



Transmittal Memo

TO: TJJJ Staff
FROM: Executive Office, Policy and Standards Section
SUBJECT: GAP Transmittal
DATE: August 18, 2025

Please be advised that changes have been made to the General Administrative Policy (GAP) Manual. These changes will go into effect September 1, 2025.

Summary of Changes

GAP.380.8701 Case Planning

- Added a definition for integrated treatment plan.
- Added that an integrated treatment plan may serve as the youth's case plan.
- Added that references throughout TJJJ's rules to case plans may be understood to mean integrated treatment plans for agency departments using integrated treatment plans.
- Removed statements specifying which staff members develop and update the case plan.
- Added that case plan objectives are reviewed and progress is documented monthly, rather than at least once every 30 days.
- Added that objectives in the case plan help the youth to develop *skillful behaviors*, rather than develop *skills to reduce individual risk factors and increase individual protective factors*.
- Replaced a reference to *the orientation and assessment unit* with *an orientation and assessment program*.
- Consolidated some redundant statements.

GAP.380.9333 Investigation of Alleged Abuse, Neglect, and Exploitation

- Clarified that an investigation may be conducted based on a report or may be initiated by TJJJ when there is reasonable cause to believe that an incident may require investigation, regardless of how TJJJ was made aware of the matter.
- Removed detailed procedures of how investigations are conducted from administrative rule as they are more appropriately addressed in policies and procedures than a Board-level rule but left that investigation must be conducted in accordance with TJJJ policies and procedures; be prompt, thorough, and directed at resolving all relevant issues; and be conducted only by a qualified person.
- Detailed that a finding of ANE requires a preponderance of evidence to establish the person engaged in conduct meeting the definition, including having done so with the required mental state.
- Defined *intentionally*, *knowingly*, and *recklessly* by using the Penal Code definitions to do so.
- Defined *negligence* using definition in civil law negligence cases.

- Defined the required findings for ANE allegations.
- Provided that the investigator in an ANE report will summarize and analyze the evidence and make a recommendation regarding whether the evidence is sufficient to establish ANE occurred.
- Provided that a TJJD attorney will review the investigation for legal sufficiency and make findings as to whether the evidence establishes that ANE occurred. The attorney may request additional information or investigation by TJJD OIG if necessary.

GAP.380.9503 Rules and Consequences for Residential Facilities

- For high-restriction facilities, revised the due process procedure that is required to prove an allegation in cases where a Level II hearing is not required. Specifically:
 - assigned the name *rule-violation review* to this level of due process;
 - added that the standard of proof is a preponderance of the evidence;
 - added that a rule-violation review may be held even if no disciplinary consequence is sought;
 - added that the youth will be *notified*, rather than *told*, about which rule was allegedly violated and which consequence staff is considering, if any;
 - removed the statement requiring staff to describe the information staff has that establishes the youth committed the alleged violation; and
 - added that the youth must be given the opportunity to review relevant evidence considered by staff and to present the youth's own evidence.
- Added that the results of a rule-violation review are not grievable through the youth grievance system, but they may be appealed to the facility administrator or designee on various grounds.
- Removed the statement that allowed a rule violation to be proven only via a Level I or Level II due process hearing and that limited a youth's disciplinary record to consist only of allegations proven in these types of hearings.
- Clarified that, in addition to an incident report, any other document that describes conduct is also something that cannot be appealed or grieved.
- Added that the *results* of hearings or rule-violations reviews, and not just disciplinary consequences, can be appealed.
- Clarified that the statement requiring appropriate due process before imposing consequences applies to *disciplinary* consequences.