



# **The High Cost of “Justice”: A Snapshot of Juvenile Court Fines and Fees in Michigan**

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# Executive Summary

When youth in Michigan enter the juvenile justice system, they face consequences such as probation oversight and out of home confinement for months or sometimes years. However, one aspect of the juvenile justice system can upend their lives even longer than those penalties: the financial burden of juvenile court fines and fees. Juvenile court fines and fees include but are not limited to civil infraction fines, attorney fees, probation supervision costs, costs of detention, and costs of counseling and other services.

The National Center for Youth Law has been investigating the impact of juvenile court fines and fees in Michigan, as part of a multi-state advocacy initiative. Beginning in 2018, NCYL obtained information regarding families' experiences in several counties, both in response to Freedom of Information Act requests to counties and directly from advocates, community members and court-involved families who participated in interviews. This brief summarizes our findings and recommendations to date.

## Key Findings and Recommendations

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### **1. Juvenile court fines and fees are inconsistently and unfairly assessed against and collected from Michigan families.**

- Michigan courts should waive these fines and fees, as permitted under law, and meaningfully assess families' ability to pay fines and fees.
- In light of the COVID-19 pandemic, Michigan policymakers should issue a one-year statewide moratorium on the assessment and collection of juvenile court fines and fees.

### **2. While jurisdictions across the state are prioritizing juvenile court fines and fees reform in order to advance fairness and equity, few Michigan courts have, at least publicly, taken similar steps.**

- Michigan courts across the state should take swift action toward collecting and studying data on their assessment and collection of fines and fees, and implement an actionable one-year plan to drastically reduce or eliminate assessment and collection.
- The Legislature must move forward recommendations in the September 2019 Trial Court Funding Commission Report to ensure funding for Michigan courts is adequate and does not fall on the backs of vulnerable families.

### **3. Juvenile court fines and fees have lasting harmful impact on Michigan families, particularly low-income and Black families.**

- The Legislature must address the inequities inherent in the juvenile court fines and fees system by passing legislation to end the assessment and collection of money from juvenile court-involved families.

# The Landscape of Juvenile Court Fines and Fees in Michigan

State law authorizes juvenile delinquency-related fines and fees in a variety of contexts. Michigan’s State Court Administrative Office (SCAO) fee schedule delineates the types of costs that young people pay.<sup>1</sup> In Michigan, the family divisions of Circuit Courts (referred to in this report as “juvenile courts”) hear juvenile delinquency proceedings. These 57 juvenile courts can assess fines or fees against children of any age within their jurisdiction.<sup>2</sup>

In Michigan, there is no presumption of indigence in juvenile delinquency proceedings. This means that children are assumed to be able to pay such fines and fees with no regard to their age or ability to work. While SCAO has issued guidance on how courts can determine the ability of families to pay these costs,<sup>3</sup> courts are not required to follow that guidance.<sup>4</sup>

## **Mandatory Assessments Include:**

- Crime Victim Rights Assessment (\$25 per disposition order, \$130 if youth is tried as an adult);
- “Minimum State Cost,” if any two other costs are ordered (\$50 for misdemeanor or ordinance violation, \$68 for felony);
- Cost of care and services, such as daily detention fees, for youth in out of home placements;
- 20% late penalty for all unpaid costs, assessed 56 days after payment is due; and
- DNA testing assessment (\$60).

## **Discretionary Assessments Include:**

- Fines reflected in the law, based on the offenses/citations charged against the young person;
- Cost of services for youth placed at home, such as probation supervision fees, counseling and substance abuse testing; and
- Fees for court-appointed counsel.

Juvenile courts can waive some mandatory fines and fees, such as care and services, late payment penalties, DNA assessments, as well as all discretionary fees. “Waiver” means that the court can either discharge payment or identify alternatives to payment, such as community service.<sup>5</sup>

# Fines and Fees Lead to Inconsistent and Unjust Outcomes for Families

## Challenges

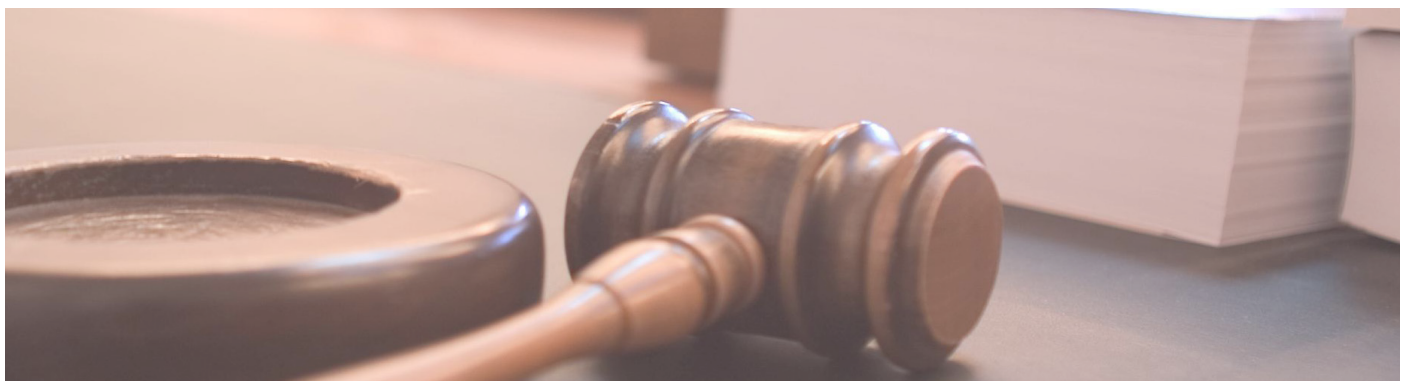
Because Michigan's juvenile justice system is decentralized, each of Michigan's juvenile courts has its own practice regarding the assessment and collection of fines and fees in juvenile court. Additionally, there is little statewide monitoring or oversight of how juvenile courts use the discretion afforded to them by state law to assess court costs. Therefore, depending on the juvenile court's practice where they live, and how heavily the court relies on this revenue to sustain court operations, youth may be subject to the full weight of juvenile costs that courts can impose upon them.

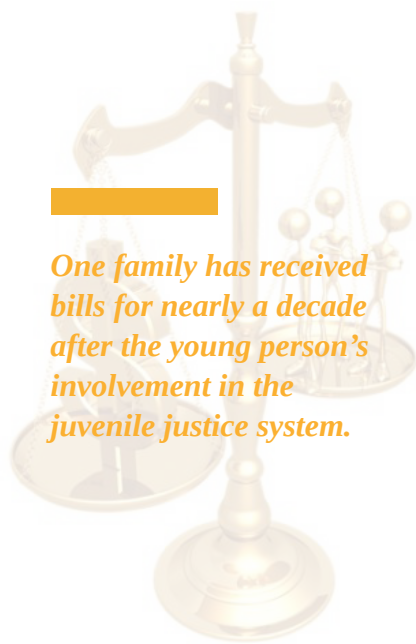
In June 2020, the National Juvenile Defender Center (NJDC) released a report on indigent defense in Michigan, including a closer look at the imposition of fines and fees in the juvenile justice system.<sup>6</sup> NJDC visited juvenile courts in multiple Michigan counties as part of their research, and found that court practices “varied significantly in how they assessed non-mandatory fees and other costs.”<sup>7</sup> Furthermore, NJDC learned that, in counties where assessment and collection efforts were aggressive, high costs were assessed against families. If families could not pay, unpaid costs were used as a reason “to prevent release from probation or otherwise terminate the court’s jurisdiction.”<sup>8</sup>

Our research has yielded similar stories of inconsistent and unfair assessment and collection of juvenile court fines and fees. Multiple families in one county reported an extremely high cost for detention and other facility stays, ranging from \$10,000 to hundreds of thousands of dollars in fees. They said the juvenile court assessment and collection process was confusing and difficult to navigate: they were not notified about the costs of care until after detention had commenced, and they were blindsided by payment plans or in-full bills that did not take into account their ability to pay.

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In addition to fees for the cost of care, many Michigan juvenile courts appear to assess a fee for the cost of services, which is unique to the juvenile court system and includes the cost of probation supervision. In its guidance to courts, SCAO has suggested that courts calculate the cost of probation supervision by using either a “Minimum Cost Method” or “Billable Hours Method.” However, SCAO does not require courts to use either method.<sup>9</sup> That means courts have the latitude to calculate the cost of probation supervision using any other method they choose, except for a non-individualized flat fee.<sup>10</sup> These supervision fees can be very high for families who are low-income. For example, in





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2016, Washtenaw County's juvenile court assessed approximately \$19,000 in probation supervision fees. The court placed 121 youth on probation that year. Consequently, the average probation supervision fee was approximately \$157, in addition to other mandatory and discretionary costs, as listed above, including the potentially steep fees of restitution. Other courts may charge much more; we learned from one attorney in another county that her clients could be charged as much as \$800 in probation supervision fees.

Michigan juvenile courts charge probation supervision fees for both formal probation and diversion programs. A recent policy report found that, based on interviews with probation departments across the state, young people were charged amounts from \$25 to \$350 for participation in diversion programs.<sup>11</sup> One source noted to us that he has heard from judges and probation officers that diversion program fees are sometimes assessed as a way for courts to make up shortfalls in their budgets. Such fees pose an inherent conflict between what may be the most appropriate approach for rehabilitating the youth and the necessity to generate revenue for court operations.

Additionally, sources reported that some judges and probation officers assess unnecessary services—and their accompanying fees—to help fund their courts, such as ordering drug screens even when the youth has not been accused of a drug offense. We also learned some youth were court ordered to perform community service through agencies that charged fees. For example, one attorney shared that their client, who had already performed many hours of community service on their own, was ordered to complete additional hours, specifically through an agency that charged around \$70 or \$75 for each of three additional community service sessions. The young person was effectively ordered to pay for a volunteer experience.

While Michigan juvenile courts can waive some mandatorily assessed costs – care and services, late payment penalties, and DNA assessments – and all discretionary fees, our research suggests that courts are not uniformly doing so. Some families have reported that they receive bills for the costs of detention, probation supervision, and attorney fees, while others stated they were given “deferrals,” which appear to be time-limited waivers of fees. In Macomb and Oakland Counties, “outstanding” fees for court-appointed counsel in juvenile delinquency cases totaled upwards of \$1 million in each county's juvenile court in 2017, suggesting that those courts do not routinely waive those fees.

For certain juvenile court fees, such as the costs of care or services and attorney's fees, the court must determine the youth's ability to pay when deciding upon the assessment. However, our research also yielded a lack of uniformity in ability to pay determination practices. While many of the stories we heard were from families who identified as low-income, few families reported ever discussing their finances with court staff. The majority had to take the initiative to raise this issue, once their debt to the court became unmanageable. The NJDC report found that judges, referees and attorneys were not even aware of financial assessments, because the collections division of the court was managing the process through “extrajudicial procedures” that the NJDC believed “run counter to due process.”<sup>12</sup>

Additionally, while these families felt the court was unresponsive to their concerns about the high costs of fees, they reported that the court's Reimbursement Division pursued them aggressively for payment, garnishing wages, intercepting tax refunds, and continuing to send bills for years after the youth had left the system. One family has received bills for nearly a decade after the young person's

involvement in the juvenile justice system. NJDC heard particularly striking stories of the length of collection efforts: one court administrator said outstanding debts “were kept open indefinitely,” and that his court had “open accounts still on children who are deceased.”<sup>13</sup>

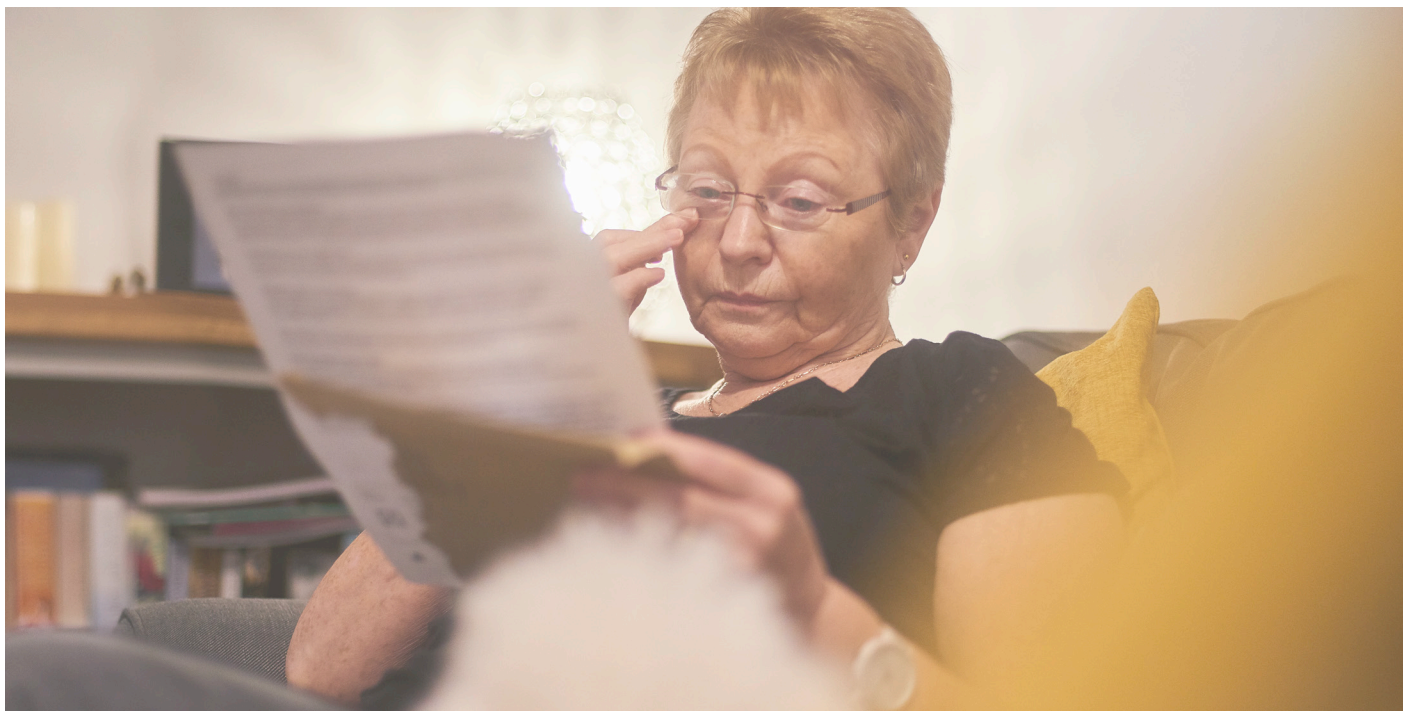
It has only become harder for families with juvenile court fines and fees to pay these costs during the COVID-19 pandemic. Michigan families in almost every locality<sup>14</sup> have been hit hard by the pandemic, generally – they’ve faced unemployment, loss of income, illness, and the deaths of their loved ones. While juvenile courts are physically closed and the Governor has discouraged detention of youth unless absolutely warranted,<sup>15</sup> the juvenile justice system has continued to operate, and there has been no executive order or other state requirement that courts suspend the assessment and collection of fines and fees. Families we interviewed reported they were even more concerned about their juvenile court fees in light of the pandemic. One guardian noted that due to losing his job during the pandemic, he is struggling to make ends meet, but the court is still garnishing his unemployment check to collect on his child’s juvenile court fees.

## Recommendations

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Michigan courts must immediately begin exercising their legally permissible options to waive certain fines and fees and make reasonable determinations of young people’s ability to pay when determining the costs they owe.

The Governor and State Supreme Court should put in place a moratorium on the assessment and collection of juvenile court fines and fees for at least the next year, as families grapple with the harmful impacts of the COVID-19 pandemic. This moratorium will ensure that courts cease assessment and collections automatically, rather than placing the burden on families to request waivers, deferrals or changes to their payment plans. The costs of probation, care and services, and other court-related fines and fees can create a mountain of debt for families, and our current public health and economic crises have only created more urgency that we, together, address families’ financial hardships.



# Michigan Courts Are Not Initiating Fines and Fees Reform Despite Low Collection Rates

## Challenge

Few juvenile courts in Michigan appear to have initiated any sort of reform related to juvenile court fines and fees. This is despite reports that courts appear to be collecting significantly less money than they are assessing against families.

Documents we reviewed in 2018 indicated that multiple courts were assessing millions of dollars against families each year, with collections rates of less than 5%. Other courts that reported lower overall assessments in the range of tens to hundreds of thousands still reported low collection rates – 40% and 11%, respectively. Similarly, NJDC found in its more recent review of juvenile courts that courts described millions of dollars in unpaid juvenile fees in their annual reports to SCAO.<sup>16</sup>

While efforts to reform courts' fines and fees systems have not been widely publicized, we have learned of a handful of promising stories. A court in a large county made a recent decision to uniformly change its policies several years ago by stopping the assessment and collection of discretionary fees. This decision followed the court's realization that families could not pay those fees, and the court was expending more resources on collections than it was receiving in revenue. We also learned that judges in two other counties often waive juvenile court fees because of similar reasoning, though they appear to not have made a formal change to policy.

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Several jurisdictions outside of Michigan have taken steps to reduce or eliminate court fines and fees imposed upon youth in delinquency proceedings and their families, thereby setting a solid precedent for Michigan courts to engage in more proactive, public transformation of their juvenile court fines and fees system.

In 2018, California abolished “administrative fees” in all juvenile courts. Administrative fees include costs of incarceration, legal representation, electronic monitoring, probation or home supervision, and drug testing. In 2019, through a bipartisan bill, Nevada also abolished juvenile court fees, including costs of incarceration, legal representation, court programs, drug and mental health treatment and evaluation, and administrative assessments.

In 2020, two other bills to eliminate juvenile fines and fees passed in Maryland and New Jersey. New Jersey's law eliminates the use of fines for young people and allows the juvenile court to end probation supervision after incarceration even if the young person has not yet paid off outstanding fines and restitution. Maryland's law repealed juvenile courts' ability to assess and collect civil fines, attorney's fees, and payments by parents for other support of the child. Maryland's law is the first in the nation to also have retroactive application, signaling that ceasing collection of such fines and fees would not have an appreciable impact on past or future county or state revenue.

Many local jurisdictions have also eliminated specific juvenile court-related costs, including New Orleans, LA (all court fees), Kansas City, MO (electronic monitoring costs), Philadelphia, PA (juvenile detention costs), Madison, WI (juvenile detention costs), and Delaware County, DE (juvenile detention costs).

Finally, professional associations have recommended that jurisdictions reduce and eliminate the imposition of juvenile court costs – including, notably, the National Council of Juvenile and Family Court Judges (NCJFCJ)<sup>17</sup> and the National Conference of State Legislatures.<sup>18</sup> Finding that “the failure to pay can result in serious and long-term consequences for youth and families [. . .] all for reasons unrelated to public safety and counterproductive to the rehabilitative aims of the juvenile court”, NCJFCJ recommended that judges and judicial leadership take a number of steps, including “work[ing] towards reducing and eliminating fines, fees, and costs.”<sup>19</sup> NCJFCJ also noted that “the core functions necessary for our nation’s juvenile courts to meet their rehabilitative goals should be fully funded by governmental revenue and not by revenue generated by fines, fees, and costs.”<sup>20</sup>



Michigan Supreme Court Justice Bridget McCormack took a related position in her July 10, 2019 concurring opinion in *People v. Cameron*.<sup>21</sup> She raised the concern that the assessment of actual court costs in criminal cases could create a conflict of interest for judges. Her concern was supported by the Michigan District Judges Association, which filed a powerful amicus brief and accompanying letters from judges stating that this conflict of interest does indeed occur, because judges are expected to fund their courts from the collection of court costs. While the *Cameron* opinion was about district courts, a similar conflict of interest likely exists in juvenile courts. There are several juvenile court fees for which the funding unit for the juvenile court receives some or all of the money collected.

## Recommendation

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The time is ripe for Michigan courts to begin proactively reforming their juvenile fines and fees systems. As an immediate step, courts can prioritize studying their data on the assessment and collection of fines and fees, including identifying the actual revenue collected from such fines and fees and alternative sources for that net revenue. Courts should then design and implement a measurable one-year action plan to drastically reduce or eliminate assessment and collection.

While courts work to rethink and transform their fines and fees systems, the Legislature must move forward recommendations in the September 2019 Trial Court Funding Commission Report, including establishing a stable court funding system and establishing an implementation team that includes juvenile court stakeholders to transition the state to the new funding model.<sup>22</sup> These steps will help to ensure funding for circuit courts is adequate and does not fall on the backs of vulnerable families.



# Court Assessments Have Lasting Impact on Vulnerable Families

## Challenges

Juvenile court fines and fees in Michigan have harmful implications for the state's young people, particularly young people who identify as Black or who live in low-income families.

These costs can prolong youth's involvement in the juvenile justice system, and follow the youth for years after they exit the system, impacting their ability to find good employment as they sacrifice education for minimum wage jobs to pay these bills, and well into adulthood due to the harmful impact on their good credit. Poor credit can affect a person's ability to rent housing, secure loans and find employment. Research indicates that the imposition of juvenile fines and fees can lead to a variety of additional harms, such as increased risk of recidivism, worsened racial and ethnic inequities in the juvenile delinquency system, and heightened financial and emotional hardships for the entire family.<sup>23</sup>

Michigan families report, in line with the research, that juvenile court fines and fees place a significant burden on their household. For example, one young person shared that she was unable to complete her terms of probation solely because of outstanding court fees that increase each month that she is on probation. She struggled to maintain school attendance, but because her mother was unwilling to pay the fees on her behalf, she had to obtain a part-time job. The job made it even less likely that she could engage with school. The family reported significant stress due to continuing probation involvement and the financial debt.

Another young person shared that, after being detained in facilities off and on for nearly four years, he had been assessed hundreds of thousands of dollars in fees and was keenly aware of the impact of the debt on his parents. He reported feeling worried that his family would have to pay court bills for the rest of his life in order to pay off his assessments completely. His mother was unemployed, and his father had just recently secured employment, so both parents talked to him frequently about the impact of his debt on their family's finances.



NJDC wrote in its report that some court staff they interviewed were keenly aware of the burden these fees placed on families. One judicial officer said, “Some families may owe more than \$100,000 – more money than they will ever see in their lifetime . . . Sometimes I think, ‘What am I doing to these people?’”<sup>24</sup> And according to the NJDC, “[a]nother judge noted that because most youth and families are poor, trying to collect is ‘like squeezing money out of a beet.’”<sup>25</sup>

There can be specific, serious consequences for non-payment of fines and fees in Michigan. Some sources shared that until a young person had paid outstanding debt, the juvenile court might continue a youth’s probation or place youth on unsupervised probation, which can later result in deeper involvement in the juvenile justice system. We have also learned that Michigan youth who age out of juvenile court with outstanding financial obligations can be detained in adult jail, with the bond for their release set at part or all of what they owed the juvenile court.<sup>26</sup> Fortunately, we have not heard stories of minors being incarcerated for non-payment. This may be because Michigan Court Rule 6.933 prohibits courts from incarcerating or detaining youth and their parents for nonpayment of court-ordered costs, unless the family has financial resources and has not made a good faith effort to pay.

Even if courts never aggressively collect fines and fees from families, the assessment of fines and fees, in itself, can cause undue harm to youth and their families. One study found a significant correlation between the imposition of court costs on youth and the recidivism rate of those youth.<sup>27</sup> Furthermore, while fines and fees negatively impact all youth in the juvenile justice system, such costs are more intensely “burdensome and destabilizing” on youth living in poverty<sup>28</sup> and disproportionately impact Black youth and families. For example, a report illuminated how court costs can weaken family relationships and undermine the goal of family reunification, with a disproportionately negative impact on families of color.<sup>29</sup> It must be noted that Michigan’s fines and fees system likely has a disproportionate impact on Black families. Black youth make up a disproportionate percentage of youth in Michigan’s juvenile justice system.<sup>30</sup> Nearly 1 in 2 Black youth in Michigan is living in poverty.<sup>31</sup>

## Recommendation

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Michigan policy makers, including counties and the Legislature, should address the inequities inherent in the juvenile court fines and fees system by ending the assessment and collection of money from juvenile court-involved families. While this may seem a bold action, it is one that is in step with a tide of reform across the nation.



## Conclusion

Michigan courts, legislators and state leaders must work together to eliminate juvenile court fines and fees. Swift, collaborative reform is necessary to ensure that Michigan’s juvenile justice system effectively rehabilitates youth and treats all families fairly. Stakeholders engaged in juvenile justice reform should explore legislative, regulatory and other advocacy to reduce these burdens on youth so Michigan can have a juvenile justice system that truly encapsulates the state’s vision of “building safer Michigan communities and assisting youth to become healthy and productive citizens.”<sup>32</sup>

# Endnotes

- <sup>1</sup> See STATE COURT ADMIN. OFFICE, MICH. SUPREME COURT, CIRCUIT COURT FEES AND ASSESSMENTS TABLE (2020) [hereinafter SCAO CIRCUIT COURT FEES AND ASSESSMENTS TABLE], available at <https://courts.michigan.gov/Administration/SCAO/Resources/Documents/other/cfee.pdf>.
- <sup>2</sup> There are 83 counties in Michigan. Therefore, some Circuit Courts hear cases from multiple counties.
- <sup>3</sup> See STATE COURT ADMIN. OFFICE, MICH. SUPREME COURT, ABILITY TO PAY WORKGROUP, TOOLS AND GUIDANCE FOR DETERMINING AND ADDRESSING AN OBLIGOR'S ABILITY TO PAY (2015), available at <https://courts.michigan.gov/Administration/SCAO/Resources/Documents/Publications/Reports/AbilityToPay.pdf>.
- <sup>4</sup> See MICH. COMP. LAWS §§ 712A.18(2), 769.1(7) (2020).
- <sup>5</sup> See SCAO CIRCUIT COURT FEES AND ASSESSMENTS TABLE, *supra* note 1 at 1 n.1.
- <sup>6</sup> NAT'L JUVENILE DEF. CTR., OVERDUE FOR JUSTICE: AN ASSESSMENT OF ACCESS TO AND QUALITY OF JUVENILE DEFENSE COUNSEL IN MICHIGAN (2020) [hereinafter NJDC REPORT], available at <https://njdc.info/our-work/juvenile-indigent-defense-assessments/michigan-assessment/>.
- <sup>7</sup> See *id.* at 74.
- <sup>8</sup> See *id.*
- <sup>9</sup> See NOAH A. BRADOW, STATE COURT ADMIN. OFFICE, MICH. SUPREME COURT, MEMORANDUM RE: IN RE KILLICH: JUVENILE PROBATION SUPERVISION/OVERSIGHT FEES 1-2 (2017), available at <https://courts.michigan.gov/Administration/SCAO/OfficesPrograms/TCS/Documents/TCS%20Memoranda/TCS-2017-21.pdf>.
- <sup>10</sup> In 2017, the Michigan Court of Appeals invalidated a \$100 flat fee for probation supervision because it was not authorized by statute. The court interpreted Michigan law to require supervision fees that were individualized for each particular youth. *In re Killich*, 900 N.W.2d 692, 699 (2017).
- <sup>11</sup> JASON SMITH & MICHELLE WEEMHOFF, MICH. COUNCIL ON CRIME AND DELINQUENCY, RESTORING KIDS, TRANSFORMING COMMUNITIES: ENHANCING MICHIGAN'S APPROACH TO JUVENILE DIVERSION (2017).
- <sup>12</sup> NJDC REPORT, *supra* note 6 at 75.
- <sup>13</sup> *Id.* at 71.
- <sup>14</sup> See *Michigan local government leaders report widespread crisis-level impacts from COVID-19 pandemic*, MICH. NEWS, June 24, 2020, <https://news.umich.edu/michigan-local-government-leaders-report-widespread-crisis-level-impacts-from-covid-19-pandemic/>.
- <sup>15</sup> See Mich. Exec. Order No. 2020-119 (June 11, 2020), [https://www.michigan.gov/whitmer/0,9309,7-387-90499\\_90705-531756--,00.html](https://www.michigan.gov/whitmer/0,9309,7-387-90499_90705-531756--,00.html).
- <sup>16</sup> See NJDC REPORT, *supra* note 6 at 71.
- <sup>17</sup> NAT'L COUNCIL OF JUVENILE AND FAMILY COURT JUDGES, RESOLUTION ADDRESSING FINES, FEES, AND COSTS IN JUVENILE COURTS (2018) [hereinafter NCJFCJ REPORT], available at <https://www.ncjfcj.org/wp-content/uploads/2019/08/resolution-addressing-fines-fees-and-costs-in-juvenile-courts.pdf>.
- <sup>18</sup> NAT'L CONFERENCE OF STATE LEGISLATURES, PRINCIPLES OF EFFECTIVE JUVENILE JUSTICE POLICY (2018), available at [https://www.ncsl.org/Portals/1/Documents/cj/JJ\\_Principles\\_122017\\_31901.pdf](https://www.ncsl.org/Portals/1/Documents/cj/JJ_Principles_122017_31901.pdf).
- <sup>19</sup> NCJFCJ REPORT, *supra* note 17 at 1.
- <sup>20</sup> *Id.* at 2.
- <sup>21</sup> *People v. Cameron*, 929 N.W.2d 785 (2019).
- <sup>22</sup> See TRIAL COURT FUNDING COMM'N, TRIAL COURT FUNDING COMMISSION FINAL REPORT (2019), available at [https://www.michigan.gov/documents/treasury/TCFC\\_Final\\_Report\\_9-6-2019\\_667167\\_7.pdf](https://www.michigan.gov/documents/treasury/TCFC_Final_Report_9-6-2019_667167_7.pdf).
- <sup>23</sup> See U.S. COMM'N ON CIVIL RIGHTS, TARGETED FINES AND FEES AGAINST COMMUNITIES OF COLOR: CIVIL RIGHTS & CONSTITUTIONAL IMPLICATIONS 33-34 (2017), available at [https://www.usccr.gov/pubs/2017/Statutory\\_Enforcement\\_Report2017.pdf](https://www.usccr.gov/pubs/2017/Statutory_Enforcement_Report2017.pdf); ALEX R. PIQUERO & WESLEY G. JENNINGS, *Research Note: Justice System-Imposed Financial Penalties Increase the Likelihood of Recidivism in a Sample of Adolescent Offenders*, 15(3) YOUTH VIOLENCE & JUV. JUST. 325, 334-36 (2016), available at <https://journals.sagepub.com/doi/abs/10.1177/1541204016669213?journalCode=yvja>.
- <sup>24</sup> See NJDC REPORT, *supra* note 6, at 74.
- <sup>25</sup> *Id.* at 73.

<sup>26</sup> Under certain circumstances, the court can continue jurisdiction over a youth until age 21. MICH. COMP. LAWS § 712A.2a(5) (2020).

<sup>27</sup> ALEX R. PIQUERO & WESLEY G. JENNINGS, *Research Note: Justice System-Imposed Financial Penalties Increase the Likelihood of Recidivism in a Sample of Adolescent Offenders*, 15(3) YOUTH VIOLENCE & JUV. JUST. 325, 334-36 (2016), available at <https://journals.sagepub.com/doi/abs/10.1177/1541204016669213?journalCode=yvja>.

<sup>28</sup> See HEATHER HAHN ET AL., URBAN INSTITUTE, BUILDING LADDERS OF OPPORTUNITY FOR YOUNG PEOPLE IN THE GREAT LAKES STATES 16 (2017), available at [https://www.urban.org/sites/default/files/publication/94726/building-ladders-of-opportunity-for-young-people-in-the-great-lakes-states\\_2.pdf](https://www.urban.org/sites/default/files/publication/94726/building-ladders-of-opportunity-for-young-people-in-the-great-lakes-states_2.pdf).

<sup>29</sup> POLICY ADVOCACY CLINIC, BERKELEY LAW, UNIV. OF CAL., MAKING FAMILIES PAY: THE HARMFUL, UNLAWFUL, AND COSTLY PRACTICE OF CHARGING JUVENILE ADMINISTRATIVE FEES IN CALIFORNIA (2017), available at <https://www.law.berkeley.edu/wp-content/uploads/2015/12/Making-Families-Pay.pdf>.

<sup>30</sup> See *Michigan Disproportionate Minority Contact Data*, MICH. COMM. ON JUVENILE JUSTICE, <https://michigancommitteeonjuvenilejustice.com/michigan-data/socio-demographic-data.html> (last visited July 31, 2020).

<sup>31</sup> ALICIA S. GUEVARA WARREN, MICH. LEAGUE FOR PUB. POLICY, KIDS COUNT IN MICHIGAN DATA BOOK 2016: CHILD & FAMILY WELL-BEING IN MICHIGAN, ITS COUNTIES AND DETROIT (2016), available at [https://mlpp.org/wp-content/uploads/2018/06/kc-11916-2016-kids-count-in-michigan\\_final\\_web.pdf](https://mlpp.org/wp-content/uploads/2018/06/kc-11916-2016-kids-count-in-michigan_final_web.pdf).

<sup>32</sup> *Vision Statement*, MICH. DEP'T OF HEALTH AND HUMAN SERVICES, [https://www.michigan.gov/mdhhs/0,5885,7-339-73971\\_34044-381646--,00.html](https://www.michigan.gov/mdhhs/0,5885,7-339-73971_34044-381646--,00.html) (last visited July 31, 2020).