

January 23, 2026

Disability Rights of North Carolina (DRNC)  
Attn: Cari Carson, Supervising Attorney – Education Team  
801 Corporate Center Drive, Suite 118  
Raleigh, North Carolina 27607

**Subject: Guilford County’s Response to Disability Rights of North Carolina’s Questions  
Regarding its Juvenile Detention Center**

Dear Attorney Carson,

We appreciate the value DRNC has in ensuring the rights of the youth at Guilford County’s Juvenile Detention Center (JDC). At the outset, Guilford County must emphasize that the statements referenced in your questions (copied below in bold) reflect anecdotal accounts provided by confined juveniles and do not incorporate information provided by Guilford County, JDC staff, or Guilford County Schools (GCS), nor are they corroborated by facility records or operational data. Accordingly, the County does not concede the factual accuracy of those characterizations, but provides the following context regarding current practices, improvements, and constraints. We hope this information provides additional context regarding youths’ interview responses and clarifies the status of JDC and GCS operations, standards, and responsibilities.

**Time Out of Cell**

**Multiple youth at Guilford JDC expressed being locked in their cells for about 22 hours a day. What plans does Guilford JDC have in place to urgently eliminate conditions of solitary confinement (22+ hours a day in cells) and to maximize time out of cell for all youth in Guilford JDC?**

Guilford County does not utilize “solitary confinement” as a routine practice at the JDC. In some instances, temporary isolation may be used in response to severe facility violations or immediate safety threats. Such measures are closely monitored and limited in duration.

At present, juveniles are out of their rooms approximately eight and one-half (8.5) hours per day. Variations occur based on school schedules, individual behavior management needs, safety considerations, and facility population dynamics. At the time of DRNC’s August 2025 visit, the regular school year had not yet begun, and juveniles were participating in a summer enrichment program, which includes structured activities but less classroom instruction than a full traditional school day. In addition, the JDC was experiencing staffing shortages that temporarily limited movement for safety reasons. Since that time, staffing levels have improved, and the JDC is now two positions away from full staffing. Guilford County is committed to providing adequate staffing to support the youth at the JDC. Being fully staffed allows the JDC to safely maintain, and potentially further increase, programming hours and activities. These positions are also dedicated to programming shifts and play a vital role in ensuring adequate supervision, staff coverage, and the overall safety of service delivery.

The JDC maintains shift-level documentation of out-of-room time and is currently enhancing data tracking to provide greater detail by activity category, including education, recreation, and programming. To the extent it is legally permissible, the JDC will share relevant information during future DRNC site visits to promote transparency and informed dialogue. In assessing movement and supervision practices, it is also relevant that the JDC houses a population that includes juveniles charged with serious violent offenses, which necessarily affects supervision ratios, security protocols, and movement decisions to maximize the safety of all youth at the JDC.

Within this operational context, the JDC generally provides youth with out-of-room time that exceeds the levels cited by DRNC. The amount of out-of-room time has increased over time as staffing levels stabilize and programming capacity expands. By way of example, in July 2025, youth spent about 5 hours per day out of the room, whereas currently, youth spend about 8.5 hours out of their room per day. Importantly, time spent in rooms is not idle; when youth are in their rooms, they are permitted to engage in structured, credit-earning educational programming delivered via secure tablets, separate from formal school instruction. During the fourth quarter of 2025, 79 active learners at the JDC completed more than 20,500 courses, earning over 229,000 credits for courses such as anger management, self-control, career exploration, and high school equivalency preparation, with a 97% engagement rate. Tablets also facilitate communication with approved contacts. Juveniles may make unlimited phone calls to court-approved parents or guardians between 3:00 p.m. - 9:00 p.m. each day.

As noted above, to support continued increases in out-of-room time while maintaining meaningful in-room programming, the JDC is working toward full staffing, which will allow the facility to consistently operate a full daily programming schedule of at least 8.5 hours per day, provided staffing levels remain stable and operations can be conducted safely.

### Education

**Multiple youth at Guilford JDC reported receiving only up to one-and-a-half hours a day of schooling. State law guarantees a minimum of 1025 instructional hours per school year. What plans does Guilford JDC have in place to improve access to educational programming, guarantee that youth receive at least 1025 hours of instruction per school year, and ensure that students with IEPs have their IEPs fully implemented?**

North Carolina law places the obligation to provide a minimum of 1,025 instructional hours per school year on the local board of education. Guilford County Schools (GCS) is responsible for providing educational services to juveniles housed at the JDC through assigned teaching staff, consistent with N.C. Gen. Stat. § 115C-84.2 and GCS Board Policy Code 3645 (Incarcerated Students). As stated earlier, at the time of DRNC's August 2025 visit, the regular school year had not yet begun, and juveniles were participating in a summer enrichment program, which includes structured activities but less classroom instruction than a full traditional school day.

It is also important context that some juveniles detained at the JDC may not be enrolled in school at the time of admission due to prior voluntary withdrawal from the school system (i.e., the juvenile has "dropped out" of school). Regardless of enrollment status or prior educational history, the JDC

strongly encourages all juveniles to participate in available educational programming and works with GCS to facilitate access to instruction whenever possible.

Attached for reference are Guilford County Schools' official academic calendar for the 2025-26 school year and the JDC's daily instructional schedule. As reflected in these documents, the JDC school-day model provides six (6) hours of classroom instruction on each scheduled school day, resulting in 1,080 instructional hours over the course of the academic year. This exceeds the statutory minimum instructional-hour requirement.

The JDC is subject to inspection twice per year by state authorities, and one of the inspection criteria is whether educational services are provided in compliance with North Carolina Department of Public Instruction standards. A review of inspection records dating back to December 12, 2023, reflects that the JDC has been found compliant with this educational standard at each inspection.

Of course, instructional hours for each juvenile may vary on a day-to-day basis due to youth intake and release patterns, court schedules, staffing availability, and safety and security considerations within the detention environment. Under certain circumstances, the JDC may temporarily restrict movement or classroom access to ensure the safety of juveniles, staff, and educators, which can affect GCS's access to students on a given day. North Carolina Department of Public Safety policy expressly permits limitations on programming, including school attendance, when necessary to address safety or security risks. Operational limitations affecting classroom access are an inherent aspect of detention operations and do not, standing alone, establish noncompliance.

Separate from detention-related operational constraints, instructional delivery may also be affected by school staffing availability and instructional practices. While the JDC is designed to support three assigned GCS teachers, unanticipated teacher absences and one-on-one testing requirements have, at times, reduced group instructional time on particular days.

With respect to students with disabilities, Child Find obligations and the provision of special education services pursuant to Individualized Education Programs are legal responsibilities of the local education agency under federal and state law. While the duty to identify, evaluate, and serve eligible students rests with the school system, the JDC fully supports GCS in facilitating access to services, and will continue to do so.

While we do not agree with the reports presented by DRNC, we do not disagree that meeting our youths' educational needs is vital. To that end, we continue to utilize feedback we receive to address concerns. We have shared DRNC's concerns with GCS and are committed to continuous quality improvement to maximize youth's education and overall well-being while at the JDC and upon re-entry.

### **Re-Entry Efforts**

**Finally, in addition to the two questions above, we wanted to ask about efforts supporting re-entry. We want to highlight the need for thinking about juvenile justice in terms of re-entry. What programs or plans do you have that you would like us to highlight or propose?**


Re-entry planning is a core component of Guilford County's Juvenile Justice framework. All juveniles placed in detention are assigned a Juvenile Court Counselor responsible for developing and implementing a re-entry plan of care. Court-involved juveniles receive Comprehensive Clinical Assessments that identify service needs and are updated every 90 days.

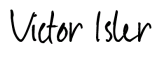
GCS transition coordinators collaborate with Juvenile Court Counselors to support continuity of education and facilitate transition back to a juvenile's home school upon release. Juvenile Court Counselors also assist youth and families with housing stability, employment resources, and mental health services. These aftercare plans are documented as part of the juvenile's court record.

For juveniles held on adult charges, the JDC has developed targeted re-entry partnerships, including employment collaboration with Furnitureland South and a nine-week digital literacy and workforce readiness program offered in partnership with North Carolina Cooperative Extension.

**Conclusion**

We appreciate the opportunity to provide this context and trust that any public reporting will accurately reflect the underlying facts, applicable legal frameworks, operational realities, and ongoing efforts at the Guilford County Juvenile Detention Center.

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