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December 22, 2025

TO: Michael Dempsey
Monitor for California Department of Justice

FROM: Eric Bates 
Interim Inspector General

SUBJECT: Quarterly Report on Programming, Room Confinement, and Grievances at Barry J. Nidorf and Los Padrinos Juvenile Halls for the Third Quarter of 2025

This quarterly report reviewing the Los Angeles County Probation Department's (Probation Department) compliance with the access to programming, grievance process, and room confinement mandates outlined in the Detailed Plan for the Barry J. Nidorf Juvenile Hall (BJNjh) and the Los Padrinos Juvenile Hall (LPjh) covers the third quarter of 2025, from July 1, 2025, through September 30, 2025. All previous determinations of compliance were based on information and documentation provided by the Department under the premise that it was working toward implementation of an electronic data system. However, the electronic data system has not been fully implemented, and as noted in the previous reports, the Department continues to provide incomplete and untimely information.¹

Based on the latest information provided by the Probation Department, the Office of Inspector General is not confident that under standard auditing principles the information received allows for an accurate determination of the Department's compliance with the Detailed Plan. As a result, once again, the Office of Inspector

¹ While the Office of Inspector General is not directly responsible for monitoring the implementation of computerized tracking systems or other processes that are included the Detailed Plan, the lack of implementation of computerized systems and improved processes continues to hinder the Office of Inspector General's ability to monitor the sections of the Detailed Plan assigned to our office. This is especially true when there are delays in providing documents timely as required by the Detailed Plan.

General lacks sufficient information to determine the Department's compliance with the Detailed Plan for providing programming.

Access to Programming, Recreation, Religious Services and Visitation

The Detailed Plan requires that the Probation Department provide youth with programming, recreational activities, religious services, visitation, and phone calls ("Required Activities") as required by law, regulation, and County policy.² The Detailed Plan also prohibits the Department from preventing access to Required Activities by confining youth to their rooms, unless it determines that a youth poses a threat to the safety or security of the facility. The Detailed Plan requires that Department staff document and log any denial of Required Activities by providing the staff member's reason for denial, the signature of the staff member, and the validation of the superintendent of the facility.³ The Department must create and review weekly reports of all denials of Required Activities and report them to the Office of Inspector General on a quarterly basis. Those reports are not being provided timely to us.⁴

² Title 15 provides that all youth shall be provided with the opportunity for at least one hour of daily programming to include, but not be limited to, trauma focused, cognitive, evidence-based, best practice interventions that are culturally relevant and linguistically appropriate, or prosocial interventions and activities designed to reduce recidivism. Examples of such activities are (1) Cognitive Behavior Interventions, (2) Management of Stress and Trauma, (3) Anger Management, (4) Conflict Resolution, (5) Juvenile Justice System, (6) Trauma-related interventions, (7) Victim Awareness, (8) Self-Improvement, (9) Parenting Skills and Support, (10) Tolerance and Diversity, (11) Healing Informed Approaches, (12) Interventions by Credible Messengers, (13) Gender Specific Programming, (14) Art, creative writing, or self-expression, (15) CPR and First Aid training, (16) Restorative Justice or Civic Engagement, (17) Career and leadership opportunities, and (18) Other topics suitable to the youth population. Education provided to the youths by Los Angeles County Office of Education is not considered "programming." As mentioned in the Monitor/SME Compliance Rating comments on the Detailed Plan, "more needs to be done to improve the overall programming, reduce idleness, and ensure that the programming being provided is based on a youth's individual needs."

³ The Office of Inspector General interprets "validation" under Paragraph 24(c) to mean a signature on the log by a supervisor and superintendent.

⁴ Although the Probation Department uploaded the requested information, it did not follow the previously agreed upon process. Specifically, the Department did not notify the Office of Inspector General staff that the documents had been uploaded, nor did it provide the location of the documents. This issue was discussed and has since been resolved. For BNJH, the information provided was incomplete due to the quality control log not being provided. For LPJH, the Office of Inspector General is not able to determine compliance due to the amount of information listed as "unknown" as the reason for missing programming activities.

For substantial compliance, the Detailed Plan requires that the Probation Department provide Required Activities each day for at least 93% of youth that it has not found to pose a threat to the safety or security of the facility or themselves (“eligible youth”). To determine compliance, the Office of Inspector General reviews written Title 15 programming exception logs, as well as supporting documentation, that are required by the Board of State Community Corrections when youths miss required programming. This quarter, the Department failed to provide complete logs and accurate information to the Office of Inspector General within the necessary timeframe in order for our staff to audit the exception log for accuracy and to assess compliance as required under the Detailed Plan.⁵ The Department has not provided information regarding religious services, visitation, and phone calls provided to the youths for this quarter. As a result, once again, the Office of Inspector General lacks sufficient information to determine the Department’s compliance with the Detailed Plan for this quarter.

Undoubtedly, implementing computerized databases will provide a more seamless, and timely, way to provide documentation to the Office of Inspector General for review. The Probation Department reported on the status of implementing computerized electronic data systems. During this reporting period, the Department commenced the implementation process of the Institutional Programs and Calendar Application (IPCA) system, which (1) tracks all daily youth programming, including self-separations and room confinements, (2) provides weekly and monthly event calendars, (3) provides an alert for canceled events, and (4) tracks any changes made to youths’ activity records.

IPCA was launched on August 5, 2025, but was replaced within weeks by the Department of Youth Development (DYD) Calendar System in September 2025.⁶ The DYD Calendar System was intended to serve as an upgraded scheduling and attendance-tracking tool, designed to streamline data collection for youth programming. It was expected to integrate with facility calendars, track youth participation in real time, and automatically generate compliance summaries for Required Activities.

⁵ Supporting documentation includes Title 15 programming logs, Self-Separation forms, SIR/PIR forms, court and medical documents.

⁶ The reason for utilizing an outside agency’s data system instead of the IPCA system that the Probation Department developed was not provided to the Office of Inspector General staff.

Given the challenges with the implementation of the IPCA system and integration with the DYD Calendar system, the Probation Department recently reported the implementation of the Electronic Calendar System (ECS).⁷ The ECS is designed to integrate the functions of the IPCA and the DYD systems, reportedly enabling the Department to track daily participation in activities such as large muscle exercise, indoor recreation, classes, and court appearances. It will also allow outside stakeholders to access youths' calendars to assist in scheduling programming for the youths. The Department reported the switch to the new ECS system was because it allows integration of the IPCA and DYD systems, and it is currently "live and accessible."

During this Reporting Period, the Office of Inspector General's review of the IPCA system found that events are not consistently entered or reviewed, roll-call and participation data are frequently missing, and inconsistent use across facilities, all of which significantly limits the system's reliability for compliance monitoring. While the system was implemented, it is not fully functional and therefore the Office of Inspector General did not have access to sufficient information to assess the programming provided to youths. The Office of Inspector General will monitor the ECS system and include a review in the next report.

The Office of Inspector General continues to recommend the development of a comprehensive compliance platform that integrates data from the Probation Case Management System (PCMS), the Safe Crisis Management (SCM) system, and Title 15 compliance records. Such an integrated platform would enable automated alerts, centralized data analysis, and real-time oversight of key operational and regulatory requirements. Without this level of system integration, the Probation Department remains limited in its ability to proactively monitor compliance, identify trends, and ensure timely corrective action.

The Office of Inspector General is tasked under the Detailed Plan with ensuring that youth are not improperly denied programming and that all eligible youth "have been provided programming, recreation, exercise, religious services, visitation, and phone

⁷ The Probation Department reports that the IPCA system will no longer be operational and there is no data currently produced by the IPCA system.

calls, as required by law, regulation and County policy.”⁸ Merely giving youth the opportunity to engage in programming is not the same as **providing** programming. Simply providing access to the Required Activities does not fulfill the goal of the Settlement Agreement and Detailed Plan that youth are engaged in the programming. Allowing youth to self-separate with no efforts to encourage participation thwarts the goal of this section of the Detailed Plan that programming is actually provided, which is also the goal of the applicable state laws, regulations, and County policy. To ensure compliance with the Detailed Plan, it is therefore necessary for the Office of Inspector General to audit efforts to re-engage youth who decline to participate, which is noted in Probation Department records as self-separation.

As noted in previous quarterly reports, Probation Department staff are expected to document the specific reasons why youth decline to participate in programming using Self-Separation forms. During the third quarter of 2025, the Office of Inspector General received and reviewed Self-Separation documentation from BJNJH. However, no corresponding documentation was received from LPJH, limiting the Office of Inspector General’s ability to assess youth participation and staff engagement practices at that facility.

The Office of Inspector General’s review of Self-Separation forms from BJNJH revealed that the majority of youth, over 95% (127 out of 133), cited “Tired” as the reason for requesting self-separation. Additionally, only approximately 14% (19 of 133) of the forms included any notation indicating that staff made efforts to encourage the youth to re-engage in programming. Of those 19 notations, 68% (13) contained identical or formulaic language, limiting the ability to verify whether meaningful, individualized staff interactions took place.

From July through September 2025, documentation from BJNJH reflected a gradual improvement in the completeness and specificity of Self-Separation forms. In July, only 18% (3 of 17) of forms included staff comments related to re-engagement efforts. This

⁸ To find substantial compliance with Paragraph 24(c)(i-iv) of the Detailed Plan the Office of Inspector General must find that “93% of youth who have not been found to represent a threat to safety and security have been provided programming, recreation, exercise, religious services, visitation, and phone calls, as required by law, regulation and County policy.” Ensuring that appropriate steps to re-engage youth in programming is necessary to achieve meaningful compliance.

increased slightly in August to 20% (9 of 44), and by September, approximately 25% (6 of 24) of forms contained handwritten notes describing individualized staff efforts and observed youth behavior. These later entries appear to demonstrate an effort to document staff interactions and youth responses, indicating incremental progress toward more consistent and meaningful documentation practices.

Nevertheless, significant inconsistencies remain in the documentation of actual staff efforts to re-engage youth and in distinguishing the specific circumstances surrounding each self-separation. The lack of individualized detail limits the ability to assess the quality of staff-youth interactions and the appropriateness of youth disengagement. The Office of Inspector General recommends continued monitoring and the implementation of standardized documentation practices to promote consistent, individualized reporting across all juvenile facilities.

The Department utilizes the Guard1 electronic safety tracking system for the required Title 15 safety checks of the youths in their rooms. The *Notes* field in the Guard1 system provides the Department the ability to note efforts made to re-engage youths who self-separate. As noted in the last quarterly report, the Guard1 *Notes* field is no longer utilized due to staff routinely entering incorrect and incomplete information in that field. The Office of Inspector General continues to recommend that the Department properly train its staff to properly utilize the *Notes* field to document efforts made to re-engage the youths in Required Activities, and the Department prioritize the completion of the electronic tracking systems to digitally memorialize youth participation, reasons for non-participation in Required Activities, and attempts to re-engage youth in programming.

Room Confinements

The Detailed Plan in paragraph 20 requires that the Probation Department create and implement an internal process to better identify and track room confinements. This system must include a mechanism to promptly notify juvenile hall superintendents of room confinements that violate Department policy or state law. It must also facilitate the swift implementation of remedial measures to address any identified deficiencies. The Detailed Plan further instructs the Probation Department to create an approved internal process to provide the Office of Inspector General with data and documentation of identified violations of room confinement policy or state law as well as the remedial

measures taken in response to these violations. This system has not been implemented by the Department making it not in compliance with the Detailed Plan.

The Detailed Plan requires Probation Department staff to promptly notify facility superintendents when room confinements do not comply with Welfare and Institutions Code section 208.3, other applicable state laws, or Department policy. Based on the Office of Inspector General's review of available documentation for the third quarter of 2025, the Department imposed 67 room confinements at BJJNH and 41 at LPJH. Of these, six confinements at BJJNH and one at LPJH exceeded four hours. All seven extended confinements were documented as compliant with state law and Department policy, with required superintendent notifications and reintegration plans in place. As a result, the Department is assessed to be in partial compliance with the Detailed Plan's requirements for extended room confinement.

However, as previously reported, the Probation Department's continued lack of a centralized and fully functional computerized database significantly limits its ability to accurately collect, cross-verify, and analyze room confinement incidents. The Office of Inspector General's ongoing review has identified inconsistencies in recordkeeping and delays in documentation across facilities, raising concerns that additional incidents may not be captured or properly reported.⁹

During a meeting with Probation Department facility leadership, the Department staff reported that BJJNH maintains an *internal log* similar in function and format to the one used at LPJH. It was explained that this log had historically been treated as a quality-control document and, as such, was not previously shared with the Office of Inspector General. However, the staff member confirmed a change in practice moving forward, and that the internal log will now be made available to the Office of Inspector General.

The Probation Department staff member was unable to provide an explanation for the discrepancies observed between the manual log maintained by Movement Control and the data reported by the Room Confinement Coordinator. However, he noted that the

⁹ The Office of Inspector General noted inconsistencies between BJJNH and LPJ in the documentation formats used to track both room confinements and grievances. Following the Office of Inspector General's review and recommendation, the Probation Department has standardized these processes, and both facilities are now utilizing the same log formats to ensure consistency, accuracy, and uniform data reporting.

Room Confinement Coordinator recently adopted a more proactive approach by notifying him directly when discrepancies in the Guard1 time entries are identified during safety checks.¹⁰

In such cases, staff conduct a review of the facility's CCTV footage to investigate the discrepancies. According to the Probation Department staff member, many of these inconsistencies are associated with incidents that result in the generation of a Program Incident Report (PIR), which is subsequently reviewed by command staff during their weekly meetings.

Full compliance with the Detailed Plan's requirements cannot be confirmed until the Department implements an integrated electronic tracking system that enables timely alerts, automated flagging of potential violations, and consistent supervisory review across both BJJNH and LPJH.

Grievances

The Detailed Plan requires the Probation Department to implement a grievance policy to provide youth and families to submit grievances through a secure online portal.¹¹ As described in the previous quarterly and semi-annual reports, the Probation Department implemented its electronic Grievance Management System (GMS) in February 2023, which allows youths to file grievances through their laptop computers.¹²

As noted in previous quarterly reports, the Probation Department reported in June 2024 that the Grievance Management System (GMS) experienced a technical failure that necessitated taking the system offline. The Department has since resolved the issue

¹⁰ Guard1 is safety check system that utilizes a handheld scanner that scans a bar code on each youth's room indicating that that a safety check was conducted by the Probation Department staff.

¹¹ Detailed Plan Paragraph 31(a): Within the timeframes set forth herein, the County will implement a revised grievance policy to provide: (i) additional avenues and means for youth and families to submit grievances, including through secure online portals; (ii) tracking of grievances for responses and appeals in compliance with California Code of Regulations, title 15, section 1361, with oversight by OIG; and (iii) a process for prompt review of and response to grievances alleging physical or sexual abuse of youth and documentation of referral to the appropriate investigating agency[ies].

¹² GMS is the electronic Grievance Management System used for tracking and distribution system of grievances, which replaced the previous system JIGS that was an email method of distribution that was flawed therefore replaced.

and confirmed that, as of September 2025, the GMS is fully operational, with restored functionality for data entry, tracking, and resolution documentation. The Office of Inspector General has verified that staff at both BJJNH and LPJH have resumed the electronic entry of new grievances into the system.

The Probation Department reported completion of the procurement process for electronic grievance kiosks, which are intended to enable youth to submit grievances directly into the GMS without staff assistance. The vendor contract was approved in late September 2025, and installation is expected to begin during the fourth quarter. In the meantime, staff continue to rely on paper grievance forms to maintain continuity in grievance reporting. However, because the kiosk component has not yet been implemented and is not accessible in all housing units, the Department is only partially compliant with the Detailed Plan's requirement for a youth-accessible electronic grievance submission portal.

Despite the prior interruption to the computerized grievance system, the Office of Inspector General reviewed grievance logs from both BJJNH and LPJH to assess the frequency and nature of grievances submitted during the third quarter of 2025. This review included an analysis of grievances alleging the denial of Required Activities, such as telephone calls, visitation, recreation, and religious services.

At BJJNH, the Probation Department documented receipt of 161 grievances, of which 33% (53) related to programming, 2% (3) to phone calls, and less than 1% (1) to visitation. No grievances were observed related to the denial of recreation or religious services. The remaining grievances addressed issues outside the scope of the Detailed Plan. The Department resolved 91% (146 of 161) of these grievances in accordance with policy and within required timeframes.

At LPJH, the Probation Department documented 238 grievances, with 2% (5) related to programming, 7% (16) to phone calls, and less than 1% (1) to visitation. As with BJJNH, no grievances were observed related to recreation or religious services, and the balance addressed matters outside the Detailed Plan. The Department reported resolving 89% (212 of 238) of grievances consistent with Department policy and the timelines established in the Detailed Plan.

Although the GMS is now operational, the Office of Inspector General notes that full compliance with the Detailed Plan will require both consistent electronic data entry by

staff and the full implementation of grievance kiosks to ensure that youth can file grievances independently and confidentially. The Office of Inspector General will continue to monitor the Probation Department's progress through quarterly system audits and direct verification at juvenile hall facilities to assess implementation status and data accuracy.

Conclusion

The Office of Inspector General's review of the Probation Department for the third quarter of 2025 indicates that the Department continues to fail in achieving full compliance with the requirements of the Detailed Plan. Specifically, the Department has not yet: (1) provided consistent and timely documentation of youth programming across all facilities; (2) implemented a fully integrated and approved internal process to identify and track room confinements in real time; and (3) completed the installation of grievance kiosks that would allow youth to electronically and independently file grievances directly into the Grievance Management System. These ongoing gaps hinder the Department's ability to ensure transparency, accountability, and timely corrective action.

Although the Probation Department has reported that the GMS has been fully restored and operational since September 2025, and that vendor approval for grievance kiosks was finalized with installation expected during the fourth quarter, the Department remains only partially compliant with the Detailed Plan until all housing units are equipped with functioning kiosks accessible to youth. Similarly, room confinement tracking continues to rely on manual review and partial pilot system data, as the Department's electronic systems, are undergoing testing and integration. Until these systems are fully implemented and capable of generating real-time, verifiable data, the Department's ability to meet the Detailed Plan's requirements remains limited.

The Office of Inspector General acknowledges the Probation Department's ongoing efforts to modernize its data systems and strengthen operational oversight. However, full compliance with the Detailed Plan requires the expedited implementation of fully functional electronic systems capable of accurately collecting, verifying, and analyzing critical information related to programming, grievances, and room confinement. The Office of Inspector General continues to emphasize the importance of timely data collection, consistent documentation of staff engagement with self-separated youth, and

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adequate staffing levels in the County's juvenile halls to ensure that all juvenile facilities meet the County's legal and policy obligations under state law and the Detailed Plan.

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