

From: Pawlowski, Nicolas [REDACTED]
Sent: Thursday, September 24, 2026 12:16 PM
To: Arizona Sex Offender Management Board
Subject: Juvenile subcommittee 9/24- DCS review of proposed definition of Problematic Sexual Behavior

Hello,

DCS has reviewed the proposed definition and we have made proposed revisions. I know it's last minute, not sure if it can be distributed ahead of the meeting or not. Please see below:

Instead of "Problematic Sexual Behavior", suggest using the term "Sexual Conduct Requiring Intervention (SCRI)"

Sexual Conduct Requiring Intervention (SCRI)

Sexual Conduct Requiring Intervention (SCRI) refers to sexual conduct by a child or youth under 18 that, based on specific and documented circumstances, requires an individualized response to address safety, harm, coercion, exploitation, violations of sexual boundaries, or an inability to meaningfully agree to the conduct. Such conduct may involve youth who are adjudicated or non-adjudicated and may occur in a variety of developmental, relational, environmental, or other circumstances.

Intervention may be warranted when sexual conduct involves force, threats, intimidation, coercion, exploitation, abuse of authority or trust, a significant disparity in the capacity to understand or participate in the conduct, or actual or reasonably foreseeable harm to the youth or another person. Differences in age, size, developmental ability, or social power should be considered in context and should not, by themselves, establish that conduct is abusive or requires intervention.

Determinations that conduct requires intervention shall be based on observable behavior, the circumstances in which it occurred, the developmental capacities of the individuals involved, and the nature and severity of any identified safety or well-being concerns. Sexual curiosity, developmentally expected exploration, or behavior that differs from prevailing social or cultural expectations shall not, by itself, constitute Sexual Conduct Requiring Intervention.

A youth's sexual orientation, gender identity, gender expression, sex characteristics, disability, neurodivergence, or other individual characteristics shall not constitute evidence that sexual conduct requires intervention. The framework shall be applied consistently to comparable conduct, regardless of the identities or characteristics of the youth involved.

Identification of Sexual Conduct Requiring Intervention does not, by itself, establish criminal conduct, abusive intent, a diagnosis, or a predetermined level of risk. Intervention shall be individualized, developmentally appropriate, proportionate to the conduct and circumstances, and focused on safety, education, support, skill development, and accountability when warranted. The response shall consider whether a youth has experienced coercion, exploitation, or other harm and shall distinguish youth who have been subjected to harmful conduct from youth whose conduct has harmed others.



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