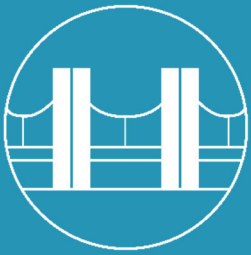


Department of Community Justice

Jail sanctions are worsening inequities and outcomes



Multnomah County Auditor's Office

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July 2025



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Report Highlights

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Jail sanctions are worsening inequities and outcomes



Multnomah County
Auditor's Office

What We Found



Since 2019, average technical jail sanctions days nearly doubled in length.



Black and Native American people are disproportionately sanctioned to jail.



The number of referrals to resources like housing and mental health services are inadequate to meet needs.

Why This is Important

Jail sanctions negatively impact people on supervision, especially people who are homeless and mentally ill.

Jail sanctions perpetuate racial inequity.

Evidence-based practices show that connecting individuals to the resources they need promotes behavior change.



REBEYOUNA ALVET
"REMEMBER YOUR CULTURE, WHERE YOU COME FROM. REMEMBER WHO YOU ARE."

REBEA PERRY
"REMEMBER YOU ARE CARRIED BY THE LOVE OF YOUR ANCESTORS."

Exit

Background

Acknowledgements

We want to acknowledge the experiences of those on supervision and appreciate those who were willing to share challenging stories in order to improve supervision for others. Throughout this audit, we heard about the past and present harms of racism, traumatic experiences, and disparate treatment within the criminal justice system. We acknowledge the structural inequities that contribute to the overrepresentation of people of color in the criminal justice system.

We also heard stories of people on community supervision who have accomplished personal successes in spite of great adversity. We appreciate the contributions of people with lived experience who use their insight and personal experiences to serve others and create positive change.

We also want to acknowledge Department of Community Justice (DCJ) staff for their engagement with this audit. We heard during interviews that frontline staff at DCJ have very challenging jobs. They often experience burnout from their earnest efforts to help people who have many unmet needs. They may also experience vicarious trauma from their relationships to individuals on supervision with intense trauma histories. As government auditors, our hope is that sharing these stories can inform our community and help lead to systems change.

Background

Why we did this audit

In our 2022 jail conditions audit, our office found evidence of overrepresentation of Native American/Alaskan Natives, and disproportionate harm against Black and African Americans and those with mental illness. The 2022 audit also found that on any given day, a number of individuals in jail are there as a result of violating a condition of probation or post-prison supervision. We wanted to better understand DCJ's Adult Services Division and their decisions related to jail sanctions.

What we found

DCJ's Adult Services Division has the opportunity to implement consistent policies and practices that align with the stated goals of the department. They can also maintain them, document them, and use that information for internal continuous improvement. We found that the experience of supervision varies and that department goals don't align with practice.

We also found that from 2019 to 2024, use of jail sanction days increased. Sanctions disproportionately impacted those with a documented history of serious mental illness, Black and African Americans, and Native Americans. DCJ offered resources inconsistently, and culturally responsive resources were limited. DCJ could gather more systematic feedback from those on supervision using an improved grievance process or similar, which could provide crucial information to support continuous improvement and consistency.

Data collection is flawed, but indicates that Black and Native American people are overrepresented

Supervision and its challenges often affect more than the individual; they can also impact families and communities. Some of the challenges come from stigma related to supervision status and its influence on the ability to find jobs, housing, and fully participate in the community. These challenges most directly impact communities that are overrepresented in the criminal justice system.

Our review of criminal justice demographic data, compared with Census data, indicated that Black and Native American individuals are over-represented in the supervision population. We also learned about potential gaps in statewide corrections race and ethnicity data collection where people may be assigned a race and ethnicity based on their physical appearance. For example, a Native American interviewee shared that their race and ethnicity has been misidentified in criminal justice settings. This type of misidentification could result in an undercount for this community in criminal justice data.

Our audit analyzed population demographic data of 17,765 adults on supervision from 2019-2023. We found that:

38% of those on supervision have a documented history of homelessness while on supervision



26% have a documented history of mental illness



40% have a documented history of substance abuse



Source: Auditor analysis of DCJ demographic data

Also, the total number of people on supervision at DCJ went down from 11,089 in 2019 to 6,613 in 2024.

About the Department of Community Justice

In Oregon, each county is responsible for community supervision (or post-prison and probation supervision). The scope of community supervision includes both requirements for those on supervision and resources like re-entry services. The Department of Community Justice (DCJ) is Multnomah County’s designated authority that oversees

probation, post-prison, and other aspects of community supervision. The Adult Services Division is responsible for adults on supervision.

DCJ's mission is not only the law enforcement aspects of community supervision. They also promise to provide resources and to address the effects of racism among those on supervision and in the community. DCJ reported to the state Department of Corrections for the 2021–2023 Community Corrections Biennial Report that it "provides supervision, sanctions, housing, employment, and treatment resources to adults to address the underlying problems that drive crime." The Adult Services Division's stated priority from their 2023–2025 Community Corrections Plan was to "focus resources on the highest risk and highest need individuals." The plan also included a goal to "identify where systemic racism is harming individuals and [...] intervening and redressing those harms using the tools available."

The 2023 DCJ Strategic Plan stated that DCJ is "committed to leading with race, restorative practices, and systemic change." In 2024, Justice System Partners, a consulting firm hired to conduct analysis of DCJ jail bookings, presented a report to the Local Public Safety Coordinating Council (LPSCC, a collaboration of public safety stakeholders) recommending the goal to "reduce booking individuals into jail for violations of community supervision conditions, especially technical, non-criminal violations."

Community supervision begins with intake and risk assessment

Individuals on supervision go through an intake and assessment process that includes a risk assessment and referrals to supports and services based on their needs. The risk assessment determines how likely they are to recidivate, or in other words, commit new crimes. About one in three people on supervision (34%) have a high risk score.

After intake, people on supervision are assigned to a unit within the Adult Services Division. While on supervision, some people on supervision meet with their assigned Parole and Probation Office (PPO) regularly and some do not. PPOs at DCJ are trained in Effective Practices in Community Supervision (EPICS), a model of practice based on maintaining positive rapport between PPOs and those on supervision.

DCJ assigns individuals to units based on risk score or crimes committed

The director of the Adult Services Division oversees four section managers. They each manage 3–5 units, such as generic units supervising those with high risk scores like the Southwest Unit and the East Unit, and specialty units like the Mental Health Unit, Gang Unit, and Women and Family Services. The units are not necessarily based on how to focus resources on the highest risk and highest need individuals on supervision; some are based on crimes committed.

Multiple parties play a role in setting supervision requirements

There are some aspects of supervision determined by the Oregon Board of Parole, some determined by a judge, and some determined by the PPO. PPOs set some of the expectations for how often people must meet with them. Office visit requirements vary depending on the PPO and the individual. However, this can lead to variation that goes outside of best practice.

How sanctions work

Supervision includes standard requirements called conditions. Conditions include things such as consent to be searched, consent to home or work visits, meeting with or contacting their Probation and Parole Officer (PPO), remaining in Oregon, and not possessing firearms. Some special conditions exist for particular crimes, including mental health evaluations and continuing to take prescribed psychiatric medication. The Oregon Board of Parole and Post-Prison Supervision may modify the conditions.

When an individual does not follow the conditions of probation and post-prison, they may be sanctioned by their PPO. Sanctions are a formal punishment by a PPO. Based on Oregon Revised Statutes (ORS), PPOs don't have to sanction those on supervision to jail, but if they do, they must follow the guidance of ORS 137 and related laws. These laws require PPOs to only impose structured, intermediate sanctions below a certain number of days, formally notify the person being sanctioned, and report the sanctions to the courts. Per OAR (Oregon Administrative Rules) Chapter 291, sanctions could also include

a requirement to attend treatment, verbal or written reprimand, jail time, community service, electronic monitoring, or others. The most common sanction is jail time. One type of sanction is revocation. The term “revoked” means community supervision is terminated. PPOs might recommend revocation and it must be approved by a judge. Our analysis of sanctions revealed that revocations made up 7% of all sanctions from 2019 to 2024.

The guidance PPOs rely on to determine the length and type of sanction is the violation response grid. PPOs use the grid to decide how many days a sanction must be based on the violation. Per policy, sanctions can’t be longer than the guidelines without manager approval. We heard during interviews that supervisors and the Oregon Board of Parole and Post-Prison Supervision can approve longer sanctions, which means that the sanction grid may not prevent very long sanctions if a PPO recommends that. These sanctions are tracked in data reported to the Oregon Department of Corrections and documented using a form.

Violations might be categorized as new crimes, public safety, or technical (or a combination). Both new crimes and some technical violations of conditions of supervision may involve direct threats to public safety. Common technical violations include failure to report to a supervision visit, changing residence without notifying a PPO, and contact with a person on a no-contact list. Technical violations, otherwise known as administrative sanctions, may not require an individual on supervision to attend a hearing, per ORS Chapter 144. Some people on supervision are obligated to be on supervision for life.

In multiple public documents, DCJ has established the need to minimize sanctions for technical violations that aren’t public safety threats. DCJ promoted an approach to supervision and sanctioning that is evidence-based in their most recent strategic plan.

An example of the kind of evidence they follow is their 2017 Best Practices in Community Justice document. That document included a study that explained that sanctions to jail or prison for technical violations worsen recidivism: “recidivism is not

lowered by using confinement for offenders who violate the technical conditions of their community supervision [...] confinement was associated with an increase in recidivism”.

The Community Corrections plan, written every two years and submitted to the Oregon Department of Corrections, emphasizes the need for alternatives to jail sanctions: “provides sanction options other than jail for individuals needing treatment.” We heard from DCJ management that they prioritize sanctions only for direct and imminent public safety threats.

DCJ participated in initiatives to lower the use of jail sanctions

In 2015, Multnomah County was selected to participate in the MacArthur Foundation’s Safety and Justice Challenge. The purpose of this initiative was “to reduce jail use and eliminate racial and ethnic disparities” in the criminal justice system. As part of this work, Multnomah County devised 12 strategies to reduce the jail population. Strategy 4 was focused on DCJ. This strategy encouraged the use of non-jail options for lower-risk offenders. To support this strategy, DCJ changed their sanction procedure, with a target of an average of seven jail days or less for administrative sanctions.

Multnomah County’s Local Public Safety Coordinating Council (LPSCC) led the implementation of the Safety and Justice Challenge strategies and initiatives. LPSCC convenes representatives from DCJ, the Sheriff’s Office, the Portland Police Bureau, the Gresham Police Department, public defenders, the District Attorney’s Office, judges, and other criminal justice stakeholders. LPSCC’s main purposes are to develop a local plan for public safety systems and coordinate public safety policies between criminal justice agencies, local governments, and community partners. LPSCC staff generated quarterly reports on the length of technical jail sanctions issued by PPOs.

DCJ was able to reduce the frequency of technical jail sanctions, particularly during changes to jail requirements during the first two years of the COVID-19 pandemic from 2019 to 2020. However, during this time, Black/African American clients were being issued longer technical sanctions than White clients, and Black/African American clients’ sanction length usually exceeded overall averages. Since 2021, LPSCC has stopped

tracking sanction length data and generating reports on racial and ethnic disparities in DCJ's use of technical jail sanctions.

Department ideals don't align with practice

DCJ's goals include equitable and trauma-informed approaches to interacting with those on supervision. But we heard that these approaches aren't always used when staff interact with each other, and staff are sometimes harmed by the work culture at DCJ.

We learned from interviews that the department has personnel challenges. One challenge is higher than average numbers of protected class complaints among employees based on race, gender identity, and other legally protected groups. DCJ also has consistently worse than average scores on the county employee ethical culture survey. Our office conducted a countywide equity audit, with recommendations to support employee needs within DCJ. For that reason, we do not focus on these issues within this report. This audit is focused more on how DCJ's policies and practices impact those on supervision.

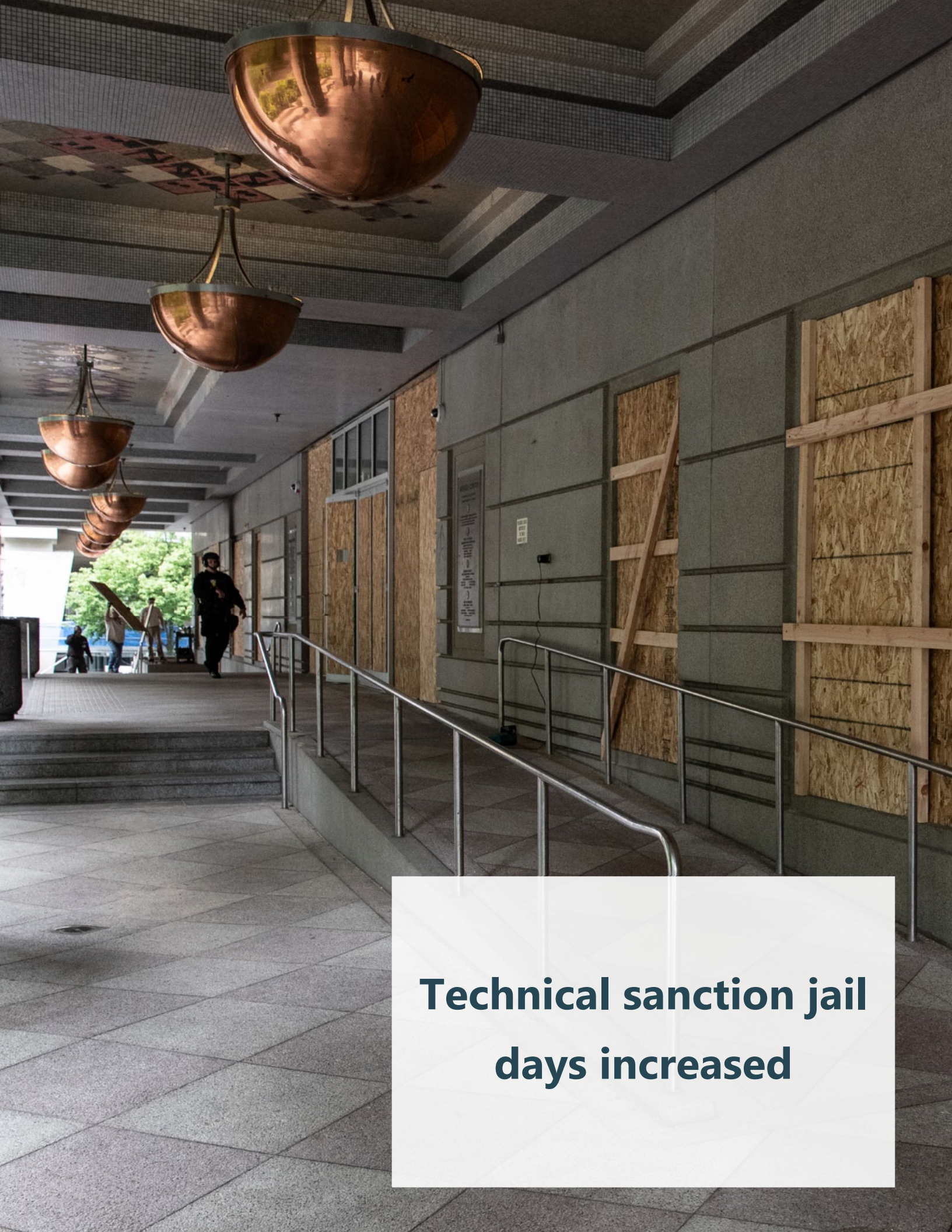
DCJ promotes evidence-based practice. But, there are structural problems making access to high-quality data difficult. The department does have some Tableau dashboards. However, frontline staff and managers may not have access to all the data they can use to improve how they do their jobs. This is especially true of treatment and referral data about resources provided to those on supervision.

DCJ lowered the use of jail sanctions as part of pandemic safety measures

DCJ faced many challenges during the years 2019–2023 due to changes in operations based on the COVID-19 pandemic. They did prove during that time that supervision is possible with fewer jail sanctions. In this audit, we examined the use of jail and non-jail sanctions for all violations of parole and probation conditions. We focused more in-depth analyses on technical violations because those were the most numerous type of sanction.

Jail sanctions should be used for public safety

Because sanctions have the potential to cause harm, a DCJ manager shared that they should only be used in the case of imminent and direct public safety threats. A DCJ document titled "Best Practices in Community Justice Sanctioning" explained that even in this case, jail sanctions are still most effective for the shortest possible duration and no more than seven days. The document also stated that there is little or no evidence that sanctions to jail or revocations to prison have any positive impact on the behavior of those on supervision.



**Technical sanction jail
days increased**

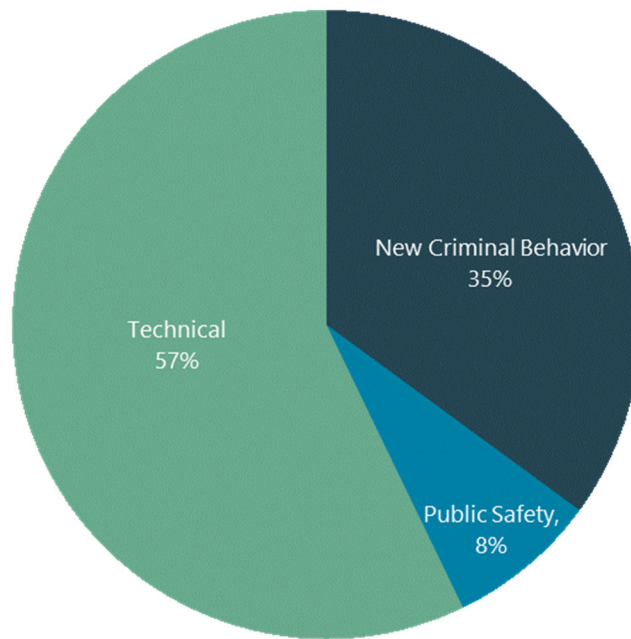
Technical sanctions decreased, but jail days increased

Use of jail sanction days increased since 2019

We analyzed sanction data from 2019 through 2024. For that six-year period, there were 15,747 sanctions and a total of 282,404 sanction days. Of those, 93% were either jail or revocation days. Revocation is a termination of community supervision. We found that DCJ sanctioned 6,026 individuals, which is 27% of the 21,913 population of those on supervision during that six-year period. Most sanctions were for technical violations. Most sanctions resulted in jail. These technical sanctions were not documented as public safety threats.

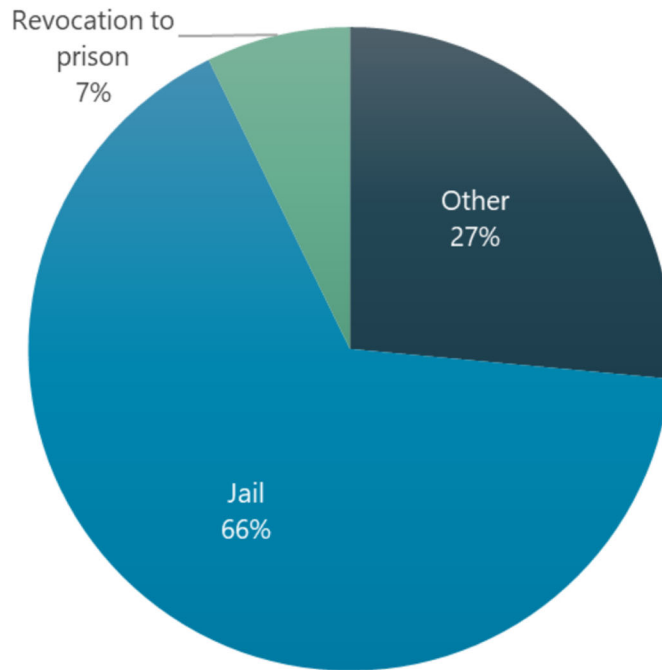
Sanctions from 2019 to 2024 were mostly from technical violations

Sanction categories are calculated based on the most severe violation in cases when there is more than one violation per sanction



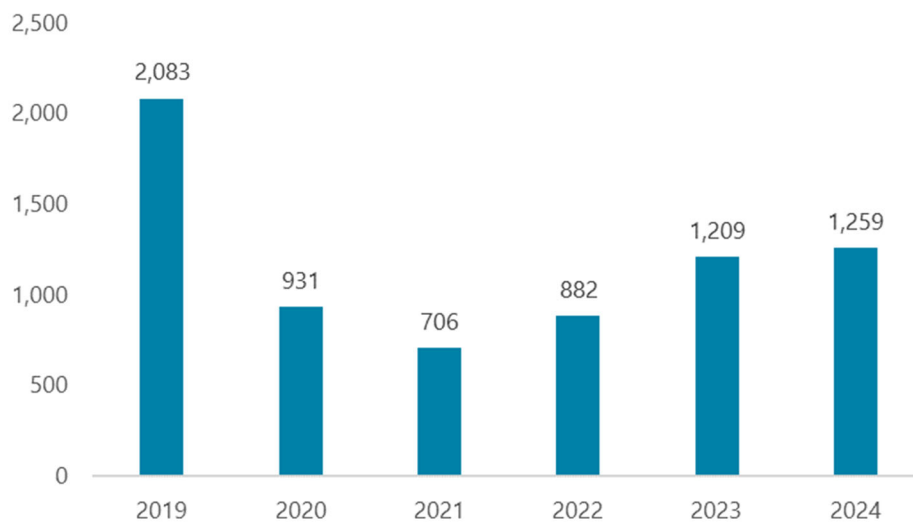
Source: Auditor analysis of DCJ sanction data

The most common type of sanction was jail between 2019 and 2024



Source: Auditor analysis of DCJ sanction data

The number of overall technical jail sanctions between 2019 and 2024 decreased, with increases between 2021 and 2024



Source: Auditor analysis of DCJ sanction data

Sanctions have the potential to cause harm

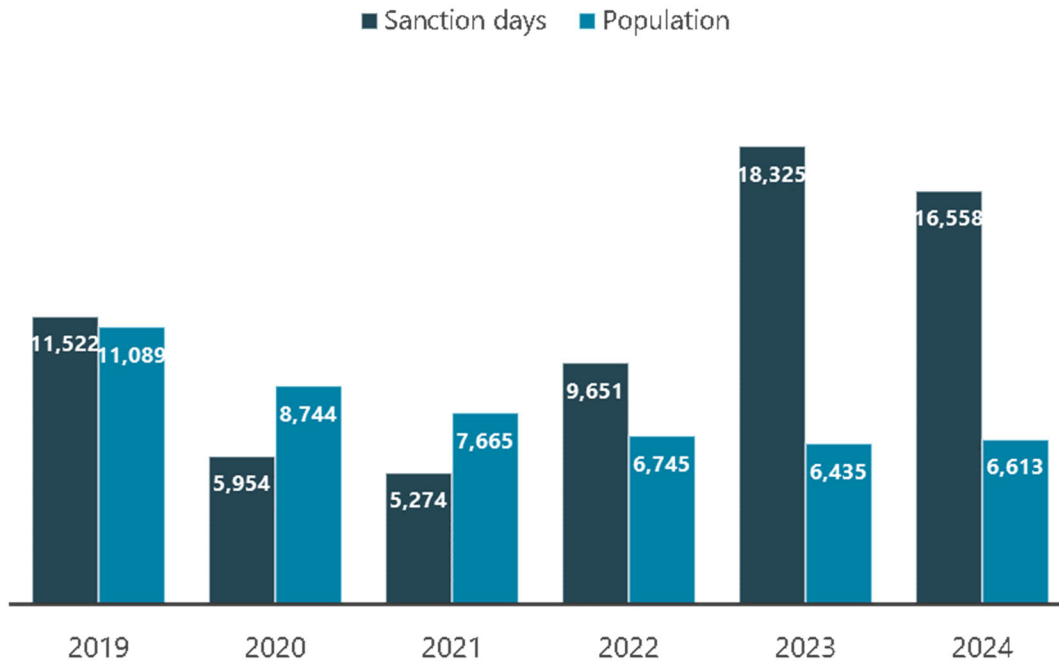
Being on supervision has the potential to cause harm in similar ways to other aspects of contact with law enforcement and incarceration. This is especially true when supervision involves jail sanctions or revocations to prison. Sanctions can get in the way of housing, hinder employment, negatively impact child custody, interrupt drug and alcohol treatment, destabilize those with existing mental illness, and create barriers to accessing healthcare and health insurance. Criminology experts David Kirk and Sara Wakefield explained in their scholarly article about the US criminal justice system: "The evidence base is voluminous that incarceration is associated with detrimental health outcomes, reduced employment opportunities and earnings, rising debt, housing insecurity, declining civic engagement, and adverse consequences for family stability and well-being."

Criminal justice researcher Michelle Phelps expanded on this perspective with specific research about community supervision: "rather than providing more assistance or positive motivation, research has consistently found that more intense supervision programs in practice produce higher revocation rates for technical violations." Phelps' research has demonstrated that there can be an assumption that experiences of supervision are positive compared to jail or prison, but this is incorrect: "Despite its dismissive reputation as merely a slap on the wrist, probation is typically accompanied by an onerous list of demands and restrictions, financial obligations and time burdens, and the lingering threat of incarceration" These researchers concluded that incarceration and a punitive approach to community supervision do not support best outcomes for those on supervision.

We learned from analyzing grievances written by those on supervision and from DCJ staff that sanctions can have negative impacts. We learned from a grievance that one individual on supervision was given emergency custody of his child by a judge. He shared this with his PPO, however his PPO threatened to sanction him for contact with his child. Any sanction, including jail, could have a cascading effect on his family and particularly his child, since he was the custodial parent. There was no documented follow-up from DCJ about the grievance. We heard during an interview with DCJ staff that when people are in custody a certain amount of time, it disrupts their life and has

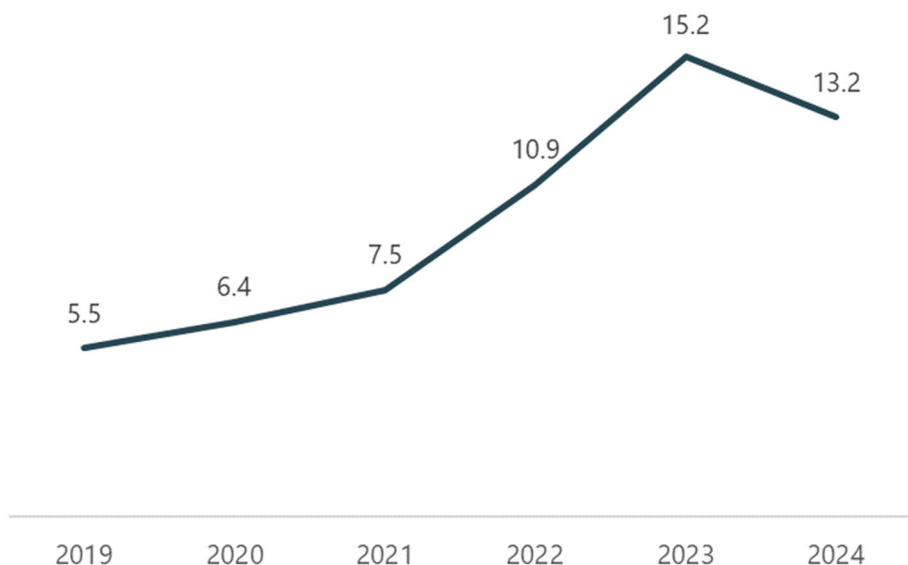
an adverse effect. An individual on supervision wrote in a grievance form that due to being incarcerated from a sanction, he missed an eviction hearing and would be homeless upon release.

Technical jail sanction days increased overall between 2019 and 2024 even though the total population on supervision decreased



Source: Auditor Analysis of DCJ population and sanction data

Average jail days per technical sanction went up between 2019 and 2024



Source: Auditor analysis of DCJ technical sanction data

Sanctions disproportionately impact those with a documented history of mental illness

We conducted a statistical analysis of multiple demographic factors that might influence the number of sanction days. We found that having a serious mental health condition was the strongest predictor of higher sanction days. It more strongly predicted higher sanction days than DCJ's risk score or any other demographic factor. This means that those with a history of serious mental illness had sanctions that were 14 days longer than others on supervision with no mental health condition history. The analysis showed that this was not due to chance.

Among those on supervision, there are some who have a history of serious mental illness documented by the Sheriff's Office or the county Health Department, but without documentation by DCJ. This means DCJ is unlikely to provide the individuals with potentially beneficial services, such as assigning them to the Mental Health Unit or making referrals for a mental health evaluation.

The most common technical sanction is failure to report

Some people on supervision don't have to report to supervisory meetings and others have to report a lot. PPOs have the authority to sanction people for failure to report or deciding a person has absconded from supervision. An abscond is an unauthorized absence from community supervision. The violation response grid guidelines allow for longer sanctions for absconsion than for simply failing to report to a required meeting with a PPO. The grid also clarifies that absconsion is not the same as failure to report. PPOs aren't required to document their efforts to locate individuals who have absconded.

The Violation Response Grid Shows Absconding as a "Level II" sanction

The Response to a violation and/or risk behavior may be wide-ranging from re-direction to formal intervention to administrative sanctioning. The key principle is that of swift and certain response which addresses criminogenic behavior identified in the Case Plan and is most likely to produce positive change; or in certain cases enhancement of public safety through containment.

BEHAVIOR LEVEL I	BEHAVIOR LEVEL II	BEHAVIOR LEVEL III
<p><i>Technical Violations that do not involve prohibited contact or weapons.</i></p> <p><i>Failure to comply with imposed sanction.</i></p> <p><i>If the JII has a low supervision level and low severity behavior, a verbal reprimand or other appropriate intervention is the recommended response.</i></p>	<p><i>Crimes with Crime Seriousness Scale of 3 and less (Sentencing Guidelines Grid).</i></p> <p><i>*Absconding Supervision</i></p>	<p><i>Crimes with Crime Seriousness Scale of 4 & above (Sentencing Guidelines Grid) and all Person-to-Person crimes.</i></p> <p><i>Possession or use of dangerous/deadly weapons.</i></p> <p><i>Prohibited contact with minors/victims/survivors.</i></p> <p><i>Level III cannot be low risk JII</i></p>

<p>1-5 SANCTION UNITS of which 3 units may be used as Jail</p>	<p>1-7 SANCTION UNITS of which 7 units may be used as Jail REQUIRES CJM APPROVAL</p>	<p>1-45 SANCTION UNITS of which 45 units may be used as Jail PPS: REQUIRES CJM & HEARINGS OFFICER APPROVAL PROB: REQUIRES CJM APPROVAL</p>
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*Abscond: Changed residence, do not know whereabouts; supervising officer has exhausted all reasonable means to locate and has requested a warrant. This is not failure to report.

Source: 2023 Violation Response Grid, DCJ Multnomah County Commons

There are few formal policies explaining the requirements for PPOs to use to determine and document absconds. For example, PPOs may be encouraged by their managers to call a phone number, attempt a home visit, and send a written notice before deciding someone has absconded supervision. But, in the absence of clear requirements and documentation, it is difficult to determine whether such diligence took place. This means that rather than sanction someone for failure to report related to a changed

address, the PPO has discretion to sanction them for absconding, which is a longer sanction.

From 2019 to 2024, there were 5,115 sanctions for failure to report; this was the second most common sanction type. Failure to report sanctions during the time period we analyzed disproportionately impacted people who were documented as homeless. Some of those without permanent housing may have no stable address, could be displaced from their last known location, and may fail to contact their PPO due to lack of access to a phone. There is no requirement for PPOs to determine and document barriers to reporting, nor a requirement to offer resources.

There may not be consistent expectations related to reporting for supervision visits. Our analysis of casefile notes and some interviews revealed that those on supervision faced consequences, including sanctions, when they failed to report. But, some who reported to their required supervision visits sometimes found that their assigned PPO was not there during the scheduled time.

Our analysis of a random sample of 91 sanction forms for failures to report revealed that only 3 had documented public safety threats of any kind. We found that 86 out of 91 had notes about housing insecurity or homelessness. Many of the people on supervision were described as being addicted to drugs like meth and/or fentanyl, and many were described as being mentally ill. Some sanctions from the sample were as high as 15 days in jail.

People who abscond tend to be homeless and/or have mental health conditions

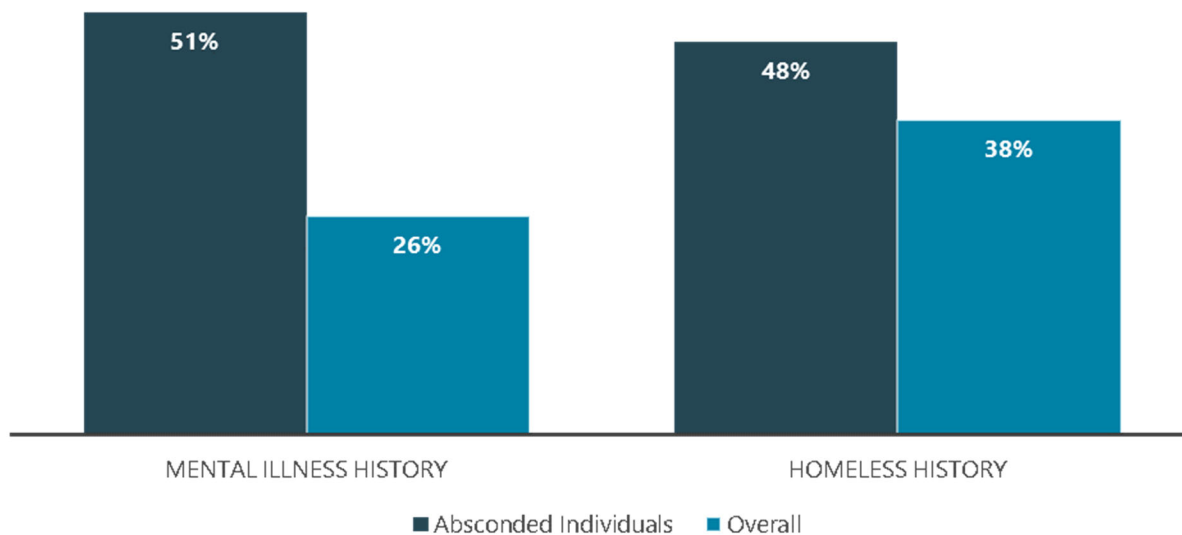
An abscond is an unauthorized absence from community supervision. There were 7,080 total abscond events between 2019-2024. The typical DCJ response to absconds was a jail sanction.

Also, between 2019 and 2023, people with a history of serious mental health illness accounted for 51% of those designated as absconded even though they represented only 26% of the population of individuals on supervision during this time. People with a

history of homelessness represented nearly 48% of those designated as absconded even though they represented only 38% of the population. Since those who have absconded are disproportionately homeless and mentally ill, more housing resources might lower abscond rates.

We learned that DCJ’s most recent sanction grid increased the severity of sanctions for absconds from level I to level II. This increase means a PPO can authorize more jail days without supervisor approval or override. The change may correspond with the increased number of technical sanction days over the five years we analyzed.

Individuals who absconded were more likely to have a history of mental illness or a history of homelessness than the overall population of those on supervision between 2019 and 2023



Source: Auditor analysis of DCJ homeless history data and mental health history data from DCJ, SWIS, and Health Department

In addition to documented homelessness, mental illness, and addiction, we learned from a survey of those with lived experience that some people may not report or may abscond in response to lack of trust in their PPO’s fairness. Positive relationship and rapport between PPOs and those on supervision, such as following the Effective

Practices In Community Supervision (EPICS) model of practice, may also decrease abscond rates. We talk about EPICS later in this report.

DCJ needs a strategy to reduce absconsions

We found that between 2019 and 2024, 40% of those who were designated as having absconded supervision were not identified as high risk of recidivism. Also, DCJ's Adult Services Division doesn't have a specific strategy to gather and document information about patterns of failures to report and absconsions. There are also no current strategies to reduce use of jail time or revocations based on failures to report or absconsions. Addressing the underlying reasons for these technical violations may reduce punitive and ineffective measures.

There may be alternatives to jail sanctions for failure to report and other technical sanctions. For example, the state supports interventions like inpatient treatment, outpatient treatment, and others if those align with the needs of the individual. PPOs also have the options of verbal and written reprimands, increased reporting, and curfew. Without a clearer strategy, limited resources, policies, procedures, and management of frontline PPOs does not sufficiently set them up for success in preventing high sanction rates due to failures to report and absconds.

Relationship and rapport between PPOs and those on supervision varies

PPOs at DCJ are trained to use a model of practice called Effective Practices in Community Supervision (EPICS). Based on research about the model, when PPOs use it consistently, the people they supervise trust them more and the increased trust leads to better outcomes. It also provides a framework for critical thinking rather than impulsive decision-making by PPOs. It is especially relevant for supervising high-risk clients. From the results of our survey of those with lived experience on supervision, some respondents shared that positive rapport with their PPO made the experience of supervision feasible. Our casefile analysis showed that not all casefiles sampled included documented efforts to establish positive rapport by PPOs. Casefile notes about

successes are important sources of information for assessing the relationship and rapport between PPOs and those on supervision.

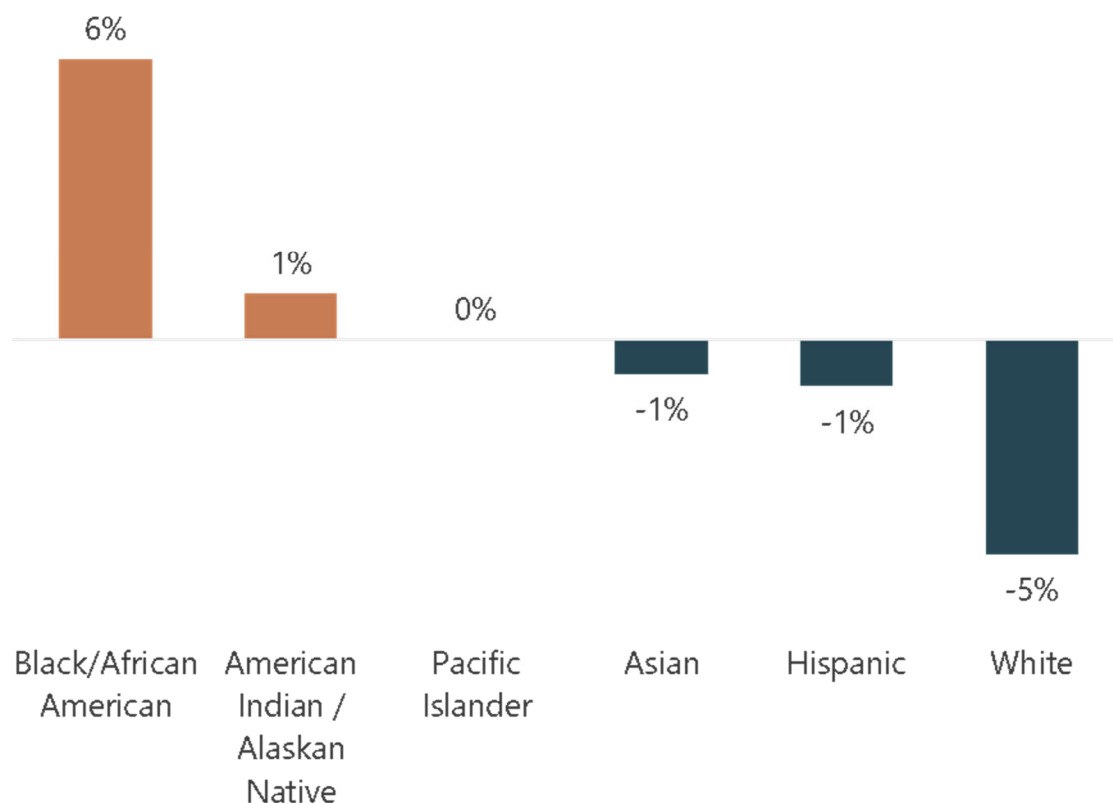
We heard that some PPOs at DCJ are not consistently practicing EPICS. We heard in interviews with DCJ management that although there is some evidence of tracking EPICS several years ago, many PPOs aren't implementing the model consistently.

Black and African American and Native American/Native Alaskan people were sanctioned more frequently and with longer jail sanctions

Even though the sanction grid noted earlier determines sanctions for violations, PPOs have a lot of power and discretion. We heard from a DCJ manager that it is well known that there are sanction disparities by race.

We analyzed sanction data from January 2019 through the end of December 2023 along with demographic data. We compared the overall racial demographics of the population on supervision to sanction data that was disaggregated by race to determine whether any racial groups were sanctioned more or less on average compared to other racial groups. PPOs sanctioned African Americans and Native American/Alaskan Natives more than other groups relative to their populations on supervision.

Difference between the percent of each demographic group on supervision, and the percent of that same demographic group among those sanctioned, from 2019 through 2023



Source: Auditor analysis of DCJ demographic data

PPOs sanctioned Native American/Alaskan Native and Black/African American people more frequently than those of all other racial groups relative to their population. Of those on supervision, 21% of the population on supervision were Black and African American people, yet they made up 28% of those sanctioned. PPOs sanctioned White people the least. Black and African American men and Native American/Alaskan Native men were the groups most disproportionately sanctioned by race and gender. Sanctions worsened racial inequity.

Along with analyzing jail sanctions based on demographic data, we also analyzed revocations to prison to determine any differences between racial groups. Black/African American people and Native American/Alaskan Native people were revoked to prison at higher rates than those of other groups relative to their population. Native

American/Alaskan Native and Black/African American people were overrepresented relative to their populations in total absconsions. White people were underrepresented.

During our interviews with people who have lived experience with supervision, they stated that racial inequities affect them. One person shared that being in jail was traumatizing. All the stipulations with the threat of going to jail can be overwhelming. Another person of color with lived experience shared that at no point did his PPO discuss how to prevent sanctions. One person shared that PPOs ignore and dehumanize Black and African American people by being dismissive. They told us that they believed there should be more training.



**Referrals and resources
are offered
inconsistently**

Referrals and resources are offered inconsistently

Both research on community supervision and DCJ's goals emphasize that meeting the underlying needs of those on supervision leads to better outcomes. The National Crime Victimization Survey, administered by the U.S. Bureau of Justice Statistics, found that the overwhelming majority of crime victims believe that the criminal justice system relies too heavily on incarceration and strongly prefer investments in prevention and treatment. One of the investments in treatment and prevention that PPOs can provide is a referral. Examples of referrals include substance abuse treatment or mental health treatment.

Our statistical analysis revealed that, on average, those with a documented success as a result of a referral to resources like mental health treatment, substance abuse treatment, and anger management were less likely to have sanctions. This means that when individuals on supervision successfully complete referred treatment programs, it improves outcomes for them.

Unfortunately, documented referrals were generally much lower than the number of sanctions. Low referral rates may reflect a lack of resources available to PPOs. Of the 17,765 individuals on supervision from 2019 to 2023, 32% received documented referrals. Of the more than 4,600 people on supervision during the five-year period with a documented history of mental illness, 2,650 did not have documented referrals of any kind. The most common referral was to substance abuse treatment.

Staff lack consistent guidance about resources available for referrals

The Effective Practices In Community Supervision (EPICS) model directs PPOs to note whether they made referrals. These notes can be found in case files. Some data are required by the Oregon Department of Corrections related to resources and referrals. We found that documented referrals and resources were very inconsistent and inadequate to address needs. In some people's supervision casefiles we noted unmet needs related to housing, mental healthcare, and general healthcare.

There is no clear policy detailing whether PPOs must provide resources and referrals to everyone on their caseloads. Without documentation of resources and referrals, it appeared that sometimes PPOs offer no support or even information about resources.

As part of our audit, we conducted a survey for those with lived experience on supervision in Multnomah County. A survey respondent shared a sentiment we heard during interviews: "I asked for support and received nothing." A person we interviewed shared candidly that their PPO had never talked to him about resources like jobs, housing, programs, or other support.

Culturally responsive resources are especially limited

Culturally responsive resources are limited at DCJ currently. Among other challenges with resources and referrals, we heard that the DCJ Gang Unit, which is more than 50% African Americans on supervision, is now staffed almost entirely by White PPOs. Similarly, we heard that HER, a program for Black/African American women, does not have a Black/African American Woman facilitator. Although some county departments with represented employees have compensation for staff with cultural knowledge, skills, and abilities (KSAs) to recognize staff best-suited for culturally responsive programs, DCJ's PPOs contract does not.

We heard during interviews that the Diane Wade House, a resource for Black/African American women, has not been consistently operational since it started. A frontline worker in community mental health expressed concern about whether there is a commitment at DCJ to culturally responsive resources.

A person with lived experience on supervision explained: "It's great to have culturally specific programs. People communicate differently and having someone that understands them and their culture is important. There should be more culturally specific mental health support for people of color." A manager in a culturally responsive community-based organization shared that PPOs are not consistent, sometimes don't respond to emails, and aren't always aware of the needs of African American women. This can set people up for failure. The inconsistency may disproportionately impact the populations already facing inequity.

DCJ does not collect enough demographic data

Due to constraints at the state level and lack of internal processes to address it, DCJ does not consistently document data about tribal affiliation, LGBTQIA2S+ identity, or data about language spoken. Without guidance about how to gather and consistently document demographic information, certain populations may have their needs unmet.

Since DCJ does not gather information about gender identity and sexual orientation, this means that there may not be enough information for PPOs to support LGBTQ people. We learned from two community-based organizations focused on LGBTQ people that the biggest barrier is housing. The housing options are limited for people who are LGBTQ, particularly people who are trans. We heard that LGBTQ individuals tend to be highly impacted by probation.

DCJ does not gather data about people's tribal affiliations even though our analysis indicates that Native American/Alaskan Natives are overrepresented in the supervision population. We learned from a Native American community liaison that her experience was that Native people come into contact with the criminal justice system disproportionately. She didn't believe that DCJ and other law enforcement agencies had processes to gather people's tribal affiliations that would help get people appropriate services.

Resources for those with mental illness are inadequate to meet needs

Of those on supervision from 2019-2023, 26% had a documented history of serious mental illness. This includes those assigned to the Mental Health Unit, those with a mental health note in their DCJ casefile, those diagnosed with mental health challenges while in jail, and those who have accessed inpatient and outpatient mental health services through the Health Department. Of the 4,706 people with a history of mental illness, 2,185 don't have documentation of their mental health history in DCJ data.

There are many people on supervision with serious mental illness histories who are not in the DCJ Mental Health Unit. They may not get enough expert support while on supervision. One person with a history of mental illness who we interviewed shared that he spent more time in mental health facilities than justice systems. He said he had a PPO who would say things like "I'm trying to instill fear in you," and "I want you to be reactive, that gets results." Several other individuals with lived experience of supervision noted in interviews and survey comments that they experienced fear of their PPOs. We learned from DCJ staff that the term trauma-informed is used sometimes, but there is no clear definition nor guidance about practice.

DCJ has challenges providing resources to those on supervision with a history of serious mental illness. As community need has increased, community-based programs have created barriers for higher risk people on supervision to access their services, including those with a history of mental illness. A DCJ staff person explained that as a result, DCJ lost access to some programs designed for clients with severe mental illness. None have been replaced. They also told us that there are also no programs in Portland for residential treatment for women with severe mental health issues.

We heard that referrals to mental health assessment with a contracted provider are difficult due to the lack of availability of the contracted clinicians. They are not able to keep up with DCJ's needs. It's possible that PPOs and others involved in community supervision require assessments that aren't needed to access treatment. Repeated mental health assessments cost time, money, and may harm those who are repeatedly assessed due to the retraumatizing effect of being asked invasive questions during an assessment.

Based on a survey we conducted of 83 people with lived experience, 40% of respondents answered that mental health support would help them. We learned from a survey respondent with lived experience on supervision at DCJ that from their perspective, the PPOs they interacted with "don't know how to express empathy towards people who have experienced severe trauma both physically and emotionally. They don't take into consideration mental illness and resort to incarceration."

Promising practices: low barrier day program (SARP)

DCJ directly operates the Stabilization and Readiness Program (SARP) for individuals in the Mental Health Unit. Some staff told us that the population they work with faces harassment and stigma in most aspects of their lives and may struggle to access services as a result. SARP is able to accomplish engagement by some of the highest risk and highest need individuals on supervision, and they offer direct resources. People who are at very high risk of absconsion, sanctions, and homelessness engage with the SARP. The program operates daily, but according to a staff person we interviewed, it is understaffed. If DCJ were able to hire additional staff for the program, then the program could provide more needed resources.

Promising practice: Culturally specific re-entry services from contracted providers

DCJ has several contracts for culturally specific re-entry services. Re-entry services are a resource that is specifically oriented toward meeting the needs of those exiting prison or jail. Contracting for these services provides greater reach beyond the services that are provided by DCJ. We heard about the positive impact of culturally specific services, particularly for connecting to housing and employment opportunities.

The culturally specific re-entry services that are currently being offered include connection to employment, housing navigation, and peer support. We also heard feedback from people on supervision that they would have benefited from connecting to re-entry services earlier as they prepare to leave prison or jail. There are opportunities to expand the reach and improve access to evidence-based re-entry services for people on supervision.



The grievance process is inconsistent

If someone on supervision has a concern about their experience of supervision, DCJ currently uses a grievance process. DCJ policy recommends informal resolution first, which may not be documented. The formal grievances are only kept for one year. This did not comport with Oregon Administrative Rules, which require that case files are kept for two years after the case is permanently closed. Consistent documentation of grievances and longer record keeping would allow DCJ the opportunity to analyze grievances for systemic issues. In light of concerns in grievances about some PPOs acting inappropriately, not having consistent documentation poses a risk to everyone involved.

For this audit, we requested all grievances currently on file. We received grievances and some grievance responses for 35 individuals. Most of the grievances we reviewed contained some form of response by DCJ. However, the responses varied from a short sentence within the grievance form stating DCJ spoke with the individual, or that the individual absconded, to a formal letter from DCJ management responding to the individual's specific concerns or a longer record of internal email correspondence within DCJ.

County leadership has a role in preventing cycles of harm to those incarcerated

The mission of Multnomah County is to improve the well-being of those in Multnomah County by providing accessible, high-quality, and innovative public services that create stability, enhance opportunities, and reduce disparities. This should include preventing the instability and disparities that result from incarceration. The 2018 Human Services Research Institute's Multnomah County Mental Health System Analysis recommended that the county "support and align efforts between mental health service providers and the criminal justice system across each intercept to ensure individuals with mental health-related needs are diverted from the justice system to services and supports." This same plan addressed the need for more funding, more coordination, and more planning around co-occurring mental health struggles and substance abuse.

A significant number of those on supervision lacked records of mental health needs in DCJ's system, despite having prior contact with county mental health services. This group was 33% Black and African American, a rate higher than their 21% representation in the overall supervision population and far exceeding the 6% Black and African American population of Multnomah County.

The Joint Office of Homeless Services' (now the Homeless Services Department) Frequent User System Engagement (FUSE) pilot program report from 2021 emphasized the connection between housing and preventing jail time: "Deeply affordable housing with wraparound support services stabilizes lives and significantly reduces returns to jail and homelessness, reliance on emergency health services, and improves overall quality of life." The high-need population at DCJ with mental illness, substance abuse challenges, and homelessness exceeds DCJ's current capacity. While DCJ should continue to provide resources like housing to those on supervision who need it, the county has a responsibility to prevent risk factors like homelessness.

Conclusions

If recommendations were implemented the following might be possible: More consistency and strategy could help distribute resources equitably and in a targeted way to those on supervision; and cycles of harm, intergenerational trauma, individual trauma, and resulting addiction and homelessness could be improved for those on supervision, their families, and the community.



Recommendations

Recommendations to DCJ

Recommendations are based on DCJ's stated goals. All recommendations must be fully implemented by **May 31, 2027**.

Reduce harmful impact of jail and revocation sanctions:

1. PPOs should recommend jail and revocation for technical violations only for imminent and direct public safety threats.
2. Create a policy that defines public safety threats with clear, measurable criteria and a response procedure for PPOs with documentation requirements.

Develop a strategy to prevent failures to report and absconding supervision:

3. Develop a policy that defines minimum efforts that should be made to locate an individual by PPOs.
4. Provide and document resources and/or referrals to those at risk of absconding due to homelessness.

Address disparities in sanctions and racial equity:

5. Create public data dashboards updated quarterly with data about sanctions and absconsions disaggregated by race, caseloads, and units.

Improve access to resources and referrals:

6. Require staff to provide and document resources and referrals.
7. Advocate to the Board for funding to expand low-barrier resource models like SARP for all high and very high-risk individuals on active supervision.
8. Advocate to the Board for funding to expand access to culturally responsive resources and referrals.
9. Consistently document identified needs, such as mental health assessment and treatment and housing resources, and require staff to provide and document corresponding resources and referrals that address those needs.

Improve access to resources for those with mental illness:

10. Expand access to mental health treatment for all those in high-risk units through documented referrals and/or resources.

Create a more consistent grievance process:

11. Provide print materials for all those on supervision about the grievance process during the initial PPO intake meeting. Printed materials should include
 - i. how to submit a grievance complaint,
 - ii. expected response time,
 - iii. contact information for grievance complaint-related questions,
 - iv. and who to contact if the issue is not resolved.
12. Implement two-year retention of grievances and documentation of follow-up, as required by OARs and the county's records retention schedule. Formal and informal grievances and follow up should be documented.
13. Establish an online grievance submission process with an option for anonymous grievances. Track trends for the nature and frequency of the complaints.
14. Assign responsibility for tracking and investigating grievances to a central staff member.
15. Publish an annual report on grievance trends and send it to the DCJ Director and Board of County Commissioners.

Report the following data to the Local Public Safety Coordinating Council and Board of Commissioners, as part of the biannual Community Corrections Plan approval process:

16. Report on jail and revocation use for technical violations that are not for public safety reasons, disaggregated by race.
17. Gather, analyze and report on data to determine trends on the reasons individuals fail to report or abscond supervision.
18. Report how many people on supervision at DCJ are experiencing homelessness.
19. Report on racial disparities in sanctioning.

20. Evaluate and report on Effective Practices in Community Supervision (EPICS) use among all PPOs as a measure of relationship and rapport.

Recommendations for the Board of County

Commissioners:

21. Ensure that there is adequate case management for housing needs of those discharged from supervision.
22. Based on data from DCJ about housing status of high-need people on supervision, the Board should build capacity for housing by promoting:
 - i. Coordination of roles between departments at regular meetings.
 - ii. Contracting with community-based providers for re-entry services.
23. Increase capacity countywide for inpatient mental health treatment and coordinated case management for those with co-occurring disorders and housing instability who may also have a criminal record.

Objectives, Scope, & Methodology

The objectives of this audit were to provide information to county community members:

- Objective 1: Assess sanctioning practices, including whether there are disproportionate impacts of jail sanctions on people who are Black/African American, Native American/Alaskan Native, or people of color.
- Objective 2: Assess DCJ's supervision practices that provide resources to meet identified needs of those on supervision.

To accomplish these objectives, we:

- Interviewed and conducted a survey of those with lived experience on supervision
- Analyzed DCJ, Health Department, and SWIS data from the Multnomah County Sheriff's Office
- Interviewed DCJ staff, community organizations, and subject matter experts
- Synthesized scholarly articles
- Analyzed random samples of case files and sanction forms for those with sanctions for failure to report
- Analyzed all grievance forms on file from 2019 onward

For this audit, we analyzed demographic, mental health, sanction, and abscond data from January 2019 through the end of December 2023 from SWIS, DOC400 (the Department of Corrections database for supervision data, managed at the local level by DCJ), and Health Department mental health program enrollments. We also analyzed demographic, sanction, and abscond data from DCJ from January 1, 2019 through December 31, 2024. By interviewing staff responsible for data and analyzing patterns in the data, our office has determined that the data were sufficiently reliable for the purposes of this report.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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Response Letter

July 8, 2025

Jennifer McGuirk, MPA, CIA
Multnomah County Auditor
501 SE Hawthorne Blvd., Room 601
Portland, OR 97214

Dear Auditor McGuirk,

The Department of Community Justice (DCJ), the Office of the Chief Operating Officer (COO), and I would like to extend our gratitude to the Multnomah County Auditor's Office for completing this report focused on sanction practices for justice involved adults on supervision in Multnomah County. We especially appreciate the work of your team over the past year in engaging with staff and clients in an effort to improve outcomes for all. We remain committed to continuous improvement, in line with our commitment to community safety, victim's rights and equity considerations. In this letter, we acknowledge the audit recommendations and describe the commitment of County and DCJ leadership in addressing those recommendations.

DCJ's Adult Services Division (ASD) implements legally mandated requirements of community supervision, governed by Oregon State Law, with over 25 Oregon Revised Statutes (ORS) and Oregon Administrative Rules (OAR) that establish baseline requirements for supervision, contact standards, case planning and behavior change models, sanctions, and govern the role of system partners. ASD parole and probation officers (PPOs) work hand-in-hand with system partners (the Courts, Department of Corrections (DOC), Parole Board and District Attorney) to implement conditions of supervision. This legal basis, and the associated roles of system partners, should be considered throughout this report, particularly in regard to references to PPO authority and ASD practices.

The report underlines the complexity of the work involved with community supervision, and also the importance of this work in contributing to public safety. Our dedicated staff and programs provide direct services to community members, navigating between the role of law enforcement and social work, working with individuals to develop plans for success, in support of public safety and community harm reduction.

Since this audit commenced, DCJ has undergone significant changes in leadership, with a new Department Director, Adult Services Division Director, and just recently, a new Research and Planning (RAP) Manager now in place. Leading with DCJ's vision of Community Safety Through Positive Change, reconnecting to the "why" of our work, and developing policies and practices that enable every staff member to deliver on this are the top priority for the County, and the Department's leadership team. In addition to leadership changes, DCJ continues to overcome the challenges associated with working with justice involved individuals experiencing a higher acuity, including substance use disorders, mental health challenges and homelessness, while also adapting to a post-COVID work environment, with resource constraints.

Of the over 7,000 adults on supervision in FY 2024, 72% of DCJ's clients are on felony supervision and 81% are on supervision for a crime that was committed against another person. The highest risk clients require the highest level of resources, determined based on validated risk assessments completed by PPOs that drive case plans aimed at reducing the risk of recidivating. The acuity and resources required for supervision based on the risk level, behavioral health and substance abuse disorders, and houselessness experienced by justice involved individuals (JIIs), has steadily increased. While the number of supervised individuals has decreased since 2019, as identified in the report, approximately 55% of adults on supervision were on high or medium supervision at that time, while in 2024 that number increased to 70%. This increase corresponds with substantial resources dedicated to individual case planning and measurable contacts.

The report also uplifts the needs of the population of justice involved individuals facing mental health disorders, and the additional resources needed to ensure positive outcomes. DCJ appreciates the focus on this population, and is equally invested in aligning supervision accordingly. This population, often both high-risk and high-need, experiences significant instability that decreases their ability to successfully engage in supervision, often resulting in technical violations or absconsions, with the only course of action available remaining to be a jail sanction. ASD is committed to meeting this increased challenge of supervision, with the Mental Health Unit (MHU) providing probation, parole, and post-prison supervision services for individuals who have been diagnosed with a severe and persistent mental illness, with supervision from specially trained PPOs. While the Mental Health Unit was established in 1998, the number of clients served continues to increase, in line with the higher acuity and prevalence of mental health disorders experienced by JIIs, and despite the overall decrease in adults on supervision. Additionally, substance use often exacerbates underlying mental health needs, making engagement and treatment more difficult for behavior health partners. To meet this growing need, ASD established the Mental Health Court in 2015 that brings together the Courts, the District Attorney and DCJ to divert JIIs from incarceration and instead facilitate linkage to appropriate treatment and community resources.

DCJ laid out their goals for FY 2026, presented to the Board during the budget work session on May 22, 2025, identifying division level outcomes that reflect many of the areas identified in this report. The data collection and review by the Auditor is in alignment with these priorities, and DCJ will utilize the analysis to inform their approach to procedural updates. ASD's outcomes for FY 2026 aim to improve best practices, in alignment with State requirements, including the following:

- **Increasing positive case closure for adults on supervision.** Currently at 63.5% for probation cases, ASD aims to increase this by improving measurable and meaningful interactions, improving timelines for completing case closure, and managing the size of PO caseloads by filling vacancies.
- **Prioritizing getting more adults on supervision referred to internal and community resources.** Currently about 20% show a referral to treatment such as substance use, domestic violence, behavioral health, and ASD aims to increase that to 40%.
- **Implementing strategies to increase the usage of non-custodial interventions.** This reduces demands on jail bed capacity, while also supporting JIIs to remain connected to the community and receiving services. When there is not an immediate safety concern but

there are issues of non-compliance with supervision conditions ASD aims to increase accountability with alternative sanctions to effect behavior change. As noted in the report, the number of jail sanctions for JIIs has decreased significantly from 2019 to 2024 (page 15), and DCJ remains committed to building on this trend.

These outcomes are reviewed on an ongoing basis (reported quarterly) by DCJ, based on indicators developed in partnership with the Department of Corrections. Based on these metrics, ASD is providing training to managers and staff to improve documentation and ways to monitor reports to adjust practices as needed.

The County and DCJ remain committed to inclusively leading with race and equitable outcomes. As part of DCJ's FY 2026 budget presentation, the Department recognized the systemic inequities that have led to the overrepresentation of Black, Indigenous, and People of Color in the criminal justice system and how this is reflected in the demographic representation of DCJ clients. This audit report further identifies racial disparities in jail sanctions, data that is monitored by DCJ by utilizing relative rate index, as described in the recommendation responses included below. In response to the systemic inequities, DCJ established a Culturally Responsive Supervision Unit for African American and Latino adults on supervision to meet the needs of clients and support successful outcomes. To further support staff in cultural competence and client engagement, DCJ implemented an implicit bias and microaggressions training program for all staff in 2024.

DCJ's ASD remains committed to best practices in community supervision. At the same time, the Department is impacted by resource limitations, particularly by State community corrections funding that is continually funded far below the actual cost of providing services, in line with OAR standards. Funding constraints also limit technological capacity related to data collection, as ASD is required to utilize Department of Corrections systems, particularly DOC400, to track case planning and referrals, desperately in need of system upgrades, but without necessary funding to do so. Despite this, the County has maintained its commitment to supporting evidence-based practices, and providing critical support services, including culturally responsive services, housing, substance abuse and mental health treatment. This will continue to be a priority for the County, and we appreciate this report underlining the necessity of these services and practices to ensure success for justice involved individuals.

Through this commitment to case planning and connecting to supportive services such as employment, housing, substance abuse and mental health treatment, Multnomah County consistently experiences one of the lowest rates of recidivism in Oregon based on Criminal Justice Commission data.

We are committed to implementing the audit recommendations to best meet our community needs while upholding community safety, and offer our response to each of the recommendations below.

Recommendations for DCJ Management:

Recommendation 1

PPOs should recommend jail and revocation for technical violations only for imminent and direct public safety threats.

DCJ partially accepts this recommendation, but must defer to Supervisory/Sentencing Authorities acknowledging Oregon State Law in place that governs this work including sanction response and usage established by OAR, ORS, case law, Parole Board and Court jurisdiction.

The requirements for JIIs to follow the conditions of supervision are set by the Courts, Parole Board, Compact etc. PPOs are required to report on those conditions, and failure to do so can result in legal consequences for the PPOs. Per OAR, 291-058-0050 and OAR 291-058-0060 all probation and post prison sanctions must be sent to the DA, Courts or Parole Board and the supervisory authority retains the authority to review and override recommended sanctions, including technical violations.

Sanction practices are set by OAR within the statewide sanctioning grid. The length of a sanction and whether it warrants the usage of jail is determined by risk score and the violation behavior of the individual. Lower level technical violations like missing a treatment group, require a lesser response while refusing to follow treatment requirements and the case plan equates to a higher level response. New criminal behavior and absconding supervision fall into a higher response level. Due to these requirements in OAR, as well from Supervisory Authorities, public safety is not the only time a jail sanction may be required and technical, absconsions and new criminal behavior will be disaggregated as well.

DCJ does not impose revocations per ORS 137.593 which states that the County Community Corrections agency shall impose structured, intermediate sanctions for the violation of conditions of probation in accordance with rules adopted under ORS 137.595 (Establishing system of sanctions). Under no circumstances may a county community corrections agency revoke probation and that revocations are under the jurisdiction of the sentencing court judge.

Additionally, probation sentences and jail units available are set by the Oregon Sentencing grid. A judge may order that there are no sanction units available and any violations of probation be returned to court. If sanction units are allowed, they are capped based on the grid score. When all custodial sanction units have been exhausted, the PPO must recommend to the courts that the case be revoked. Failure to engage in supervision altogether requires reporting to the Supervisory/Sentencing Authorities by requesting a warrant. Absconding supervision extends beyond the definition of a technical violation.

As identified in the ASD division level outcomes, the Division is committed to implementing strategies to increase the usage of non-custodial interventions, and will track and report on this accordingly.

The Adult Services Director will lead efforts to implement training and tracking in support of this recommendation.

Recommendation 2

Create a policy that defines public safety threats with clear, measurable criteria and a response procedure for PPOs with documentation requirements.

DCJ accepts this recommendation and efforts are already underway as part of the review of ASD's Response to a Violation policy. The policy includes guidelines for determining a public or victim safety threat, and a response procedure when a violation of supervision conditions occurs.

The Adult Services Director is overseeing the policy revision, to be completed by December 2025.

Recommendation 3

Develop a policy that defines minimum efforts that should be made to locate an individual by PPOs.

DCJ accepts this recommendation and efforts are already underway in line with meeting measurable contact standards established by the State. Documentation regarding effort to locate is required in order to request a warrant, PPOs have to articulate that the individual has failed to report and their whereabouts are unknown. To establish more standardization, ASD is currently upgrading the report writing training and practices, in cooperation with the DA's Office, and updating the Detainer and Warrant policy, in line with these upgrades to current practices.

The Adult Services Director is overseeing the policy revision, to be completed by December 2025.

Recommendation 4

Provide and document resources and/or referrals to those at risk of absconding due to homelessness.

DCJ accepts this recommendation with efforts underway, as described under recommendation 3 that takes a more systemic approach.

It should be noted that homelessness is not a criminogenic risk for men but is a responsivity concern. For women, housing safety has shown linkages to risks of recidivism. Despite this, homelessness increases challenges to successfully engaging with supervision for all, and DCJ invests significant resources to connect JIs with housing services, providing over 700 unique individuals on supervision with housing during FY 2024 through the Transition Services Unit. DCJ actively participates in the Homelessness Response Action Plan (HRAP) implementation, supporting the foundational strategy to establish rapid and long-term interventions aimed at preventing unsheltered homelessness among individuals exiting the justice system and the outcome of ending discharges from carceral settings to the streets by 2026. Additionally, as the report identifies, ASD established the Stabilization and Readiness Program (SARP), to provide a stabilization center for JIs to more easily engage with supervision.

The Adult Services Director will lead efforts to implement training and tracking in support of this recommendation.

Recommendation 5

Create public data dashboards updated quarterly with data about sanctions and absconsions disaggregated by race, caseloads, and units.

DCJ partially accepts this recommendation. DCJ's Research and Planning (RAP) team currently updates an internal dashboard with data on sanctions disaggregated by race and units, with updates possible on a monthly basis. Due to the additional technological capacity required to establish public facing dashboards, DCJ is not able to deliver on this part the recommendation. Additionally, dashboards regarding absconsions are not available. In the FY 2026 budget cycle, DCJ's RAP team was impacted by reductions, losing a Research and Evaluation Analyst Senior. This reduction will limit DCJ's ability to expand dashboard reporting beyond current capacity.

DCJ recommends utilizing the already available public data from the [Criminal Justice Commission Justice Reinvestment Program dashboards](#) for crimes and sentencing, that provide public facing dashboards per county on incarceration. These dashboards do not include caseloads or units. DCJ has internal capacity to analyze across crime categories which would be a more relevant dataset to analyze, as caseload data does not reflect differences in conduct and risk profile of those on supervision.

The Adult Services Director, together with the DCJ RAP Manager, will lead efforts to update internal dashboards and integrate data into training and case planning.

Recommendation 6

Require staff to provide and document resources and referrals.

DCJ accepts this recommendation. *One of ASD's priorities for FY26 include improving measurable contacts, treatment module usage and documentation of interventions and alternative sanctions. This work is already underway. In June 2025, ASD partnered with DOC on a training for all managers on updates to chrono rules in DOC400 to more accurately capture resources, referrals and measurable contacts. With updated chrono practices, ASD can better reflect the work occurring.*

The Adult Services Director will continue to lead efforts to implement training and tracking in support of this recommendation.

Recommendation 7

Advocate to the Board for funding to expand low-barrier resource models like SARP for all high and very high-risk individuals on active supervision.

DCJ accepts this recommendation *to advocate for funding, while acknowledging the resource constraints experienced across the County and State that will drive prioritization during the FY 2027 budget process, including maintaining DCJ's legally mandated service.*

SARP was established to respond to a critical need, providing stabilization support for clients experiencing homelessness and mental health disorders in order to engage with supervision. This was made possible following the COVID pandemic, and with Federal ARPA funding. After this funding expired, SARP was funded in FY 2025 through Supportive Housing Services funds. During the FY 2026 budget cycle, DCJ requested SHS funding for SARP once again, which was transitioned to one-time-only County General Funds during final budget amendments. The funding for SARP remains unstable, while the services provided are not legally mandated supervision requirements established by the State, and must be taken into consideration when prioritizing resource allocation.

DCJ's Director will continue to advocate for stable and ongoing low-barrier resource models for high-risk, high-need, justice involved individuals, in line with available resources and DCJ's commitment to maintaining legally mandated requirements. Additionally, DCJ remains committed to taking a one county approach when identifying community resources to support JIIs, including through forums such as the Homelessness Response System and Deflection coordination.

Recommendation 8

Advocate to the Board for funding to expand access to culturally responsive resources and referrals.

DCJ accepts this recommendation *to advocate for funding, while acknowledging the resource constraints experienced across the County and State that will drive prioritization during the FY 2027 budget process, including maintaining DCJ's legally mandated service. During the FY 2026 budget cycle, DCJ prioritized culturally responsive services, holding these services harmless from reductions. The County is committed to inclusively leading with race, and will continue to prioritize this commitment to the greatest extent possible.*

DCJ's culturally specific programming for adults on supervision is essential to inclusively leading with race and recognizing the embedded disparities in the criminal justice system. With culturally specific caseloads focused on African American and Latino clients, in-house capacity to implement the HEAT (Habilitation Empowerment Accountability Therapy) curriculum, a culturally-tailored, holistic, strength-based, and trauma-informed program designed to support African-American males involved in the criminal justice system, and partnership with culturally specific community providers, meaningful rehabilitation for high-risk populations is made possible.

DCJ's Director will continue to advocate and prioritize culturally responsive resources and referrals, in line with available resources and commitment to maintaining legally mandated requirements.

Recommendation 9

Consistently document identified needs, such as mental health assessment and treatment and housing resources, and require staff to provide and document corresponding resources and referrals that address those needs.

DCJ partially accepts this recommendation, recognizing limitations of data tracking tools managed and required by the Department of Corrections.

As noted above, ASD has identified as a priority to increase treatment referrals, and improve documentation, already underway with the June 2025 training with the Department of Corrections on chrono practices.

ASD PPOs are guided by the limitations of the DOC400 treatment module, as described above. For instance, ASD can not track mental health diagnosis, only whether an individual has been referred for an assessment. Additionally, housing is not a treatment referral and is therefore not allowed as an entry in the DOC 400 treatment module. It is tracked by ASD's Transition Services Unit, but cannot be added to the treatment module. While increased training on chrono practices will address more standardization, the depth of documentation remains limited by State-wide systems.

The Adult Services Director will lead efforts to implement training and tracking in support of this recommendation.

Recommendation 10

Expand access to mental health treatment for all those in high-risk units through documented referrals and/or resources.

DCJ partially accepts this recommendation, and work is already underway to increase documentation of referrals and resources in line with DOC400 standards described above. However, the ability to expand access to mental health treatment is beyond the scope of DCJ, and the resource constraints experienced across the County and State impact availability of mental health treatment. Without fiscal resources this recommendation can not be fully implemented.

As possible, and as noted above, ASD has identified as a priority to increase referrals, and improve documentation, already underway with the June 2025 training with the Department of Corrections on chrono practices.

The Adult Services Director will lead efforts to implement training and tracking in support of this recommendation.

Recommendation 11

Provide print materials for all those on supervision about the grievance process during the initial PPO intake meeting. Printed materials should include:

- i. how to submit a grievance complaint,
- ii. expected response time,
- iii. contact information for grievance complaint-related questions,
- iv. and who to contact if the issue is not resolved.

***DCJ accepts this recommendation**, as this information is already included as part of the intake process and information packet for adults on supervision. This information clearly describes the grievance process, including what constitutes a grievance, where to send the grievance, and the timeline for response. Grievances are submitted on carbon copy forms when submitted by JIs to support transparency and ability of the JI to follow-up, as needed.*

In addition to this, DCJ is currently updating its Grievance and Complaint policy to include several updates to the policy and process, upgrades to the grievance form and material JIs receive at intake.

The DCJ Director and Adult Services Director will lead efforts to update policy and practice around the grievance process.

Recommendation 12

Implement two-year retention of grievances and documentation of follow-up, as required by OARs and the county's records retention schedule. Formal and informal grievances and follow up should be documented.

***DCJ accepts this recommendation** and has already identified the need to review and update the Grievance and Complaint policy, currently underway, including implementation of the two-year retention schedule*

DCJ's Director is overseeing the revision of the Grievance and Complaint policy and will oversee related monitoring.

Recommendation 13

Establish an online grievance submission process with an option for anonymous grievances. Track trends for the nature and frequency of the complaints.

***DCJ accepts this recommendation** and the Grievance and Complaint policy and process is currently being reviewed and updated. As part of this update, an online submission form on the public facing website, including an anonymous option will be established. DCJ remains committed to tacking and investigating anonymous complaints, this also limits our ability to fully investigate.*

Additionally, an online complaint form is available to JIs through the [Department of Public Safety Standards and Training](#) for complaints related to standards required for certification or licensure, as included in OAR Chapter 259, that is then directed to DCJ's ASD for review and response.

DCJ's Director is overseeing the revision of the Grievance and Complaint process that will include a process for tracking trends, in cooperation with the ASD Division Director.

Recommendation 14

Assign responsibility for tracking and investigating grievances to a central staff member.

DCJ accepts this recommendation, and has already identified the need to review and update the Grievance and Complaint process, currently underway. The policy addresses the process for tracking and investigating grievances.

DCJ's Director is overseeing the revision of the Grievance and Complaint process.

Recommendation 15

Publish an annual report on grievance trends and send it to the DCJ Director and Board of County Commissioners.

DCJ accepts this recommendation. DCJ's Director will oversee the data collection and communicate with the Board of County Commissioners accordingly.

Recommendation 16

Report on jail and revocation use for technical violations that are not for public safety reasons, disaggregated by race.

DCJ accepts this recommendation, however there are nuances to the data collection methodology, and some practices already in place (as detailed in recommendation 1, 2 and 5).

As noted above, ASD PPOs do not impose revocations and the requirement to follow the conditions of supervision are set by the Courts, Parole Board, Compact etc. PPOs are required to report on those conditions, and failure to do so can result in legal consequences.

Consistent with the response to recommendation 1 and 2, nuances regarding the definition of public safety and response will need to be considered in this reporting. This recommendation is also addressed by recommendation 5, confirming that current dashboards exist with sanction data, maintained by DCJ and CJC. As also noted in recommendation 5, the reduced capacity of DCJ's RAP team will limit the time available for in-depth reporting on this topic, outside of current performance measures established.

The Adult Services Director, together with the DCJ RAP Manager, will facilitate reporting on jail sanctions.

Recommendation 17

Gather, analyze and report on data to determine trends on the reasons individuals fail to report or abscond supervision.

DCJ accepts this recommendation. Due to the nature of failure to report and absconsions, ASD has already determined an inability to contact the JII once that is documented and a warrant has been requested. The length of time that a JII, who may be experiencing a number of underlying challenges, is on abscond is varied and makes it difficult to identify the reason. Additionally new criminal behaviors preceding or following the abscond are often blended with substance use, low or no engagement in services, an unwillingness to report and receive supervision and services. Given these conditions, our ability to analyze this will be focused on the confirmed behaviors through documentation of the violations of conditions rather than just the primary violation to better analyze themes.

As noted above in response to previous recommendations, reduced RAP capacity will be taken into consideration when defining the scope of analysis.

The Adult Services Director, together with the DCJ RAP Manager, will consider internal mechanisms for addressing this recommendation.

Recommendation 18

Report how many people on supervision at DCJ are experiencing homelessness.

DCJ accepts this recommendation and is already able to report on the rate of homelessness, pulled from Department of Corrections data on a monthly basis. The May 2025 report indicated 15% of JIIs on supervision with DCJ are experiencing homelessness.

The Adult Services Director, together with the DCJ RAP Manager, will continue to facilitate this reporting.

Recommendation 19

Report on racial disparities in sanctioning.

DCJ accepts this recommendation and already has an internal dashboard for the relative rate index regarding sanctions to analyze racial and ethnic disparities (as detailed in response to recommendation 5). DCJ's RAP team currently updates the internal dashboard with data on sanctions disaggregated by race and units, with updates possible on a monthly basis.

The Adult Services Director, together with the DCJ RAP Manager, will facilitate reporting.

Recommendation 20

Evaluate and report on Effective Practices in Community Supervision (EPICS) use among all PPOs as a measure of relationship and rapport.

DCJ partially accepts this recommendation. DCJ is a nationally recognized leader in implementing evidence based practices, and was one of the first community corrections agencies to implement EPICS, as part of supervision standards. The approach of EPICS has now been integrated state-wide into mandatory case planning requirements for high and medium risk JIIs, developed by the Oregon Department of Corrections. Lows do not receive a case plan/EPICS. DCJ is committed to utilizing validated assessments as outlined in OAR to set supervision, sanction and reporting levels. Additionally, those assessments are utilized on all high and medium risk individuals that engage in supervision to identify the areas most likely to lead to new criminal behavior and PPOs build case plans and referrals to reduce those risks. In FY 2024, DCJ completed case plans for 74% of all high and medium risk offenders, and aims to increase that number year on year.

To increase our case plan completion rate, DCJ is committed to managing case load size by decreasing vacancies and supporting staff training. The Department made adjustments to meet this need with an FY 2025 budget modification to increase HR capacity and staffing changes to support training in the FY 2026 budget.

The Adult Services Director will lead efforts to implement training and tracking in support of this recommendation, acknowledging adjustments in how EPICS is being utilized based on recently adopted state-wide standards.

Recommendations for the Board of County Commissioners:

These recommendations focus on countywide or interdepartmental work under the purview of the Board of County Commissioners. Acceptance of a recommendation does not mean endorsement by the Board of Commissioners nor does it represent the perspective of the Board. Responses are representative of the County's executive leadership tasked with responding to the Auditor's report and were drafted in consultation with relevant departments.

Recommendation 21

Ensure that there is adequate case management for housing needs of those discharged from supervision.

We accept this recommendation and will work within the constraints of available resources and operational requirements to ensure that all relevant County departments, including DCJ, the Homeless Services Department, the Health Department, and the Department of County Human Services are identifying opportunities for additional case management that could be made available for those being discharged from supervision.

DCJ and its agency partners will also continue to strengthen cross-departmental and jurisdictional coordination of case management efforts to enhance access to housing placement resources for individuals exiting incarceration and supervision, especially in collaboration with the Homelessness Response Action Plan (HRAP). The HRAP calls for the Homelessness Response System to end discharges from carceral settings to the streets by 2026.

Acceptance of this recommendation does not mean endorsement by the Board of Commissioners nor does it represent the perspective of the Board.

Recommendation 22

Based on data from DCJ about housing status of high-need people on supervision, the Board should build capacity for housing by promoting:

- i. Coordination of roles between departments at regular meetings.
- ii. Contracting with community-based providers for re-entry services.

We accept this recommendation and will work within the constraints of available resources and operational requirements to ensure that the County is increasing role alignment and coordination between departments. The Chief Operating Officer convenes regular meetings of departmental leaders to ensure that coordination and alignment of roles and responsibilities takes place. It is important to note in response to this recommendation that Multnomah County is not responsible for the development of housing capacity in our community, however we do advocate for investments to increase housing capacity at the state level and with our local jurisdictional partners.

The County's work to improve its contracting practices in response to the 2024 Contract Monitoring Audit, which includes the development of standardized processes for contracts' entire lifecycle, will enhance the County's ability to contract with community-based providers for reentry services. As we implement standardized contracting procedures across the organization, it will become easier for community-based partners to understand how to engage the County and become a new or expand as a service provider to the County. Those new standards were piloted in the spring of 2025 and are being rolled-out enterprise-wide in summer 2025. Future work that is planned includes strengthening the County's ability to provide technical assistance to community-based providers as they navigate the County's contracting processes.

Acceptance of this recommendation does not mean endorsement by the Board of Commissioners nor does it represent the perspective of the Board.

Recommendation 23

Increase capacity countywide for inpatient mental health treatment and coordinated case management for those with co-occurring disorders and housing instability who may also have a criminal record.

We partially accept this recommendation, with the recognition that Multnomah County does not directly provide in-patient mental health services, but relies on state-funded services, which we will continue to advocate for investment in through our advocacy efforts and Government Relations team. That said, the County remains committed to increasing the effectiveness of our mental and behavioral health services and coordinated case management. The Health Department opened the Coordinated Care Pathway Center in 2024, which significantly increased the County's ability to provide services to individuals who may have co-occurring challenges including behavioral health, interactions with the criminal justice system, and houselessness. Those services will continue to expand when the County opens its permanent sobering center in the near future.

Per work related to the HRAP, care coordination resources do exist within the Transition Services Unit via a contract with CareOregon. However, due to very recent news that the State of Oregon put the expected 1115 carceral benefit on indefinite hold, the housing component of this work has been put into question. The HRS team is organizing a new table that includes all involved in carceral settings and will be looking at what can be done in light of this news from the State. In addition, the HRS team is working with HSD and jail staff on creating set pathways to shelter beds as a way to help in the interim.

In addition, the HRAP contains numerous strategies focused on increasing access to behavioral health services in corrections systems, which can have a significant impact on reducing recidivism and the likelihood of a person exiting the criminal justice system to houselessness. That work is in progress, and as mentioned above, care coordination is in place via a contract with CareOregon.

Partial acceptance of this recommendation does not mean endorsement by the Board of Commissioners nor does it represent the perspective of the Board.

Thank you again for the opportunity to partner with you to improve our outcomes for justice involved adults in Multnomah County. We look forward to building on the efforts identified in this report, and will keep you updated on progress towards recommendations.

Sincerely,



Jessica Vega Pederson
Multnomah County Chair



Chris Neal
Multnomah County Chief Operating Officer



Denise Peña
Director, Department of Community Justice