

CONCISE EXPLANATORY STATEMENT

Proposed Amendment to 214-RICR-60-00-1

Rules and Regulations of the Rhode Island Training School

I. Introduction

Pursuant to R.I. Gen. Laws § 42-35-2.8, the Department of Children, Youth and Families (DCYF) issues this Concise Explanatory Statement in response to public comment received regarding the proposed amendment to 214-RICR-60-00-1.

The amendment updates the division title referenced throughout the regulation from “Division of Juvenile Correctional Services” to “Division of Youth Development.”

The amendment is administrative and terminological in nature. It does not:

- Modify statutory authority.
- Alter the secure status of the Rhode Island Training School.
- Change staffing classifications, training requirements, or care, custody, and control authority.
- Amend collective bargaining agreements.
- Affect Family Court jurisdiction or commitment authority.

The facility remains a secure institution operating pursuant to statute.

II. Summary of Public Comment

Oral testimony was received at the February 18, 2026, public hearing. Written comments were also submitted during the public comment period from February 12, 2026, through March 5, 2026.

Comments in support emphasized:

- The impact of language on youth dignity and identity.
- Alignment with adolescent development research.
- Equity considerations.
- The importance of development-centered framing.

Comments in opposition raised concerns regarding:

- Recruitment and retention.
- Staff identity and morale.
- Public safety messaging.

- Applicant confusion regarding the secure nature of the facility.
- Implementation costs.
- Procedural compliance and labor implications.

Several commenters expressed concern regarding the potential reintroduction of the term “Juvenile Correctional Services.” The proposed amendment instead updates regulatory terminology to “Division of Youth Development.”

III. Department Response

A. Recruitment and Operational Clarity

The Department acknowledges concerns regarding recruitment and applicant understanding. The amendment does not alter job duties, hiring standards, academy requirements, physical intervention authority, or operational expectations.

Recruitment materials and job postings will continue to clearly describe the secure nature of the facility and staff responsibilities.

B. Public Safety and Secure Operations

The Rhode Island Training School remains a secure facility operating under statutory authority and Family Court commitment. The amendment does not modify security standards, staff authority, or operational protocols.

Terminological alignment does not alter secure status.

C. Collective Bargaining and Labor Issues

The amendment modifies regulatory terminology only. It does not alter collective bargaining agreements, compensation, classification specifications, or terms and conditions of employment.

The rulemaking was conducted in full compliance with the Administrative Procedures Act. The existence of labor-related proceedings, including an unfair labor practice complaint, does not affect the Department’s statutory rulemaking authority.

D. Implementation Considerations

The Department acknowledges comments regarding uniforms and materials. Administrative implementation will occur through standard operational processes.

E. Mission Alignment

The amendment aligns regulatory language with the Department’s rehabilitative framework while maintaining accountability and secure operations.

IV. Determination

After consideration of all oral and written comment, the Department determines:

1. The amendment is administrative and terminological in nature.

2. It does not alter substantive rights, duties, or statutory authority.
3. The rulemaking complied with R.I. Gen. Laws § 42-35.

The Department carefully considered the comments received and determined that the proposed amendment should proceed as drafted. Accordingly, the Department will finalize the amendment.

This Concise Explanatory Statement constitutes the Department's response to public comment in accordance with R.I. Gen. Laws § 42-35-2.8.

Respectfully submitted,

Sarah St. Jacques

Policy Director

On behalf of the Rhode Island Department of Children, Youth and Families

August 18, 2026