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# At-Risk Girls and Delinquency

## Career Pathways

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Through fieldwork and in-depth interviews examining the careers of adolescent girls in the juvenile justice system, this article reveals some of the interaction processes by which challenges to parental authority may facilitate contact, entry, and movement through the system. Parents or guardians act as informal agents of control until a breakdown in family solidarity prompts appeal to more formal measures of control. These findings suggest the continuing significance of status offenses in the arrest and incarceration of girls. The 1974 Juvenile Justice and Delinquency Prevention Act restrained courts from responding vigorously to status-type offenses. This article illustrates how families, in their interactions with authorities, have negotiated alternative methods for dealing with troublesome teenage girls.

**Keywords:** *status offenses; parental authority; at-risk adolescent girls; family conflict; juvenile delinquency; juvenile justice; social control*

Before the 1974 Juvenile Justice and Delinquency Prevention (JJDP) Act, girls were arrested or detained primarily for status offenses (offenses that would not be regarded as wrongdoing if committed by an adult). Although decriminalization of status offenses should have resulted in a diminished presence of girls in the justice system, there has instead been a recent increase. More than a quarter of the youths arrested every year are girls. Delinquency cases involving girls increased by 83% between 1988 and 1997, with data indicating an increase of 106% for African American girls, 74% for Anglo girls, and 102% for girls of other races (American Bar Association and

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National Bar Association, 2001; Federal Bureau of Investigation [FBI], 1998). The use of detention for adolescent girls increased 65% between 1988 and 1997, with African American girls, as well as African American women, comprising nearly 50% of those in secure detention (American Bar Association and National Bar Association, 2001; Bureau of Justice Statistics, 2001, 2003).

Through ethnographic fieldwork and interviews, this article reveals current negotiations and practices of parents and the juvenile justice system after the deinstitutionalization of status offenses. Through examining the contexts of the girls' offenses, family conflict over issues of parental authority emerged as a salient factor underlying the girls' initial contact with the system and the construction of their recorded offenses. This article illustrates the ways that parental responses to challenges to their authority influence entry and movement through the system. These illustrations suggest the possibility that although the 1974 act decriminalized status offenses, challenges to parental authority are now being constructed and processed under other "official" categories of crimes or delinquencies.

### **Getting Into the System: Status Offenses and the Sexual Double Standard**

Previous literature documents how girls in the juvenile justice system have historically been disproportionately sanctioned for status offenses (Belknap & Holsinger, 1998; Chesney-Lind & Shelden, 2004; Cohn, 1970; Datesman & Scarpitti, 1977; Gibbons & Griswold, 1957; Odem, 1995; Odem & Schlossman, 1991; Schlossman & Wallach, 1978). The phenomenon of girls entering the system through status offenses is part of the broader historical development of the creation of organizations to monitor the social and moral behavior of troubled youths who do not commit serious offenses. This evolution led to the establishment of the first juvenile court in 1899. In essence, the purpose was to distinguish delinquent from criminal behavior (Platt, 1969).

In the 19th century, with the growth of urbanization, industrialization, immigration, and increased geographic mobility, communal mechanisms of social control collapsed. An underclass emerged, labeled as poor, who were perceived as living in slums regarded as unregulated and lacking in social rules (Platt, 1969). Children of the poor were primary among those whom it was believed could benefit from rehabilitation. Most were recent immigrants, with ethnic backgrounds different from that of established American

residents. In general, these children were not considered hardened offenders but instead were considered to be vagrant or wayward youths whose non-criminal behavior could be rehabilitated. They were often thought of as “incorrigible” or “beyond control” and considered to be living in environments likely to foster delinquency and criminality (Chesney-Lind & Shelden, 2004). Social reformers emphasized the temporary and reversible nature of adolescent crime and believed that delinquent children must be saved by preventing them from pursuing criminal careers. Institutions proliferated to reform the behaviors of these youths. This child-saving movement crafted a system of government that had unprecedented authority to intervene in the lives of families, and particularly in the lives of youths (Empey, 1982; Platt, 1969; Zatz, 1982).

The moral behavior of girls was of specific concern to the child savers (Belknap & Holsinger, 1998; Chesney-Lind & Shelden, 2004). As part of this reform movement, White middle-class women reformers sought to protect White, working-class girls from straying from moral paths. These middle-class women’s activities revolved around monitoring the moral and sexual behaviors of working-class, particularly immigrant, girls (Chesney-Lind & Shelden, 2004; Gordon, 1988; Odem, 1995). On the basis of middle-class ideals of female sexual propriety, reformers assumed they had the authority to define appropriate behavior for working-class women and girls. Girls who did not conform to these ideals were labeled as *wayward* and deemed to be in need of control by the state in the form of juvenile courts, reformatories, and training schools (Chesney-Lind & Shelden, 2004; Odem, 1995). Black female delinquents were placed in adult institutions or sent out of state until it became practically or fiscally unfeasible to do so (Young, 1994). Research examining court practices after the court’s initial inception reveals a preoccupation with girls’ sexuality, as revealed in charges relating to some form of waywardness or immorality, and views contemporary status-type offense charges as buffer charges for suspected sexual activity (Chesney-Lind & Shelden, 2004; Odem, 1995; Odem & Schlossman, 1991; Schlossman & Wallach, 1978; Shelden, 1981).

Studies also document the historical pattern of parental use of the status offense category in referring their daughters to authorities for a variety of activities (Andrews & Cohn, 1974; Belknap & Holsinger, 1998; Chesney-Lind & Shelden, 2004; Ketchum, 1978; Odem & Schlossman, 1991; Teitelbaum & Gough, 1977). This, coupled with the vagueness of status offense statutes and the precedence of authorities and courts to uphold parental authority, makes the misuse of the status offense category particularly likely (Sussman,

1977). The recognition that some parents turn to the courts to enforce their authority is thought to be a primary reason for many girls' presence in the juvenile justice system (Chesney-Lind & Shelden, 2004).

After establishment of the juvenile court, the next major attempt to address noncriminal, troubled youths was in the 1960s when another reform movement attempted to redefine categorization of wayward and/or non-criminal offenders (Empey, 1973; Zatz, 1982). The result of these reform efforts was the 1974 JJDP Act. The federal government recognized a specific category of offenders—"status offenders"—and ordered measures that would remove or divert this group of juveniles away from the juvenile justice system and away from incarceration. Because historically, girls have been disproportionately sanctioned for status offenses, the immediate impact of the 1974 JJDP Act was greater for girls. Girls' institutionalization rates for status offenses fell by 44% (Krisberg & Schwartz, 1983). However, this decline in the institutionalization of status offenders leveled off between 1979 and 1982, and there is continuing concern that status offenders are not being sufficiently differentiated from delinquents and that they are still largely represented in the justice system (Arthur D. Little, Inc., 1977; Chesney-Lind & Shelden, 1998, 2004; Federle & Chesney-Lind, 1992; Schwartz, Jackson-Beeck, & Anderson, 1984; Zatz, 1982).

Previous literature suggests two opposing views for the impact of deinstitutionalization on the discretionary powers of the police, with some asserting that it has increased discretionary powers, allowing circumvention of the 1974 JJDP Act (Austin & Krisberg, 1981; Klein, 1979; Lemert, 1981), and others arguing that deinstitutionalization has weakened the discretionary powers of the police (Schwartz, 1989). Previous literature has suggested that status-type offenses are being relabeled as *criminal offenses* (Klein, 1979; Mahoney & Fenster, 1982) and that some actions constituting nonserious family conflicts have been relabeled upward as violent or assault charges (Acoca, 1999; Acoca & Dedel, 1998; Chesney-Lind & Shelden, 1998, 2004; Mayer, 1994). This is considered one reason underlying the increase in assault charges for girls, particularly a rise in the category of "other" assaults. This is particularly thought to be a significant factor in African American girls' prevalence in the system (Bartollas, 1993; Robinson, 1990). Although authorities may have historically incarcerated White immigrant working-class girls for protectionist reasons during the child-saving movement, Black and Brown girls are also likely to be detained or incarcerated because, like Black and Brown boys, they are seen as dangerous.

The findings in this article begin to provide evidence of the processes of relabeling status-type offenses as criminal offenses. The data illustrate how these families in their interactions with authorities have negotiated alternative methods for dealing with troublesome teenage girls since the 1974 Deinstitutionalization Act has restrained courts from responding vigorously to status-type offenses.

### **Theoretical Framework: The Insanity of Place**

Conflicts over parental authority form the basis on which parents eventually turn to the justice system to seek help in restoring their authority with their daughters. Although enforcing the sexual double standard is an underlying source of tension between parents and their daughters, this in itself does not explain how the girls come into contact with the system. Goffman's (1971) "The Insanity of Place" provides a useful framework for understanding the processes by which girls come in contact with the juvenile justice system. In "The Insanity of Place," Goffman examined the processes in families by which a person comes to be classified as mentally ill and committed to hospitalization. According to Goffman, the productive functioning or welfare of a family depends on family members' supporting the expected internal order of authority relationships. In supporting the internal order of a family, members know and keep their places in the family structure. When a family member fails to support the internal order by not keeping his or her expected social position in relation to others within the family, this threatens one of the fundamental elements on which family unity is based.

A breakdown in family solidarity begins when a family member, for whatever reason, feels the life that others in the family have been according him or her is no longer sufficient, thus the member makes demands for change. In response, other family members may accept these demands for change as valid and modify the structure of the family in accordance, or they may refuse to recognize the demands and attempt to maintain the existing social structure. It is the latter—when family members decide not to honor or recognize the family member's demands for change and the demanding family member's refusal to fall back to the status quo—that results in increasing tension. In this standoff, the family member may either voluntarily withdraw from the family organization or remain a part of the family. If he or she chooses to remain with the family but refuses to fall back to the status quo in family relationships, the member in effect promotes himself or herself in the family hierarchy, thus beginning his or her "manic" activity. According to Goffman (1971) the demands of the "maniac" are not necessarily bizarre in themselves but are

bizarre coming from the person with respect to his or her social location in the family. At this breaking point, the stronger of the two participants may form a collaborative arrangement with a third party to control the weaker party's environment and definition of the situation.

The parents (primarily mothers) act as informal agents of control by attempting to assert authority over their daughters' actions. Rather than accepting their parent(s)' authority, these girls challenge parental assertions of authority and demand the same autonomy over their actions as have the parents. The girls' promotion of themselves in the family hierarchy to that of an equal plane as their parents is disruptive to the internal organization of the family. In these instances, the parents neither physically withdraw, nor do they reconstitute the family organization to accommodate the self-assumptions of autonomy of their daughters. Instead, in attempting to restore their authority with their daughters, these parents form collaborative arrangements with the justice system to either threaten the girls into obeying parental authority or having the girls removed by detention if they do not act accordingly.

Frequently, it is the collusion of the families and the justice system that places the girls in the category of delinquent. This collusion is accentuated by racial and ethnic stereotypes of formal social control agents that contribute to perceptions of Black and Brown girls as dangerous. Although Goffman's (1971) framework provides a base for understanding these family dynamics, an understanding of this collusion is deepened when Goffman's framework is coupled with literature (Bishop & Frazier, 1992; Bridges & Steen, 1998; Gaarder, Rodriguez, & Zatz, 2004; Leiber & Stairs, 1996; Miller, 1999; Wordes, Bynum, & Corley, 1994) exploring how racial and ethnic stereotypes affect perceptions and subsequent processing by formal social control agents.

As this article will illustrate, tensions escalate as the girls persist in their autonomous conceptions and accompanying demands and/or actions, while their parents exercise great efforts in attempts to bring the girls back into appropriate relationship to them: a relationship in which their daughters keep a "child's place." It is not so much that their daughters' actions represent delinquent acts as much as that the actions are out of line with daughters' expected social position in the family. The remainder of this article will use Goffman's (1971) framework in examining how issues of authority are negotiated between the girls and their parent(s) or guardians and how a breakdown in these negotiations may facilitate contact, entry, and movement through the juvenile justice system. Since the 1974 Deinstitutionalization Act restrained courts from responding vigorously to status-type offenses, families in their interactions with authorities have negotiated alternative methods for dealing with troublesome teenage girls.

## Data and Methods

### Sample Population

The data on which this article is based consist of field notes from 2 years of participant observations of 50 girls, periodic taped interviews with 30 of those girls during incarceration, and field notes and interviews with 7 of the 30 girls after they were released from incarceration. The data in this article are part of a larger study in which I examined not only the girls' pathways but also their institutional adaptation patterns while they were incarcerated. At the time I began the research, all of the girls were incarcerated in a coed public detention facility for minor offenders between the ages of 13 and 18. I gained access to this facility through a juvenile court order granting me permission to do a participant observation and interview study of all activities of the girls at the facility, after meeting with the facility's clinical director and clinical staff. The ethnic composition of the girls is predominately African American and Latina (Salvadoran and Mexican), and they are from predominately underprivileged to lower- and/or working-class neighborhoods. The most common charges included assault, assault and battery, assault with a deadly weapon, and prostitution.

The interviews occurred after months of having established rapport, by "hanging out" with the girls, during which time I recorded extensive field notes. The interviews were continuous and unstructured (more in the form of conversations) and primarily consisted of the girls telling me about their lives before and after they entered the system. Although I did not formally interview their parents, I was able to substantiate the girls' accounts through informal conversations with parents and probation officers and by sitting in on family group therapy sessions.

Of my sample interview population of 30 girls, 57% had family or guardian conflicts that facilitated either contact with the system (13%), movement toward detention and incarceration (34%), or both contact and movement (10%). Of the remaining 43%, 17% were girls who did not have families and came into the system from the Department of Child and Family Services (DCFS). Girls from DCFS will often move into the juvenile justice system as a result of the same types of control struggles that are faced by girls coming from families. Just as the standoff between girls and their parents often results in the parents' reliance on the justice system to help them establish authority over the actions of their daughters, the standoff between girls and foster parents or group home staff often results in foster parents' or staff reliance on the system to help them establish authority.

Of those girls who did not come into the system from DCFS, the majority lived with their mothers and stepfathers. The remaining were almost evenly divided between girls living with grandparents, girls living in two-parent homes, and girls living in single-mother homes. For simplification, I will use the term *parent* in the sense of adult guardian. The actual person may be a grandmother or other relative. For the most part, even in families that included either male parents or guardians, maintaining authority with the girls was primarily left to the female parent or guardian.

## Data Analysis

In contrast to studies analyzing data through preconceived categories of preliminary literature reviews, I conducted my literature review after identifying emerging salient themes in the data. This is consistent with the purpose of grounded theory methods. I used grounded theory methods to conduct an inductive analysis of the interview and field note data. I built my theoretical analysis on what I discovered as relevant in the worlds of the girls in my study. This process involved a stage of initial coding followed by a round of focused coding. During the stage of focused coding, I took earlier initial codes that continually reappeared in my initial coding and used these codes to sift through large amounts of data. Focused coding allowed me to create and try out categories for capturing data and begin to see the relationships and patterns between categories. These categories were part of my developing analytic framework, as I selected certain codes as having overriding significance in explaining events and processes in my data. In generating categories through focused coding, I made comparisons between girls, comparisons of data from the same girls at different points in time, and comparisons of categories in the data with other categories.

## Limitations

Although some aspects of the findings in this study are consistent with findings of previous qualitative studies of girls in the juvenile system, caution should be used in generalizing beyond the sample population in this study.

## Parental Authority Versus Girls' Autonomy: "Going Out"

At the root of these family conflicts are struggles over control, in which the parent attempts to establish authority over the girl's actions, whereas the girl resists this authority in an attempt to gain autonomy. These struggles

revolve around such issues as doing chores, going to school, seeing boys, hanging out with friends, observing curfews, and spending time talking on the phone. However, the most contentious issue in these control struggles is the girls' desire to have the freedom to "go out"—to spend time away from home. Parents (or grandparents) attempt to establish authority over their daughter's freedom to go out or spend time away from home by using varying strategies to control or restrict it, whereas the girls use various strategies to counter these restrictive measures. The following excerpts illustrate how the girls and parents negotiate going out even before they enter the juvenile justice system. Subsequent sections will illustrate how these struggles may facilitate contact and entry into the system.

One way that parents may assert their authority is by placing restrictions on their daughters' time away from home. Their daughters may respond in a variety of ways. If the internal order of the family (family solidarity) is intact, the daughters may accept this authority restricting time away from home and simply abide by these restrictions. Alternatively, children may attempt to alter the prohibition by pleading and agreeing to be back by a certain time:

MARA (Age 16): Going out. Wanting to go out is a big thing in my house. Cause they'll be like, "No, you don't wanna come back at this time and da-da-da-da-da." I'll be like, "Well, why don't you let me come back at ten o'clock? I'ma be here." "No, cause it's a school night, and it's this and it's that."

At least at this point, although Mara is challenging authority by pleading to go out, she appears to be sticking to her social place in the family. She makes demands for change, which are denied by her grandparents, and she appears to acquiesce to their position, thus internal order or parental authority appears to be intact.

Alternatively, a girl may not agree to her parent's restrictions on going out but instead may choose to ignore the restrictions:

CATHY (Age 17): She didn't like me going out partying . . . and she tried—convincing me not to go—. . . she would say, "Please be home by two." And I would never be home by two . . . it's not like you're gonna be home by two, you know, it's like—*two*? I leave at *twelve*, how am I gonna be back by two—you know?

In the earlier excerpt, Mara's grandmother appears to have some semblance of authority in that she denies Mara's pleas to go out, and Mara appears to accept these restrictions. However, in Cathy's scenario, a breakdown in family solidarity is evident by the mother's, rather than the daughter's, resort to

pleading. With restrictive command statements not being enough, Cathy's mother resorts to pleading with her daughter not to go out. When it becomes apparent that these appeals will not be heeded, Cathy's mother attempts to set curfew limits by pleading for her to be back by 2:00 a.m. Cathy denies both the legitimacy and the feasibility of her mother's pleas and ignores both the restrictions on leaving and the 2:00 a.m. curfew. In so doing, Cathy has promoted herself in the family hierarchy by refusing to keep a child's place in that she refuses to comply with her mother's restrictions over her time away from home.

The previous scenario illustrated the parent's resort to pleading in the case of a breakdown in the internal order of the family. When the breakdown of parental authority reaches a point where resorts to pleading are to no avail, family members may then resort to the use of physical coercion. When a parent uses physical coercion in attempting to restrict the daughter from leaving the house, the daughter may counter with physical force:

MONICA (Age 17): I remember one night, they [friends] came to pick me up and—I was—running down the stairs to go out the house—my aunt was blocking one door, my dad was blocking the other, and my grandma was blocking one—I said okay, you know, who do I go for—so, I went—I went to try to go through the door my grandma was at—and it ended up—I didn't hit her, but it ended up, I pushed her—out of the way—to go out there, because they're [friends] honking, I'm like, "Shit, I wanna get high, oh my god,"—next thing I know, my dad has me by my hair on the floor, "You fucking little bitch—don't you *ever* hit my mother," you know—so it was really bad—so I ended up not going out that night.

A breakdown in the functioning of the internal order of the family is signaled by the fact that Monica's parents are apparently unable to gain compliance with prohibitions on going out and thus resort to physical coercion by blocking the doors. The daughter attempts to counter with physical force, but the parent's physical force prevails. Because of physical strength, using physical force to challenge girls' attempts to go out generally only works when the challenger is a male.

When there is a breakdown in authority, physical force may prevent overt attempts of a girl to go out, but it does not address covert attempts. To counter covert attempts to go out, parents may resort to more manipulative measures in attempting to restrict their daughters from going out, such as maintaining locked doors and keeping close reign on the keys. However, the girls may counter with various strategies, as illustrated in the following scenario in which Mara's grandmother keeps all of the doors locked and carries the keys

with her on a chain around her waist. Mara finds a way to remove the keys without being detected:

MARA (Age 16): I would sneak out the house . . . she [grandmother] watches movies on the floor on the mat, and she falls asleep . . . she likes holding me when she sleeps—like I'm her teddy bear . . . when she fell asleep . . . I acted like I had fallen asleep . . . I pushed the hook, and I pulled it off . . . I held the keys with me . . . I wiggled away from her . . . and she just turned back over. I had the keys and I ran to the back door, and I unlocked the door, and I came running back and I, um, I slipped them on her and . . . I'll just act like I'll turn on my T.V. in my room . . . and I'll go to the back door, and I'll just leave for like 2 or 3 hours and she won't even know I'm gone, she'll be asleep, and I'll come back—and I'll—get the keys again and lock the door, and she'll *still* be asleep.

The grandmother's practice of keeping all of the doors locked and the keys around her waist symbolizes a breakdown in the internal order and functioning of parental authority. A simple prohibitive command and honoring of that command is apparently not enough to gain the granddaughter's compliance to prohibitions on going out. The fact that the grandmother has resorted to such extreme measures indicates that she is aware that her authority is not intact and must resort to more coercive measures. However, whereas an institution is equipped to effectively exercise such surveillance measures, the family is not set up to effectively exercise coercion. Pure coercion (with no trust and legitimacy) is generally an unreliable method of maintaining control in a family and home (Goffman, 1971). In addition, covert challenges to parental authority generally do not lead to overt friction between daughters and parents as long as the measures remain undetected by the parent.

### **Coming Into Contact With the System: Calling Police to Help Restore Authority**

Previous literature has suggested the phenomenon of parents calling on police to act as family disciplinarians (Joe, 1995). This section illustrates what happens when parents call police to help them restore authority. Similar to Andrews and Cohn's (1974) findings in New York, parents were likely to refer their children to the court for a variety of reasons. One way that these family conflicts over parental authority may contribute to placing girls at risk for initial contact with the juvenile justice system is when parents solicit assistance from police. When their authority is challenged and attempts to try to restore authority internally by resorting to mechanisms such

as pleading, bargaining, and physical coercion have failed, these parents frequently appeal to the police as a means to restore or reestablish parental control. At least initially, the police reaction is primarily symbolic—they are constrained from and/or hesitant to react punitively by making arrests; rather, they “talk to,” lecture, cajole the girls into behaving. The following scenario provides an example of how this unfolds. Mara’s grandmother began calling the police to her home when Mara was 11:

CARLA: What did she used to call the cops for?

MARA (Age 15): When we wouldn’t listen to her.

CARLA: And she—what would she say when she called them?

MARA: My—my grandchildren aren’t listening to me—they don’t wanna do what I tell them—I don’t want them here.

CARLA: And they would come out to the house?

MARA: And they would pull us outside and just talk to us and that was it . . . Umm—maybe about 12 times. . . . The *same* ones would come. . . . They said, “We’re always coming over here, your grandma’s always telling us something new, or it’s always the *same* thing. And you know what?—It’s always something stupid, and we’re tired of you guys not listening to your grandmother—they’re old—your grandparents are old—they—they—they should be retired, they should be—just kicking back in rocking chairs, and you guys shouldn’t be—they shouldn’t be handling you, and we think we should take you away—and—” I’d be like, “No—no—no—no—I’m gonna be good, I’m listen to my grandmother, don’t take me away, I don’t wanna go anywhere—”

A breakdown in family solidarity is evident by Mara and her brother not supporting the expected internal order of authority relationships. With her authority not intact, Mara’s grandmother resorted to appealing to the police for assistance. The police responded by lecturing and threatening Mara and her brother with “We think we should take you away.” Just as a breakdown in family solidarity may result in parents’ mechanisms for asserting authority becoming more progressive, the same may be true for police techniques attempting to restore authority. When lecturing and threatening seem not to be effective, police may resort to scare tactics in attempting to restore parental authority:

MARA (Age 15): They [police] were forever like, “You ain’t got no fucking respect for your grandmother, and you’re gonna end up in the Halls, and you don’t know what it’s like—people—be um—people be *raping* people, and—” . . . they were just like constantly in my face . . . cussing at me—they were *basically* trying to scare me . . . but it never worked.

Similarly, Cathy estimates that before she entered the system, her mother called the cops to the house approximately 20 times. Although the specific points of contention ranged from not washing the dishes to staying away from home for extended periods of time, her mother's overall complaint is that Cathy does not listen to her and does not follow her rules:

CATHY (Age 17): She's called them before, but for stupid stuff like I didn't wash the dishes . . . I got home late . . . I didn't come home . . . total times, she's called the cops I'd say around . . . maybe 20 . . . just for incidents like I didn't come home, and—stuff like that or—you're not listening to your mom—you're not following the rules—stuff like that. . . . They would just tell me, "Well, listen to your mom, just begin—" "—just like whatever—and they just wanted to leave—they were like, "Well, ma'am, . . . we have things to handle—we have things to do—you just can't be calling us for *this*."

These excerpts illustrate how the police, at least initially, treat these calls as interpersonal problems rather than as criminal matters. However, when the police run out of patience, they may consider arresting and processing the matter as a criminal case, bringing the girl officially into the juvenile justice system. The following is an example of what happens when the police run out of patience in these situations. In this example, Mara's family calls the cops for a third time to report her as a runaway. Whereas the first couple of times, the cops simply retrieved her and returned her home, their patience is tried the third time they receive this request, and they threaten to take her to juvenile hall:

MARA (Age 15): So I was just sitting in the cop car, and I was crying—I was like, "No, I don't wanna go to the—um—Juvenile Hall—I don't wanna go, I don't wanna go," they were like, "Well, that's it—that's your last chance, this is your third time running away, and—um, we're sick of being called, and we're tired of all this bullshit and da-da-da-da-da," . . . my aunt comes over, and it's—you know—my aunt's sitting there *crying* to the cops, "Please don't take her, she'll be good, she'll be good, she'll be good." . . . "Just let her come home with me, and she'll be—you know—she'll start acting right" . . . she [aunt] convinced him, and then. . . . They let me go under the condition that I stayed at my aunt's house, and I said, "Okay."

This time when the family called to report Mara's running away, rather than doing the usual and returning her home, the police prepare (or at least feign preparation) to take her to the police station for processing. Mara's aunt's intervention once the police arrive on the scene illustrates how family may

influence whether a girl enters the system in the first place by influencing police decisions about taking her in for processing. In this instance, although the aunt was the one who initially called in the police, she diverted her niece from entering the system at this time by meeting the cops on the scene and persuading them to let her niece go home with her. It also illustrates the amount of discretion that police have in determining when to cease treating a family conflict as a personal matter and to instead begin treating it as a criminal matter.

### **Struggles Culminating in Assault Charges: Relabeling Domestic Disputes**

The previous sections of this article explored the types of family conflicts over parental authority and how a breakdown in family solidarity or internal order of family may lead to parents' soliciting help from outside authorities. This is often many of the girls' initial contact with the system before they actually enter it, and this section will explore how these family conflicts over authority result in the girls actually entering the system. Although Joe (1995) found that with respect to runaways, the police's net of social control does not appear to be widening, others suggest that police discretionary powers allow them to circumvent the restraints of deinstitutionalization in other circumstances (Acoca, 1999; Acoca & Dedel, 1998; Austin & Krisberg, 1981; Chesney-Lind & Shelden, 1998, 2004; Klein, 1979; Lemert, 1981; Mahoney & Fenster, 1982; Mayer, 1994). This happens when the police relabel family conflicts or domestic disputes as assaults. This section explores the process by which relabeling of family conflicts into assaults occurs.

Girls' arrests for assaults have dramatically increased since 1970 (Chesney-Lind & Shelden, 2004; FBI, 1971, 1981, 1995, 2001). The increases are greatest for two categories of assaults: aggravated assaults and "other" assaults. Arrest rates for girls for aggravated assault increased by 364% between 1970 and 1995 (Chesney-Lind & Shelden, 2004; FBI, 1971, 1981, 1995). Arrest rates for girls for "other" assaults increased by 343% between 1970 and 1995 (Chesney-Lind & Shelden 2004; FBI, 1971, 1981, 1995). One explanation offered for this increase is the possibility of "greater attention to normal adolescent fighting and/or girls fighting with parents" (Chesney-Lind & Shelden 2004, p. 11). In the past, these conflicts may have been more likely dealt with informally. Previous literature has suggested that greater attention to conflicts between girls and parents may at

least partly be attributed to increased attention to domestic violence and/or changes in domestic violence laws, which encourages more active involvement of police in family conflicts (Chesney-Lind & Shelden, 1998, 2004; Gaarder et al., 2004).

Family-related assault charges often represent the highest degree of escalation in family control struggles. By the time assault charges occur, struggles over parental authority have been ongoing for some time and have reached a breaking point. By the time families reach this point, their attempts to establish authority through conventional mechanisms (routine commands and/or requests) or through less conventional methods (pleading, bargaining, or manipulation) have failed. Parents then resort to attempting to exert parental authority with coercive physical control, which is likely to be countered with similar physical resistance from the daughters. Earlier examples in this article described instances where parents called police to their homes to restore order and police responded by going to the homes and talking, cajoling, or threatening the girls. In situations where the girls may use physical force to counter parental attempts of controlling with physical force, both parents and police seek a restoration of order by removing and detaining the girl at least temporarily. Many girls either enter the system with assault charges or are subsequently incarcerated for these charges after having already entered the system.

There may be evidence of assault in some cases. However, in many cases, there often seems to be a lack of evidence supporting these assault charges. These instances often seem to be opportunities for parents to appeal to the juvenile justice system for assistance in their overall control struggles with their daughters. When police arrive on the scene, they are much more likely to believe the parent or guardian rather than the girl's version of what transpired. Countering coercive physical control with physical resistance presents the opportunity for parents to begin the process of having disobedience classified as "delinquent." Changing the plea from "she won't obey me" to "she assaulted me" gives police something on which to act. Many of these family assault charges seem to have one theme in common. They appear to almost always involve a parent's attempting to physically block the daughter from taking some kind of action, such as leaving the house, and a daughter's subsequent push to resist the parent's restraining action results in the parent's alleging assault. As the following passages will illustrate, it is not uncommon for family assault charges to emerge from the most contentious point underlying control struggles—a daughter's freedom to leave the house or "go out."

In the following excerpt, Renee describes what happened when she returned home to pick up some items after one of her extended periods away from home:

RENEE (Age 16): So we went back to my house, and I was picking up my makeup . . . shampoo . . . lotion. . . . And—my mom’s like, “No, this isn’t a motel, you’re not just gonna come in and out whenever you please, you’re only *fourteen*,” . . . she was really upset . . . she was trying to keep me in the house . . . and—basically I—I pushed her. I had a whole bunch of stuff in my hands, like all these bottles and stuff—and I pushed her out of my way when I was coming out of the bathroom . . . then . . . they [parents] called the police . . . “she needs to stay here,” . . . “she’s out of control,” and he [stepfather] would not let me go anywhere . . . the police came, and I was cussing them out . . . they arrested me . . . they’re like, “Well, I’m getting you for battery on your mom,”—“Battery on my mom, I didn’t do anything to her”—“You pushed her, didn’t you?” I’m like, “Yeah.” Shit—okay, they got me for battery.

Being able to come and go as one pleases is distinctly an adult prerogative. Renee’s mother suggests her frustration lies in part by Renee’s not keeping a child’s place in the family order when she says, “You’re not just gonna come in and out whenever you please, you’re only *fourteen*.” In this case, it is not just that Renee is not keeping her place by coming or going as she pleases; she has returned home with concrete justification for parental attempts to police her sexual activities—a boyfriend. In attempting to prevent Renee from leaving the house again, her mother first attempts to block her, and Renee responds by pushing her out of the way. Her stepfather then intervenes to block and restrain Renee while they call the police and continues to block Renee from leaving until the police arrive. In this situation, the parents attempted to restore authority or order in the family by calling in outside authorities (police) to remove and detain Renee. This illustrates the police role or influence in defining the situation upon arriving on the scene and shows the importance of social control agents in defining what constitutes a criminal act—in this case, battery. This also challenges Joe’s (1995) conclusions that the consequence of deinstitutionalization was a narrowing and restricting of police discretion and social control.

Similarly, the following excerpt also illustrates how conflict over leaving the house or going out resulted in assault charges. In this instance, a breakdown in authority relationships is symbolized by Teresa’s not adhering to her mother’s restrictions on going out. Consequently, Teresa’s mother resorted to attempts to manipulate the situation by making it more difficult for Teresa to leave the house. Because getting dressed is a precondition of leaving the

house, by placing Teresa's clothes in her (mother's) closet, Teresa's mother attempted to keep Teresa from leaving. This made it more difficult for Teresa to leave the house because Teresa would have to go through her mother to retrieve her clothes. The following illustrates what happened when Teresa attempted to retrieve some items of clothing before she left on one of her extended stays away from home:

TERESA (Age 16): So, she took my clothes—she put it in . . . the closet in her room—so that I couldn't get to it. And I needed something to wear that day, so I went to—the closet—in *her* room—and I was going to get my clothes—so she walked to—over from her bed—and she tried to block me—she tried to hold the closet door closed. And then . . . she tripped over my little brother's toy that was on the floor . . . that's when she called the police . . . she said that I hit her and almost made her fall.

Teresa's mother's attempts to gain authority over Teresa's leaving the house by manipulating placement of her clothes failed and resulted in Teresa's mother resorting to coercive, physical control. However, in attempting to block Teresa from retrieving her clothes from the closet, either her mother tripped or perhaps some sort of altercation occurred prompting her mother to trip. Either way, the event provided the opportunity for Teresa's mother to gain assistance in her overall authority struggles with Teresa by constructing Teresa's actions as being serious enough to warrant removal from the home and detention. The police had come to the house twice before in response to Teresa's mother's call and, as with this time, indicated that they found no evidence to apprehend the daughter. It seems that the mother's persistence and suggestions that her daughter was out of control may have influenced the police to take her in for processing and incarceration in Juvenile Hall. In addition to describing the possible context for assault charges, this case also illustrates how the police serve as mediators in family conflicts well before the girls actually enter the system. In this case, not only was there no evidence of assault when the police appeared on the scene for the third time, but the charges were subsequently dropped because Teresa's mother did not show up in court to testify.

Although family control struggles seem to most commonly occur between parents (primarily mothers) and daughters, these struggles may also occur between the girls and older siblings:

BRENDA (Age 15): I had got into it—the one—the brother (age 23) I said I don't like—one day—um—my mama had found some Weed in my room—and I had got mad and then—I started cussing and stuff—and he don't like

me cussing—especially with my mom right there—so like I cussed, and I ran outside—and [he] came behind me—and he was like holdin me—he threw me on the ground, and he started holdin me—like—and I started kickin him and stuff, and he was still holdin me . . . I was just kickin him so hard, and he slipped . . . he slapped me . . . he didn't mean to do it—I was just kickin him so hard, and he slipped . . . then I went to go get a knife, and then I called the police—then they end up takin *me* . . . he always big and bad like when I ain't got nothing—but if I like pick up a stick, then he wanna move back—so I picked up a knife . . . and then the police came . . . I threw the knife before they came, and my sister—let me know—she like—“The police out there,” . . . I just threw 'em [knife] down—and then they came and—and they—took me.

One of the interesting dimensions of this scenario is that when the police arrived on the scene, the struggle had subsided, and there was no knife in sight:

CARLA: They didn't even *see* you with the knife.

BRENDA: They sho didn't—that's what—like the police—he came to court too—he said he didn't see me and um—my attorney [public defender] was telling 'em—he was like, “If she wasn't swingin the knife—it can't be assault with a deadly weapon.”

That the police were ready to remove Brenda with no apparent evidence of struggle raises the question of the basis for removing Brenda from her home:

BRENDA: My mom told 'em like—she need a break . . . she told 'em that um—like, “Take her cause she goin crazy.” . . . At trial, my mom was telling him [judge] like—she just wanted me gone for like 2 weeks just to—give me a lesson or whatever—and she was just sayin stuff like—she wanted me home . . . she just wanted to give me a lesson—but my judge—he was like—he ain't goin for none of that—he deal with all my mama' kids—like most of 'em—they done been in here . . . he was like—“What makes you think if I release you—like you ain't gon be like them and get in trouble again?” So, he was like, “Nah—I'ma keep you.”

As illustrated in previous excerpts, this particular control struggle provided an opportunity for Brenda's mother to appeal to authorities for “a break” by pleading with them to remove Brenda. Age or minor status of the girls leaves them powerless in defining what actually occurred when the police arrive on the scene. The tradition of upholding parental authority over the rights of children results in authorities nearly always accepting the parent's or guardian's definition of the situation. Although filing assault charges

may be one strategy that parents or guardians use as a last resort to gain help in their overall control struggles with their daughter, in most instances, they only intend for their daughters to be gone for short periods of time, such as a short-term stay in Juvenile Hall to “teach her a lesson.” This is particularly the case for those parents who are familiar with the way the system works. However, the above passage illustrates how sometimes this strategy may backfire. In this situation, the judge did not see authority in the home as viable and sentenced Brenda to incarceration.

Brenda’s situation breaks with the general pattern of girls not being incarcerated after their first contact with the system and/or first arrest if the parent is willing to take them home. This illustrates how a judge’s sentencing decision may be based not on the girl’s offense but on the judge’s perception of whether the internal order of the family’s authority relationships is intact. In this situation, the judge’s decision to incarcerate Brenda seems to evolve from a sense that Brenda’s family lacks a viable authority or control structure, based on the fact that several of Brenda’s siblings had previously been in this judge’s court.

### **How Control Struggles May Shape Differential Juvenile Justice Outcomes**

Not only are many girls in the system for status offenses, but also a substantial number of girls are in the system for violating court orders. Many of these acts of violations of court orders are in essence status offenses, such as running away. Previous literature suggests judges’ use of violations of court orders as a technique of “bootstrapping” girls into detention (Costello & Worthington, 1981). Once a girl enters the system, control struggles are reproduced as violations of probation, and with each of these violations, punitive measures are likely to increase. Whereas going out and/or running away were not crimes before the girl entered the system, once in the system (on probation), going out, especially for extended periods of time, now becomes a violation of probation, or in other words, going out against parental prohibitions now becomes a crime.

Just as family control struggles may contribute to placing a girl at risk for entering the system, these struggles may also influence differential outcomes after she enters the system. Once the juvenile justice system becomes involved, it is not uncommon for the judge to consult with the parent before rendering a decision. A parent’s input may influence whether a girl is able to come home or whether she is institutionalized after arrest. For example, if a parent stipulates to the judge that her daughter may come home if she

abides by her rules, then the judge may send the girl home on house arrest. House arrest is a more severe measure than simply being placed on probation because it prohibits the girls from leaving the house for any purposes other than school. For this reason, house arrest appears to be a favorable measure for parents in their struggles to control their daughter's time spent away from home, or going out. However, this is rarely the case. Because many of the girls' entries into the justice system are predicated on family authority struggles, house arrest often fails because nothing is done to address the underlying control struggles:

MIRANDA (Age 14): House arrest—that couldn't even *fade* me. . . . House arrest cannot fade me, cause I would be at home, and I'm supposed to be in the house—I would *leave*—I'd just get up and *leave*.

Sentencing a girl to house arrest represents the court's attempt to reinforce parental authority by supplementing parental prohibitions with court-sanctioned prohibitions, thus the penalties for disobeying restrictions to go out are much harsher. However, what house arrest does is add another layer of authority, assuring more punitive consequences for the girls' strategies to gain more freedom away from home. Specifically, house arrest makes the girls' extended periods of time away from home crimes for which they can be incarcerated, which usually means recurrent stays of approximately 30 days in Juvenile Hall.

Alternatively, if a parent or guardian refuses to accept the girl back home, the judge may institutionalize her or send her to a group home:

MARA (Age 15): They said, "Okay, then we're gonna let you go on probation," and my grandmother ended up saying, "No, I don't want her home. She can't listen to me. . . . She doesn't obey me, she's always answering back . . . I don't want nothing to do with her." . . . So . . . they arrested me. They put me in a soda pad [temporary home] and gave me a couple more court dates. And my grandmother still said she didn't feel I was changing, and she didn't want me home. So, they put me in placement.

Mara's grandmother confirmed that at the court hearing, the judge was ready to release Mara home with probation, but the grandmother refused to accept her. Not yet willing to sentence her to incarceration or placement outside of the home, the judge placed her in a temporary shelter, and she was given a couple more court dates, giving the grandmother a longer time to reconsider. Only after the grandmother seemed steadfast in her decision not to accept her granddaughter home did the judge sentence her to an open placement (group home).

Although sentencing to a foster home or open placement (group home) is considered to be a viable alternative to incarceration, for many girls in the juvenile justice system, it is often the first step to eventual incarceration. Girls who are sent to foster or group homes rather than returning to their parent's home face the same dilemmas. Control struggles are often reconstructed in foster and group homes, which are deemed community alternatives to incarceration. Not surprisingly, the girls want the same freedom of action that they wanted at home, whereas the foster parents or group home staff wish to establish authority and curtail girls' freedom:

SABRINA (Age 18): Yeah—it was two of 'em—parents [foster parents]—they were like pastors at a church. And it was just like something I wasn't used to, and it was like I couldn't be myself—you know?—I'm the type of person where I like to blast my music, I like to—smoke cigarettes, I like to—go out partying, and I like to talk on the phone—and they wasn't having it, and I didn't—like it—you know? So, my social worker made an agreement with me—“Well, this is gonna be your curfew—you do whatever you have to do on that when you're out,”—you know?—and it worked for a little bit, and then I got tired of it, and—I left [after about 6 months]. . . . I went to a group home . . . I—awoled and I never went back . . . finally turned myself in to my social worker, and she took me to *another* foster home.

Control struggles between Sabrina and her foster parents are evidenced by Sabrina's assertion that she is “the type of person where I like to blast my music, I like to—smoke cigarettes, I like to—go out partying, and I like to talk on the phone—and they wasn't having it.” Sabrina's social worker attempts to ease the standoff between Sabrina and her foster parents by suggesting, if not implying, to Sabrina that in exchange for abiding by her curfew, she may do whatever she wishes during her time out or away from the home. This practice of “don't ask, don't tell” about activities while away as long as home by curfew was also a tactic some mothers used after release, which resulted in diminishing, if not eliminating, control struggles. Because of these control struggles, Sabrina went from a foster home, to a group home, to a foster home, then back to a group home.

Just as the standoff between girls and their parents often results in the parents' reliance on the justice system to help them establish authority over the actions of their daughters, the standoff between girls and group home staff often results in staff reliance on the system when there is a breakdown in authority:

MARA (Age 15): And I went to S. for my first [group home] . . . all girls. . . . And so—they were trying to get us to go to a boy's [group home] and have

this dance . . . I didn't want to go. . . . And you know, I just said, "Well, if you take me there, I swear, I'm just going to go off on everybody there, you know, and they ain't gonna like it." So they [group home] sent me to a mental hospital. And the mental hospital—I didn't want to go there . . . and I ended up staying there for 2 weeks . . . I got sent back to [group home]. And I didn't want to go back to [group home], and they [group home] ended up keeping me again, and . . . when I came back, they were trying to get me to go to school. I was like, "I'm not going to school," . . . they took me to [Juvenile Hall] trying to—you know—admit me in, and [juvenile hall] said they couldn't take me. . . . So they took me back to the [mental] hospital. In the hospital, I stayed there a week . . . the one I liked—the exact same one. And—I stayed there for a week, and—the [group home] came to pick me up again. I told them, "No—I'm not going back. I am *not* going back." So I refused [group home], and [juvenile hall] just came, and they picked me up right away.

As illustrated in the above scenario, group home control struggles result in girls' moving from institution to institution (often from group home to group home), with incarceration in juvenile halls in between each group home. This occurs not because the girls commit new offenses but because the same control struggles that took place between parents and daughters take place between group home staff and the girls.

After release from institutionalization, girls in the juvenile justice system are likely to return to the same family control struggles that contributed to their entering the system or being incarcerated. Their desires for autonomy are often not likely to be dampened after time spent incarcerated:

MONICA (Age 17): I had just got out, so my mom was still kinda tripping, like—you know—"Oh, you're already trying to go out, and—"blah-blah—whatever." . . . So, I started getting really like—I don't know—like—just anxious—I wanted to leave the house—I started going out a lot . . . she tried to put twelve o'clock on me, but—that never happened—we would—me and my sister would pour into the house like two or three in the morning . . . my mom's like, "Well—no, I don't want you going, you have school tomorrow," you know,—this and this and that—"No, you're not gonna go,"—and I was like, "No, I *am* gonna go." I was like, "I'll be right back."—"Oh Monica, don't go,"—"No, I *am* gonna go."—"Okay, okay, that's how you wanna play it—go ahead—go Monica," and I said, "I'm going,"—so I took off.

This illustrates how struggles over parental authority have not been modified from their preincarceration form. Monica's mother first attempts to exercise her authority with a direct command, "No, you're not gonna go." Monica dismisses her mother's command with "No, I *am* gonna go," to which her

mother resorts to some semblance of a pleading. After realizing that this battle was lost, Monica's mother resigns—"Okay, okay, that's how you wanna play it—go ahead."

In addition, if family control struggles resume after a girl is released, she may face the constant threat that her parent may report her misbehaviors to the court or other authorities. The girls often fear that their freedom is dependent on their parents. In the following passage, Mara expresses concern that at her upcoming court date, her grandmother will tell the judge that she should not be home and they will reincarcerate her:

MARA (Age 15): My grandma—since we've been fighting, she's been threatening me, that's she gonna tell the—um—the court that I shouldn't be home . . . so I hope she doesn't do that. Because they'll put me right back in the system . . . little things we'll argue over . . . it starts off with something little, and then it works—very big. I don't know. But every *day*, there's a fight . . . and then she ends up picking up the phone, and I end up leaving the house. Cause I don't wanna stick around . . . to see the cops if she does call 'em.

In this instance, the grandmother's leverage in their arguments consists of constant threats to report Mara to either the police or to court officials at her upcoming hearing. It is debatable whether this is an effective tool to bring her granddaughter in line, but it is enough to keep Mara in a heightened sense of anxiety, which serves to exacerbate tensions.

The level of family discordance is likely to have significant consequences for the quality of life of girls after they are released, thus having consequences for whether they are successfully able to get off of probation. This is significant because most girls are reincarcerated not on the basis of new offenses but on probation violations. Because periods of incarceration are unlikely to contribute to improving the family control struggles that propelled the girls into the system, after the girls are released, these control struggles are one of the most difficult challenges with which they must contend.

## Discussion and Conclusion

In finding that family dynamics often generate what is officially considered an offense, this research supports previous literature suggesting that some deviance is in large part the product of the response of the group, either family or community (Becker, 1963; Goffman, 1971; Lemert, 1951; Perrucci, 1974). These girls are largely classified as delinquent through their families' appeals to the justice system for help. The parents (primarily

mothers or female guardians) act as informal agents of control until a breakdown in family solidarity prompts appeal to more formal measures of control. In many instances in attempting to restore their authority with their daughters, these parents form collaborative arrangements with the justice system to either threaten the girls into obeying parental authority or having the girls removed by detention if they do not act accordingly. Although nearly all families have these struggles, the mechanisms and/or options used by families depend on their social locations along hierarchies of race, ethnicity, and class. The most marginalized along these hierarchies are less likely to have resources other than appealing to police and the justice system. Furthermore, unlike those at other social locations, these families are in environments that more readily bring them in contact with police.

The system's response to these parents' pleas for help shows continuation of historical practices of state intervention into the families of children perceived to come from environments regarded as unregulated and lacking appropriate values and structure thought necessary to foster obedience, self-discipline, and hard work. Whereas in the 19th century, children of European immigrant families who had ethnic backgrounds different from those of established American residents were primarily the target population of excessive state intervention, in the 20th and 21st centuries, these demographics have shifted to children of primarily African American and Latino families. Whereas intervention in the 19th century was primarily imposed from the outside, these contemporary parents (lacking alternative familial or community resources) are themselves calling the police, thus initiating state intervention.

Although there are previous studies on how macro structural factors may converge to shape fractured emotional attachments between parents and children in impoverished African American families (Duncan, Brooks-Gunn, & Klabanov, 1994; Henriques & Manatu-Rupert, 2001; Leadbeater & Bishop, 1994; Sampson & Laub, 1994), there are no studies of how these factors may shape problematic authority relationships in these families. Simultaneous intersecting structures of race/ethnicity, class, and gender converge to place African American women and Latinas in positions of extreme powerlessness. Although the powerlessness of African American women and Latinas has been acknowledged relative to the larger society, the powerlessness of these women in their own communities and in their families has been less explored. These women have no power and are often struggling economically and emotionally just to survive.

To the extent that challenges to parental authority play an instrumental role in the girls' coming in contact and moving through the justice system,

this suggests the continuing significance of status offenses (offenses that would not be considered wrongdoing if committed by an adult) in the arrest and incarceration of girls, even though the 1974 JJDP Act officially decriminalized status offenses. The findings in this article suggest that not only has the problem of differentiating youths whose actions are more affronts to parental and local authority than violations of law not been resolved but challenges to parental authority are now being constructed and processed under other “official” categories of crimes or delinquencies.

The family dynamics revealed in this article play a significant role in the girls’ contact, entry, and movement through the justice system and are important not only for implications for the continuing significance of status offenses but also for subsequent program and policy planning for girls in the system. The data in this article suggest the extent to which families lack resources to navigate these conflicts. Certainly, the institution provides a remedy to family control struggles over “going out,” by locking the girls in; however, the institution’s resources and measures for ensuring discipline and obedience are not something that can be readily transferred to the family. As reflected by one mother’s comments to her daughter, “Well, of course you get up and go to school here [institution], you have a whole team of people to help with that.”

The girls return to the same family control struggles that existed before they entered placement. Policy and program designers should take into consideration the significance and nature of these family control struggles in facilitating girls’ contact and entry into the system, and programming should be aimed at developing community resources to address these issues. Any program that does not also address the needs of the families, particularly the mothers or other female guardians, will fall woefully short because this is to whom the girls return. Although directing resources toward building programs within institutions may be expedient, the girls and their families would be better served by emphasizing and developing community, rather than institutional, programs.

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