



Ventura County Probation Agency

Calvin C. Remington
Director/Chief Probation Officer

July 19, 2005

The Honorable John R. Smiley
Presiding Judge of the Superior Court
Ventura County Hall of Justice
800 South Victoria Avenue
Ventura CA 93009

Re: Ventura County Grand Jury Final Report Dated June 23, 2005, Entitled Court
Ordered Anger Management

Dear Judge Smiley,

The Ventura County 2004-2005 Grand Jury received a citizen's complaint about an anger management class provider. It is our understanding the complainant is the mother of an adult offender who was on formal probation as a result of a domestic violence related offense. The offender passed away unexpectedly on December 8, 2004, reportedly from a drug overdose or possible suicide. The complaint alleged that certain behavior on the part of the provider relevant to the class members seemed unethical and coercive. Our Agency is not aware of the nature of the allegations in any additional detail.

In their report, the Grand Jury concluded that the monitoring of providers by the Ventura County Probation Agency is insufficient and could allow such alleged actions to take place. When they discovered that the probation file had been destroyed after the defendant's case was abated, they decided to look into the Agency's file purging practices.

This letter is a response to findings, conclusions and recommendations of the above referenced report, specifically recommendations R-01 and R-02, as requested by the Grand Jury.

Findings: We agree with the Grand Jury's finding F-1 through F-23.

Conclusions: While we agree with conclusions C-02, C-03 and C-05, we do not agree with conclusions C-01 and C-04. Conclusion C-01 is addressed below while conclusion C-04 is addressed in our response to recommendation R-01.

Conclusion C-01:

It is unreasonable to expect that a defendant, court-ordered into a program and dependant on the provider to report compliance, would complain to the VCPA about unethical behavior on the part of the provider.

Response:

As stated in F-05, a list of approved providers of domestic violence classes is given to the defendant, from which he or she chooses the one he or she wishes to attend. There are four approved providers in Ventura County with treatment locations in Camarillo, Newbury Park, Ojai, Santa Paula, Simi Valley, Thousand Oaks and Ventura.

This particular probationer initially selected to attend sessions with one provider and was subsequently disqualified. He then attended sessions with a different provider of his choosing and was again disqualified. He returned to the first provider and completed at least 42 of the 52 required sessions with no absences. He was terminated by the provider on December 4, 2004.

As delineated above, probationers have the opportunity to select a provider from whom they wish to take domestic violence counseling classes. Additionally, probationers routinely lodge complaints regarding these and other providers as they see fit, as well as complaints about their probation officers, terms and conditions of probation etc.

The Ventura County Probation Agency has a formal complaint process that offenders use, as well as an informal process of discussion and resolution with the assigned probation officer or the Senior or Supervising Probation Officer. We believe the process works quite well. In one instance fairly recently, a complaint was received by our Agency regarding a DV treatment provider. The complaint was investigated and the provider was contacted regarding the concerning issue. The complaint was subsequently resolved satisfactorily.

In addition to contacting a probation officer with a complaint, probationers are rarely hesitant to address complaints to their attorney or to the Court. These are also fairly routine processes used by probationers.

There is also a Domestic Violence group, which includes the assigned DV Court judge and representatives from the defense bar, Public Defender's office, District Attorney's office, Probation, and treatment providers. The group meets regularly, generally on a monthly basis. This cooperative effort by all parties provides an excellent venue for sharing information and problem solving issues that arise. Any difficulties with a provider can easily come to attention of this group by any member of the group surfacing issues. The group does not hesitate to tackle difficult questions or problems.

These methods appear to be sufficient checks and balances in addition to provider monitoring by probation.

Recommendation R-01

VCPA should develop a tighter policy of monitoring providers with random unannounced site visits at times other than during the approval process. (C-01 thru C-04)

Response:

The VCPA standards and guidelines are addressed in Finding F-16 and provide that site monitoring be conducted and may be unannounced. While it is understood that these unannounced visits may occur at any time, it is generally accepted that the presence of probation staff in a group treatment setting has an inhibiting effect on the participants, diminishing the benefit gained from attending the session. While an initial visit is necessary to grant a provider status on the approved list, we disagree with the assumption in C-04 that additional unannounced visits to treatment groups would necessarily serve to preserve the integrity of the programs. It is our opinion that the regular, ongoing and open contact between probation and the treatment providers, along with the Court and counsel at the Domestic Violence group meetings, combined with an open and regularly utilized complaint procedure, serve that purpose.

Recommendation R-02

VCPA should provide the Grand Jury a copy of the revised purge policy upon its approval by its executive staff. (C-05)

Response:

The previous and current (revised) file purging and destruction policies are attached. The Agency policy was previously to hold files for **one year** after the case was closed due to an abatement after a probationer died unless there was a possibility of litigation anticipated. The policy has been revised to hold files for **three years**. In this particular instance, the file was destroyed by mistake only ten days after the case was abated by the court.

If you have any questions, please feel free to contact me at (805) 654-2100.

Sincerely,



Calvin C. Remington
Director/Chief Probation Officer

cc: ✓ Grand Jury
County Clerk and Recorder (2)
County Executive Office

FILE PURGING AND DESTRUCTION

1. The files meeting the following criteria will be destroyed at the unit level when they are successfully closed:
 - A. Basic Criteria: Single referral case files with no prior probation contacts that meet the following:
 - First-time DUI or successful drug diversion with no substantive information in file. These cases usually include Court documents and opening and closing information, all of which is replicated in the computer data system. Before closing DUI cases, the supervision officer should ensure that the offense is listed on the DMV. If the offense is not listed, the supervisor should direct the supervision officer to notify the clerk of the sentencing Court who should remedy the matter. Once the clerk is notified, the file may be destroyed.
 - Intake cases for out-of-county runaways who have no 602 behavior, warrants, or local ties. These cases are usually booked and held until transportation home can be arranged. For cases that go to Court, the file will not be destroyed until five years from the date of the last hearing.
 - Youth Services cases with sole sanction and single cite may be destroyed if all relevant information has been replicated in the computer data system.
 - B. Supervisor Override:
 - At any time, a supervisor may determine that a case merits retention and the closed file will be sent to records.
 - Supervisors will use the override provision judiciously. To override a file for retention, a supervisor merely designates the override on the chrono sheet with the word "Override" followed by the supervisor's signature. A destruction date of five years from the date of closing would be entered in the system.
2. The Agency code of "D" will designate files destroyed because there was nothing of value to mandate a supervisor override. The file location status code will be changed to "D" for destroyed.
3. Misdemeanor files already located at Records will be destroyed if a bench warrant was issued five or more years previously.
4. Felony bench warrant files will remain in records.
5. Old files will be destroyed by key clerical staff reviewing computer listings and will verify that the misdemeanor bench warrants are still outstanding, and the five-year

statute has run. If the bench warrant was recalled but formal probation was not reinstated, the case should be destroyed.

6. All cases that are closed due to abatement will be destroyed three years after the case has been closed unless there is pending litigation against the County or the defendant died in Ventura County custody. Any case closed while litigation is pending against the County will not be destroyed until the litigation is resolved.
7. Experienced Senior Deputy Probation Officers should supervise file destruction to provide guidance for which cases should be destroyed. Seniors assigned to this duty should review all files prior to destruction.
8. Clerical staff closing out CDC commitment cases will create an artificial destruction date to coincide with the maximum commitment plus five years.

File Purging & Destruction

Phase One:

1. Effective 00-00-98, the files meeting the following criteria will be destroyed at the unit level when they are successfully closed:
 - A. Basic criteria: Single referral case files with no prior probation contacts that meet the following:
 - First time DUI or successful drug diversion with no substantive information in file. These cases usually include court documents and opening and closing information, all of which is replicated by the computer data system. Before closing DUI cases, the supervision officer should insure that the offense is listed on the DMV. If the offense is not listed, the supervisor should direct the supervision officer to notify the clerk of the sentencing court who should remedy the matter. Once the clerk is notified, the file may be destroyed.
 - Intake cases for out-of-county runaways who have no 602 behavior, warrants, or local ties. These cases are usually booked and held until transportation home can be arranged. For cases that go to Court, the file will not be destroyed until five years from the date of the last hearing.
 - Youth Service Cases with sole sanction and single cite may be destroyed.
 - B. Supervisor override
 - At anytime, a supervisor may determine that a case merits retention and the closed file will be sent to records.
 - Supervisors will use the override provision judiciously. To override a file for retention, a supervisor merely designates the override on the chrono sheet with the word "Override" followed by the supervisor's signature. A destruction date of five years from the date of closing would be entered in the system.
2. The Agency CARMS code of "D" will designate files destroyed because there was nothing of value to mandate a supervisor override. The file location status code will be changed to D for destroyed.

Phase two:

1. Misdemeanor files already located at Records will be destroyed if a bench warrant was issued five or more years previously.
2. Felony bench warrant files would remain in records.

Phase three:

1. Old files will be destroyed over a twelve-month period through use of file destruction committees. Key clerical staff will review computer listings and verify by computer that the misdemeanor bench warrants are still outstanding and the five-year statute has run. If the bench warrant was recalled but formal probation was not reinstated, the case should be destroyed.
2. All cases that are closed due to abatement will be destroyed one year after the case has been closed unless there is pending litigation against the County or the defendant died in Ventura County custody. Any case closed while litigation is pending against the County will not be destroyed until the litigation is resolved.
3. Experienced Senior Deputy Probation Officers should supervise file destruction to provide guidance for which cases should be destroyed. Seniors assigned to this duty should review all files prior to destruction.
4. Clerical staff closing out CDC commitment cases will create an artificial destruction date to coincide with the maximum commitment plus five years.

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Court Ordered Anger Management Classes

Summary

The Ventura County 2004-2005 Grand Jury received a citizen's complaint about an anger management class provider. The complaint alleged certain behavior on the part of the provider relevant to the class members that seemed unethical and coercive.

The complaint raised questions about the Ventura County Probation Agency's (VCPA) authority and responsibility in such cases; therefore an investigation into those issues was initiated.

The Grand Jury concluded that the monitoring of providers by VCPA is insufficient and could allow the alleged actions to have taken place. The Grand Jury also discovered that probation files were being destroyed immediately upon a defendant's death without taking into account any possible need for information contained therein. VCPA is currently developing a new policy for the purging of client files to ensure that records are retained for a period of time before being destroyed.

Background

The Grand Jury received a citizen's complaint about the behavior of an anger management class provider. In the complaint it was alleged that the defendant was court-ordered to go for group therapy in anger management after a domestic violence conviction. It alleged that the therapy provider engaged in conduct that seemed unethical and coercive.

While domestic violence takes many forms, for purposes of this report reference is to batterers' anger management treatment groups. The term "defendant," as used in this report, refers to a person who has been convicted and sentenced to probation supervision, and is synonymous with the term "probationer."

The Grand Jury's investigation did not extend to the individual provider but questions raised by the complainant about the authority, responsibility and accountability of government led the Grand Jury to look into VCPA's policies and procedures in the approval and monitoring of treatment providers.

When the Grand Jury attempted to review VCPA's records relative to the complaint it discovered that they had been destroyed upon the probationer's death. The Grand Jury also decided to look into VCPA's file-purging practices.

Methodology

The Grand Jury's investigation took the following steps:

- Interviewed the complainant
- Studied Ventura County Superior Court documents relevant to the case

- F-09. VCPA views defendants as being capable of making a complaint to their probation officer if there is a problem with a treatment provider.

Approval Process for Treatment Providers and Programs

- F-10. California state law governs treatment provider criteria and protocol and is contained in Penal Code sections 1203.097 and 1203.098. Examples of the criteria are that classes must be group settings, two hours long, limited to 15 per group, have a specified curriculum and no victim is to be part of the counseling program.
- F-11. VCPA has sole authority to approve a treatment provider and approval must be renewed annually.
- F-12. Provider approval is sought by the completion of a written application describing the treatment program, demonstrating the ability to administer and operate a batterer's program, and documenting at least one year's experience. The application process also includes an on-site review of the program and the payment of approval fees.
- F-13. VCPA has sole authority to deny, suspend or revoke approval for reasons such as violation of the penal code or misrepresenting any material fact alleged in the approval process.
- F-14. Approval is an accreditation process and does not result in a contract between the county and the provider.
- F-15. Each program must reapply yearly for approval by submitting an approval application, paying the fee and providing documentary support.
- F-16. Standards and Guidelines directs VCPA as follows in the monitoring of group sessions:

VCPA shall conduct a site monitoring of at least one batterer's group session, per program. The selection of the group and date shall be within the discretion of VCPA and may be unannounced.

At the determination of VCPA, additional sessions of the same group may be monitored, all groups offered by the program may be monitored, or only selected sessions may be monitored. This determination shall be within the discretion of VCPA.

VCPA shall record the observations in a written report on a uniform document and shall determine program compliance with these standards based upon observations and report.

Program Content

- F-17. The California Penal Code directs that the anger management program content focus on education about gender roles, socialization, the nature of violence, the dynamics of power and control, and the effects of abuse on victims and children.

Response Requested

Ventura County Probation Agency (R-01, R-02)



Ventura County Probation Agency

Calvin C. Remington
Director/Chief Probation Officer

December 5, 2005

RECEIVED

DEC 09 2005

**VENTURA COUNTY
GRAND JURY**

Esther Bleuel, Chairman
Grand Jury Review Committee

James H. Dekker, Foreperson
Ventura County 2005-2006 Grand Jury
800 S. Victoria Ave.
Ventura, CA 93009

Dear Ms. Bleuel and Mr. Dekker,

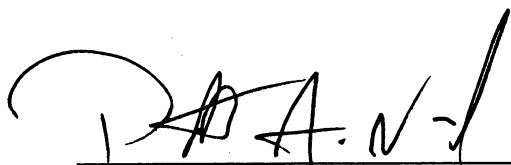
Thank you for your interest in Ventura County Probation and the local Domestic Violence Batterers Intervention Programs. Regarding the topics of interest in your letter of November 15th, the offender complaints cited in our prior response typically are provided verbally to our Probation Officers from Domestic Violence defendants. Our officers listen to and seriously consider such complaints, and generally are able to resolve them through discussion with the defendant. The most common topic of complaint has to do with the issue of program compliance, as mandated by Statute and the terms of probation. Offenders will make complaints regarding the structure of the program and their obligations to attend and pay for treatment, or they will assert some special circumstance that they feel should exclude them from the treatment mandate. Offenders will less often make personal complaints about the providers as being unfair, biased against the defendant, or simply not understanding their individual circumstances. A dispassionate review of the Court's and program's expectations, and the defendant's obligations is very useful at defusing any accusations of personal bias. Very rarely do we receive a complaint that has substance enough to warrant an in depth investigation. Such complaints are generally resolved with a phone call to the provider. I am not aware of any complaints filed under our formal Citizen's Complaint

procedure, or any that led to our revoking a program's approval to received Court mandated treatment referrals.

Regarding the qualifications to become a provider of a Batterers Intervention Program, these are controlled by Statute. The qualifications for a program are included in Penal Code section 1203.097(c)(5) while those for group facilitators are included in Penal Code section 1203.098. These standards have been incorporated into our local Standards and Guidelines document, relevant sections of which have been attached for your convenience.

I hope this response has been adequate to your concerns. Should you need any additional information in this area, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'P.A. Neil', written over a horizontal line.

Patrick A. Neil, Division Manager
Adult Services
800 S. Victoria Ave., L#3200
Ventura, CA 93009
(805) 654-2115
patrick.neil@ventura.org

- d. The defendant blames, degrades, or has committed acts that dehumanize the victim or puts at risk the victim's safety, including, but not limited to molesting, stalking, striking, attacking, threatening, sexually assaulting, or battering the victim.
 - e. The defendant demonstrates an understanding that the use of coercion or violent behavior to maintain dominance is unacceptable in an intimate relationship.
 - f. The defendant has made threats to harm anyone in any manner.
 - g. The defendant has complied with any requirements to receive alcohol counseling, drug counseling, or both. (Penal Code § 1203.097)
 - h. The defendant demonstrates acceptance of responsibility for the abusive behavior perpetrated against the victim.
3. The Court shall order any additional number of sessions recommended by the program, unless it finds that it is not in the interests of justice to do so, and states its reasons on the record. (Penal Code § 1203.097) Upon its own recommendations, the Court may recommend additional sessions be added to the defendant's original program.
- D. The defendant shall be required to produce a written referral from VCPA prior to enrolling in a program. (Penal Code § 1203.097)
- 1. Upon request, the Court or VCPA shall provide a copy of the arrest or incident report substantiating the charges.

IV. APPROVAL OF BATTERERS' PROGRAMS FOR COURT-MANDATED REFERRALS:

- A. VCPA shall have the sole authority to approve a batterers' program. The program shall be required to obtain only one approval but shall renew that approval annually. (Penal Code § 1203.097)
- B. The procedure for the approval of a new or existing program shall include each of the following: (Penal Code § 1203.097)
 - 1. The completion of a written application containing necessary and pertinent information describing the applicant program. (Penal Code § 1203.097)

2. The demonstration by the program that it possesses adequate administrative and operational capability to operate a batterers' treatment program. (Penal Code § 1203.097)
 3. The program shall provide documentation to prove that the program has conducted batterers' programs for at least one year prior to application, and all facilitators meet requirements as stated in Penal Code § 1203.097 and 1203.098.
 4. The on-site review of the program, including monitoring of at least one session to determine that the program adheres to applicable statutes, regulations (Penal Code § 1203.097), and to the provisions of these standards.
 5. The payment of the approval fee: (Penal Code § 1203.097)
 - a. VCPA shall fix a fee for approval not to exceed \$250 and for approval renewal not to exceed \$250 every year an amount sufficient to cover its cost in administering the approval process. (Penal Code § 1203.097)
 - b. No fee shall be charged for the approval of local governmental entities. (Penal Code § 1203.097)
- C. VCPA has the sole authority to approve the issuance, denial, suspension, or revocation of approval and to cease new enrollments or referrals to a batterers' program. VCPA shall review information relative to a program's performance or failure to adhere to standards, or both. VCPA may suspend or revoke any approval issued under these standards or deny an application to renew an approval or to modify the terms and conditions of approval, based on grounds established by probation, including, but not limited to, any of the following: (Penal Code § 1203.097)
1. Violation of any of the provisions of Penal Code Section 1203.097 or any provisions of these standards by any person holding program approval or by a program employee in a program under this chapter. (Penal Code § 1203.097)
 2. Misrepresentation of any material fact in obtaining the approval. (Penal Code § 1203.097)

D. The programs must submit to VCPA the following written documents: (Penal Code § 1203.097)

1. Proof of enrollment, to be submitted to VCPA and/or to the Court and to include the fee determined to be charged to the defendant, based upon the ability to pay, for each session.
2. Periodic progress reports that includes attendance, fee payment history, and program compliance.
3. Final evaluation that includes the program's evaluation of the defendant's progress, using the criteria set forth in these standards and recommendation for either successful or unsuccessful termination or the continuation of the program. (Penal Code § 1203.097)

E. No program, regardless of its source of funding, shall be approved unless it meets the following standards: (Penal Code § 1203.097 and 1203.098)

1. The establishment of guidelines and criteria for education services, including standards of services that may include lectures, classes, and group discussions, and homework assignments.
2. Supervision of the defendants for the purpose of evaluating the person's progress in the program.
3. Adequate reporting requirements to ensure that all persons who, after being ordered to attend and complete a program, may be identified for either failure to enroll in, or failure to successfully complete the program or for the successful completion of the program as ordered. The program shall notify the Court and VCPA in writing within five (5) days of any person who fails to enroll or complete the program. Notification shall be given if the program determines that the defendant is performing unsatisfactorily or if the defendant is not benefiting from the education, treatment, or counseling. (Penal Code § 1203.097)
4. No victim shall be compelled to participate in a program or counseling and no program may condition a defendant's enrollment on participation by the victim. (Penal Code § 1203.097)

V. APPROVAL PROCESS:

A. Application by Programs:

1. Each program seeking Court-mandated referrals shall apply, through the use of a uniform document, to VCPA for approval.

concurrent counseling for substance abuse and violent behavior and, in appropriate cases, detoxification and abstinence from the abused substance. (Penal Code § 1203.097)

4. Individual counseling sessions:

- a. Individual counseling sessions are not permitted under these standards. Individual sessions serve only to support the defendant's beliefs of uniquely different reasons for employing violence in the relationship and prevent the beneficial interaction of direction confrontation and education that occur in group sessions.
- b. Individual sessions shall not be credited toward the minimum attendance requirements mandated by the program or the Court.

C. Facilitators/Educators and Staff:

1. All program staff, including facilitators/educators and all staff who may communicate with defendants and victims, shall, to the extent possible, have specific knowledge regarding, but not limited to, spousal abuse, child abuse, sexual abuse, substance abuse issues, the dynamics of violence and abuse, the law, and procedures of the legal system. (Penal Code § 1203.097 and 1203.098)
2. Training requirements:
 - a. All program facilitators shall be required to complete the following requirements, pursuant to Penal Code § 1203.098, before being eligible to work as a facilitator in a batterers' intervention program:
 - 1) Forty hours of core-basic training. A minimum of 8 hours of this instruction shall be provided by a shelter-based or shelter-approved trainer. The core curriculum shall include the following components:
 - a) A minimum of 8 hours in basic domestic violence knowledge focusing on victim safety and the role of domestic violence shelters in a community-coordinated response.
 - b) A minimum of 8 hours in multicultural, cross cultural, and multiethnic diversity and domestic violence.
 - c) A minimum of 4 hours in substance abuse and domestic violence.

- d) A minimum of 4 hours in intake and assessment, including the history of violence and the nature of threats and substance abuse.
 - e) A minimum of 8 hours in group content areas focusing on gender roles and socialization, the nature of violence, the dynamics of power and control, and the affects of abuse on children and others as required by Penal Code § 1203.097.
 - f) A minimum of 4 hours in group facilitation.
 - g) A minimum of 4 hours in domestic violence and the law, ethics, all requirements specified by VCPA pursuant to Penal Code § 1203.097, and the role of batterers' intervention programs in a coordinated-community response.
 - h) Any person that provides documentation of coursework, or equivalent training, that he or she has satisfactorily completed, shall be exempt from that part of the training that was covered by the satisfactorily completed coursework.
 - i) The coursework that this person performs shall count towards the continuing education requirement.
- 2) Fifty-two weeks or no less than 104 hours in six months, as a trainee in an approved batterers' intervention program with a minimum of a two-hour group each week. A training program shall include at least one of the following:
- a) Cofacilitation internship in which an experienced facilitator is present in the room during the group session.
 - b) Observation by a trainer of the trainee conducting a group session via a one-way mirror.
 - c) Observation by a trainer of the trainee conducting a group session via a video or audio tape.
 - d) Consultation and/or supervision twice a week in a six-month program or once a week in a 52-week program.
- 3) An experienced facilitator is one who has the following qualifications:

- a) Documentation on file, approved by the Agency, evidencing that the experienced facilitator has the skills needed to provide quality supervision and training.
 - b) Documented experience working with batterers for three years, and a minimum of two years working with batterers' groups.
 - c) Documentation by January 1, 2003, of coursework or equivalent training that demonstrates satisfactory completion of the 40-hour basic-core training.
- b. A facilitator of a batterers' intervention program shall complete, as a minimum continuing education requirement, 16 hours annually of continuing education in either domestic violence or a related field with a minimum of 8 hours in domestic violence.
 - c. A person or agency with a specific hardship may request VCPA, in writing, for an extension of time to complete the training or to complete alternative training options.
 - d.
 - 1) An experienced facilitator, as defined in paragraph 3) of subdivision a., is not subject to the supervision requirements of this section, if they meet the requirements of subparagraph c) of paragraph 3) of subdivision a.
 - 2) This section does not apply to a person who provides batterers' treatment through a jail education program if the person in charge of that program determines that such person has adequate education or training in domestic violence or a related field.
 - e. A person who satisfactorily completes the training requirements of a county probation department whose training program is equivalent to or exceeds the training requirements of this act shall be exempt from the training requirements of this section.
 - f. Documentation for each facilitator shall be presented to VCPA with the program's application for referrals. Documentation shall be submitted within one month of hire for any facilitators who join the program after the approval process is completed.
3. Experience requirements:

- a. All program facilitators shall be required to present documentation demonstrating activity as a group session facilitator in a batterers' program.
 - b. Each program shall have a minimum of one person in a supervisory position that has a minimum of one year of experience working with perpetrators of domestic violence.
4. Continuing education requirements:
- a. Program facilitators should participate in ongoing professional education specific to batterers' intervention programs.
 - 1) The content of the training should include such topic areas as: current practice and research on the issue, gender analysis of domestic violence, sex role socialization as related to domestic violence, and current domestic violence law.
 - 2) Program facilitators should participate in training on racism, sexism, homophobia, and disabilities and their impact on violent attitudes and behaviors.
 - b. Program facilitators should participate in workshops or seminars presented by local domestic violence centers, or by State or national domestic violence coalitions.

Documentation of training and education shall be maintained and presented to VCPA upon request.

5. All program facilitators/educators shall meet the following standards:
- a. Program staff and facilitators must consistently act and communicate to not perpetuate attitudes of racism, sexism, homophobia, economic discrimination, and victim blaming.
 - b. Facilitators shall immediately notify VCPA when defendants have engaged in threatening or violent behavior to themselves or others, have become disruptive in the program, or have violated the terms of a restraining order.
 - c. Facilitators shall immediately notify the victim and VCPA of any threats or threatening behavior requiring a warning under the Tarasoff decision. All warnings shall be clear and explicit regarding a possible life-threatening situation and shall include referral to a safe refuge.

