



**Office of Inspector General  
County of Los Angeles**

**Max Huntsman  
Inspector General**

**Reform and Oversight Efforts:  
Los Angeles County Sheriff's  
Department**

January 2018

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## **INTRODUCTION**

The Office of Inspector General is charged by the Board of Supervisors with four primary functions:

- Monitoring the Department's operations and conditions in the jail facilities, including the Department's response to prisoner and public complaints.
- Periodically reviewing data on the Department's use of force, the Department's investigations of force incidents and allegations of misconduct and the Department's disciplinary decisions.
- Conducting periodic audits and inspections of Department operations and reviewing the quality of the Department's audits and inspections.
- Regularly communicating with the public, the Board of Supervisors and the Sheriff's Department regarding the Department's operations.

This report is a brief summary of some of the Office of Inspector General's activities through the fourth quarter of the 2017 calendar year toward fulfilling these functions.

## **ACCESS**

All requests by the Office of Inspector General which were made in compliance with the Memorandum to Share and Protect Confidential LASD Information have been complied with in a timely manner. Each access concern which has been expressed by the Office of Inspector General has been addressed by the Department in a satisfactory manner.

## **MONITORING**

The Office of Inspector General responds to the investigations of all Deputy Involved Shootings. The Office of Inspector General also responds to investigations of all deaths of persons which occur while in the custody of the Sheriff's Department or after contact with Department personnel, all uses of force which are the proximate cause of a person's death or serious injury and other significant events to which the IAB force/shooting response teams respond.

## Deputy Involved Shootings

### Shootings: October 1 through December 31, 2017

Between October 1 and December 31, 2017, the Office of Inspector General responded to the scene of seven Deputy Involved Shooting investigations. In four of these Deputy Involved Shootings, persons were hit by deputy gunfire, two of whom suffered fatal injuries. Three of the persons shot were Hispanic males and one was a white male.

The Office of Inspector General has conducted a review of the categorization of all Deputy Involved Shootings since 2013. The number of shootings the Office of Inspector General reports may vary slightly from historical data provided by the Department because the Department categorizes Deputy Involved Shootings by tactical situations.

The Office of Inspector General categorizes as a Deputy Involved Shooting any shooting in which: 1) a person was intentionally shot at by a Department member, whether injured by the gunfire or not; 2) a person was injured, including fatally, by the Department member's gunfire, whether intentionally or not; and 3) the Department member shot at a vehicle occupied by a person, unless it is clear from the circumstances that the purpose of the use of the firearm was to disable the vehicle (i.e. shoot tires).

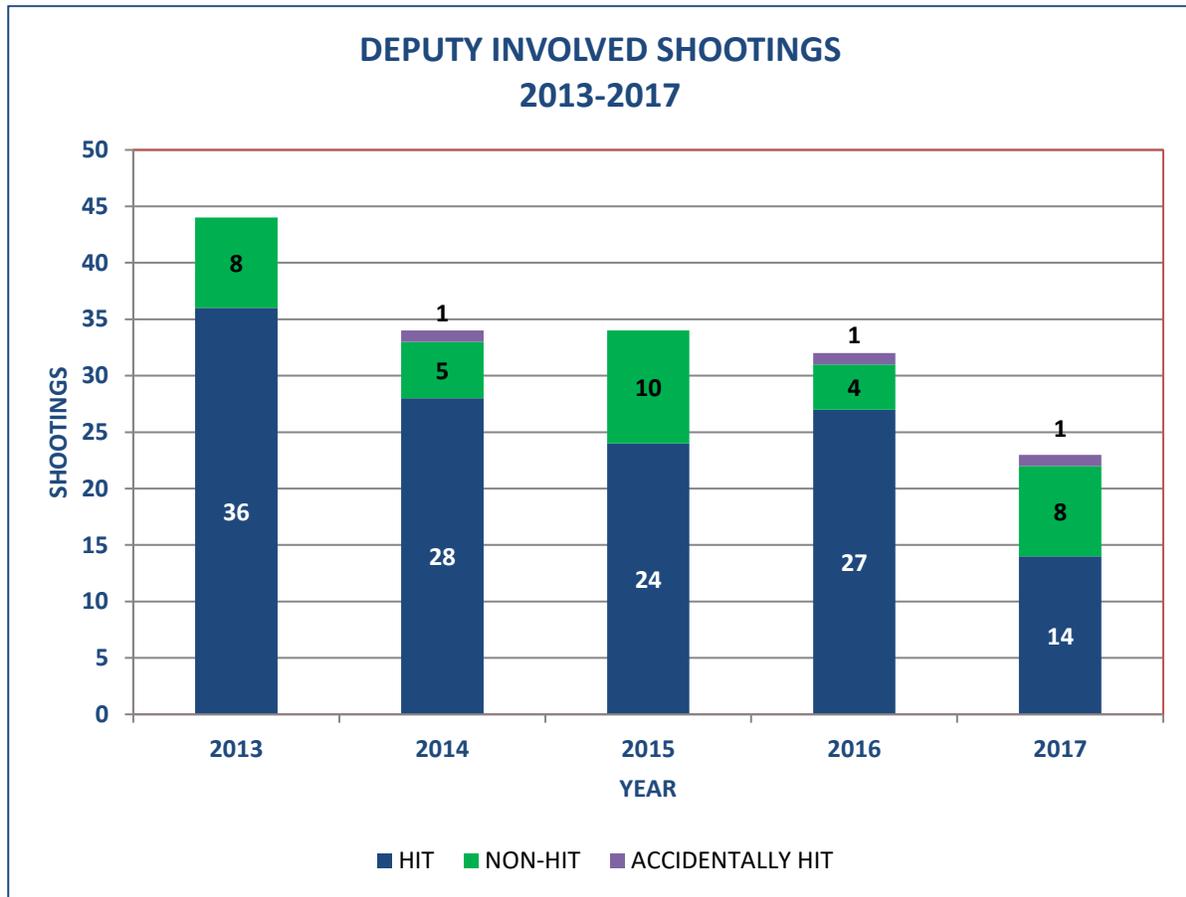
The Department's definitions of shootings can be found in the Manual of Policies and Procedures, 3-10/300.00.<sup>1</sup> The Department categorizes accidental shootings of persons by the tactical nature of the shooting itself. The Department has added to its data sharing web site a "Persons Accidentally Struck by Gunfire" table to identify those shootings in which a person was accidentally struck by a Department member's gunfire in tactical situations or in situations in which the gun was discharged unintentionally.

The Department's Homicide Bureau investigates all Deputy Involved Shootings in which a person is injured, regardless of the shooting's category.

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<sup>1</sup> This policy may be accessed by the reader at <http://lasd.org/pdfjs/web/DeputyInvolvedShootingPolicies.pdf>.

## Comparison to prior years



In two of this quarter's shootings deputies were shot at by the suspect before the deputies fired their weapons. One deputy was struck in the neck by the gunfire. In another incident, two deputies were stabbed before the person who stabbed them was shot.

### District Attorney Review of Deputy Involved Shootings

The Sheriff's Department Homicide Bureau submits the investigation of each Deputy Involved Shooting which occurred in the County of Los Angeles and in which a person has been injured to the District Attorney's Office for review and the possible filing of criminal charges.

As of December 31, 2017, the Department reports it has submitted five 2017 shootings to the District Attorney.<sup>2</sup> The District Attorney has issued findings in one of those cases. In a letter dated September 20, 2017, the District Attorney's Office informed the Sheriff's Department that the April 12, 2017, shooting of Zelalem Ewnetu was in lawful self-defense and the defense of others.

Since October 1, the District Attorney has issued findings in two Deputy Involved Shootings which occurred in prior years. In a letter dated November 1, the District Attorney's Office informed the Sheriff's Department that the February 20, 2016, shooting of Deon Butler was in lawful self-defense and the defense of others. In a letter dated October 17, the District Attorney's Office informed the Sheriff's Department that the December 20, 2015, shooting of Leroy Browning was in lawful self-defense and the defense of others.

The District Attorney's findings may be found at the District Attorney's web site, <http://da.lacounty.gov/reports/ois>.

### **In Custody Deaths**

Four prisoners died while in the custody of the Sheriff's Department between October 1 and December 31, 2017. The Office of Inspector General responded to the scene of three of the in-custody deaths. Office of Inspector General personnel were given complete access to Department facilities and personnel during these death investigations.

The Office of Inspector General did not respond to the scene of a death which occurred in the court lock-up facilities at the Bellflower Consolidated Court.

A fifth death occurred at the Los Angeles County Medical Center on October 8, where the decedent had been transported on September 22, 2017, after being found lying on the floor in Twin Towers Correctional Facility. The prisoner was in the Intensive Care Unit from September 22 until his death on October 8. Prior to his death his family had sought, and

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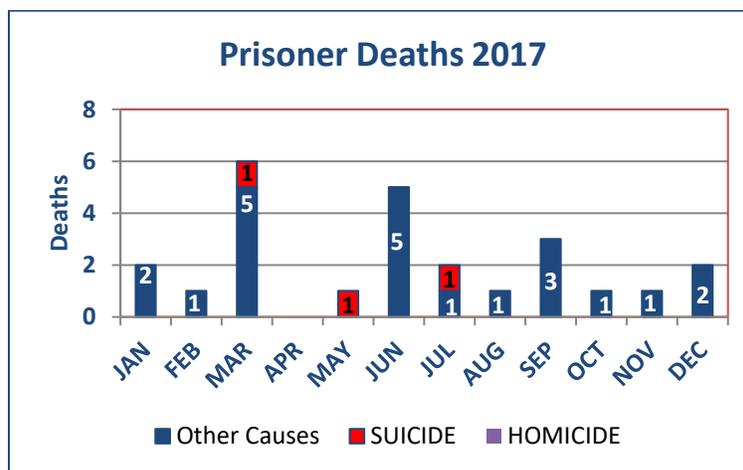
<sup>2</sup> The Homicide Bureau also responds to and investigates officer involved shootings for many of the police departments within Los Angeles County.

obtained from the court, compassionate release of the prisoner, effective October 5 at 12:12 p.m. The decedent remained in the intensive care unit until his death on October 8.

There were Custody Services Division administrative death reviews<sup>3</sup> of all five of these deaths. The Office of Inspector General attended the administrative death reviews of all five of these deaths and continues to monitor the participation of the Department and the Department of Health Services delivery of care evaluative process.

All five deaths appear to be for reasons other than suicide or homicide, although the medical etiology (cause) of the deaths has not yet been conclusively determined by the Medical Examiner.

Concerns regarding the assessment of patients by medical and mental health staff, the provision of timely medical and mental health care, collaboration and communication between custody and Correctional Health Services (CHS) staff, ratio of patients to mental health care providers, the classification and housing of patients, communication issues involving coordinating patient care with community providers, and the quality of safety checks continue to be the subject of active efforts by health care providers and custody staff to address.



<sup>3</sup>Section 4-10/050.00 of the Custody Division Manual (CDM) requires the Department to conduct a death review for each in-custody death or death of a prisoner in the Community Based Alternatives to Custody (CBAC) program.

## Custody Operations

### Office of Inspector General Site Assessments

Office of Inspector General personnel conducted forty-one total site visits to nine Los Angeles County custody and lockup facilities the fourth quarter of 2017. Typically during these visits, Office of Inspector General staff meets with Department personnel at all ranks, from security and custody assistants to facility captains and commanders, and with civilian staff, clergy, and volunteers.

Office of Inspector General personnel also continued to meet with prisoners in the general population, administrative segregation units, disciplinary housing and medical and mental health facilities. Monitors met with and received input from prisoners at cell front, during recreation and treatment group time, and in private interview rooms, when necessary to ensure confidentiality. The following chart represents facilities visited from October 1, 2017, through December 31, 2017.

<b>Facility</b>	<b>Site Visits</b>
Century Regional Detention Facility (CRDF)	18
Inmate Reception Center (IRC)	4
Men's Central Jail (MCJ)	9
North County Correctional Facility (NCCF)	3
Pitchess Detention Center (PDC)	1
Twin Towers Correctional Facility (TTCF)	6
<b>Total</b>	<b>41</b>

### Citizen's Commission on Jail Violence Updates

#### *CCJV Recommendation 3.12: The Department should purchase additional body scanners*

Where possible, the Department continues to operate body scanners in lieu of conducting strip searches at the Inmate Reception Center (IRC), the Century Regional Detention Facility (CRDF) and the Pitchess Detention Center (PDC) – South. The Department is still in the process of implementing body scanners at the North County Correctional Facility (NCCF) and working out technical difficulties with the body scanner at the PDC – North facility.

The Department reports that, although reviews of these body scans only yield limited quantities of contraband, they serve a deterrent purpose for most prisoners. Deputies report that the machines are effective in helping staff identify larger, denser objects like metal, but that it remains difficult to identify smaller, less dense objects, like narcotics. Refusals to submit to a body scan or strip search continue to hamper the Department's ability to detect and deter contraband.

As the Office of Inspector General has previously reported, the Department does not force prisoners to submit to body scanners following refusals. Pursuant to California Penal Code section 4030, the Department is limited to pat searches of pre-arraigned detainees who have been arrested for misdemeanor or infraction offenses, except those involving drugs, weapons or violence. Furthermore, Department practice has typically precluded cavity searches of *all* pre-arraigned detainees, with some exceptions. As a result, pre-arraigned detainees can successfully smuggle contraband into the facility more easily than other prisoners. The Department recently publicized an incident during which the Department, Correctional Health Services, and Los Angeles County Fire personnel saved the life of a pre-arraigned prisoner who had overdosed on drugs which had been smuggled into the facility.

### [Inmate Reception Center](#)

At the IRC in the Booking Front area, the Department continues to operate three body scan machines for prisoners entering the jails when staffing levels allow. The Department also operates three body scanners at Old Side IRC for prisoners returning from court or from other facilities which operate full-time. The Department reports that between October 1 and December 31, 2017, personnel operating body scanners at the IRC did not identify or recover any contraband.

Recently at the IRC, personnel from the Department and Custody Health Services were able to save five prisoners from near overdoses of controlled substances which the Department reports were likely smuggled into the facility and ingested during the booking process. On November 5, 2017, a custody assistant conducting Title 15 security checks of prisoners in the "custody line" holding cells noticed five prisoners displaying odd behavior. The custody assistant notified other Department personnel who responded to remove the prisoners from the cell. As personnel entered the cell to retrieve

the five prisoners, one prisoner collapsed. Custody, CHS personnel and paramedics administered emergency first aid on the scene including CPR and injections of NARCAN, a medication used to block the effects of opioids. Their efforts resuscitated the affected prisoners and ultimately saved the prisoners' lives. The Department's thorough safety check and the swift action taken by all to care for these prisoners is commendable.

### Century Regional Detention Facility

Body scanners at the CRDF have been operating since April 2016. The Department reports that the facility has a mechanism for tracking refusals of body scans and recovery of contraband, however, the Office of Inspector General has not ascertained whether this mechanism is being utilized consistently. Department personnel have consistently stated to the Office of Inspector General that female prisoners prefer the body scanners over strip searches and that refusal rates are low. The Department reports that in the month of December, no contraband was recovered through the operation of the body scanners.

### Pitchess Detention Center - South facility

As reported in the Office of Inspector General's October 2017 report entitled Reform and Oversight Efforts: Los Angeles County Sheriff's Department, the Department is working to ensure that all prisoners entering the PDC - South facility receive a body scan. To do so, the Department reports that it will reduce the number of general population prisoners at South, who are most likely to refuse the scan. In October, the Department began declining to accept prisoners at the PDC - South facility who refuse a body scan. Instead, these prisoners are routed to North County Correctional Facility for general population housing. The Department reports that refusal rates have dropped to 0.61 percent for the month of December 2017.

### Pitchess Detention Center - North facility

As previously reported, the Department installed two scanners at the PDC - North facility in early September. The Department received required radiation badges on October 26, 2017, and began operation of the scanners on October 29, 2017. However, since then, the Department reports experiencing issues with the operation of the machine due to Wi-Fi connectivity issues. The Department reports that it is in consultation with

Smith's Detection, the manufacturer of the body scan machines, to resolve the issues.

### North County Correctional Facility

On December 5, 2017, Department personnel conducted a final walk through to determine placement of four body scanners at the NCCF. The Department plans to place three scanners in the Inmate Processing Area and one in the area between the NCCF workshops and housing locations. The Department reports an expected delivery date for the scanners of February 15, 2018, and that the scanners will be operational by that date absent any unanticipated issues.

*CCJV Recommendation 4.11: Facilities Administration Staffing*

*CCJV Recommendation 6.03: Increase Custody Specific Training*

*CCJV Recommendation 6.05: Supervision of Deputies*

*CCJV Recommendation 6.07: Expand Use of Custody Assistants*

*CCJV Recommendation 7.01: Restructure Investigation/Disciplinary System*

*CCJV Recommendation 7.08: Custody Facility Risk Managers*

On October 8, 2013, the Board of Supervisors authorized \$29.3 million to fund Phase I of the Department's implementation of the CCJV recommendations. On April 15, 2014, and September 30, 2014, in two separately approved motions, the Board authorized approximately \$34.7 million to fund Phase II of the Department's implementation of the CCJV recommendations. The budget authorized for the recommendations listed here was to provide increased staffing.

On August 1, 2017, the Board of Supervisors directed the CEO, in conjunction with the Sheriff, the Auditor Controller and the Office of Inspector General to: a) memorialize a shared understanding of the specific intentions of the CCJV staffing recommendations, b) identify criteria and processes that can be used to determine whether the Sheriff's Department is meeting the that intent, and c) review the implementation status of those recommendations.

The mandates of this motion are being addressed by the Office of Inspector General as part of our ongoing oversight efforts.

The Office of Inspector General has completed the review of the Internal Affairs Bureau staffing implemented as a result of CCJV recommendation 7.01. This review was provided to the Department and a joint analysis of the review was scheduled by the Office of Inspector General with the Commander of the Professional Standards and Training Division.

The joint review by the Office of Inspector General and the Sheriff's Department of the remaining recommendations is ongoing. The Office of Inspector General anticipates a future report on staffing levels of both Internal Affairs and Custody operations once that review is sufficiently complete.

*CCJV Recommendation 7.14: The grievance process should be improved to include added checks and oversight*

The Office of Inspector General monitors the grievance system in the Los Angeles County jails through policy review, direct observation, interviews with prisoners and custody personnel, maintenance of a public complaint system (pursuant to Los Angeles County Ordinance 6.44.190) and direct access to the Department's automated grievance database, the Custody Automated Recording and Tracking System (CARTS).

Limitations Policy

In June 2016, the Department agreed to provide the Office of Inspector General with a draft of all Custody Services Division policy revisions prior to finalization and implementation. Consistent with this agreement, the Office of Inspector General was consulted during drafting of and revisions to the initial Grievance/Limitations Policy.

The Department's Custody Division Manual (CDM) policy 8-04/050.00, "Duplicate or Excessive Filings of Grievances and Appeals and Restriction of Filing Privileges," (informally, the Limitations Policy) was first published in July 2016 along with other policies governing the Department's new grievance process.

As the Department has progressed in its reform efforts, the grievance system has remained a particularly complex challenge. As the Office of Inspector General has previously reported, the Department struggles with

the timely processing of and responding to an exorbitant number of grievances, many of which are duplicates filed by the same complainants over periods of days, weeks or months.

In efforts to reduce the volume of grievances it must process, the Department initiated revisions to its Limitations Policy. However, the Department did not provide these revisions to the Office of Inspector General prior to finalizing and implementing them division-wide on December 1, 2017.

Prisoner grievances are one of the few means by which prisoners may communicate complaints about issues that range from the benign to life threatening, and grievances are typically the first-tier administrative remedy for federal claims. For these reasons alone, policies that govern the receipt and processing of prisoner grievances must be clear, unequivocal, and carefully crafted to maintain the ability of prisoners to seek redress at all times. Before a new restriction is imposed on the number of grievances a prisoner may file, the existing grievance policy, procedure and practice should be functioning properly.

The original Limitations Policy restricted the filing of duplicate grievances and allowed facility command to place restrictions on prisoners who continued to file malicious, false, obscene or frivolous grievances following a warning. The Department's revisions to the Limitations Policy further restrict the number of grievances that may be filed to two per week and no more than four per month. Between December 1 and December 31, 2017, the Department reports that five grievances were denied pursuant to its new policy, including one submitted on behalf of a prisoner by the American Civil Liberties Union.

The revised limitations policy makes exceptions for grievances related to the Prison Rape Elimination Act, the Americans with Disabilities Act, emergency grievances, and grievances against staff alleging "serious misconduct."<sup>4</sup> On

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<sup>4</sup> "An emergency grievance is defined as an urgent matter wherein a disposition according to the regular time limits could subject the inmate to immediate risk of death, personal injury, or irreparable harm" and ". . . any claim by an inmate wherein he or she alleges to have been held in custody beyond his or her release date." CDM 8.03/010.00.

the face of this policy, grievances alleging denial of out of cell time, denial of non-critical health care and “non-serious” staff misconduct may be restricted. The policy should not restrict the number of grievances a prisoner may file against personnel based solely on the severity of the conduct alleged.

Grievance limitations do not appear to have been communicated to prisoners. The Department reports that prisoner notification will be available via iPads. However, iPads currently have limited deployment within custody facilities. All prisoners should be notified of the new policy, and in all instances, notification should be made in advance of filings which may result in restrictions. Notification should include information that a policy exists, its purpose, function, requirements and any consequences for violating it.

Lastly, any addition or modification to existing policy should be reconciled with other provisions within the same policy and with any other policies that intersect with or may be altered by the revisions. Improvements to the grievance system are particularly critical as the Department works toward PREA compliance.

The Office of Inspector General will continue to monitor and report on the implementation of the grievance policy revisions.

### [iPads](#)

The Department continues to implement iPads at the Los Angeles County jails, including Men’s Central Jail, Twin Towers Correctional Facility and Century Regional Detention Facility. The Department reports that, as of December 31, 2017, it has deployed a total of fifty-four iPads at Men’s Central Jail, six iPads at Twin Towers Correctional Facility and sixteen iPads at the CRDF. The Department reports that it is still experiencing trouble with Wi-Fi connectivity at Men’s Central Jail and Twin Towers Correctional Facility. The Department reports that it discontinued the implementation of additional iPads at these facilities and will resume the implementation of more iPads once the issues are resolved. As of January 2, 2017, the Department reports that it has processed over 545,000 requests through these iPads.

***CCJV Recommendation 7.15: The use of lapel cameras as an investigative tool should be broadened.***

As previously reported the Department opted for an alternative implementation of this recommendation and embarked on a five-year program to install fixed cameras in the jail facilities. The Department continues to implement Closed Circuit Television (CCTV) cameras at the PDC. At the PDC – South facility, the Department is currently recording footage from the central administration building, the front side of the David compound, areas surrounding the Inmate Dining Room and the kitchen dock. The Department reports that it is continuing to hardwire the remaining cameras at the PDC – South and does not yet have an estimated date of completion for the camera installation.

The Department completed the implementation of cameras at the PDC – North facility in June 2017. However, the Department reports that due to connectivity issues, cameras in housing modules 1 and 4 are not consistently recording. The Department reports that the Data Systems Bureau notified the Facilities Planning Bureau of hardwire issues with the fiber cables used to connect the cameras to the camera server. The Department reports that it is still in the process of repairing these issues.

## **COMMUNITY CONTACTS**

The Office of Inspector General continues to regularly communicate with the public, the Board of Supervisors, the Civilian Oversight Commission and the Sheriff regarding the work of the Office of Inspector General and the Department's operations.

The Inspector General attends all meetings of the Civilian Oversight Commission and the Office of Inspector General is present at all Board proceedings which effect or touch on the Department's operation.

The Office of Inspector General received sixty-six new service comments in the fourth quarter of 2017 from members of the public, prisoners, prisoners' family members and friends, community organizations and County

agencies.<sup>5</sup> Each service comment was reviewed by Office of Inspector General staff. These service comments included fifty-nine individual grievances and one commendation, all related to conditions of confinement within the Department’s custody facilities, as shown below:

Grievance/ Incident Classification	Totals
Personnel Issue	
Use of Force	1
Rude/Abusive Behavior	2
Unlawful Conduct	1
Off Duty Conduct	1
Discrimination	2
Commendation	1
Medical/Dental Issue	6
Mental Health Services	3
Housing	6
Dietary	3
Other Service Issue	34
<b>Total</b>	<b>60</b>

These service comments included eighteen individual grievances and two commendations related to contacts with Department personnel by persons who were not in custody.

Grievance/ Incident Classification	Totals
Personnel Issue	
Rude/Abusive Behavior	4
Unlawful Arrest	3
Unlawful Search	1
Failed to Take Action	3
Discrimination	2
Commendation	2
Other Service Issue	4
No Discernible Issue	1
<b>Total</b>	<b>20</b>

Five service comments were not about the Department or Department personnel and the persons submitting those comments were either referred to the appropriate agency or directed to seek legal advice.

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<sup>5</sup> A single service comment may contain more than one grievance or incident classification. When a service comment raises multiple issues, the Office of Inspector General tracks and monitors the Department’s response to each issue.

The Office of Inspector General received two complaints via the Sheriff Civilian Oversight Commission. One was related to a civilian contact with Department personnel by an individual who was not in custody. One was related to a contact with Department personnel by an individual in custody.

## **CONCLUSION**

The Inspector General and his staff strive to establish and maintain a collaborative working relationship achieved between the Office of Inspector General and the Department. The Inspector General and his staff continue to identify issues and to work with the Department to facilitate systemic reform its policies, practices, and operations. The Department has remained receptive to many of the Office of Inspector General's recommendations and suggestions. The Office of Inspector General will continue to monitor, track and report on Department critical incidents, policies and operations.



# OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

HALL OF JUSTICE

JIM McDONNELL, SHERIFF



February 1, 2018

Max Huntsman, Inspector General  
Los Angeles County Office of Inspector General  
312 South Hill Street, 3<sup>rd</sup> Floor  
Los Angeles, California 90013

Dear Mr. Huntsman:

**RESPONSE TO THE LOS ANGELES COUNTY OFFICE OF INSPECTOR  
GENERAL REPORT – REFORM AND OVERSIGHT EFFORTS:  
LOS ANGELES COUNTY SHERIFF'S DEPARTMENT**

Attached is the Los Angeles County Sheriff's Department's (Department) response to the Los Angeles County Office of Inspector General's (OIG) final report entitled, "Reform and Oversight Efforts: Los Angeles County Sheriff's Department."

I thank you and your staff for your efforts in monitoring the various Department reforms. I would like to address a few of the topics covered in the report, and I have therefore provided a response in the attached document.

The effort and dedication made by members of the OIG to execute this report are greatly appreciated by the Department. The Department will continually strive to meet and/or exceed the recommendations of this report.

The Audit and Accountability Bureau has the responsibility to monitor and document the Department's response related to this evaluation. Should you have any questions regarding the Department's response, please contact Captain Steven E. Gross at (323) 307-8302.

Sincerely,

JIM McDONNELL  
SHERIFF

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

*A Tradition of Service*  
— Since 1850 —

**RESPONSE TO THE LOS ANGELES COUNTY OFFICE OF  
INSPECTOR GENERAL REPORT**

**COUNTY OF LOS ANGELES – SHERIFF**

**SUBJECT: REFORM AND OVERSIGHT EFFORTS: LOS ANGELES COUNTY  
SHERIFF'S DEPARTMENT**

**RESPONSE TO RECOMMENDATIONS BY THE OIG**

1. In discussing the Department's efforts to limit duplicate or excessive filings of grievances by inmates through revisions to Custody Division Manual (CDM) Policy 8-04/050.00, the OIG reported that five grievances were denied pursuant to that policy between December 1, and December 31, 2017.

We feel it is important to note that those five denials were from an aggregate total of 1,278 grievances filed during that same time period.

2. The OIG recommends that CDM 8-04/050.00 should not limit the number of grievances inmates may file against personnel based upon the severity of the conduct alleged.

We respectfully disagree. As correctly noted by the OIG, the grievance system has remained a particularly complex challenge for the Department in terms of the timely processing of and responding to an exorbitant number of grievances. We consider the limitations in CDM 8-04/050.00, to be reasonable in furtherance of our effort to prevent frivolous overuse of the grievance system from impeding our ability to respond to legitimate concerns of inmates – a stance confirmed by the monitors of the *Rosas* settlement agreement with which the Department is presently required to comply. The exemptions included in CDM 8-04/050.00, that allow for the processing of more serious grievances without any quantitative limits, help us to strike an important balance between more efficiently and equitably responding to the grievance concerns of all inmates and ensuring that all of the most serious grievances are given their due attention.

Additionally, it is worth mentioning that duplicate grievances will continue to be accepted from inmates and will not count against the quantitative limitations laid out in CDM 8-04/050.00. Duplicate grievances will be retained as records linked to the original grievance that they duplicate (with only the original grievance counting against the limits of 2 per week and 4 per month). In accordance with policy, when a grievance is categorized as a duplicate, a notification of this is made to the filing inmate and a record of the notification is entered into the Custody Automated Reporting and Tracking System (CARTS).

3. The OIG recommends that all inmates should be notified of the new policy (CDM 8-04/050.00), and in all instances, notification should be made in advance of filings which may result in restrictions. Notification should include information that a policy exists, its purpose, function, requirements, and any consequences for violating it.

We agree. A revised grievance form reflecting the revisions made to CDM 8-04/050.00, has been approved by the Department. The new form includes language in two locations notifying inmates of the grievance processing limitations. The Department has also started the process of adding similar notification language to our form entitled "A Guide Through Custody", which is provided to inmates as they enter the jail system. Additionally, inmates who do have a grievance denied as excessive based on the limits set by CDM 8-04/050.00, will receive a notice reiterating the limits and identifying the date after which another grievance may be filed in adherence to those limits.