



Timothy Montoya Task Force | Meeting 11 November 1, 2023, Meeting Recap Intervention Subcommittee

Overview

The Timothy Montoya Task Force to Prevent Children from Running Away from Out-of-home Placement is legislatively charged with analyzing the root causes of why children and youth run from out-of-home care to help develop a consistent, prompt and effective response for when children and youth do run. It is also charged with assessing how to address the safety and well-being of children and youth upon their return to care.

Overview of Subcommittee Work

Trace Faust reminded the group that they will divide into one of two subcommittees: Intervention Subcommittee and Prevention Subcommittees. Guest speakers will present during each subcommittee discussion on respective topics. Trace reminded members they will have access to all the materials of the subcommittee they do not select and all members may access full recordings of each meeting on the Office of the Colorado Child Protection Ombudsman's (CPO) website. Dorris Tolliver will be facilitating the Intervention Subcommittee and Jordan Steffen with the CPO will be present to support. Trace will be facilitating the Prevention Subcommittee and Bryan Kelley with the CPO will be present to support. Both subcommittees were provided with unique sets of research specific to the subjects they are discussing.

Intervention Subcommittee

Doris Tolliver introduced the speakers. Demaris Nicholson, Program Specialist, and Greg Eakens, Director of Special Investigations, Special Investigations Division, Texas addressed the Intervention Subcommittee.

Greg and Demaris provided an overview of the Texas Department of Family and Protective Services, introducing the role of special investigators. The special investigators were integrated into the division due to their law enforcement experience in serious investigations, particularly child protection cases. They have about 308 staff, including regional directors, program directors and program specialists. The unit covers 254 counties and supports over 2,600 investigators, with specialized roles, including locating missing children and youth and families avoiding child protection services. Demaris and Greg provided the following highlights of the special investigators' unit:

• While some states have a county-based approach, a statewide oversight system works well for Texas, especially for the special investigators. Special investigators collaborate across regions to locate missing children and trafficked children, ensuring continuity and building relationships with the child.

- The same special investigator is primarily responsible for locating the same child or youth each time, ensuring consistency and a familiar face in the child's experience. For example, when a child or youth placed in Region 1 goes missing in Region 6, the Region 1 special investigator takes action. They conduct social media checks, contact the child's family, attorneys, and the Guardian ad Litem. The investigator also collaborates with the Region 6 investigator, visiting the placement to understand the circumstances leading to the child's disappearance. When the child is recovered, the investigator conducts a recovery interview. However, challenges arise when the placement relocates to yet another region.
- Special Investigators have just over 300 staff to handle 1,334 children and youth. Some of these children run away multiple times a day. They stressed the importance of the resources, time, and commitment involved in finding missing children and youth, including ensuring their safety and addressing health concerns.
- The importance of communication with ongoing staff was emphasized. The example of a diabetic teenager who ran away illustrates the urgency of such communication. Tracking her from Austin to Houston, Dallas and Oklahoma involved coordination among special investigators, law enforcement agencies, and other stakeholders, leading to her recovery within 24 to 48 hours.
- Beth McNalley inquired about the training provided to investigators for engaging with youth, particularly high-risk youth. Greg mentioned that many investigators bring valuable communication skills from their law enforcement careers, which often involve de-escalation and social work aspects. He highlighted training through their academy and collaborative efforts with coalitions, such as the Texas Human Trafficking Coalition. There are also ongoing training initiatives like motivational interviewing get into practice comes into play with recovery interviews, highlighting the importance of covering specific topics in a conversational way during engagement and potentially teaming up investigators with different communication strengths to enhance interactions.
- Jana Zinser shared concerns and questions about the advantage of hiring ex-law enforcement for engaging with high-risk youth. Greg maintained that special investigators often establish a connection with the child or youth and sometimes the child or youth prefer to communicate with them. While this might be challenging to back up with data, it was noted that this approach works effectively. Greg highlighted the importance of hiring individuals with extensive investigative experience who understand the nuances of communication with victims, perpetrators, and witnesses, as it goes beyond a simple checklist interview and involves effective communication.
- The speakers discussed the urgency surrounding missing youth and clarified that in Texas, the response to a missing youth may not always qualify an Amber Alert. They explained that law enforcement has specific time frames for reporting missing children and their responsibilities have been outlined in legislative amendments. Special investigators focus on building relationships and communication with law enforcement agencies to expedite the process.
- The Child Safety Check Alert List is used for cases where the state does not have custody but a child has gone missing while under the care of a caregiver. Special investigators manage this process and communicate directly with the Department of Public Safety to enter the information, which allows law enforcement to locate the child.
- Recovery interviews involve asking children what they had to do to survive while they were away from placement, covering essential topics. However, children cannot be forced to talk, and their rights are respected.
- The availability of child advocacy centers (CACs) can vary across the state. The decision to use CACs for forensic interviews depends on the specific situation. While forensic interviews are not

yet a standard checklist item due to capacity issues, the focus is on ensuring that the child's best interests are met and may depend on the presence of allegations of trafficking or other criminal activities.

- They have two guides for locating missing children or youth, one for all of Texas and one specifically for the "big five" counties like Travis County and Harris County. They use the "SEE IT" tool, a screening tool for identifying high-risk factors, including potential trafficking or other risks when children come back after being on the run. This tool helps capture information about sexual victimization and trafficking incidents, and it is used for recovery interviews. The tool is widely used by various advocacy groups and agencies to screen and assess high-risk cases.
- A question was asked: "What do you do if children don't want to be recovered?" Greg explained that they are not authorized to use force on children as they are not peace officers but part of a social services agency. "We are we're not going to put our hands on children. One, that doesn't do much for the next encounter for the child but we also remember that child is a victim at the beginning of when they come into our care and we're very careful about that."
- If they locate a missing child or youth who refuses to come with them, they rely on law enforcement to handle the situation. Law enforcement can detain the child or youth, and depending on local requirements, this detention can involve measures like handcuffing.
- Interactions with law enforcement vary by location. In some counties, when they locate a missing child or youth, law enforcement may detain the child or youth if they are actively running away and treat it as a status offense or civil action. The child might be taken to juvenile detention, and officers decide how to proceed. Some areas also have initial detention hearings with judges within three days and follow-up hearings every 10 days to determine the best course of action for the child or youth.
- In some areas, especially larger cities, law enforcement may be stretched thin and not respond promptly to non-priority calls, such as locating a 17-year-old missing child. In such cases, the special investigator team might pick up the child, and law enforcement could clear the child out of NCC (National Crime Information Center) later. The Texas Highway Patrol and the Department of Public Safety are mentioned as entities that assist in these efforts.
- The partnerships and relationships with law enforcement are both formal and informal. They have agreements, such as a Memorandum of Understanding (MOU), with various organizations and coalitions. They also have regular collaboration with detectives who investigate trafficking.
- Effective communication is crucial in addressing the challenges they face. One way they overcome communication barriers is by attending meetings, inviting others to theirs, and engaging in face-to-face discussions. This helps foster better relationships and collaboration.
- Additionally, understanding each agency's limitations and specific goals is essential. Recognizing what their partners can and cannot do allows them to allocate resources more efficiently and prevent unnecessary resource tie-ups. This understanding contributes to smoother cooperation and resource management.

Member Q&A with Speakers

Brian Cotter believes the Texas model has great potential for adaptation in Colorado and can serve as a helpful reference for improving the coordination and communication between different agencies in Colorado.

Doris presented the question: "What would you stand up first knowing what you know?"

The speakers discussed key lessons learned and critical success factors for the Special Investigations unit in Texas. They emphasized the importance of collaboration, communication, and leveraging the unique skills and backgrounds of special investigators. They also highlighted the need to provide resources and latitude to allow the unit to function effectively. Additionally, they stressed that hiring experienced individuals with the right qualifications is crucial for the success of such a program. In Texas, being a state-run system allows for better coordination and communication between state agencies.

Member Discussion

The Texas Special Investigations unit follows a specialized law enforcement approach, focusing on individuals with law enforcement backgrounds and expertise, ensuring a more tailored response to the specific challenges related to missing and trafficked youth. In contrast, Colorado tends to expect law enforcement agencies to handle these tasks, which can lead to mixed responses from different agencies. Often, the personnel tasked with this responsibility lack the specialized skills and expertise required for addressing the unique needs of missing and trafficked youth.

Texas has effectively merged law enforcement knowledge with a deep understanding of child welfare and the child welfare system, creating a more comprehensive and specialized approach to dealing with these cases.

Dennis Desparrois discussed a few points:

- He expressed his view that the county-administered nature of child welfare services in Colorado may not be a significant barrier to implementing a state-level Special Investigations unit, contrary to the belief of some at the CDHS. He noted that Division of Youth Services (DYS) occasionally uses similar services, albeit at a higher cost.
- Concerns from Colorado Department of Human Services (CDHS) leadership, including doubts about the necessity of housing such a unit within CDHS, were mentioned. Dennis indicated there might be skepticism regarding the proposed model.
- Dennis pointed out the need to examine state statutes to determine whether non-law enforcement personnel can perform tasks similar to those undertaken by Texas's Special Investigators. He emphasized the importance of considering legal aspects and potential barriers.

Norma Aguilar-Dave inquired about the consensus within the group regarding whether they are committed to pursuing the proposed intervention or if they are still in the exploratory phase. The response emphasized that the group may not be entirely united on the decision, with some members wanting to explore the topic further. Further investigation into the details is required before making a recommendation.

Dennis expressed his hesitation to bring forward the proposed intervention as a recommendation in isolation. He emphasized the importance of evaluating this option in conjunction with other recommendations, considering the need for a cost-benefit analysis, especially since it could potentially be one of the most expensive options.

Doris expressed concerns about the Texas model's approach and how it might affect the trust of the youth involved, especially the process of talking to them and then relaying information to law enforcement without their consent. She also expressed the importance of listening to the youth and encouraging them to share information in a trauma-informed way. She suggests adding a question about how Texas prioritizes different approaches for various youth based on their level of need.

Norma mentioned the idea of categorizing children based on severity or risk, indicating that there might be additional unexplored ideas that the group should consider. Dennis raised the point that the majority of runaways return to the facility before any intervention could be implemented. A targeted approach might be more cost-effective, focusing on the specific group of children for whom this intervention could be most helpful, particularly those who are away from care for more extended periods.

The discussion also included:

- 1. The need to assess the volume of youth who run away to understand the cost of implementing an intervention.
- 2. The importance of targeting high-risk youth, particularly those with specific vulnerabilities or those who are away for an extended period.
- 3. The role of nonprofits in helping with interventions and recovery, with an emphasis on training and vetting.
- 4. The distinction between law enforcement and non-law enforcement roles in recovering children.

Public Comment

Steve Fisher talked about his observation of the Tennyson Center and emphasized that there might be a misunderstanding regarding egress and the significance of fencing. He conducted research on building codes and believes that secure lot fencing is not inherently problematic and can prevent injuries and deaths among runaways. He expressed hope that implementing secure lot fencing could reduce restraints.

Pam Treloar, a provider, emphasized the importance of fluid and timely assessments for clients, acknowledging that clients' needs can change throughout their treatment. She highlighted the challenges of coordinating assessments with various agencies involved in a child's life and suggested the need for more efficient and accurate processes. Pam shared insights from a recent conference focused on ending corporal punishment, seclusion, and restraint. She mentioned ongoing federal discussions and movements towards eliminating these practices. Additionally, Pam suggested considering a step system in Colorado, starting with emergency response plans and gradually working towards more integrated and effective practices in the long term.

The meeting concluded with gratitude for the participants' engagement and a reminder of the recorded group sessions and forthcoming meeting minutes and synthesis. The next meeting is scheduled for December, and the group will continue to work on addressing the challenging issue of child runaway interventions.





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Prevention Subcommittee

Bryan Kelley from CPO prepared materials on prevention policies from Kansas, Vermont, Wyoming and Texas, providing a five-pager resource for review. At this meeting, Trissie Casanova, Deputy Compact Administrator and Human Trafficking Consultant, and Chris Ward, Residential and Special Investigations Agency Team Supervisor (the unit licenses and regulates all residential treatment programs and conducts investigations into allegations of child abuse or neglect within such facilities) from Vermont addressed the Prevention Subcommittee. Highlights from their presentation include:

- Trissie is the only person in her role in Vermont, and she acknowledged the differences in decentralized roles in Colorado.
- Vermont has staff-secure programs with delayed locks, and they can issue stop orders on highrisk youth to restrain them if they attempt to run away. (The term "stop order" refers to the concept of preventing a youth from running away, typically by physically intervening to prevent them from leaving the facility.)

- Vermont's unique approach involves handling Juvenile Justice and Child Protection under the umbrella of the Department for Children and Families (DCF), serving multiple population groups within the same programming.
- In Vermont, a risk screening tool has been developed to assess the risk of sex trafficking of minors. A high-risk score doesn't automatically lead to a recommendation for a stop order; it contributes to understanding the child's overall risks and planning accordingly.
- Regulations allow for physical intervention with youth, such as restraint, only for immediate safety purposes (where a child poses a significant risk to themselves, other youth, or staff members). Consideration is given to human and civil rights, aiming to prevent unnecessary harm or unfair treatment while addressing serious risks. The regulations include a carve-out for secure Residential Treatment Facilities, acknowledging the need for secure environments for certain youth, especially those accused of serious crimes.
- Some facilities in Vermont are not considered secure but have delayed locks on doors, allowing for fire safety and providing staff with a brief window for de-escalation attempts.
- In Vermont, if a youth is gone for more than three hours, programs are expected to report to the state licenser and the youth's parents or guardian.
- Staff-secure residential treatment programs largely serve kids in DCF custody (child protection or juvenile justice system); there are also residential programs in Vermont serving kids not in these systems.
- Vermont has a unique approach to accessing residential treatment care, allowing kids to receive care without entering the child protection system.
- A question was posed that prompted a discussion about the challenges parents may face in accessing the right facilities for their children, especially when dealing with mental health issues.
- There has been difficulty in managing a facility that served both adjudicated delinquents and kids with significant mental health issues in Vermont. The now-closed locked secure facility faced challenges in addressing the diverse treatment and supervision needs of kids with behavioral issues and those with mental health concerns.
- The process involves a Coordinated Service Plan (CSP) meeting, where the child's team, including the school, designated mental health agency, parent, and Department for Children and Families (DCF), discusses the child's needs, strengths, and weaknesses.
- If residential care is deemed necessary, the team can send a request to the state-level Case Review Committee, consisting of members from various departments, which meets weekly to review cases and approve placements for residential care. The committee, including representatives from the Department for Children and Families, Department of Mental Health, Department of Aging and Independent Living (Dale), Department of Education, and the Federation of Families, assesses whether kids meet the threshold for residential care and provides recommendations on suitable programs.

Member Q&A with Speakers

 A question pertaining to the restraint guidelines for facilities where children are not in state custody but are licensed by the Department for Children and Families (DCF) as Residential Treatment Programs (RTPs) was presented. The response highlighted that RTPs throughout Vermont, whether taking youth in DCF custody or referred through the Department of Mental Health, follow the same regulations, including requirements for physical intervention if a child is about to cause significant harm, as well as notifying the family if a child runs away.

- Brandon Miller asked about Vermont's runaway problem, the size of facilities, and the authority to request a stop order. Trissie explained that most programs are relatively small, resembling houses, and are licensed for six, eight, or ten kids. The largest program, the Vermont Permanency Initiative and New England School for Girls, are licensed for 50 and 20 kids, respectively, on one campus.
- Programs have policies for notification when a child in DCF custody runs away, but information about kids not in DCF custody running away from residential programs comes through various sources (law enforcement, the Vermont Intelligence Center, or media reports). For example, wilderness programs in Vermont are not required to report runaway incidents unless a child is gone for more than three hours. Trissie acknowledged she may not have comprehensive knowledge of runaways from wilderness programs due to this reporting limitation. Trissie estimated receiving notifications of a child running away approximately once a month, but the intensity varies, and situations where a child is gone overnight or for multiple days are considered serious.
- The authority for physical intervention (the "stop") in Vermont is based on licensing regulations. Programs are expected to follow these regulations, and if they physically intervene in a manner consistent with clinical and supervisory decisions outlined in the regulations, they would not be in violation.
- The Specialized Services Unit in Vermont plays a role in coordinating with programs and provides explicit guidance on cases that warrant physical intervention. They communicate with programs before a youth enters the program to discuss the appropriateness of intervention in certain cases.
- The closure of Vermont's secure facility led to an increase in the use of stop orders. When the secure facility existed, there was no need for such orders as the facility itself was designed to prevent escapes.
- The interpretation of what constitutes an emergency can lead to disagreements between regulators and facilities in deciding when to physically intervene with youth. The regulations are purposefully vague to allow flexibility based on individual program needs, leading to subjective interpretations.
- The Vermont regulation states that restraint should only be used to ensure immediate safety when no less restrictive intervention is likely to be effective and should be a last resort. Chris emphasized the difficulty of creating specific guidelines for subjective situations.
- In Vermont, they are currently working on implementing the Family First Prevention Services Act (FFPSA) and designating facilities as Qualified Residential Treatment Programs (QRTPs). However, as of now, Vermont has not designated any facility as a QRTP. They do not have a Psychiatric Residential Treatment Facility (PRTF) in the state, but there are plans to build one. The closure of Woodside, the secure facility, has led to a higher percentage of youth being placed out of state, posing challenges for the system. The Department of Mental Health and other agencies send some youth out of state for private residential placements, especially when the complexity of needs exceeds the capacity of in-state services.
- In Vermont, there is a lack of Residential Treatment Programs (RTPs) for substance abuse, and youth requiring such treatment often have to go out of state. The community also struggles to

meet the complicated and complex needs of violent youth, and there is limited intensive outpatient treatment for substance abuse within the state. Some violent delinquent youth face difficulties finding appropriate programs due to their level of aggression and treatment needs. The state's Specialized Services Unit actively seeks and evaluates programs to meet the needs of youth when in-state resources are insufficient.

- When a youth repeatedly runs away, the response involves considering a higher level of care, potentially looking at a locked psychiatric treatment program (PRTF) in another state. There is a recognition of the challenge in finding suitable placements for chronic runners, especially when they have unsuccessful discharges from previous facilities.
- Vermont is facing challenges with placements, resulting in situations where kids are housed in various locations, including hospitals, police stations, and temporary rooms. Staffing is provided by the department, but the current arrangement is considered unsafe and not sustainable, leading to concerns about the well-being of both staff and the youth involved.
- Michelle Bradley and Brandon discussed challenges related to adolescents running away from
 residential programs in Colorado. Michelle shared concerns about kids labeled as chronic
 runners facing difficulties finding suitable placements. She highlighted instances where facilities
 gave short notice or refused to accept kids back after running incidents. Brandon added that
 finding placements for kids who exhibit violent behavior and have a history of running is
 challenging in Colorado due to limited facilities. They described situations where kids end up in
 hospitals or other temporary locations while awaiting placement. Michelle also mentioned the
 struggle with finding suitable placements for kids who have complex needs, especially in cases of
 substance abuse. Overall, they expressed concerns about the lack of secure facilities in Colorado,
 leading to safety risks and limited placement options for certain youth.
- Chris emphasized understanding what kids are running to (or from) and addressing those needs for healthier outcomes.
- There is a requirement for kids in DCF custody to have a post-run interview within seven days of their return, aiming to understand the reasons behind their actions. Chris expressed the belief that all kids, even those in residential programs, should have someone they trust talk to them after a runaway incident. Trissie highlighted the necessity of ongoing communication and continuous effort to talk to them and address the underlying issues that contribute to running away.
- Trace noted the group's interest and momentum regarding youth voice, suggesting a future discussion on how they incorporate and prioritize the perspectives of young people.

Discussion

Trace recently attended a meeting where the Colorado Department of Human Services (CDHS) listed the top 10 out-of-state facilities where they send kids, and expressed interest in knowing if these facilities are predominantly locked or secure in nature.

Someone mentioned a facility which has a significant amount of land. The concept being to allow kids to run within the facility's extensive grounds, tiring them out and making it difficult for them to escape.

The conversation also touched on the challenges of small programs, and the difficulty of sustaining such programs economically based on current funding models in Colorado. The preference for smaller, more personalized settings was acknowledged, but the financial feasibility remains a significant consideration.

CDHS is engaging in discussions to enhance the physical security of private behavioral treatment services (PBTS). The focus is on implementing delayed locks in certain facilities (Brandon noted that his facility has this feature on specific doors). There is a desire to align the task force's conversation with the state's initiatives, especially concerning PBTS. The discussion highlighted the need for more detailed information on policies and procedures related to security measures.

Becky Miller Updike is seeking information on the hard infrastructure used by facilities nationally, aside from purely locked doors. Alternatives such as electronic monitoring and delayed time doors were of interest to the group, considering both immediate needs and longer-term prevention planning.

Bryan shared two key resources on the Google Drive. The first is an 80-page document compiling Colorado statutes and regulations relevant to the discussions. This document provides a common resource for understanding the legal framework in the state. The second resource is a one-page summary of state policies from Kansas, Vermont, Wyoming and Texas, focusing on limited use of seclusion and restraint and runaway prevention training. Brian suggested task force members explore these resources, and if any state policies are of particular interest, he could reach out to find experts to provide more information.

Brandon raised concerns about contradictions in the statutes and regulations he reviewed, particularly regarding the definition of restraints. Stephanie explained that the 80 pages of statutes encompass different circumstances, covering restraint and seclusion for youth in various contexts, such as those adjudicated in the Division of Youth Services or held under the Behavioral Health Act. The CPO team is working on a presentation to clarify how the statutes relate to their specific circumstances. Regarding Volume Seven, Stephanie explained that rules committees are formed to operationalize laws passed in statute. While there should be correlation between statutes and rules, she acknowledged that inconsistencies may exist.

Task force members were encouraged to use the note catcher to capture their thoughts, identify what stands out, note any missing information, and pose questions for further discussion. The group was given approximately 15 minutes to review the materials and provide feedback.

Brandon mentioned that Vermont seems to have a coordinated approach, especially concerning high-risk runaway cases. It appears that when they identify a high-risk runner, the agency reaches out to the monitoring or licensing person to coordinate and assess whether interventions, such as stopping the child, would be acceptable without facing citations. Brandon also noted that Vermont uses assessment tools to align everyone on agreed-upon risk factors, particularly related to human trafficking, and suggested that having common risk factors for children would be a beneficial approach.

Renee Marquardt raised the question of what specific added allowances the stop order provides, and Stephanie expressed interest in understanding the practical implications of having a stop order. There seems to be a need for clarification on the details and practicalities of the stop order and how it enhances the facility's ability to address safety concerns promptly.

Brandon shared that Colorado does have placement agencies, and while the state has a system, it is more decentralized, operating at the county level. He acknowledged that there are calls and referrals from placement agencies, but it seems less coordinated than the centralized system in Vermont.

Stephanie highlighted the importance of involving parents in decision-making processes, emphasizing that parents know their children best. She expressed curiosity about the pre-admission tools and whether there is a systematic approach to assessing and addressing risk factors in advance. She also found Texas's runaway prevention curriculums for providers, staff, and foster parents particularly interesting. Stephanie mentioned that Vermont seems to be facing similar challenges as Colorado.

Renee shared insights about comprehensive assessments conducted by assessors who gather different perspectives from individuals working with the child.

Brandon highlighted the importance of understanding the "why" behind running incidents, emphasizing the significance of post-run assessments to prevent recurrence. He mentioned their partnership with the University of Southern Florida for a trauma-informed, in-depth interview to explore the reasons why children run, focusing on addressing those needs in a safer way.

Stephanie highlighted the challenge of finding a comprehensive solution, noting the absence of a single state with a definitive set of best practices. Stephanie emphasized the difficulty of extracting valuable insights from various articles and state practices, emphasizing the need for Colorado to innovate based on the available information.

Renee highlighted the benefits of examining other states' practices, and understanding the spectrum of interventions. Renee acknowledged that the conversation primarily focused on kids in congregate care settings, noting the differences in strategies applicable to foster homes.

Brandon emphasized the importance of individualized treatment plans, recognizing that each child's needs are unique. He expressed his belief that decisions regarding interventions, including responses to runaway situations, should involve input from the team, professionals, and the family who know the child best. Brandon highlighted a potential barrier, citing a reference in the statutes that restricts certain considerations from being guided by the treatment plan. He suggested that revisiting and lifting this restriction could lead to more tailored and effective interventions.

Ashley Chase expressed her struggle as an attorney with the perceived lack of process and the concern that youth in facilities might face restrictions and restraints that resemble those in detention facilities. She highlighted the challenge of finding a balance and understanding the impact of decisions on all children in these facilities, emphasizing the need to consider interventions carefully. Ashley acknowledged the complexity of the issue and the difficulty in navigating decisions that affect the wellbeing of youth in different settings.

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need for more efficient and accurate processes. Pam shared insights from a recent conference focused on ending corporal punishment, seclusion, and restraint. She mentioned ongoing federal discussions and movements towards eliminating these practices. Additionally, Pam suggested considering a step system in Colorado, starting with emergency response plans and gradually working towards more integrated and effective practices in the long term.

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