



November 26, 2008

Written Commentary
Sunset Advisory Commission
Staff report on TYC, TJPC, and OIO

Texas Network of Youth Services would like to thank the Sunset Advisory Commission for its commitment to improving the juvenile justice system in Texas. We are pleased to see that many of the Advisory Commission's recommendations for reform are congruent with best practices for juvenile justice systems, and we support the Advisory Commission in its recommendations to resolve the issues it has identified as two through four in its recent staff report. We have some concerns about the Sunset Advisory's recommendation to abolish TYC and TJPC and transfer their functions to a newly created state agency, however.

First, we have strong Faith in Commissioner Townsend and the efforts she is making to reform TYC, and we are concerned that such a dramatic restructuring of the Youth Commission will delay the necessary improvements and reforms that are already underway. Second, while we recognize that the intention of the Advisory Commission is to improve the functional performance of both agencies, we are concerned that consolidation poses the risk that funding could be diverted from youth probation services to cover the higher costs of incarcerating youth; especially over time. Furthermore, previous efforts to house both probation and incarceration services under one umbrella juvenile justice agency have not been successful, so we are concerned about trying it again, especially at a time when there is such a strong need for successful agency reform.

We recognize that the Advisory Commission presents a good case for consolidation, however, so we would like to request that if the Commission makes a final decision to recommend the consolidation of both agencies, it also recommend that savings from reduced administrative costs be spent on prevention and intervention programs. Such a recommendation will help ensure that any move to consolidate is based on advantages the Commission outlines in its report - better strategic planning, increased information sharing, and more integrated services - rather than to save the state money at the expense of youth and families who are in crisis and need our help.

Thank you,

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Texas Network of Youth Services