I. Introduction

This report is the Third Quarterly Report to be submitted by this office under statute and is intended for the Conservator of the Texas Youth Commission, the Governor, Lt. Governor, Speaker of the House, members of the Texas Legislature, and the Auditor for the State of Texas. This report will serve to provide a description of the activities of the office during the third quarter of FY 08, and will address the following areas as specified by Senate Bill 103 (SB103).

- the general scope of work of the Office of the Independent Ombudsman (OIO);
- trends observed as the result of reviews and investigations of facilities and contract care programs that have been undertaken by this office;
- recommendations to improve the efficiency of the operations of the Texas Youth Commission and the OIO.

The OIO has submitted additional reports and testimony to the members of the Joint Committee on the Operation and Management of the Texas Youth Commission as well as several other Committees and Sub-Committees which have held numerous hearings since the conclusion of the 80th Regular Session. Additionally the Chief Ombudsman has met twice with Sunset Commission staff, and the office continues its work to prepare Legislative Appropriations Requests for the next session and to provide information required by the Legislative Budget Board.

II. Overview of the Work of the Office of the Independent Ombudsman

During this quarter the staff members of the OIO, one of its interns, and two expert consultants have traveled to various TYC facilities and contract care programs to evaluate services and to ensure that the rights of youth committed to the TYC are protected. This office has focused a substantial amount of its time and resources this quarter with the valuable assistance of Dr. Michael Krezmien evaluating the educational services offered by the Texas Youth Commission, with an emphasis on the special education services offered. The office has also begun a review of some of the medical
services offered to youth committed to the commission with an emphasis on the
services provided to female youth including those youth in contract care programs who
are pregnant and/or parenting.

In addition to the above mentioned items this quarter, the OIO has also seen the
completion of the Parents’ Bill of Rights which we helped draft. Currently the OIO is
represented on several reform working groups which were necessitated by the passage
of SB 103, problems identified with operations of TYC, and federal legislation. Some of
these include:

- The Committee to ensure compliance with the Prison Rape Elimination
  Act (PREA)
- The Committee to evaluate CoNEXtions – TYC’s new treatment program
- The Needs of Female Offenders Committee – formed to address gender
  parity, and the unique needs of incarcerated female youth
- The Behavior Management Plan/Redirect Committee
- Use of Force Committee
- Staff Training Committee
- The Youth Grievance System Committee
- The Tracking System Database Committee
- The Medical Concerns Committee
- Re-Entry working group to address the concerns of youth re-entering
  public schools after being incarcerated
- TCOOMI Work Group – a group to assist youth with mental health needs
  who are returning to the community with accessing mental health services

The OIO has established a web presence thanks to the valuable
assistance of TYC web designer Cynthia Park. You can view that website at the
following link:

http://www.tyc.state.tx.us/ombudsman/index.html

The OIO created and has posted (in both English and Spanish) a pamphlet on its
website which will be provided for youth and parents/guardians outlining ways for youth
to stay safe from sexual and other types of assault while in TYC facilities and contract
care programs. The pamphlet is currently being prepared for printing and dissemination
to youth at TYC institutions, as well as halfway houses and contract care facilities.
The Youth Ombudsman Pilot Program\(^1\) which has been piloted at both Giddings and Ron Jackson Unit I has continued this quarter with success. The office has been informed of events by the youth ombudsmen during regular phone calls and site visits which we might not have otherwise been made aware of. For example, Youth Ombudsmen at Ron Jackson informed us once by phone that on an occasion, female youth at the Ron Jackson Unit were not provided medications because an entire dorm was turned away from the infirmary due to the actions of three peers. This office acted on the information and took the opportunity to investigate the event and take the concerns to the Medical Director to ensure that youth would not be denied medication punitively because of the actions of other peers. Other information was made available to the office subsequent to the riot which occurred on May 5, 2008 at Giddings State School. Their input, which came in the form of written memos and teleconference participation in work group meetings, has been well received by working groups revising TYC policies and procedures. The Youth Ombudsman Pilot Program will become even more valuable and sustainable once we formalize a more collaborative relationship with the Youth Rights Division; a process that began after a recent reorganization of that division.

**Accounting of Site Visits**

The OIO had some unique challenges placed before it this quarter, including when the Conservator specifically asked one of the Assistant Ombudsmen to visit the Al Price State Juvenile Correctional Complex on nearly a weekly basis for several weeks. Additionally the OIO staff went to several facilities with the purpose of obtaining data for the Review of Educational Services which is in the final stage of completion, and these visits took many days. That initiative also required extensive document review. Another change this quarter was that the OIO began to focus more extensively on the services offered to youth on parole and was able to travel to the largest district office (located in Houston, Texas) to meet with staff and evaluate re-entry issues to ensure the rights of the youth on parole were also monitored. That initiative will continue through the next quarter and will be a focus of the next report.

The Chief Ombudsman went to several different facilities to conduct site visits. Table 1 documents all visits made by the Chief Ombudsman this quarter. Table 2 shows all visits made by Assistant Ombudsmen this quarter. At times both the Chief Ombudsman and one or more of his staff were on the facility at the same time. For Table 3, the ‘Number Interviewed’ column represents the number of youth who were formally interviewed specifically about education services. None of the youths counted

\(^1\) The OIO Youth Ombudsman Pilot Program was approved by Conservator Richard Nedelkoff in February 2008 in keeping with the underlying philosophy of his reform priority stated in **Vision & Framework for the 21st Century Texas Youth Commission** (February 2008) “All TYC facilities have student councils to help youth learn responsibility and to enable them to have a voice in operational and rule-making decisions at their campuses. This endeavor will soon be extended to encourage student council input at the agency-level. In addition to voicing concerns, TYC student council representatives also participate in community service and youth leadership activities.”
in Table 3 is counted in any of the measures for Tables 1 or 2. None of the youths counted are duplicated.

Table 1  
**Chief Ombudsman Site Visits**

<table>
<thead>
<tr>
<th>Facility Visited</th>
<th>Date(s) of Visit</th>
<th>Number of Youth Met In Person by Chief</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mart I</td>
<td>February 25</td>
<td>12</td>
</tr>
<tr>
<td>Crockett</td>
<td>February 25-26</td>
<td>11 (2/25) 30 (2/26)</td>
</tr>
<tr>
<td>Giddings</td>
<td>March 5-March 6</td>
<td>24</td>
</tr>
<tr>
<td>Giddings</td>
<td>March 24</td>
<td>12</td>
</tr>
<tr>
<td><strong>New Waverly Do/ Gulf Coast Trades Center</strong></td>
<td>April 3</td>
<td>15</td>
</tr>
<tr>
<td><strong>Houston DO/Southwest Key Independent Living Program</strong></td>
<td>April 3</td>
<td>2</td>
</tr>
<tr>
<td><strong>Alliance East Foster Care Contract</strong></td>
<td>April 3</td>
<td>1</td>
</tr>
<tr>
<td><strong>Byrd’s Therapeutic Group Home</strong></td>
<td>April 4</td>
<td>9</td>
</tr>
<tr>
<td>Ron Jackson Unit I</td>
<td>April 7-8</td>
<td>8</td>
</tr>
<tr>
<td>Ron Jackson Unit I</td>
<td>April 16</td>
<td>9</td>
</tr>
<tr>
<td>Giddings</td>
<td>May 8</td>
<td>9</td>
</tr>
<tr>
<td>Giddings</td>
<td>May 14</td>
<td>5</td>
</tr>
<tr>
<td>Giddings</td>
<td>May 21</td>
<td>14</td>
</tr>
<tr>
<td>Giddings</td>
<td>May 30</td>
<td>3</td>
</tr>
<tr>
<td>Mart I</td>
<td>June 11</td>
<td>7</td>
</tr>
<tr>
<td>Mart II</td>
<td>June 11</td>
<td>8</td>
</tr>
<tr>
<td>Ron Jackson Unit I</td>
<td>June 17-18</td>
<td>13 total for both days</td>
</tr>
<tr>
<td>Houston District Office</td>
<td>June 24-25</td>
<td>0 – Staff interviews only</td>
</tr>
<tr>
<td>Al Price</td>
<td>June 26</td>
<td>14</td>
</tr>
<tr>
<td>Giddings</td>
<td>July 1</td>
<td>5</td>
</tr>
<tr>
<td><strong>Ron Jackson Unit I</strong></td>
<td>July 3</td>
<td>146 – Assembly/Q&amp;A Session</td>
</tr>
<tr>
<td><strong>Total Youth Met In-person</strong></td>
<td></td>
<td>327</td>
</tr>
</tbody>
</table>

Table 2  
**Assistant Ombudsman Site Visits**

<table>
<thead>
<tr>
<th>Facility Visited</th>
<th>Date(s) of Visit</th>
<th>Number of Youth Met In Person by Assistant(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Crockett</td>
<td>February 26</td>
<td>8</td>
</tr>
<tr>
<td>Victory Field</td>
<td>February 28-29</td>
<td>9</td>
</tr>
<tr>
<td>Gainesville</td>
<td>February 29</td>
<td>1</td>
</tr>
<tr>
<td>Al Price</td>
<td>March 10-11</td>
<td>14</td>
</tr>
<tr>
<td>Cottrell House</td>
<td>March 22</td>
<td>1</td>
</tr>
<tr>
<td>McFadden Ranch</td>
<td>March 22</td>
<td>1</td>
</tr>
<tr>
<td>Al Price</td>
<td>March 31-April 2</td>
<td>18</td>
</tr>
</tbody>
</table>
Al Price  April 7-8  12
Ron Jackson Unit I  April 7-8  17
Al Price  April 16-17  8
Giddings  April 17  11
Gainesville  April 21-23  17
Al Price  April 30  5
Ron Jackson Unit I  May 1  6
Mart II  May 12  3
Al Price  May 13-14  0 youth; all teaching staff
Giddings  May 21  4
Mart I  June 3  4
Mart I  June 11  5
Ron Jackson Unit I  June 16-17  20 in group; 8 individually
Houston D.O  June 24-25  2 youth; multiple files & staff
Al Price  June 26  21
Corsicana  June 30  18
W.I.N.G.S.  July 2  6
Total Youth Met In-person  216

Table 3  Number of Youth Interviewed regarding Education Services by Campus

<table>
<thead>
<tr>
<th>Facility</th>
<th>Number Interviewed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Al Price</td>
<td>30</td>
</tr>
<tr>
<td>Crockett</td>
<td>15</td>
</tr>
<tr>
<td>Gainesville</td>
<td>30</td>
</tr>
<tr>
<td>Giddings</td>
<td>21</td>
</tr>
<tr>
<td>Mart I</td>
<td>10</td>
</tr>
<tr>
<td>Mart II/AMP</td>
<td>30</td>
</tr>
<tr>
<td>Ron Jackson Unit I</td>
<td>35</td>
</tr>
<tr>
<td>Total Students Interviewed</td>
<td>171</td>
</tr>
</tbody>
</table>

**Individual Cases**

There were several individual cases which were referred to this office in a variety of ways. Some of these cases were youth who called the office directly seeking OIO services, some cases were referred to the office by family members of the incarcerated youth, a few cases were brought to the attention of the office by TYC staff, two were brought to the OIO staff by community advocacy groups, and three were brought to the attention of the office by legislators. The total number of individual cases referred to the
OIO for the third quarter was 44; with 29 of the 44 were handled by the Austin Office. The Assistant Ombudsman assigned to the Austin office had 14 cases referred to her and documented 237 phone calls made or received to specifically address these 14 cases. These phone calls included calls made to and from attorneys, parents, the youth, caseworkers and facility superintendents, Child Protective Services, the Office of the Inspector General, the General Counsel of the TYC, the Release Review Panel, TYC Medical Services, and advocacy groups.

Public Education

SB 103 requires the OIO to educate the public about the rights of youth committed to the TYC. The Chief Ombudsman is regularly invited to make public presentations to advocacy groups, professional associations, and parents groups. He is also invited to speak in academic forums and within TYC. The following are examples of public education events at which the Chief Ombudsman presented during this quarter:

- University of Houston Law Center, Center for Children, Law and Policy, “7th Annual Zealous Advocacy Conference”
- Junior State, “2008 Texas Symposium”
- Texas Bar Association, Juvenile Law Section, “Special Education and Juvenile Justice”
- Texas Families of Incarcerated Youth, Quarterly Meeting

The OIO also organized an informational session and dialogue with 15 advocacy and faith based organizations and the TYC Deputy Commissioners on June 19, 2008.

III. Events and Trends Observed as a Result of Site Visits Conducted by the Office of the Independent Ombudsman

Educational Services

As mentioned above, a substantial amount of time was spent by the members of the OIO staff, assisted by Dr. Krezmien, gathering the data required for our extensive review of educational services. During these trips to the various facilities, certain problematic practices within the educational department became apparent. The full report will be released shortly and will be available on the OIO website.

It is important to note that the TYC Conservator fully supported this review and Deputy Commissioner Dianne Gadow and her staff collaborated with this office in our effort. This was expected since Deputy Commissioner Gadow is nationally renowned for her work and expertise on the topic. Also, in his February 2008 publication Vision & Framework for the 21st Century Texas Youth Commission, Nedelkoff stated the following reform priority:
Enhance the TYC education system. This will be a centerpiece of the reform framework considering the agency must address these facts: 40% of youth at TYC are eligible for federal special education programming; a significant portion of youth sent to TYC are school dropouts; and the median reading and math achievement levels of TYC youth are four and five years behind their peers, respectively.

Use of Force/OC Spray and the Behavior Management Program/Redirect Program

Soon after the OIO was established, we raised concerns regarding the use of OC spray and the over-reliance on the use of isolation. We are pleased to report that the policies on both are in the process of revision. We are even more pleased to announce that the practice has declined substantially. At the time of the writing of this report, there are half as many youth on an isolation program as there were at the beginning of this year. The most egregious isolation program referred to as the Aggression Management Program (AMP) was discontinued in April. There are also currently about half as many monthly OC spray incidents as there were a year ago when we began to address the problem. We have continuing concerns and still monitor, but the OIO believes that this trend represents substantial progress.

Gender Parity

There continues to be substantial differences in the programming and services offered to male youth and female youth. To address the concerns raised by this office and several other groups, two members of the Treatment and Case Management Department who are both Licensed Sex Offender Treatment Providers have been taking turns traveling to the Ron Jackson Unit I to ensure that female youth with high needs for Sex Offender Treatment and/or Capital and Serious Violent Offender Treatment are able to receive services. There are currently no Licensed Sex Offender Treatment Providers who are employed at the Ron Jackson female unit.

This office met with the Director of Rehabilitation and Specialized Treatment, David Walenta, to address the concerns about the lack of treatment providers for the girls and discussed several concerns with the specialized treatment throughout the agency. Mr. Walenta was receptive to concerns and ensured that he and other members of TYC’s Executive Management Team were evaluating several options to provide programming for the girls including evaluating outside contract providers, moving the girls to another unit and having the Ron Jackson Unit be an all-male unit, and continuing to travel on a bi-weekly basis to Ron Jackson until a staff member becomes licensed to provide Sex Offender Treatment.

The agency was sued by the American Civil Liberties Union (ACLU) in June, 2008. The specific allegations raised in that lawsuit concerning strip
searches conducted at Ron Jackson had not ever been reported to the OIO or observed by this office before the lawsuit was filed. The OIO provided Chairman Madden with a detailed memorandum explaining that and we will provide copies of that memo upon request.

A site visit by the OIO revealed that in the security unit, girls were not allowed to wear undergarments (bras and underwear) even while on a Behavior Management Program and were reportedly transported to the infirmary and recreation by male staff while wearing no undergarments. The girls were provided diapers to wear while menstruating if they were in the security unit. Additionally, girls in security who were on BMP were not allowed to read books other than the Bible. These issues along with the issue of searches were raised by the Chief Ombudsman in a memorandum to the Superintendent, Teresa Stroud, dated June 19, 2008. Within a week of the report, Ms. Stroud addressed in writing each of these concerns to the satisfaction of the OIO.

Youth Extortion

After hearing recurring complaints by youth alleging occasional and even patterns of youth extortion of other youth for food, we undertook an investigation at the Al Price Unit and submitted a report to TYC on June 30, 2008. We intend to take a closer look at this issue on other facilities.

It appears that there is a systemic problem with youth extorting other youth for food at Al Price and the staff has not taken adequate steps to abate the problem. At every facility we have heard of the occasional situation where a bully youth steals food from weaker youth. But it appears that at Al Price there is an entrenched pattern.

We interviewed staff and youth and a practice referred to on that campus for a number of years as “Deebo” is notorious and on-going. “Deebo” is a practice by which under duress a youth will agree to provide another youth with food or canteen items whenever asked.

Every youth we spoke to about this believes it is simply a fact of life at Al Price that you must “fight for what is yours”. Youth seem to accept that they have but two choices at Al Price; “fight for your food or go on Deebo”. Some youth who are capable of fighting for their food do not do so because it could result in an extension of their length of stay in TYC. They might opt to give in rather than reporting the extortion to staff because if they do, they could be placed on

---

2 Wikipedia describes the movie character after whom this practice is nicknamed as follows: Deebo is the primary antagonist in the Friday movie series. He has a menacing appearance, and every character expresses fear of Deebo, probably due to his continual violent and criminal conduct.
protective custody. Youth on protective custody are stigmatized as being weak or worse, they are identified as “snitches” and therefore subject to retaliation.

Some youth choose to stay long periods in the security unit refusing to leave so that they don’t have to subject themselves to this unfortunate scenario. One youth interviewed has been in security for two months because he knows he’ll have to fight if he goes to the dorm and that will make him stay longer. As he put it:

I’m going home and I don’t care what they say. You can call me a peon, but I’ll be home eating good food while you are still here trying to steal food from your peers…It’s never gonna stop so I just stay in security so I don’t have to worry about it…At least here I know I’ll wake up and my shoes will still be by my bed.³

As it was explained to us, when a new kid shows up on a dorm, others will claim him within moments or days of his arrival. Occasionally there is conflict between youth attempting to claim the new youth. Whoever has a claim to the new youth will ask them to “accept”. To accept means you will commit to giving up whatever food is asked whenever it is asked of you. If you do not accept, a group of youth will jump you when the opportunity presents itself. That usually occurs on the recreation yard or in the shower area. Also, youth will continually “run dome shots” which is the act of hitting youth in the head with a closed fist when staff can’t see as they pass the youth’s personal area.

If a youth initially “accepts” he can later get “off Deebo” by fighting. Also, if a youth appears as though he might fight back or he actually does fight back, he may avoid being placed on “Deebo” even if he doesn’t win the fight. One youth explained that he was originally placed on “Deebo” on his first dorm and learned from the experience. When he was moved to another dorm, he took the following approach:

If you come in with your head down and stuff, they are gonna punk you. You gotta mug up some and they might leave you alone.

The youth who has other youth “on Bo” or “Deebo” is referred to as a “Bo Master”. A “Bo Master” can have a single youth or multiple youth (in some cases as many as three) on “Deebo” or “on-Bo”. He can also take another youth “under his wing”. Essentially “under the wing” is the same relationship but more of a voluntary arrangement that will provide the weaker youth with certain protection. Another term for this relationship is “protective custody” or “PC”. Youth can also be “slick-bo” which means they do not openly acknowledge being on “Deebo” but will sneak other youth minor food items for protection secretly or “on the down low”.

³ This youth explained that if you fight for food, other youth will try to wear you down by stealing your shoes and clothes while you sleep.
Youth did acknowledge that some staff always try to intervene and other staff do so when “Austin” is on the campus. But since the practice is so entrenched, when staff try to separate “Bo-Masters” at meals from youth on “Deebo”, they still pass food under the table, even if it involves three or more youth passing the food from one to the other.

Some youth try to help their peers who are on “Deebo”. As one explained:

I’ll try to help (particular kid on Deebo who I will not name under a promise of anonymity) ‘cause he’s my homie and I feel bad for him. He’s lost so much weight you can see his spine. I’ll trade up with him. If they take his meat and cake I’ll say hey, ‘you can have half of my meat and my cake if you give me your beans’. They only really take the good stuff.

Another youth explained that:

The Bo-Master won’t try to starve a kid. They’ll take your food but leave enough for you to get by. He might say I’m taking one of your hamburgers but you can keep your lettuce and take my applesauce.

At the time of our interviews, youth we spoke to believed there was only one dorm at Al Price that didn’t have anyone “on the Bo”. That’s not due to staff interventions they claimed. It’s because there is no one on the dorm, Dorm 4 D, that won’t fight. The worst dorms are 5B and 5D. According to youth, staff on those dorms “don’t even care”. On 3A, there are 3 “Bo-Masters”. One has one youth “on Bo” and one “under his wing”, another has 3 “on Bo” and the third has one youth “on-Bo”.

If a youth is a bona fide member of the dominant gang on a dorm, he may be spared “Deebo” but might have to “ride under somebody’s wing”. While all races are subjected to this, white boys always get selected because they are considered less likely to fight or to get protection.

Youth on “Deebo” must provide food when asked and that happens every day at every meal and snack time. If you are on “Deebo”, you also might have to give up canteen items such as shampoo and toothpaste. Some youth have forfeited their food and canteen under this system for months or years.

Staff acknowledge that this has happened at Al Price by that name “for years”. One youth told me when he arrived on a dorm, staff commented “Oh boy, they are gonna get his food.” Youth explained that female staff are more likely to intervene but male staff believe boys need to get tough and learn to fight.

Medical Services
Far more medical service complaints have been brought to the OIO than were anticipated. We have elected to make this a major focus of review over the next few quarters. We have secured the assistance of attorney Meredith Martin Rountree on a pro bono basis, to help the OIO evaluate medical services. This week, Conservator Richard Nedelkoff granted OIO access to the Electronic Medical Records system (“EMRs”) so that we can achieve our mandate to evaluate medical service delivery and so that we can efficiently resolve individual medical complaints that come to this office. Also, this office has begun meeting with the TYC Medical Director and his principal staff bi-weekly to address concerns.

The OIO is very concerned with what we identified as the disciplinary denial of medication for youth caught “cheeking” medication. We brought that concern to the attention of legislators, the TYC Conservator, and the TYC medical director. We are hopeful that the issue is being addressed but have not been able to monitor this practice due to a lack of access to EMR’s. As stated above, this week we gained authorization to access that system and will begin monitoring.

Another area which was of concern to the OIO was raised at a Medical Concerns Committee after a site visit to the W.I.N.G.S. program located in Marion, Texas. It was discovered that the girls assigned to the program who are pregnant and/or parenting have one Licensed Vocational Nurse (LVN) assigned to the Unit for 40 hours per week, who until March 2007, worked only in Orthopedics. Girls housed at the Ron Jackson Unit and at Willoughby Halfway House have access to Registered Nurses on those facilities. The girls assigned to the W.I.N.G.S. program, by virtue of being pregnant as adolescents, are considered high-risk pregnancies by the medical community and there are concerns that the lack of medical training by facility staff places these girls and their children (both born and unborn) at undue risk. The Medical Director and Director of Nursing both agreed to provide for additional staff training and oversight to ensure that these youth receive adequate medical care.

IV. Recommendations to Improve the Effectiveness of TYC and the OIO

The OIO Review of Educational Services an extensive evaluation of education and special education across TYC. The OIO could never have accomplished that without the help of Dr. Michael Krezmien who committed substantial time during the past five months without compensation. In order to continue securing the assistance of national experts such as Dr. Krezmien, and indeed to be able to use him for continued monitoring of educational services in TYC, the OIO will be approaching the agency, foundations, and the legislature for funds that can be used to pay for their services and support the work of experts.
While the OIO Review of Educational Services is a critical first step in establishing a baseline for the level of educational services offered by TYC, there is a statutory requirement and an ongoing need for the OIO to continue monitoring these services to ensure that substantial changes in the delivery of education occurs, and are maintained over time. In addition to educational services, there are many other services offered to TYC youth which should be evaluated for their effectiveness, quality, consistency, and level of importance to stakeholders and to the rehabilitation and safety of TYC youth.

The OIO will be requesting that the legislature authorize additional funding for the OIO to hire additional staff to monitor services to youth in institutions, halfway houses and contract care programs specifically in the Southern and Western regions of the state and to have the ability to house these additional staff in those regions to facilitate contact with parents and youth and to monitor TYC services. Better regional coverage will become increasingly essential as TYC regionalizes and additional contract care programs are utilized.

IV. Conclusion

This OIO report, like dozens of previous reports submitted to TYC and the Legislature, points out several concerns regarding TYC operations. Indeed, that is our statutory mandate. However, we embrace the goals laid out in the Conservator’s Vision & Framework for the 21st Century Texas Youth Commission and believe that Mr. Nedelkoff and his team are leading the agency in the right direction. Our strongest recommendation is that TYC stay the course. We recognize that meaningful reform does not occur in an instant.