

2025

Recommendations to the Administration

THE COALITION FOR JUVENILE JUSTICE

Letter from the CJJ Executive Board

Dear President Trump and Attorney General Bondi,

The Coalition for Juvenile Justice (CJJ) Executive Board and nationwide membership wish to thank you and your Administration for your commitment to the Office of Juvenile Justice and Delinquency Prevention (OJJDP), as reflected in your proposed Fiscal Year 2026 budget. CJJ and its member State Advisory Groups (SAGs), across all states, territories, and the District of Columbia, work closely with OJJDP in statutory, professional, and voluntary capacities. OJJDP and its programs and initiatives are essential in keeping our children and communities safe. The funding outlined in your budget proposal sustains and advances this critical work.

We would also like to express our appreciation for Acting Administrator, Eileen M. Garry. We appreciate her willingness to engage with CJJ and our members across the country. We look forward to continuing this partnership with a permanent OJJDP administrator once appointed.

In this collaborative spirit, CJJ is pleased to share our recommendations in support of a strong and focused federal partnership in juvenile justice and delinquency prevention, guided by your Administration. Specifically, we have included recommendations based on input from our members nationwide regarding the practices and priorities of OJJDP. We ask that your Administration focus this work on the important role which OJJDP has in ensuring that all youth have the opportunity to live safe and fulfilling lives and ensuring state compliance with the four core requirements of the JJDPA.

We are particularly focused on the Juvenile Justice and Delinquency Prevention Act (JJDPA) and other federal juvenile justice efforts that address prevention of youth victimization and violence, support positive youth development and school climate, and provide community-level support. All existing juvenile justice funding streams highlighted in CJJ's recommendations currently support continued investment in the JJDPA and the carrying out of state plans and solutions. We urge the Administration to utilize these options when crafting proposals to prevent and reduce violence in the lives of youth.

Respectfully submitted on behalf of the entire board and with our gratitude for your leadership,

Jack Martin, National Chair



Melissa Milchman, Executive Director



RECOMMENDATIONS TO THE ADMINISTRATION

1. Appoint a Permanent Administrator for OJJDP

It is imperative that a permanent administrator be appointed to lead the Office of Juvenile Justice and Delinquency Prevention (OJJDP) by December 2025.

Over the past four years, staffing capacity in the office has diminished with just under 55 staff members now left in the office to work on and support OJJDP's myriad of critical programs. A permanent administrator is needed at this moment to signal to the states the importance and value that the Administration places on American children and youth. Appointing a permanent administrator to lead OJJDP is crucial to ensuring financial investments are effectively utilized to achieve the goals and purposes of the JJDPA and improve justice systems. A permanent administrator can drive maximum improvement in state systems and outcomes by:

1. Providing clear and consistent leadership to align funding with evidence-based practices and policies that address the specific needs of youth involved in the justice system;
2. Facilitating collaboration among states, local governments, community organizations, and other stakeholders to develop and implement comprehensive strategies that support youth rehabilitation and reduce recidivism;
3. Establishing robust mechanisms to monitor the implementation and impact of funded programs, ensuring accountability and the effective use of resources; and
4. Advocating for policies that promote systemic improvement within juvenile justice systems, focusing on evidence-based practices, community-based alternatives to incarceration, and diversion from detention.

Juvenile justice experts around the country are struggling with the lack of regulation of the Juvenile Justice Reform Act of 2018, illustrating the need for an Administrator who will prioritize guidelines for implementation of the Act. Our field has seen the damage that can result from long-standing vacancies in permanent leadership. After the Administrator resigned in 2008, it took more than five years to appoint a permanent leader at OJJDP. States struggled during this time without a clear vision for youth justice or leadership around the core protections of the Act, contributing to inconsistent implementation of the JJDPA and increased risk of inappropriate practices that harm American children and youth.

These challenges weakened the well-established framework designed to protect children and youth in the justice system and that demonstrated effectiveness in reducing youth crime and arrest. To ensure effective implementation and compliance with the Act and to ensure that its critical protections for children are carried out, the states require a visionary leader who can stand at the agency's helm. We implore you to appoint an administrator by December 2025. This is essential so states have the guidance and clarity they need to successfully navigate continued implementation.

2. Ensuring the Continued Existence of OJJDP

To maintain effective and responsive juvenile justice practices across the nation, it is essential that the Office of Juvenile Justice and Delinquency Prevention remains a dedicated and distinct entity within the U.S. Department of Justice. This commitment ensures that the juvenile justice system remains grounded in the principles of accountability and rehabilitation, as originally intended by Congress.

As the federally designated agency for oversight and implementation of the JJDPA, OJJDP plays a vital role in:

- Ensuring the continued implementation and enforcement of the JJDPA, including its core protections and reforms that safeguard youth in custody;
- Providing national leadership and coordination for juvenile justice policies, priorities, and programs, while advancing research on delinquency prevention and reduction; and
- Offering guidance, support, and oversight to states in fulfilling their obligations under the JJDPA and other federal juvenile justice priorities.

OJJDP's distinct role allows it to maintain national leadership, supporting coordinated efforts across state systems while identifying challenges and opportunities on a broader scale. As the entity charged with this responsibility by Congress, OJJDP is uniquely positioned to ensure the continued advancement of the JJDPA and to safeguard the rights and well-being of children and youth in the justice system as they grow into responsible, contributing adults.

Central to OJJDP's success is the deep institutional knowledge and specialized expertise held by its career service professionals. Their knowledge in child development, criminology, research, and public administration anchors the agency's strategic direction and sustains long-term progress to address the ever-changing needs of systems.

OJJDP's federal leadership is not only a reflection of its congressional mandate but also a testament to the skill and dedication of its personnel whose work, including research, training, and technical assistance, has a multiplier effect at the state level, driving broader and more sustainable changes in the juvenile justice field as OJJDP is further strengthened.

3. Clear Guidance on JJDP Implementation

It is critical that states receive the support and guidance needed to implement the JJDP with fidelity. Fifty years after its enactment, the JJDP remains one of the most successful standard-setting statutes at the federal level, and, at its heart, recognizes the value of citizen-driven efforts to prevent and stem delinquency. The success of the JJDP has been supported in significant part by the national agenda-setting, research, evaluation, oversight, and technical assistance functions of OJJDP. OJJDP interprets and exercises its authority by issuing guidance, defining compliance expectations, and ensuring that state practices align with the requirements of the JJDP.

It remains the landmark federal statute—and single most influential piece of federal legislation—providing substantive safeguards for youth who come into contact with the juvenile justice system. Failure to support states in fully engaging in and implementing the JJDP may cause our most vulnerable youth to lose the critical protections it provides.

To start, OJJDP should revise and reissue rules and a comprehensive practice manual outlining clear guidelines for states to follow when applying for Formula Grant funding and implementing the requirements of the Formula Grants Program. This should include specifics about the application process, eligibility requirements, reporting standards, and accountability measures. OJJDP should also strive to ensure that state agencies are equipped to effectively implement any rules and guidelines promulgated.

In addition to core protections, the Title II Formula Grant Program supports state and local initiatives to improve systems and responses to young people who are already involved in the justice system or at risk of becoming involved. Among more than 30 purpose areas emphasizing preventive, developmentally sound responses to youth who are at risk of court involvement, state plans and grant funds are directed to addressing and preventing youth violence and victimization. Examples of program areas include:

- Programs to prevent gang involvement and illegal activities for juveniles at risk of gang involvement;
- Treatment programs for juvenile offenders that are victims of child abuse and neglect to prevent future offending; and
- Programs that enhance community supervision and support for non-violent offenders, such as status offenders, that enable young people to safely remain at home with their families as an alternative to institutionalization and enable resources at the deep end of the juvenile justice system to remain focused on rehabilitation of youth that have committed more serious offenses.

The JJDP sets the tone for the national approach taken to juvenile justice and delinquency prevention. It establishes a lead agency in the OJJDP and articulates the commitment to a federal-state partnership around juvenile justice. Part of implementation and oversight must focus on carrying out the law and the spirit in which it was drafted. Clear guidance is needed to ensure successful implementation of the Act.

CJJ supports ongoing efforts to reauthorize the JJDP, including current legislation S.B. 2248, introduced on July 10, 2025, which seeks to reauthorize Titles II and Title V of the JJDP. CJJ also previously endorsed H.R. 1809, the legislation that successfully reauthorized the JJDP in 2018.

4. Ensure Federal Investment in Juvenile Justice

For every dollar invested in community-based youth development and prevention efforts, taxpayers save up to approximately \$12 in future costs, while delinquency rates decline significantly. [i] Beyond leadership and guidance, it is crucial to provide adequate resources to support state systems and the young people they serve. Research demonstrates that prevention programs, such as those funded through the JJDP, are highly effective. With 50-years of bipartisan support, the JJDP reflects a shared recognition that investing in locally driven prevention is both fiscally responsible and beneficial.

Community-based treatment for youth is not only more cost-efficient compared to incarceration, but it is also more effective in reducing harm and promoting long-term rehabilitation. Research shows that system-involved youth face increased risks of emotional and physical harm unless systems invest in alternatives that keep them separate from adult offenders and limit the use of locked confinement for less serious offenses. [ii] These strategies reduce recidivism and improve outcomes for youth while being low-cost. Federal partnerships with states play a vital role in expanding these solutions, providing the leverage needed to secure local funding and help states improve the lives of youth and communities.

5. Guidance on 223(a)(11)(B) Implementation and Impact of Violations

States and facilities are grappling with increasingly complex compliance demands, particularly with respect to the implementation of Section 223(a)(11)(B) of the JJDPa (as amended and reauthorized in 2018). We request clear and comprehensive guidance from OJJDP regarding the interpretation and implementation of this provision, concerning the rule that interest of justice hearings are required within 6 hours of placement. Facilities across multiple states have expressed ongoing frustration with the logistical challenges posed by this requirement, especially since securing timely judicial review outside of regular business hours (for example, on the weekends and late evenings) is often unfeasible.

Additionally, the increasing emphasis on closing or repurposing juvenile detention facilities in favor of community-based alternatives, while well intentioned, has made compliance with this requirement more difficult. Although placing a youth charged as an adult in a juvenile facility is never considered a violation, doing so has become less feasible due to staffing shortages and a reduced number of operational juvenile detention beds. In many cases, there are no available beds within a reasonable driving distance. As a result, the shrinking availability of juvenile detention options has significantly hindered compliance efforts.

Facilities have expressed growing confusion and frustration when policies, procedures, and practices that align with state law regarding youth placement conflict with federal requirements under the JJDPa. These conflicts appear to be increasing in both frequency and complexity. There is an urgent need for a comprehensive resource that consolidates and clarifies OJJDP's interpretations of requirements, including Section 223(a)(11)(B). Currently, guidance from technical assistance providers lacks OJJDP endorsement and is often subject to change without notice. Clearer direction would enable more consistent compliance, reduce frustration among facilities, and support the shared goal of appropriate treatment of justice-involved youth.

6. Support for Reauthorization

We urge OJJDP to actively support and advocate for the reauthorization of the JJDP, which remains a foundational framework for protecting youth in the justice system. The proposed reauthorization includes updates that would enhance the law's effectiveness and relevance. These updates include:

- Granting states greater flexibility in how Title II funds are used;
- Phasing out the Valid Court Order (VCO) exception, which currently allows for the detention of youth for non-criminal behaviors such as truancy; and
- Structural improvements to the statute itself, such as relocating Section 223(a)(11)(B) to the intended section and addressing the non-participating-states loophole to ensure that all states receiving federal juvenile justice funding are held to the same standards of youth protection.

These reforms reflect a broad, bipartisan, and cross-sector consensus that the juvenile justice system must continue to evolve in ways that are research and practice-informed and focus on long-term public safety.

Reauthorization of the JJDP has garnered support from across those in the juvenile justice field who witness, firsthand, the importance of federal guidance, funding, and leadership in sustaining progress that prioritizes prevention, accountability, and rehabilitation.

We are asking that the JJDP be reauthorized through FY30, providing states and territories with the much needed stability and predictability to plan and implement effective and responsive policies and programs.

CONCLUSION

Our continued progress relies on the Administration and OJJDP's strong commitment to full implementation of the JJDPa and sustained federal investment that empowers state-level action and advancement of a robust federal-state partnership. CJJ stands ready to collaborate closely with you and OJJDP to achieve these shared goals.

On behalf of the CJJ Executive Board and our nationwide membership, thank you for considering our recommendations. We look forward to your response and to continuing this important work together. For any questions or follow-up, please contact CJJ's Executive Director, Melissa Milchman, at 202-656-5401 or at milchman@juvjustice.org

