, including the extent to which they contribute to incarceration and an expanded reach of correctional control.

KEY FINDINGS: FORMAL VIOLATIONS

- Nearly one-quarter (22%) of adults under probation supervision were convicted of a formal violation in 2019. Among these individuals, 64% had one formal violation, 25% had two formal violations, and 11% had three or more formal violations.
- Nearly 40% of formal violations were for technical violations or absconding.
- Among formal violations that were the result of technical violations, 42% were for failure to report and 36% were related to substance use and program participation.

Formal Violations in 2019

Violation Rates

Slightly less than one-quarter (22%, N=381) of adults under probation supervision were convicted of a formal violation in 2019. This includes violations for new offenses, as well as technical violations for noncompliance with probation terms and conditions. Approximately two-thirds (64%) of these individuals were convicted of one formal violation, 25% were convicted of two, and 11% were convicted of three or more formal violations in 2019 (see Figure 2). This suggests that there are over 125 adults under SCCPD's supervision who were convicted of at least two formal violations in 2019 and continued to struggle to remain compliant with the terms of supervision.

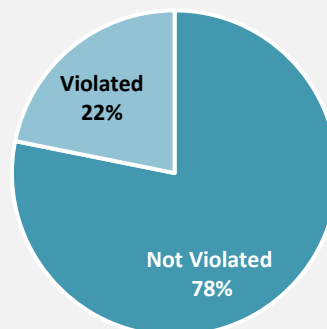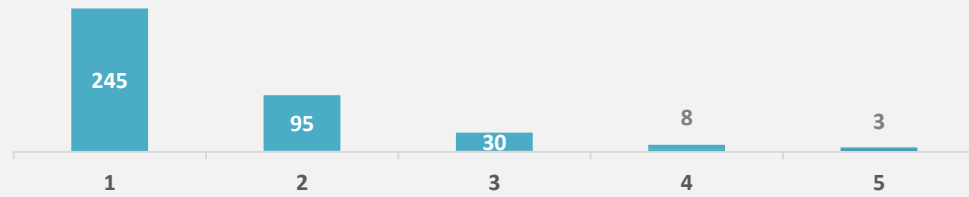FIGURE 1.
2019 Formal Violation Rate

Violated 22%

Not Violated 78%

FIGURE 2.

Number of Violations Per Client, of Clients with Violations (N=381)

1	2	3	4	5
245	95	30	8	3

Among all formal violations in 2019 (n=576), 61% included a new criminal offense and 39% were for technical violations and/or failing to appear (FTA) in court or absconding. This suggests that a substantial proportion of formal violations did not involve new law violations.

Reasons for Technical Violations

RDA reviewed a random sample of 363 bench warrants and formal violation petitions filed for 250 unique individuals in 2019. Among 110 petitions filed that did not include a new criminal offense, 42% percent were filed for failure to report to probation and 36% were related to substance use and programming, including failure to participate in programming/treatment, failure to complete treatment/programming, failure to abstain from a controlled substance, and failure to test.

FIGURE 3.

Violation Basis, 2019 Formal Violation Convictions

FTA/Abscond 12%

Technical Violation 27%

New Offense 61%
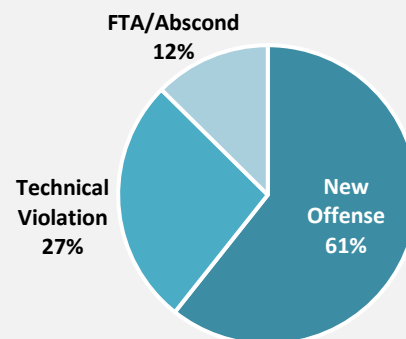
TABLE 4.

Violations Reasons, 2019 Sample of Petitions Filed Not Including a New Criminal Offense[13]

Reason for Technical Violation	Count	%
Failure to Report	96	42%
Failure to participate or complete programming/treatment	59	26%
Failure to abstain from controlled substance or test	22	10%
Other	20	9%
Failure to pay fines/fees	16	7%
Failure to provide an address/report changes to address	15	6%
Failure to enroll/complete community service	3	1%

These findings suggest that formal violations were often filed due to a lack of engagement with probation or drug treatment, not because individuals necessarily posed a grave public safety threat.

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[13] Table 6 includes data for 110 petitions filed with the court that were for technical violations only (i.e., no new criminal offenses). Among these 110 petitions, there were a total of 231 technical violations included (in other words, on average, each petition filed with the court included 2.1 technical violations of probation terms and conditions).

Revocations Drivers

Demographic and Case Characteristics

KEY FINDINGS: DEMOGRAPHIC AND CASE CHARACTERISTICS

- Individuals at high-risk for recidivism had higher formal violation rates (33%) than individuals assessed as moderate (25%) or low risk (10%); individuals who were assessed as high or moderate risk were significantly more likely (3.2x and 2.8x respectively) than those who were assessed as low risk to be convicted of a formal violation.
- Individuals with specialized drug or alcohol related terms were over twice (2.1x) as likely to be convicted of a formal violation than individuals without these terms, all else equal.
- Individuals under AB 109 post release community supervision (PRCS) were twice (2.1x) as likely as individuals on formal probation for a felony offense to be convicted of a formal violation.
- Probation clients experience challenges complying with terms that prohibit them from carrying weapons. Some unhoused clients suggested they need to carry a weapon as a form of protection, while other individuals suggested that almost anything in their possession might be considered a weapon and result in a formal violation.
- Black individuals comprised only 1 % of the adult population in Santa Cruz, yet represented 5% of adults under probation supervision, and 7% of adults convicted of a formal violation in 2019.

TABLE 5 presents the violation rate of individuals under probation supervision by demographic groups and case characteristics. Overall, 22% of adults under probation supervision in 2019 were convicted of a formal probation violation. Findings indicate that individuals on AB 109 supervision had higher than average formal violation rates (36%), as did individuals assessed as high risk (33%). In addition, individuals with specialized probation terms, especially drug/alcohol- or mental health-related terms, also had higher violation rates (29% and 31% respectively). Individuals with no specialized terms (i.e., standard probation terms only) had much lower than average violation rates (7%).

TABLE 5.

2019 Formal Violations, by Demographic and Case Characteristic[14]

Characteristic	Active Probation Population (N=1,744)	% Active Probation Population	Population with Formal Violation (N=381)	% Population with Formal Violation	Revocation Rate, by Group
Race/Ethnicity					
Black	92	5%	25	7%	27%
Hispanic/Latinx	720	41%	143	38%	20%
White	826	47%	197	52%	24%
Other/Unknown[15]	106	6%	16	4%	15%
Gender					
Female	291	17%	57	15%	20%
Male	1,452	83%	324	85%	22%
Age					
18-24	158	9%	38	10%	24%
25-34	684	39%	157	41%	23%
35-44	493	28%	125	33%	25%
45+	409	23%	61	16%	15%
Case Type					
Formal Supervision - Felony	1,110	64%	230	60%	21%
Formal Supervision - Misdemeanor	300	17%	31	8%	10%
PRCS	201	12%	72	19%	36%
Mandatory Supervision	133	8%	48	13%	36%
Risk Level					
High	545	33%	182	48%	33%
Moderate	547	34%	139	36%	25%
Low	535	33%	48	13%	10%
Terms					
Domestic Violence/ Protective Order	678	39%	144	38%	21%
Drugs and Alcohol	1,076	62%	309	81%	29%
Gang	138	8%	33	9%	24%
Mental Health	177	10%	54	14%	31%
Standard Only	143	8%	10	3%	7%

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[14] Data for all adults under probation supervision at any point in 2019.

[15] The "Other/Unknown" category includes Asian and Pacific Islander individuals.
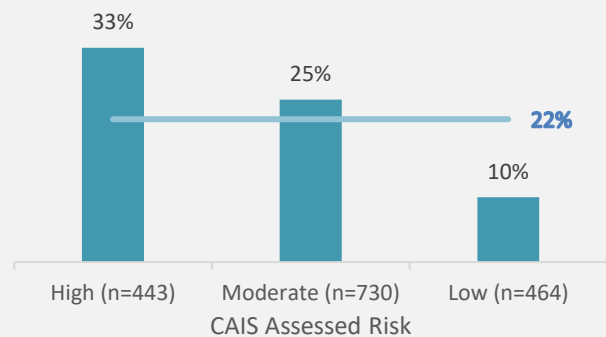
Risk Scores

Individuals at high risk for recidivism had higher formal violation rates (33%) than individuals assessed as moderate (25%) or low risk (10%). After accounting for age, race, gender, case type, and terms of probation, logistic regression findings suggested that individuals who were assessed as high or moderate risk were 3.2 and 2.8 times, respectively, more likely to be convicted of a formal violation than those who were assessed as low risk (see the full output in Appendix D). Findings from focus groups with probation officers and supervisors also suggested that criminogenic risk levels impact probation officers' responses to noncompliance.

> "All of my cases are high risk…if they're high risk, let's violate them now. If they're lower risk, we look at how many times they've violated, and are they housed, and other things come into play." –Probation Officer

It is not surprising that individuals with higher risk levels have higher violation rates, because risk assessment tools are intended to measure the likelihood of recidivism, and 61% of formal violations in 2019 were for new criminal offenses. However, the probation officer's quote, which was in alignment with most probation officers and supervisors we spoke with, indicates that individuals assessed as high or moderate risk are more likely to have formal violations filed against them, not necessarily because of different behavior, but because probation officers are trained to have disparate responses to similar

FIGURE 5.
Violation Rates, by Risk

behavior based on risk scores. This approach is built into the Department's response grid, which is discussed in greater detail later in the report.

Specialized Probation Terms and Case Types

Drug and Alcohol Terms

Probation leadership, probation supervisors and officers, and individuals under probation supervision all identified substance use as a key driver of probation violations. Over half of adults under probation supervision in 2019 had drug or alcohol-related terms that mandate

FIGURE 4.
Violation Rate, by Drug/Alcohol Terms
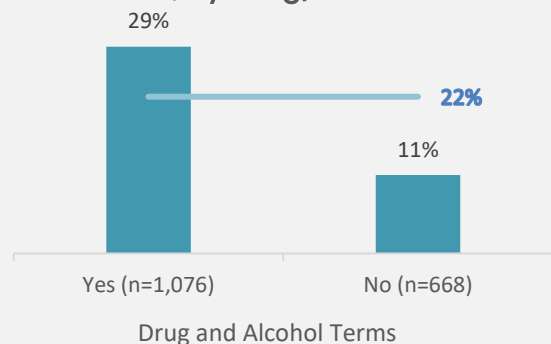
they abstain from drugs/alcohol and/or enroll in and complete substance use treatment. After accounting for other demographic and case characteristics, findings from the logistic regression indicated that individuals with drug- or alcohol-related terms were 2.1 times as likely as individuals without these terms to be convicted of a formal violation. In focus groups, probation clients expressed how drug addiction is a barrier to successful probation completion.

> *"If I don't have a place to live and am on the streets and a drug addict, it is tough. Sometimes it's easier to not check in and catch me when you can and see what happens." –Probation Client*

While probation officers shared that they provide clients numerous opportunities to abstain from drug and alcohol use and engage in treatment (i.e., probation officers shared they almost never file a formal violation for testing positive one time or leaving/disengaging from treatment once), they also shared that substance use is one of the most common reasons they file formal violations. Probation leadership, as well as probation officers and supervisors, expressed that the County does not have the capacity to treat everyone with substance use issues. There is a shortage of residential and outpatient treatment options for adults under probation supervision in Santa Cruz County, which means in cases where clients have trouble with a specific program or provider, there are often limited, if any, open spaces to provide them with an alternative treatment setting. As a result, some individuals struggle

FIGURE 6.
Violation Rate, by Case Type
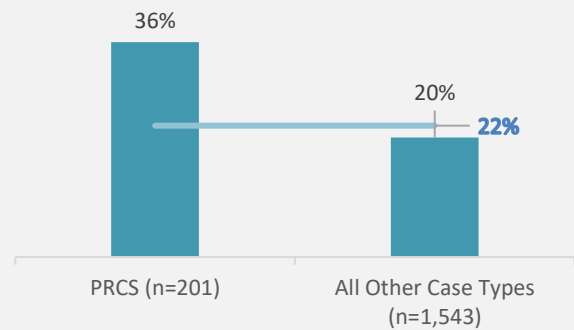
to comply with drug- or alcohol-related terms while on probation, and in some cases, jail stays are extended while individuals wait for a residential treatment bed to become available.

AB 109 Post Release Community Supervision

Individuals under AB 109 PRCS also had substantially higher formal violation rates than other individuals under probation supervision. Logistic regression findings suggested that the PRCS population was over twice as likely as individuals on formal probation for a felony offense to be convicted of a formal violation. On the other hand, individuals on formal probation for a misdemeanor offense were 40% less likely to be convicted of a formal violation than individuals with a felony offense. The PRCS population, which was previously incarcerated in state prison, is considered a higher risk population, and these individuals have committed more serious offenses than their counterparts on probation. In focus groups, probation officers and supervisors shared that they often file formal violations more swiftly against probation clients who are assessed as higher risk and who have more serious criminal histories because they

consider these individuals to be greater public safety risks.

Mental Health, Gang, and Weapons Terms

Individuals with specialized **mental health terms** also had higher violation rates than other individuals under probation supervision. Almost all these individuals also had drug/alcohol terms and were mandated to drug/alcohol and/or mental health treatment. This can result in higher violation rates for these individuals if they are unable to engage with treatment. In addition, individuals suffering from serious mental illness often face challenges complying with their probation terms because of their mental illness, as well as homelessness.

> *"One of the hardest things is mental health. It's hard when we're dealing with people who are homeless, and the situations where they're trying to survive on a daily basis and there's also all these expectations on probation that they have to abide by. It's a big issue in our community where there's a big homeless population too."* *–Probation Officer*

Over half (53%) of individuals with **gang terms** were assessed as high risk for recidivism, in part because the CAIS identifies these individuals to have an "antisocial" peer network. The terms of their probation forbid them from spending time with other individuals who are or were gang-affiliated. Probation clients shared that this term was often very difficult to comply with and can result in more punitive behavior from law enforcement:

FIGURE 7.
Violation Rate, by Mental Health Terms
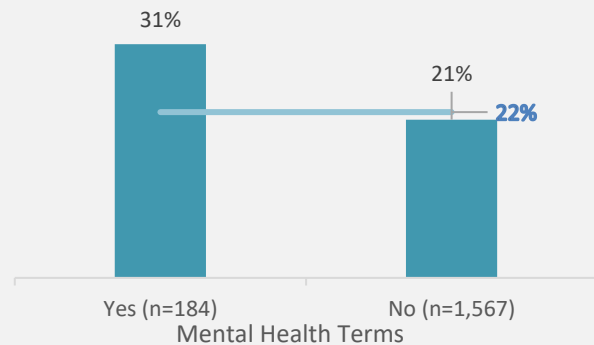
> *"What makes [gang terms] harder it is just, almost everyone I know or knew was affiliated and that alone is a violation."* *–Probation Client*

Finally, probation clients frequently identified the **standard weapons term** that does not allow individuals on probation to be in possession of any weapon as the term most difficult to comply with. Individuals who were homeless, particularly women, expressed that they feel compelled to carry a weapon for protection and, as a result, are almost always in violation of this term.

> *"Weapons [terms are difficult to comply with] because I am homeless and I carry a knife for protection and always get in trouble for it."* *–Probation Client*

Additionally, especially for individuals with charges that are considered violent, probation clients suggested that a wide range of objects can be considered a weapon, putting them in violation of their probation terms. Some individuals shared they will not even carry a pen or pencil for fear of it being labeled a weapon.

"I can't have anything. Anything can be counted as a weapon. I had a paint spackle. They pulled me over and tried to say I had a knife. They tried to violate me. Ever since then I keep nothing with me." –Probation Client

Race

Black individuals comprised 1% of the adult population in Santa Cruz, 5% of adults under probation supervision, and 7% of adults convicted of a formal violation in 2019. While Black individuals were not more likely to be convicted of a formal violation after accounting for other demographic and case characteristics, a greater proportion of Black individuals were assessed as high risk and under AB 109 post release community supervision, which accounts for their greater likelihood to be convicted of a formal violation. Black and Hispanic/Latinx clients who participated in focus groups also suggested that they experience disproportionate police contact due to racial biases in policing, as well as biases from the public in police calls for service.

"Sometimes they still harass me, the police . . . . I had nothing to do with the crime, but I was a young Black kid in the city, and I had no idea what was happening . . . . I came to Santa Cruz for vacation and have been here on probation ever since. [The police] harass me, they follow me, they have taken me to jail numerous times and said I didn't go to court when I had proof I did. There's racism, turned to hatred, mixed with lack of self-respect." – Probation Client

These experiences align with findings about disproportionate police contact with Black and Hispanic/Latinx individuals nationwide, however, we did not obtain administrative data to corroborate these findings locally in Santa Cruz.

KEY FINDINGS: PROBATION OFFICER EXPERIENCES AND RESPONSES TO NONCOMPLIANCE

- Probation officers can have a significant impact on clients and their success on probation. Some clients felt more connected to their probation officers and suggested that they could go to them for support and receive appropriate referrals to services. Others described weaker relationships with a more adversarial and less trustworthy dynamic that, in some cases, resulted in failing to report to probation.
- Probation officers utilize discretion when determining whether to file a formal violation, especially for technical violations and/or misdemeanor offenses. The Department's graduated response matrix is used inconsistently by probation officers.
- Some probation officers feel compelled to submit a formal violation if their client is not in compliance with their probation terms. They fear scrutiny if they do not file a violation and the client, especially if they are assessed as high-risk, subsequently commits a serious offense.

Probation Officer Experiences and Responses to Noncompliance

Client Relationships

Findings from focus groups with probation officers and clients indicate that some clients feel more connected to their probation officer than others. In cases where clients had positive experiences, they shared that their probation officer was supportive and understanding of their life circumstances. Their probation officer helped connect them to appropriate services and supported them in other ways, such as writing letters of recommendation.

> *"I love my probation officer. He is amazing. I'm in the middle of a hard divorce case. He wrote me an exceptional recommendation letter. I'm getting time for my community service. I really enjoy having him . . . . [He] texts me, calls me, checks in with me. He excuses me from court dates . . . . because I'm doing good and . . . . [now] because he recognized that, he is pushing me to go from formal to informal, which is awesome." – Probation Client*

Clients also spoke of experiences where they did not have positive relationships with their probation officer. In these cases, clients suggested their probation officer did not take the time to get to know them, and they did not believe their probation officer was invested in their success. These clients said that they were violated for very minor violations of the terms of their supervision and were not referred to services to address their needs.

> *". . . . Initially she was confrontational and authoritative. But she got a feel for me and loosened up. Our relationship is okay but nonexistent. Her caseload is backed up; she knows I do what I'm supposed to do . . . . but I know if I violated, even something small, she wouldn't hesitate to put me upstate." – Probation Client*

Probation supervisors indicated that high caseloads impact the extent to which probation officers can invest time and develop relationships with clients, which impacts decisions around when to file formal violations.

> *"When my staff's caseloads have gotten higher, there are more violations because there is no time to work with clients one-on-one, engage them. When there is engagement, probation officers are more into working with clients. When caseload gets big, there is not time to work with people. I advocate for the smaller the caseloads, the more quality work you get with clients. The less of a relationship there is, you throw them back in jail. When there is a relationship with the client, you want them to succeed." – Probation Supervisor*

Probation officers on general supervision caseloads who supervise a majority of clients who have been assessed as moderate- to high-risk for recidivism have an average caseload size of 100:1, and domestic violence caseloads are approximately 65:1, both of which are higher than American Probation

and Parole Association (APPA) recommended industry standards for moderate- and high-risk caseloads.[16][17]

> *"Some of us have really, really high caseloads. Doing all of this (building relationships and making referrals to services), it just is not feasible . . . . [Sometimes] we may have ten people come to our office all at once and we can't give them as full attention as we'd like to." –Probation Officer*

Probation officers suggested that when they do develop rapport with clients, they are less likely to violate them for minor violations of their supervision terms. On the other hand, when they cannot develop these relationships, this increases the likelihood that they will file formal violations for more minor violations of supervision terms.

> *"If you have a really high caseload you might not have the opportunity to engage or connect with everybody on your caseload. Therefore, you are not building the relationships which allow you to minimize the sanction when they do get in trouble." – Probation Officer*

Responses to Noncompliance

Probation officers have limited discretion for filing formal violations for more serious misdemeanors and felony offenses. In these cases, almost all probation officers expressed they file formal violations. However, probation officers do have more discretion, as well as differences in philosophies, for how they respond to some misdemeanors and technical violations.

> *"I think we have discretion when it's a misdemeanor . . . . If I were to violate all my people on [all of the] misdemeanor drug violations they have that would be a ton. So I just make sure they're actually trying, and if they are, I won't waste the courts time in actively filing a violation." – Probation Officer*

> *"[Other Probation officers] and I don't agree on some things. One thing we don't agree is for property crimes and drug offenses. For me, it depends. Sometimes it doesn't make any sense to incarcerate people. But if there is a victim in the home . . . . I don't care if it was a misdemeanor. That raises the level." – Probation Officer*

Overall, probation officers and supervisors described a departmental approach where they seek to avoid filing formal violations whenever possible. However, probation officers and supervisors demonstrated differences in philosophies for when a behavior meets that threshold. Some probation officers suggested they felt compelled to file formal violations, especially

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[16] Matthew T. DeMichele, Brian K. Payne, and Adam K. Matz, "Community Supervision Workload Considerations for Public Safety" (The Bureau of Justice Assistance, August 2011), https://www.appa-net.org/eweb/docs/APPA/pubs/CSWCFPS.pdf.

[17] APPA's recommendations suggest caseloads of 20:1 for high-risk clients, 50:1 for moderate- risk clients, and 100:1 for low-risk clients.

when supervising "high-risk" clients, because the risk assessment tool suggested they *would* recidivate.

> *"If they're reporting doing the minimum, but not addressing criminogenic needs, and assessment tools say they're high risk, that tells me they're likely to recidivate if they're not engaging in services. I would bring that to the attention of the court. Just doing the minimum and having that high of a risk to recidivate is concerning. If someone scored low or moderate, I would approach that different than high risk cases. Because sure enough if they're not addressing criminogenic needs, the tool is telling us they're going to recidivate." – Probation Officer*

Another probation officer suggested that to reduce violence and maintain public safety, sometimes it is appropriate to file a formal violation even if they have not committed a new criminal offense.

> *"I may violate depending on overall compliance. Are they reporting, working, not working, proactive engagement in the community, bad address, the violations may pile up. This adds to high public safety risk too. In our area over here, we know who the gang members are and we take that into consideration. We've had a lot of violence and try to minimize violence by responding to violations like this accordingly." – Probation Supervisor*

Some probation officers and supervisors suggested that a sense of personal accountability and a fear of harming the community results in some probation officers being more likely to file formal violations, especially when "high-risk" clients are not in compliance with terms such as reporting and engaging with programs and services.

> *"So when you go back you just try to see who has been compliant. Because the department is also holding you accountable, so you feel responsible. So if a person isn't reporting then it falls back on the probation officer, what has the probation officer done?" – Probation Officer*

> *"[My staff] work hard and only use violations when they have to. If a caseload gets bigger, there are violations. They feel like they are not doing their job if they don't do something about it. Probation officers get a fear-based mentality. They see noncompliance and are afraid of harm to the community." – Probation Supervisor*

Probation officers and supervisors also noted disparate use of the Department's graduated response matrix across officers. The response matrix is a structured decision-making tool intended to enhance transparency and reduce bias in responses to noncompliance. It uses client risk and the seriousness of the violation to determine a range of acceptable responses. However, the response matrix has not been updated since 2013 and officers are not regularly trained to use the tool.

Formal Violation Outcomes

KEY FINDINGS: FORMAL VIOLATION OUTCOMES

- Nearly 90% of formal violations in 2019 resulted in custodial sentences.
- Less than 10% of formal violations in 2019 resulted in probation termination, while 65% of sentences resulted in tolled time, increasing clients' time under probation supervision by pushing back their probation expiration dates (on average just under one year).
- Judges typically agreed with the sentencing recommendations of Probation for formal violations filed with the court. In cases where judges did not agree with Probation's recommendations (24% of cases), more often judges' sentences were less punitive (18%), not more punitive (6%) when compared to Probation's recommendation.

TABLE 6 shows the sentencing outcomes for all formal violation convictions in 2019. Less than 10% of these formal violations resulted in probation termination. In cases with no new criminal offense, only 5% of all cases resulted in probation termination. Overall, 65% of sentences resulted in tolled time, which increased clients' time under probation

supervision by pushing back their probation expiration dates. On average, cases that resulted in tolled time increased the length of probation by just under one year.

TABLE 6. 2019
Formal Violation Outcomes

Formal Violations	Convictions (N=576)	% Population w/ Formal Violation
Technical Violation	**229**	**100%**
Probation terminated	11	5%
Sentenced to jail	196 (avg. 60 days)	86%
Sentenced to prison	7 (avg. 3 years)	3%
Modified treatment	88	38%
Modified other terms	18	8%
Tolled time	145 (avg. 10 months)	63%
New Criminal Offense	**347**	**100%**
Probation terminated	40	12%
Sentenced to jail	260 (avg. 117 days)	75%
Sentenced to prison	35 (avg. 3 years)	10%
Modified treatment	134	39%
Modified other terms	47	14%
Tolled time	230 (avg. 1 year)	66%

Almost 90% percent of formal violations for a technical violation of probation terms resulted in custodial sentences, with 86% resulting in jail sentences and 3% resulting in prison sentences. Eighty-five percent of formal violations for new criminal offenses resulted in custodial sentences, with 10% of these resulting in prison sentences. Prison sentences were for an average of 3 years, whereas jail sentences were shorter, approximately 2 months for technical violations and 4 months for violations for a new criminal offense. According to probation staff, in a substantial portion of these cases, individuals did not serve their entire custodial sentence in jail. In some cases, individuals received credit for time served and were released from custody immediately upon sentencing. In other cases, individuals may have been released to the County's Custody Alternative Program (CAP) or a treatment center.

In addition to serving custodial sentences, over one-third of violations resulted in modified probation terms. Nearly 40% of all formal violations resulted in modified terms related to substance use treatment while approximately 11% of formal violations resulted in the modification of other terms (e.g., frequency of check-ins, protective orders, adding DUI-related terms). This is noteworthy given that individuals with terms related to substance use treatment were more likely to be convicted of formal violations than individuals without these terms.

Error! Reference source not found. demonstrates that in approximately three-quarters (76%) of cases, judges imposed Probation's sentencing recommendations.

However, in instances when they did not agree with Probation's recommendations, judges imposed three times as many sentences that were less punitive (18%) than more punitive (6%) compared to Probation's recommendation. This suggests a landscape where judges are likely to be amenable to policies or practices that support probation success and reduce the severity of sentencing outcomes in cases where individuals do violate the terms of their supervision.

FIGURE 8.
Judges Alignment with Probation Sentencing Reccomendation

Imposed Probation's Recommendation	Less Punitive Sentence	More Punitive Sentence
76%	18%	6%
401	98	34
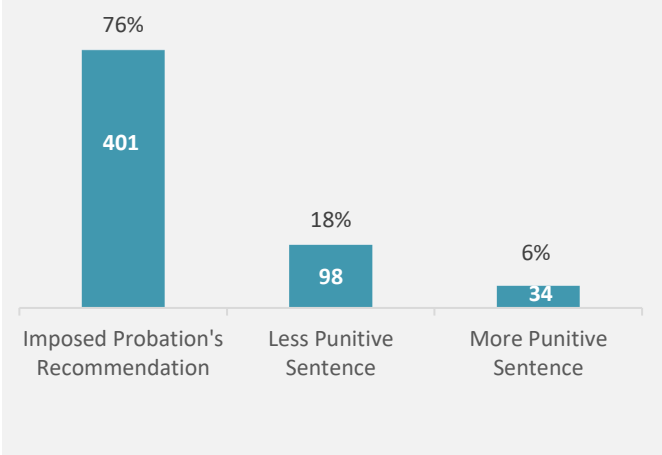
Discussion

The Santa Cruz County Probation Department has established a reputation as a forward-thinking organization based on a long history of successful reforms. In that vein and spirit, the County was drawn to the Reducing Revocations Challenge. The findings above are, in large part, attributed to the co-design and cooperative partnership with probation staff in developing the methods, implementing the data collection, and contributing to the analysis and interpretation of data. The steering committee and data collection workgroup have provided structure and opportunity to engage local expertise throughout this project. It is important to continue to build upon the expertise, opinions, and reflections of staff by maintaining engagement with the steering committee, working groups, and other staff to support data collection and analysis, and to identify policies, practices, and strategies to reduce technical violations and revocations. This will be crucial moving forward to ensure the successful integration of new policies or practices stemming from the above findings, discussed in greater detail below.

Key Findings

Taken together, the findings above show that in Santa Cruz County, nearly 80% of adults under probation supervision were successful in 2019. At the same time, findings revealed themes among adults (22%) who were convicted of formal violations in 2019, pointing to areas for further inquiry. These themes are discussed below, along with preliminary recommendations for moving the findings forward into actionable policies, practices, and strategies geared towards system improvements and reduced numbers of probation violations.

Inconsistencies in probation officer philosophies and practices.

Inconsistencies in probation officers' approaches impact client experiences. Some probation officers, particularly those with smaller caseloads, are able to focus on developing relationships with clients built around assistance and providing greater opportunities for success, including referrals to a wider array of services. Other probation officers, often those with larger caseloads, focus more on compliance to court mandates. These factors result in discrepancies around when to file formal violations and sentencing recommendations made to the court. While almost all probation officers expressed the Department leads with a rehabilitative approach, it is noteworthy that formal violations are often filed for reasons that suggest a lack of engagement with probation or drug treatment rather than a grave public safety risk. Developing a greater consensus around the purpose of probation, as well as ensuring that all policies and practices align with the Department's mission, could help create more consistency in probation officer approaches.

The role of risk in policy and practice.

Santa Cruz County Probation should look deeper into the role of recidivism risk and how risk scores impact supervision practices. Because risk scores are determined in part from prior criminal justice contact, utilizing risk to determine outcomes can exacerbate racial disparities and result in Black and Hispanic/Latinx populations further penetrating the justice system. Currently, risk scores from the CAIS are used in the violation response grid to determine sanctions. As a result, higher risk individuals receive more restrictive sanctions for the same behaviors as their lower risk counterparts. Additionally, supervision practices for individuals with higher risk scores result in greater monitoring, surveillance, searches, and drug testing. This approach is likely to result in a self-fulfilling prophecy in which the response to risk, in part, contributes to the perpetuation of criminal justice system involvement. Risk scores do not predict violence and individuals who commit lower-level crimes, which are less of a threat to public safety, are often the same individuals with high risk scores. Santa Cruz County should ask how it can mitigate risk and address the root causes responsible for clients' high risk scores. These discussions should not only focus on the individual, such as promoting protective factors, resiliencies, and skills that reduce the risk of rearrests—but also involve contextual factors such as reducing the need for police contacts by reducing warrants and better engaging clients. These issues related to risk are not specific to Santa Cruz County Probation, but broader problems facing juvenile and criminal justice systems throughout the country and an

unfortunate unintended consequence of implementing certain evidence-based practices such as risk assessments and structured decision-making tools.

Responses to vulnerable and high need populations.

Certain populations may have higher rates of violations because of barriers, needs, biases, and common practices that impact these vulnerable groups more significantly than other populations.

- **Substance use**. Over half of adults under probation supervision in 2019 had specialized drug- and/or alcohol-related probation terms (e.g., abstain from use, mandated engagement, and completion of programming). Individuals with these terms were convicted of formal violations at over twice the rate of all other adults under probation supervision. Many had formal violations filed for failure to report to probation, failure to enroll in or complete programming, or failure to abstain from drug use. Treating, disrupting, and responding to substance use, abuse, and dependency is incredibly challenging, as is evidenced by the high rate of violations for individuals with drug terms. Given the degree to which this issue is at the heart of many violations that often lead to jail, Santa Cruz County should evaluate whether the cost and resources applied to control, detect, and punish these behaviors outweigh their benefits. SCCPD should consider to what extent current practices contribute to "no shows" and non-reporting that result in warrants, and how certain practices could be altered so that there are higher levels

of engagement (e.g., individuals looking to probation for assistance addressing substance use and dependency). If treatment resources are not sufficient to serve and engage the population with substance use needs, SCCPD and Santa Cruz County should determine who needs to be involved, beyond probation, in addressing this issue. SCCPD should also explore what alternatives to formal processing and jail can be implemented administratively within SCCPD to address these vexing issues. These are important issues for Probation, as well as cross-system partners, to consider that get at the heart of probation's purpose.

- **Mental illness.** Probation clients with serious mental illness have additional opportunities for technical violations for behavior such as refusal to take medication or engage in treatment. These clients are often challenged by homelessness and co-occurring substance use disorders. Some behaviors associated with certain mental health issues make these clients vulnerable to arrest, often for petty matters or technical violations. Clients with serious mental illness may also receive more intensive supervision which can lead to greater detection and higher rates of violations. Probation might consider to what extent additional alternatives to incarceration and incentives that promote stability can be expanded to reduce violations for this vulnerable population.

- **Homelessness.** The homeless population is vulnerable to technical violations because they are more exposed to law enforcement, making them more susceptible to searches and monitoring. They are also more prone to low-level,

vagrancy-related crimes. Clients who are homeless may possess knives and other items for self-protection, although possession violates supervision terms. In addition, issues related to not having a permanent residence or mailing address make regular contact with probation a greater challenge for this population.

- **Racial Disparities.** Black adults comprised 1% of Santa Cruz County's adult population, 5% of the County's adult probation population, and 7% of the adult probation population convicted of a formal violation in 2019. Santa Cruz County should investigate the extent to which disproportionate police contact contributes to the overrepresentation of Black and Hispanic/Latinx individuals under probation supervision. Additionally, Santa Cruz County Probation should look deeper into revocation drivers for this subgroup, including how the utilization of risk scores to determine outcomes might have deleterious consequences for Black clients under their supervision.

With all of the issues surrounding vulnerable populations, discussions around a compliance versus assistance orientation to case planning and management would be fruitful.

Formal violations appear to contribute to a cycle of probation.

Formal violations do not often lead to probation termination, but instead lead to extending the supervision end date for those who are convicted of a formal violation. This creates higher caseloads, which also can lead to higher violation rates when probation officers are unable to develop meaningful relationships with their clients. In this way,

violations contribute to individuals remaining under probation supervision for longer periods of time, where they continue to be exposed to the risk of being convicted of a formal violation.

Interagency and community partnerships.

Probation alone cannot address all the challenges noted above. Issues like substance abuse, mental illness, homelessness, and institutional and systemic racial bias involve other county agencies and community partners who should be part of developing solutions. After this initial phase, where findings from the study are finalized and Probation works to develop policies or practices to reduce revocations, other justice system stakeholders (e.g., judges, prosecutors, defense attorneys, police, and social and human service organizations) should convene to address the systemic issues identified through this work.

As a result of this study, the Santa Cruz County Probation Department is undertaking an examination of its culture, practices, and variations in approaches among probation officers, as well as developing an incentive-based case management pilot for individuals with substance use issues.

Appendix A. Santa Cruz Probation Department's Adult Division Organizational Chart

Division Director
Sarah Fletcher

Santa Cruz County Probation
Adult Division

9/26/2019

Asst. Division Director
Yolanda James-Sevilla
MAA-TCM

Asst. Division Director
Jennifer Buesing
Training Manager

DPO III
Linda Perez
PRCS/Intensive

DPO III
Alicia Ybarra
DV

DPO III
Michelle Zubey
Pretrial

DPO III
Alphonse Arretz
1170(h)/Intake

DPO III
Mindy Sutter
General Supervision

DPO III
Natalie Berns
Mental Health/Sex Offender

DPO III
Stephanie Jarvis
Investigations

Extra Help
Probation Aide
Vacant

DPO I/II
Ed Guzman
PRCS

DPO I/II
Nicole Sheldon
South Co DV

DPO I/II
Julio Juarez
PTS Assessment/Sup

DPO I/II
Deb Voith
1170(h)/CAP

DPO I/II
Gen Sup Low/Mod
North
Vacant

DPO I/II
Duc Huynh
Mental Health

DPO I/II
Max Smith
Investigations

Extra Help
Probation Aide
Vacant

DPO I/II
Avery Keller
PRCS

DPO I/II
Glaris Carillo
North Co DV

DPO I/II
Nereida Rodriguez
PTS Assessment/Sup

DPO I/II
Priscilla Tracy
South Co 1170(h)

DPO I/II
Felicia Santiago
North Co Gen Mod/Moderate/High

DPO I/II
Ana Gallardo
Mental Health

DPO I/II
Myra Rodriguez
Investigations

DPO I/II
Armando Baltazar
PRCS

DPO I/II
North Co DV
Carlo Castagnetto

DPO I/II
Tatiana Dias
Martins PTS
Assessment/Sup

Probation Aide
Jessica Mills-Denti
Intake

DPO I/II
Denise Sanchez
North Co Gen Mod/Moderate/High

DPO I/II
Sam Palomares
Sex Offender

DPO I/II
Genalle Gilmore
Investigations

DPO I/II
Leigh Armentano
North Co Intensive

DPO I/II
Kevin Berns
South Co DV

DPO I/II
Esteban Maturino
PTS Assessment/Sup

Probation Aide
Crystal Mendoza
Intake

DPO I/II
Liz Haro
South Co Gen Sup
Moderate/High

DPO I/II
Sandy Aguilar
Sex Offender

DPO I/II
Joey Miller
Investigation/P63

DPO I/II
Jorge Romo
South Co Intensive

DPO I/II
North Co DV
Cliff Sullivan

DPO I/II
Adam King
PTS Assessment/Sup

OA III
Barbara Eisenbeis

DPO I/II
Angela Vasquez
ICOTS/1203.9
Transfers

DPO I/II
Andy Lesniak
Mental Health

OA III
Sarah Scheeper

DPO I/II
Taylor Moore
DV High/Gang/Intensive

Probation Aide
Marshall Jaurigi
PTS Sup

OA III
Chase Brown
.5

DPO I/II
Olga Perez-Mayorquin
Gen Sup Low/Mod
South

Probation Aide
Heather Johnson
PTS Sup

GS
Service Center
Vacant

OA III
Vanessa
Valenzuela

Intensive/Specialized – Avg. Size = 34

Domestic Violence – Avg. Size = 65

General Supervision – Avg. Size = 100

Appendix B. Santa Cruz Probation Department's Violation Response Grid

Santa Cruz County Probation Department – Adult Division
VIOLATION RESPONSE GRID – VIOLATION BEHAVIORS

Step 1: Identify Behavioral Level

BEHAVIOR LEVEL 1 (MINOR)	BEHAVIOR LEVEL 2 (MODERATE)	BEHAVIOR LEVEL 3 (SERIOUS)	BEHAVIORAL LEVEL 4 (HIGHEST INTENSITY)
a. Fails to report truthfully or notify Probation Officer as directed (report police contact, report personal contact information, travel violation change employment or /residence, etc.) b. Failure to report as directed. c. Failure to maintain employment or schooling including failure to comply with work search requirements and failure to provide employment verification. d. Failure to pay victim restitution and/or fails to meet payment schedule (Failure to meet financial obligations) e. Prohibited use of alcohol and/or drugs (1 or 2 times) or fails to submit to testing. f. Misses appointments/sessions (1 or 2 times) for treatment programs and/or Failure to enroll in required programming/treatment. g. Inappropriate dress during office visits (e.g., drug- related, gang-related attire). h. Failure to enroll in community service i. Failure to complete community service. j. Violation of geographic restrictions. k. Violation of travel restrictions. l. Curfew violation. m. Violation of electronic monitoring schedule, non victim related.	a. Fails to follow the directives of the Court and Probation Officer 3 or more times related to conditions of supervision not otherwise listed. b. Prohibited use of alcohol /or drugs or fails to submit to testing (3 or more times). c. Failure to meet programming or treatment requirements or expectations or negative termination from treatment or other programming. d. Takes prescribed psychotropic medications irregularly e. Failure to register (Controlled Substance Offender) 11590 HS. f. New Crimes that are non-persons and non-weapons misdemeanors. g. Willful failure to pay victim restitution h. Violation of stay away orders [gang members, associates, co-defendants]. i. Abscond 1-2 times with no new crime. j. Electronic monitoring time violation for non-sex offender, non-DV, or non-intensive supervision client. k. Violation of work release or custody alternatives requirements/rules. l. Association with gang members and/or felons and/or co-defendants (1-2 times).	a. Refusal to take prescribed psychotropic medications. b. Refusal to participate in or comply with conditions of prescribed treatment programs. c. Refuses to comply with imposed violation responses [sanctions]. d. Failure to Register under PC 290, PC 457.1, and PC 186.22. e. Denying access to residence and/or searches. f. Failure to report at jail commitment or community corrections facility. g. Absconding 3 or more times h. Tampering with electronic monitoring equipment. i. Association with gang members and/or felons and/or co-defendants (3 or more times). j. Behavior related to sexual assault cycle. k. All New Property and Drug Felony Crimes [All Felony crimes not included in Behavioral Level 4]. l. Refusal to engage in behavioral change strategies. m. Prohibited contact with minors, victims, potential victims, witnesses and/or survivors (1 to 2 times). n. Possession of a dangerous or deadly weapon.	a. Possession of dangerous or deadly weapons (2 or more times) or Use of dangerous or deadly weapons. b. All New Felony Crimes under PC 187-247, PC 261-269, Child Abuse, Domestic Violence, Arson, Kidnap and Felony Weapons]; All Misdemeanor Persons & Weapons Crimes, Restraining Order/Stalking Order Violations. c. Absconding 3 or more times, with current abscond from residential treatment, or failure to surrender. d. AWOL from custody alternative program or Escape from custody. e. Prohibited contact with minors, victims, witnesses and/or survivors (3 or more times). f. 4 or more prior responses to violations have been imposed and Interventions have not reduced high criminogenic needs and offender has not exhibited motivation to change pro-criminal behaviors. **Refusals:** Behavioral Level 3 violations of "refusal" (Items a, b, c and l) are defined by either of the following: 1) client stating they are refusing to engage, participate, or comply; or 2) there is repeat pattern (minimum of 2 previous times) of failing to engage, participate, or comply [which has been addressed with prior sanctions] and the client had been advised (and it has been documented) at the time of the previous sanction that further such violations would constitute a refusal for sanctioning purposes. **New Crimes:** New crime violations speak to the behavior of new criminal activity the client is engaged in, not necessarily whether a conviction occurs or an arrest has been made by law enforcement.

Assessed Risk Level	BEHAVIOR LEVEL 1	BEHAVIOR LEVEL 2	BEHAVIOR LEVEL 3	BEHAVIORAL LEVEL 4
HIGH RISK	Flash Incarceration – up to 3 days (A) Home Visit (A) Curfew (A) Daily Phone-Ins (A) Community Service (max 16 hours) (A) Increased Reporting and/or Testing (A) In-Person Reporting (A) Restrict Travel (A) ☞May select additional responses from Mod/BL1 and/or Low/BL1 Cells.	Flash Incarceration – up to 7 days (A) Pickup and Detain Court intervention - Custody time (A) Increase searches (A) Treatment Assessment or Referral GPS/Electronic Monitoring – up to 30 days (A) ☞May select additional responses from ALL BL1 & 2, Mod/BL2 and/or Low/BL3 Cells.	Flash Incarceration – up to 10 days (PRCS ONLY) (A) Pickup and Detain Court intervention - Custody time (A) Residential treatment /therapeutic community ☞May select additional responses from ALL BL 1 & 2, Cells and Mod/Low BL3 Cells..	
MOD (Med) RISK	Flash Incarceration – up to 2 days (A) Office Visit - discussion about behavior (A & B) Engage in prosocial activity (B) Modification of Case Plan (B) Employment-related activity (B) Support Groups (B) Educational Classes (B) Cog Referral (B) Thinking Report (B) Skill practice/role play (modeling by PO) (B) Writing assignments (triggers, high risk situations) (B) Problem solving homework/practice (B) Parenting class (B) Relapse prevention homework (B) Vocational/Employment services referral.(B) Job log requirement (B) College exploration/visits (B) ☞May select additional responses from Low/BL1 Cell.	Flash Incarceration – up to 5 days (A) Pickup and Detain Treatment Assessment or Referral (B) Probation extension / modification (A) Court intervention/Reprimand (A) WRAP referral (B) Victim Awareness Program (B) Immediate Contact (in person or phone) (A) Daily Phone-Ins (A) GPS/Electronic Monitoring – up to 14 days (A) Curfew - Monitored (A) Increased Reporting and/or Testing (A) Relapse prevention plan (may be done incrementally) (B) Relapse prevention group (B) Refer to specialized program (B) Gang program and/or terms (B) Community Service (max 24 hours) (A) ☞May select additional responses from All BL1 Cells and/or Low/BL2 Cells.	Flash Incarceration – up to 7 days(PRCS ONLY) (A) Pickup and Detain Work Release (A) Court intervention - Custody time (A) Increase searches (A) Drug Court (A & B) GPS/Electronic Monitoring – up to 60 days (A) ☞May select additional responses from ALL BL1 & 2, and/or Low/BL3 Cells.	1. Revocation (A) 2. Court Intervention-Custody time (A)
LOW RISK	Letter of apology (A) Verbal Reprimand (A) Written Reprimand (A) Phone Contact (A) Deny Travel Permit (A) Send Comply Letter (A)	Verbal Reprimand (A) Written Reprimand (A) Deny Travel Permit (A) Immediate Contact (in person or phone) (A) Office Visit - discussion about behavior (A & B) Geographic restrictions (A) Restrict contact with peers (A) Vocational/Employment services referral.(B) ☞May select additional responses from Low/BL1 Cell.	Flash Incarceration – up to 5 days (PRCS ONLY) (A) Pickup and Detain Probation extension / modification (A) Court intervention/Reprimand (A) GPS/Electronic Monitoring – up to 14 days (A) Immediate Contact i(n person (A) ☞May select additional responses from ALL BL1, and/or Low/BL2 Cells.	

A = Accountability Response: Accountability Responses are designed to stress accountability and public protection.
B = Behavior Change Response: Behavior Change responses address criminogenic needs that are driving violation behavior.
➪Flash Incarceration (PRCS only) and GPS/Electronic Monitoring requires Manager approval.
➪Community Service response may require consent to modify / stipulated order or court intervention.
➪Select the appropriate response(s) from the prescribed grid cell. As long as at least one of the response(s) selected is from the prescribed grid cell, lower level responses can also be selected to address the violation behavior. Primary Response outside prescribed grid cell is considered an override.

Appendix C. Research Methodology

The Santa Cruz County Action Research Team (ART), led by Resource Development Associates (RDA) in partnership with the Santa Cruz County Probation Department (SCCPD), implemented a mixed-methods, multi-phased assessment to explore a wide range of potential revocation drivers including 1) terms and conditions of probation, 2) client behavior, 3) probation officer responses to client behavior, and 4) court dispositions, among other factors. The research team initially planned on a linear transition through the research phases, however, COVID-19 and the California wildfires, including the CZU Lightning Complex fire that caused widespread evacuations and destruction across Santa Cruz County, led to unanticipated changes in the data collection and analysis process. RDA extended the timeline of some data collection activities, relied on alternative data sources when others were unavailable, and updated the overall research approach to reflect a more iterative process in which some of the research phases occurred simultaneously rather than distinctly, as was originally planned. RDA's four research phases and descriptions of the aligned activities are described in further detail and depicted in **Error! Reference source not found.**, below.

Figure 9. Research Phases

| Phase 1: Project Launch and Context Setting | → | Phase 2: Revocation Landscape Analysis | → | Phase 3: Revocation Process Analysis | → | Phase 4: Policy & Practice Recommendations |

Phase 1: Project Launch and Context Setting

The initial research phase provided an opportunity to obtain contextual information to guide data collection and analysis activities over the course of the assessment. RDA worked with SCCPD to build a foundation for the assessment by reviewing previous reports and documents that provided context, such as legal and administrative policies and procedures, to support upcoming assessment activities. The evaluation team also conducted interviews with key cross-system stakeholders involved in the probation violation process.

Document Review: To obtain the necessary context to support assessment activities, RDA reviewed reports such as the *2018 Annual Report* and *Justice System Change Initiative-Santa Cruz County Jail Utilization Report*, as well as administrative documents such as the Violation of Probation Report Writing Procedures Manual, Probation Violation Form templates, and the Probation Violation Response Grid. These documents provided RDA with important insights into local policies and practices to inform subsequent research phases.

Key Informant Interviews with cross-system stakeholders: RDA conducted key informant interviews with cross-system stakeholders, including judges and leadership from Probation, the Sheriff's Office,

the District Attorney's Office, and the Public Defender's Office. This was an important formative step in the research process to better understand their perceptions of revocations drivers in Santa Cruz County, as well as priorities for the research.

Phase 2: Revocation Landscape Analysis

RDA conducted quantitative analyses using administrative data extracted from both Probation's and the Court's case management systems to develop an understanding of what is occurring regarding probation revocations in Santa Cruz County. These data and analyses were used to assess the demographic and case characteristics associated with probation violations in Santa Cruz County.

<u>Probation Case Management System - Administrative Data Analysis:</u>[18] RDA obtained individual, docket-level data from SCCPD's case management system for all adults under probation supervision at any point in 2019 (n = 1,744). The administrative data RDA received included:

- Sentence date, open date, and close date for each probation case for each individual
- Case type (formal supervision, post-release community supervision, mandatory supervision)
- Demographic information (e.g., race, sex, age)
- CAIS assessed risk scores[19]
- Probation terms and conditions
- Client contacts with Probation Department
- Incentives and graduated sanctions
- Court event hearings

RDA used these data to perform descriptive analyses to identify a profile of the adult probation population across demographic characteristics, CAIS assessed risk scores, classification types, and probation terms and conditions.[20]

<u>2019 Formal Violation Data and Analysis:</u> RDA worked with the Superior Court and Sheriff's Office for a significant period before learning that the court was unable to provide information on the outcomes of violation hearings, and limitations to the data the Sheriff's Office could provide would not allow

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[18] These data rely on probation officers entering information on formal violations into their case management system, and thus, are an underrepresentation of all formal violations during this period. There is no reason to believe there are systematic differences in the case profiles of formal violations that were not entered into the system at this time.

[19] The Correctional Assessment and Intervention System™ (CAIS) is a supervision strategy model that weaves together a risk assessment and a needs assessment—in one face-to-face assessment interview.

[20] RDA quality assured and ran descriptive statistics for all data provided by Probation. After discussing these data and identifying which were most meaningful based on data quality and relationship to probation success and failure, the Santa Cruz ART determined these were the most useful data for the research dataset.

RDA to calculate the impact of probation violations on the County's jail population. To ensure we had access to a robust dataset to report on formal violations, RDA worked with SCCPD leadership to develop a database template and recruit a data entry workgroup comprised of probation officers and probation aides. The data elements collected on formal violations in 2019 included:

- P-Number (Client Probation ID#)
- Name
- Arraignment Date
- Sentencing Date
- Probation Officer Name
- Judge Name
- Reasons for Violation (New Offense, Technical Violation, and/or FTA/Abscond)
- Technical Violation Type (Failure to Report, Failure to Attend or Complete Programming, Failure to Abstain from Controlled Substance)
- Violation Hearing Outcome (Convicted, Dismissed, Withdrawn)
- Sentencing Outcomes
  - Probation Termination (Yes/No)
  - Jail/Prison Days/Years
  - Modified Terms (Treatment/Services, Other)
  - Tolled Time (Original Expiration Date, New Expiration Date)
- Court Decision Similar to Probation (Yes, No – More Punitive, No – Less Punitive)

These data were merged with Probation's administrative data to develop a descriptive overview of violation outcomes. Next, RDA conducted inferential analyses to isolate the effects of specific factors on violation outcomes. RDA utilized logistic regression, which is widely accepted for analyzing recidivism rates and isolating the effect of different factors on the likelihood of recidivism.[21]

- *Logistic regression.* Logistic regression is a method for analyzing data that examines the probability of an event occurring – in this case, the probability of individuals on probation being convicted of a formal violation. The logistic regression results indicate the estimated probability of a formal violation, isolating the effects of specific factors while controlling for additional factors including age, gender, race, risk, probation terms, and probation caseload type.

In addition, these data were used to measure sentencing outcomes for formal violations by violation type. This included examining the proportion of violations that resulted in probation being terminated or time being tolled on their probation case (i.e., supervision end date pushed back), as well as the proportion of violations resulting in modified probation terms or jail or prison sentences.

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[21] Schmidt, P. Witte, A.D. (1988). *Predicting Recidivism Using Survival Models. Research in Criminology.* Springer.

RDA was also able to track whether judges' sentences were more or less punitive than probation officer recommendations, measured by whether judges sentenced individuals to longer jail terms or prison instead of jail (more punitive), versus recommending shorter jail terms or treatment in lieu of jail sentences (less punitive).

Phase 3: Revocation Process Analysis

Due to the environmental circumstances described above, RDA conducted the revocation process analysis while simultaneously conducting the landscape analysis (Phase 2). Phase 3 included a case file review as well as focus groups with probation officers, supervisors, and clients. The iterative nature of Phases 2 and 3 facilitated a process in which the findings from the landscape analysis and the process analysis informed one another – gaps in quantitative data were explored through focus groups and the case file review and vice versa – to simultaneously assess *what* was occurring regarding revocations and explore *why* and *how* revocations occurred.

Case File Review: SCCPD captures case notes in their electronic case management system. RDA conducted an initial review of a sample of all electronic case files from 2019 and discovered that there were thousands of case events in Probation's case management system and that some documents were more informative than others. The evaluation team ultimately decided to conduct a thorough review of bench warrants and violation petitions because they contained the most relevant information about violations and revocations, as well as detailed information about the trajectory of each case.

RDA reviewed a random sample of 363 bench warrants and formal violation petitions filed for 250 unique individuals in 2019 (approximately 50% of all violations filed during the calendar year). These data were used to better understand why probation officers filed formal violations in 2019. In reviewing the petitions filed with the court, the RDA team was able to assess the extent to which clients' risks and needs were associated with violation filings, and most importantly, the reasons why formal violations were filed (e.g., new criminal offense, technical violation, FTA/abscond), including an in-depth assessment of the most common technical violations filed (e.g., failure to report, failure to participate in treatment, failure to pay fines and fees).

Probation Staff Focus Groups: RDA conducted remote focus groups with probation officers and aides, as well as supervisors, to gain insights into how they view their roles, and what their supervision approaches look like, including how they work with clients on a day-to-day basis. As a part of these focus groups, RDA also sought to learn more about 1) the main challenges individuals under their supervision face, 2) key factors that influence their responses to client noncompliance, and 3) the extent to which there are consistent approaches, including use of the response matrix, in dealing with noncompliance.

RDA worked with SCCPD leadership to seek participation from all probation officers, supervisors, and aides within the Department. In total, RDA conducted a total of three focus groups with 21 probation

officers, supervisors, and one probation aide. The supervisor focus group had six participants and the two probation officer/aide focus groups had 15 participants. The supervisors oversaw the mental health, sex offender, pretrial, and general supervision units, as well as the Probation Services Center. The probation officers were responsible for supervising clients classified as low, medium, and high-risk and represented a variety of caseloads, including domestic violence, mental health, sex offender, PRCS, mandatory supervision, and general supervision. They also worked in the pretrial and intake units.

Probation Client Focus Groups: RDA conducted remote focus groups with probation clients to understand their experiences under supervision by the Probation Department and their perspectives on facilitators and barriers to success, including conditions that are most difficult to meet, and why. The RDA team sought to sample clients from across the County (i.e., North and South County), as well as Spanish-speaking clients, clients under general supervision and AB 109 supervision, and clients who accessed services through probation. Given circumstances surrounding COVID-19 and wildfires in Santa Cruz County, identifying clients who were willing to participate was challenging. In the end, utilizing convenience sampling procedures where probation officers reached out to clients across this range of characteristics (noting that each participant would receive a $20 gift card for their time and that all responses would remain anonymous), we obtained a sample of clients with a variety of experiences on probation. All clients who expressed interest in participating were invited to join a focus group.

The evaluation team conducted five client focus groups with 18 individuals. One focus group was conducted in Spanish and the remaining four were conducted in English. Clients represented a variety of caseload types, including felony, PRCS, and general supervision.[22] Some clients were on probation for the first time and had completed one to two years of their supervision term, while other clients had been on probation for five years or more. Clients with longer periods under probation supervision either had multiple simultaneous active cases or had their probation period extended due to violations.

Phase 4: Policy & Practice Recommendations

After synthesizing the results from Phases 1 through 3 and finalizing a report, RDA identified opportunities and developed recommendations for policies and practices SCCPD can implement to reduce revocations while maintaining public safety.

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[22] Some clients did not know their caseload type; therefore, this information was not available for all focus group participants.

Appendix D. Logistic Regression

Variable	*Formal Violation* Odds Ratio (SE)
Demographics	
White	1.00
Hispanic/Latinx	.85 (.12)
Black	.99 (.27)
Asian/Pacific Islander	.55 (.44)
Other	.71 (.23)
Male	1.00
Female	.89 (.16)
Ages 35-44	1.00
Ages 18-24	1.46 (.34)
Ages 25-34	.95 (.14)
Ages 45+	.57 (.11)*
Risk Level	
Low Risk	1.00
Moderate Risk	2.80 (.52)*
High Risk	3.22 (.62)*
Caseload Type	
Formal Probation - Felony	1.00
Formal Probation - Misdemeanor	.60 (.13)*
PRCS	2.05 (.41)*
AB 109 Mandatory Supervision	1.33 (.28)
Probation Terms^	
Standard Terms Only	.59 (.22)
Domestic Violence or Protective Terms	1.04 (.14)
Gang Terms	.64 (.13)*
Mental Health Terms	1.28 (.24)
Drug/Alcohol Terms	2.09 (.37)*
Pseudo R-Square Value	.12

* Indicates coefficient statistically significant at $p < .05$ or below

^ Reference groups are individuals with any other terms other than the term listed