



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

**Transfer of Youth from Central Juvenile
Hall to Barry J. Nidorf Juvenile Hall**

December 30, 2022

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INTRODUCTION

On Saturday March 12, 2022, and Sunday March 13, 2022, the Los Angeles County Probation Department (Probation Department) conducted a hasty transfer of all of the approximately 140 youths housed at Central Juvenile Hall (CJH) to the Barry J. Nidorf Juvenile Hall (BJNJH). The move was precipitated by Probation Department concerns over failing to meet the California State Board of Community Corrections (BSCC) suitability requirements by a hearing date on whether required improvements had been completed. These improvements were required based upon repeated findings of unsuitability by the BSCC, which is responsible for licensing the County juvenile detention facilities. Neither the Probation Oversight Commission (POC), nor the Office of Inspector General were informed of the transfer until the next day, Monday, March 14, 2022, after the transfer had been completed.

Once informed, Office of Inspector General staff responded to both facilities to conduct an inspection. The Office of Inspector General staff surveyed the abandoned grounds and residence halls of CJH with a supervising probation officer who explained that due to the late notice of the transfer of youths, some staff arrived for their regular shift at CJH unaware that there were no longer any youths housed at the facility. Probation Department management contends that staff were contacted and advised where to report to work, stating that “some staff were directed to report to CJH to assist with the transfer and monitor youth who remained at CJH through the last moves on Sunday, March 13, 2022. All other staff were directed to report to BJNJH.”

In response to a draft of this report, the Probation Department informed the Office of Inspector General that staff were notified of the transfer *beginning on Friday evening, March 11th*. Parents/guardians were not notified of the transfer until their children *arrived at BJNJH*. The youths housed at CJH were only notified *just prior to their move*. The Probation Department explained that the decision to delay notification to the youths to just prior to the move was made in an effort to minimize disturbances.

Through its own inspection, Office of Inspector General staff observed the presence of playing cards left on a table in one of the youth residence dayrooms evidencing that the move was abrupt. After inspecting the facilities, the Office of Inspector General staff confirmed that no youths were being housed on the premises. The only youths present at CJH were there for the day for court appearances at Eastlake Juvenile Court or for medical treatment at CJH.

Probation Department officials insist they have articulated reasons for the last minute decision made on a Friday to move the youths over the weekend days without a

detailed plan for the move in place. As seen from the correspondence by Probation Department management, while there were articulated reasons for moving the youth, there is no plausible reason for the last minute decision other than to avoid a negative BSCC rating, which would have undoubtedly been the result of the BSCC inspections scheduled for the week of March 14, 2022. The Probation Department management has failed to accept responsibility that the last minute decision was avoidable and that they did not have the safety and security of the youths in its care as the top priority.

THE STATED REASON FOR THE MOVE

EMAIL FROM CHIEF GONZALES TO THE BOARD OF SUPERVISORS

On March 9, 2022, the following email was sent to the Los Angeles County Board of Supervisors:

“On behalf of Dr. Adolfo Gonzales, Chief Probation Officer

The Probation Department has worked diligently to address the items of non-compliance outlined in our Corrective Action Plan (CAP) dated December 10, 2021 [See Attachment 1] and in the new items of non-compliance identified during a BSCC site visit and inspection at Central Juvenile Hall on February 3, 2022. While a formal CAP will be submitted to the BSCC tomorrow, March 10, 2022 [See Attachment 2], the following outlines our plan to continue to address these specific areas of non-compliance and other improvements to our current operation.

The Department proposes to suspend the operations at our Central Juvenile Hall for ninety (90) days to assist in facilitating leadership changes, training for staff, and needed repairs to the facility. This brief suspension of operations will include moving our youth to Barry J. Nidorf Juvenile Hall in order to accomplish these changes and enhancements. During these ninety (90) days, the Department will maintain an Intake Unit for law enforcement agencies to book youth into custody, a Medical Unit to provide medical screening clearances and services, and a Court holding area for youth appearing at the Eastlake Juvenile Court facility. This Court holding area will also afford attorneys access to their clients before and after Court.

At the conclusion of the ninety (90) days, youth will be returned to Central Juvenile Hall in a phased approach to ensure the safety and security of our youth, partners and staff. Upon return to Central Juvenile Hall, the Department will request that the BSCC return to conduct their inspection

of the facility with the intent of successfully concluding this inspection cycle. During the week of March 14, 2022, the BSCC will be on-site to conduct the inspection of Barry J. Nidorf Juvenile Hall and then will proceed to inspect each of our Camp facilities.

The Department will meet with the CEO and County Counsel for further discussion tomorrow. Please contact me if you would like to discuss before submitting our CAP to the BSCC on March 10, 2022.

Thank you.”

COMMUNICATIONS AND STATEMENTS BY CHIEF DEPUTY KAREN FLETCHER

Probation Department Chief Deputy Karen Fletcher stated in a March 11, 2022 email (Attachment 3) to Probation Department staff that the reason for the abrupt transfer of the youth residents at CJH was the Probation Department’s acknowledgement that improvements to CJH recommended by the BSCC would not be completed prior to an April 7th hearing suitability hearing (Attachment 2).

Chief Deputy Fletcher also stated in a March 14, 2022, email to Probation Department staff:

“[t]he department proposed this temporary suspension in order to ensure that we were in compliance with title 15 regulations at Central Juvenile Hall. Unfortunately, the timing of the transition was accelerated do to circumstances which were out of our immediate control.” (See Attachment 4).

In an interview with a Deputy Inspector General from the Office of Inspector General, Chief Deputy Fletcher referenced a portion of the March 14th email that stated, “unfortunately the timing of the transition was accelerated due to circumstances which were out of our immediate control . . .” referring directly to the letter by the BSCC to the Probation Department dated March 11th, which informed the Probation Department of a March 14, 2022, inspection of CJH (Attachment 5). Chief Deputy Fletcher further explained that the Probation Department was concerned that CJH would fail the inspection due to non-compliance with BSCC recommendations for Title 15 violations. During this interview, Chief Deputy Fletcher noted that the transfer had been considered after the February 3, 2022 inspection but did not occur at that time because the Probation Department felt that the corrections could be completed prior to the next BSCC meeting on April 7, 2022.

According to the Probation Department, after the Corrective Action Plan was submitted to the BSCC on March 10, 2022, (Attachment 2) it was informed on March 11, 2022, via

a letter from the BSCC that an inspection of CJH would occur on March 14, 2022, (Attachment 5). Concerned that both CJH and BJNJH would be found *unsuitable*, the Probation Department believed that an alternative plan would need to be implemented immediately. Two other options discussed were to transfer all the youths from both juvenile halls to Camp Challenger in Lancaster or to place the youths in a facility outside the County of Los Angeles.

STATEMENTS TO THE PROBATION OVERSIGHT COMMISSION

The POC agendaized and discussed the transfer of youths from CJH to BJNJH at the POC meeting on April 14, 2022.¹ Chief Probation Officer Adolfo Gonzales was asked by a POC commissioner why the decision to transfer the youth to BJNJH was made so abruptly. Gonzales stated that the March 11, 2022 BSCC letter approved the move but the letter also informed the Probation Department there would still be an inspection on March 14, 2022. The executive staff of the Probation Department was apparently surprised by this and concluded the only choice was to transfer the youths based on their belief that CJH would be found *unsuitable* (See Attachment 5).

The same POC Commissioner asked Chief Gonzales “Why are you trying to avoid an inspection?” Chief Gonzales responded that it wasn’t to avoid the inspection, but to delay it. Specifically, Chief Gonzales stated that they had “identified items we needed to fix. The inspection was not going to go well based on an internal audit . . . we were not ready for the inspection . . .” He further stated, “we felt pressured to do the move immediately . . . pressure from a potential unsuitability finding from the BSCC.” Gonzales was asked by the POC “ . . . why not let the board come in to Central to see what was happening and declare it unsuitable if that is what was going to happen . . . why not let the process happen?” Gonzales answered, “we were not doing the work that we should have been doing.”

Chief Deputy Fletcher also responded to questioning by the Commissioners stating that “. . . the department really didn’t know that the time frame would be accelerated until the Friday afternoon just before 5:00 o’clock. And that’s when we all met and made very strategic decisions about which units would be moved and how they would be moved and when they would be moved. I think if we had more time that would have been ideal . . . all hands were on deck it was a crisis situation.”

In both Chief Probation Officer Gonzales and Chief Deputy Fletcher’s responses to the POC, they implied that the March 11, 2022, letter from the BSCC detailing the March 14, 2022, inspections was unexpected. As Chief Deputy Fletcher stated, it resulted in an

¹ [POC Meeting April 14, 2022.](#)

accelerated timing of the transfer “. . . due to circumstances out of our immediate control.”

However, the Office of Inspector General has obtained emails from the BSCC that indicate that the Probation Department was notified of the March 14, 2022 inspection almost two months prior by an email communication dated January 27, 2022, (Attachment 6). In addition, a subsequent email was sent to the Probation Department on February 23, 2022, reiterating that the BSCC inspection would still take place on March 14, 2022, but the Title 15 inspection portion would be conducted on a later date (Attachment 7).

The Probation Department asserts that it was aware of the pre-planned inspections scheduled to begin the week of March 14th but at the same time asserts that the March 14th inspection was “unexpected.” Chief Deputy Karen Fletcher of the Probation Department explained this as follows: “The Department submitted a letter to the BSCC dated March 10th informing the BSCC of our intent to temporarily suspend operations at CJH for 90 days and move the youth to BJNJH. The plan was to move youth from CJH to BJNJH in small cohorts during the week of March 14th. On March 11th the Department received a letter from the BSCC advising that ‘if youth remain housed at Central Juvenile Hall on March 14, 2022, Field Representative Southwell will begin the inspection process of the facility as previously scheduled.’ This information was unexpected and prompted the accelerated movement of youth.”

In fact, the language in the BSCC’s March 11, 2022, letter itself evidences that the Probation Department was previously notified of the scheduled March 14, 2022, (Attachment 5). The letter states “*As you are aware*, field representative Lisa Southwell was scheduled to conduct a re-inspection of both Barry J. Nidorf and Central Juvenile Hall on March 14, 2022, to determine whether the items of noncompliance had been remedied by the March 2022 deadline.” [Emphasis added]

At the POC meeting on May 26, 2022, Chief Deputy Fletcher stated the following: . “We submitted our action plan to the State Board of Community Corrections on March 10th and that Friday [March 11th] they responded and indicated that we must move the youth from the facility at Central Juvenile Hall otherwise they would be at the facility the week of March 14th so as a result we made the very quick decision to move our youth over that weekend March 12th and 13th.”²

She repeated her surprise at having to move the youths, stating “so, we were as surprised as everyone else to receive the letter on the 11th indicating that we had to move . . .”

² [POC Meeting May 26, 2022.](#)

POC commissioner Garcia-Leys also responded to Chief Deputy Fletcher's statements by pointing out that the BSCC did not mandate the move at all but rather informed the Probation Department that so long as youth were housed at CJH the facility inspection would be conducted. Commissioner Garcia-Leys offered the explanation that the Probation Department was simply trying to avoid the embarrassment of a failed inspection.

"I want to make sure that the public is not misled by Chief Fletcher's statements. It would seem to suggest that the state ordered the youth to be moved to Barry J. Nidorf. That's not what happened. The State said that they were going to inspect the facility to ensure the corrective action plan had been implemented. When the department found out that they were likely to fail that inspection, the department chose on its own to avoid accountability with the state by emptying and moving those kids to Sylmar to avoid an inspection that they thought they were going to fail and thereby avoid accountability for their failure to implement the corrective action plan . . ."

³

The available evidence provided to and reviewed by the Office of Inspector General, including the multiple emails and letters dating back to January 27, 2022, referencing the March 14, 2022 scheduled inspection, substantiates that the BSCC inspection on March 14, 2022, is not properly characterized as "unexpected" or that Probation Department management were "surprised."

BSCC TIMELINE

Los Angeles County Juvenile Halls conditions have been the subject of BSCC investigations for approximately 18 months. As noted above, in February 2021, both juvenile halls were found to be out of compliance with several BSCC regulations, which required the Probation Department to develop a corrective action plan (Attachment 8). At its September 16, 2021 meeting, the BSCC found that both juvenile halls were unsuitable for the confinement of youths (Attachment 9). As a result, on October 1, 2021, the BSCC Board issued a 60-day notice that the facilities were *unsuitable* and that the County would no longer be able to house any youths at the facilities (Attachment 10). On November 17, 2021, the Probation Department sent a letter to the BSCC outlining how they had corrected each area of non-compliance enumerated in the BSCC letter of October 1, 2021, (Attachment 11). On November 18, 2021, the BSCC determined that the issues at Los Angeles County juvenile halls that made the facilities

³ [Video recording of POC Meeting on May 26, 2022](#) and Attachment 5, March 11, 2022, letter.

non-compliant and *unsuitable* for confinement of youths had been remedied (Attachment 12).

While the prior items of non-compliance had been remedied, the BSCC cited new problems regarding safety checks and room confinement at the BJNJH and CJH. The Probation Department was required to submit an additional Corrective Action Plan by December 14, 2021, which was submitted on December 10, 2021 (Attachment 1). A BSCC inspection on February 3, 2022, revealed an additional incident in violation of room confinement policies, as well as in violation of Title 15 regulations on programs, recreation, and exercise. On February 8, 2022, the BSCC instructed the Probation Department to submit another Corrective Action Plan no later than March 10, 2022, (Attachment 8).

On March 10, 2022, the Probation Department sent a Corrective Action Plan letter detailing what was done to address problems regarding room confinement and the lack of programming. That letter also announced to the BSCC the Probation Department's plan to transfer youths to BJNJH.

“To further address systematic issues and make sustainable enhancements to ensure compliance with Title 15 regulations the department plans to suspend the operations at CJH for 90 days to assist in facilitating leadership changes training for staff and needed repairs to the facility.”

The letter also stated:

“During the week of March 14, 2022, we will expect BSCC will be on site to conduct the inspection of Barry J. Nidorf Juvenile Hall and subsequently each of our facilities.” (Attachment 2).

The absence of any mention of the CJH inspection in the letter indicates that the Probation Department believed announcing the suspension of operations at CJH would prevent or delay the inspection of that facility.

On March 11, 2022, the BSCC sent a letter in response to the Probation Department's March 10, 2022 letter acknowledging the Probation Department's plan to transfer the youths. The letter also reminded the Probation Department that the items of non-compliance outlined in prior correspondence needed to be remedied by March 10th. The BSCC March 11th letter went on to say:

“Based on your correspondence is not clear when the juvenile hall will be vacated. As such, if youth remain housed at Central Juvenile Hall on March 14, 2022, field representative Southwell will begin a re-inspection process of the facility as previously scheduled (See Attachment 5).

The following day, the Probation Department initiated the transfer of youths from CJH to BJNJH. This action substantiates that the Probation Department concluded that the BSCC’s newly identified problems at CJH would not be remedied prior to a BSCC inspection in advance of the April 7, 2022 suitability hearing. For instance, on March 29, 2022, the BSCC discovered that BJNJH was still holding youths in isolation longer than necessary (Attachment 13).

Despite the Probation Department delays in implementing the necessary corrective actions, at the April 7, 2022 suitability hearing for both CJH and BJNJH the BSCC determined that the Probation Department was “demonstrating a positive trend toward corrective action including the temporary suspension of the use of Central Juvenile Hall” and continued the determination of suitability to its June 9, 2022, meeting (Attachment 14).

REPORTS OF INCREASED VIOLENCE AND PROPERTY DAMAGE

At the request of the Office of Inspector General, the Probation Department provided statistical reports for the incidents of violence and property damage for a month-long period prior to the transfer and for the month following the transfer (Attachments 16, 17, and 18). The statistical reports provided covered the following categories: *youth on youth violence, threatening staff, assault on staff, property damage, unit disturbance, disruptive behavior, and safe crisis management reports* (reports prepared after staff use of force on youth) and covered the periods of February 10 to March 10, 2022, and March 11 to April 8, 2022. In the month preceding the transfer, CJH generally had a greater number of incidents in each category of incidents compared to the number of incidents at BJNJH (Attachments 16, 17, and 18).

In the month preceding the transfer, CJH had 107 incidents of youth on youth violence compared to BJNJH’s 30. In the month following the transfer, with all of the youth from both facilities housed at BJNJH, there were 115 incidents of youth violence. For incidents of youth threats to staff, in the preceding month CJH had 15 threats to staff and BJNJH had 12 threats; following the transfer there were 39 threats with the populations combined. There were 22 assaults on staff at CJH and 11 at BJNJH in the month prior to the transfer, and in the month following there were 34 with the populations combined at BJNJH.

At CJH pre-transfer, there were 19 property damage incidents, 13 pre-transfer property damage incidents at BJNJH, and 42 post-transfer property damage incidents at BJNJH. There were no unit disturbances at BJNJH pre-transfer, 2 at CJH and 12 for the combined populations post-transfer. Disruptive behavior incidents occurred 16 times at CJH and 60 at BJNJH respectively pre-transfer and post-transfer rose to 98 when the populations were combined.⁴ Safe crisis management reports, which record uses of force by staff on youth, were recorded as occurring 145 times at CJH pre-transfer, 39 times at BJNJH and with the populations combined post-transfer 168 times.⁵

There have been several reports by anonymous Probation Department staff, some of which included photographic evidence, of disruptive behavior following the transfer, resulting in significant property damage to BJNJH (Attachment 15). Youths who were transferred from CJH to BJNJH reported to Office of Inspector General staff that upon arrival to BJNJH there were incidents of violence and disruptive behavior by and towards the newly transferred youths.⁶ Several youths stated that they were told of the transfer to BJNJH the day before the move and expressed that the rushed manner of the transfer may have contributed to reported disturbances.

When comparing the combined incidents for both juvenile halls with the incidents at BJNJH with the combined populations housed there post-transfer, there was no significant increase. However, for the youth housed at BJNJH the transfer of youth from CJH caused some disruption, with increased incidents of violence, threats, property damage, and staff uses of force in the month following the transfer compared with the frequency of incidents at BJNJH in the month prior to the influx of the additional population.

SEARCHES OF YOUTH

Documents provided by the Probation Department show that numerous canine searches were conducted at BJNH on the days of the transfer. On March 12, 2022, the day of the initial transfers, 173 canine searches were conducted. On March 13, 2022,

⁴ This is the only category for which pre-transfer there were a greater number of incidents at BJNJH than for CJH.

⁵ Approximately 140 youths were transferred to BJNJH. The Office of Inspector General is not opining that the reported increase in these incidents was caused by the management of the transfer. The increased population likely accounts for much of the increases in these incidents. What is noteworthy, is that for the youths at BJNJH prior to the transfer, there were fewer of these incidents meaning that the transfer caused more disruption for the youths at BJNJH than they experienced for at least the month preceding the transfer.

⁶ According to the Probation Department, the youths from the two facilities were not comingled. The Office of Inspector General is reporting the statements shared by the youth who were interviewed. The youths did not specify that the described behavior was by youths who were transferred or who were already housed at BJNJH, although the statement suggests at least some of the behavior was by youths who were already housed at the facility.

the second day of transfers, 136 canine searches were conducted. The net result of those canine searches was 18 grams of marijuana, \$40 cash, and one cell phone.

It was reported to the Office of Inspector General that some of the canine searches by officers from the Special Enforcement Office (SEO) resulted in referrals to the Internal Affairs Bureau (IAB) based on complaints from several youths of inappropriate strip searches, rough handling by the officers, and the removal of personal belongings. According to the Probation Department, IAB investigated these allegations and no complaints were substantiated

STAFF SHORTAGES

During the time frame of the transfer, a dramatic number of staff were not showing up for work, were calling in sick, or were on leave. The Probation Department provided the POC with staffing statistics for CJH and BJNH. In the month of March 2022, (the month of the transfer) BJNH had 112 staff out on leave, which accounts for 27% of the total staff at BJNH. In the week of April 17, 2022, to April 23, 2022, there were 599 “call outs,” (a Probation Department term for staff calling in sick or simply not showing up for work) or staff on leave. These staffing shortages may have been a factor in the reported incidents of violence and property damages at BJNH following the transfer.

PROBATION OVERSIGHT COMMISSIONER VISIT

A POC Commissioner noted the following while visiting BJNH on April 2, 2022:

- Director Collins reported to the Commissioner that on Saturday, April 2, 2022, BJNH's population total was 288 and that the minimum number of staff required to run the facility is 88. According to the POC Commissioner there were 76 staff available during the visit.
- Due to staffing shortages, visiting was cancelled on that Saturday, April 2nd.
- The youth visited by the Commissioner in Units N & O and T & V reported that they had not had consistent outside recreation with the reported reason given for this lack of programming as due to the low level of staffing.
- It was reported to the Commissioner that staff are utilizing FMLA to obtain 8-hour restricted shifts, which prevents staff from being ordered over.
- The Commissioner was informed that over the past two months there have been over 50 resignations between CJH and BJNH.
- It was reported to the Commissioner that the previous night there was a disturbance in the Secured Youth Treatment Facility unit.

The Commissioner's notes raise an additional concern that management and staffing issues are also limiting access to outdoor recreation and visitation and possibly to other program activities.

OFFICE OF THE INSPECTOR GENERAL'S FINDINGS AND CONCERNS

After review of the materials generated by the decision to transfer the youths, making unannounced visits to the facilities, speaking to both youths and Probation Department staff and attending the relevant POC meetings, the Office of Inspector General has identified the following issues:

- 1) The Department failed to provide timely notification of the March 12th and 13th transfer of youth from CJH to BJNJH to multiple stakeholders including the Office of Inspector General, the Probation Oversight Commission, and a monitor for Los Angeles County Juvenile Halls assigned by the California Department of Justice
- 2) The Probation Department's assertion that an inspection would occur if youths were present was "unexpected" therefore necessitated "immediate action," is contradicted by the documents reviewed by the Office of Inspector General showing that the Probation Department was previously notified of the inspection by communications dated January 27, 2022, and February 23, 2022.
- 3) During the transfer, searches conducted by the SEO using canines reportedly resulted in referrals to the Internal Affairs Bureau. According to the Probation Department, IAB investigated these allegations and no complaints were substantiated.
- 4) Anonymous Probation Department staff reported that the transfer caused disruptive behavior that resulted in multiple incidents of property damage to BJNJH on March 11, 2022, and March 12, 2022, which, if true, raises concerns about the management of the transfer.⁷
- 5) While Probation notes that the youths from the two facilities were not comingled, there has been an increase in youth-on-youth violence, assaults on staff, threats of violence, and property damage at BJNJH since the transfer. While the population increase may account for the rise in incidents, youth and staff expressed the opinion that the hasty transfer may have been a factor in these increases. For the youths already housed at BJNJH prior to the transfer, the influx of youths from CJH led to

⁷ In response to a draft of this report, the Probation Department noted that property damage is not uncommon within their facilities and occurred both before and after the movement of youth.

an increase in disruptions compared to the previous month. The Probation Department's executive staff responded to the identification of this issue by stating that they are of the opinion that the significant factor in any increase in incidents is lack of staffing.

CONCLUSION

The available evidence shows that the Probation Department made the transfer of youths from CJH to BJNJH to avoid the embarrassment and consequences of failing a BSCC inspection. It created its own crisis situation that disrupted the lives of the incarcerated youths, creating substantial risks to both the youths and staff.

Stakeholders such as parents, staff, the POC, as well as the youths residing at the facilities were not given advance notice of the move. The move had no measure of the transparency that all stakeholders are owed. The Probation Department management acknowledges that the Office of Inspector General and the POC were not notified of the move in advance. In response to a draft of this report, the Probation Department reported that staff were only notified *beginning on Friday evening, March 11th*. Parents/guardians were not notified until their children *arrived at BJNJH* and the youths at CJH were only notified *just prior to their move*.

Going forward, the Probation Department needs to ensure compliance with BSCC and state regulations. More importantly, the Probation Department management needs to be transparent in all of its communications and public statements. Misrepresentations by Probation Department management about the reasons for the last minute decision to transfer erode public trust. Transparency is one of the necessary steps to ensuring the County's goal to improve the Probation Department's treatment of the youth in the juvenile halls.

ATTACHMENT 1



ADOLFO GONZALES
Chief Probation Officer

COUNTY OF LOS ANGELES PROBATION DEPARTMENT

ADULT & JUVENILE SERVICES
9150 EAST IMPERIAL HIGHWAY – DOWNEY, CALIFORNIA 90242
(562) 940-2513



December 10, 2021

Board of State and Community Corrections
Attention: Lisa Southwell, BSCC, Field Representative
2590 Venture Oaks Way, Suite 200
Sacramento, CA 95833

COUNTY OF LOS ANGELES PROBATION DEPARTMENT – JUVENILE FACILITIES CORRECTIVE ACTION PLAN

Dear Ms. Southwell:

The Board of State and Community Corrections (BSCC) conducted inspection activities and suitability oversight at both the Barry J. Nidorf Juvenile Hall (BJNJH) and the Los Angeles County Central Juvenile Hall (CJH) from September 23, 2021 through November 12, 2021. During this reinspection process, the BSCC identified the following new items of non-compliance:

Title 15, Section 1354.5 – Room Confinement

At both Barry J. Nidorf and Central Juvenile Halls, youth reported that they were periodically being placed in their locked rooms for long periods of time after fights, during visiting, before and during showers, at shift change, and were placed in their room when the group was split to minimize the possibility of unit disturbance and incidents ("modified program") due to gang or other unit problems. Youths' reports of room confinement were confirmed in video reviews. These incidents of room confinement were not documented. While some of the incidents could be described as "brief" and "necessary for required institutional operations," after reviewing the video and speaking with facility staff and youth, BSCC staff determined that many of these placements could not be reasonably characterized as brief or necessary for required institutional operations.

Title 15, Section 1328 - Safety Checks

At Central Juvenile Hall, while reviewing video footage, BSCC staff observed several instances of staff not conducting safety checks in accordance with regulation. Staff were observed not completing the safety check in a timely manner, allowing significant amounts of time between checks, and not looking in the youth's window into the room to personally see youth's movement and/or skin.

Rebuild Lives and Provide for Healthier and Safer Communities

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The BSCC provided a written Notice of Noncompliance regarding these two items on November 15, 2021. This Notice of Noncompliance documents that these issues were brought to the attention of the Department on October 15, 2021, at which time corrective action was immediately initiated. The Notice of Noncompliance further states, "it should be noted that there has been significant improvement in instances of room confinement after this date. Safety checks will be reviewed at reinspection."

In response to these findings, the Department has addressed each of these items with the following solutions:

Title 15, Section 1354.5 – Room Confinement (BJNJH and CJH)

A mandatory four-hour BSCC Title 15 training was provided to all sworn staff at both the BJNJH and CJH during the month of October 2021 (10/18/2021 – 10/24/2021 at CJH and 10/25/2021 – 10/31/2021 at BJNJH). This training covered Title 15 Regulations, Updates to BSCC compliance, Safety Checks, Self-Separation, Room Confinement, Specialized Supervision Plans, Unit Classifications, Use of Mechanical Restraints and Title 15 Programming. In addition to the four-hour mandatory training, a BSCC refresher course will be provided during the required two-week block training to keep staff apprised of all regulations and policies. The BSCC Subject Matter Experts (SMEs) will conduct annual training on current and new BSCC regulations. Additionally, on-going training is occurring during Staff Meetings. An Instructional Memorandum (*BSCC Section 1354.5 Room Confinement Compliance Guide*) was sent to Juvenile Hall Staff on November 16, 2021 to specifically address room confinement during transitional times such as shift change, showers and after incidents.

Cool Down Rooms are being utilized as an alternative to the Healing Opportunities and Positive Engagement (HOPE) Centers, which have significantly decreased incidents of room confinement within our facilities. Each HOPE Center has established a daily report for documenting the number of youths in room confinement, on a cool down or Specialized Supervision Program (SSP). This report is audited daily by BSCC SMEs to ensure compliance with Title 15 Regulations. Daily reports are being provided to Administration to monitor incidents of room confinement.

The placement of any youth in room confinement, even for brief periods of time necessary to conduct required institutional operations, is documented in Unit Log Books. Documentation will continue to be reviewed daily and if any concerns are identified, the facility will be immediately contacted to make the correction. The Quality Assurance (QA) Team and BSCC SMEs are providing immediate real-time training when corrections are required.

Managers and the QA Team at both facilities are conducting random video reviews during critical times of the day such as school, visiting, religious services and in the evenings. Additionally, all videos are reviewed after an incident has occurred to ensure room confinement is not occurring unless within policy in the HOPE Center.

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The Video and In-Person Observation Log continues to be utilized by managers when conducting random video reviews of Title 15 Programming and/or walking through units. Each manager is required to provide immediate correction and instruction when witnessing non-compliance. In the event of any potential egregious behavior, a referral for disciplinary action is required.

The Compliance Unit at each facility continues to review documentation to ensure compliance with BSCC regulations, which includes but is not limited to, justification for room confinement. Any documentation requiring additional clarification is immediately referred to the Compliance Unit Supervisor who follows up and provides training.

Title 15, Section 1328 – Safety Checks (CJH)

A mandatory four-hour BSCC Title 15 training was provided to all sworn staff at both the BJNJH and CJH during the month of October 2021 (10/18/21 – 10/24/2021 at CJH and 10/25/2021 – 10/31/2021 at BJNJH). This training covered Title 15 Regulations, Updates to BSCC compliance, Safety Checks, Self-Separation, Room Confinement, Specialized Supervision Plans, Unit Classifications, Use of Mechanical Restraints and Title 15 Programming. In addition to the four-hour mandatory training, a BSCC refresher course will be provided during the required two-week block training to keep staff apprised of all regulations and policies. The BSCC SMEs will conduct annual training on current and new BSCC regulations. Additionally, on-going training is occurring during Staff Meetings. An Instructional Memorandum (Safety Checks) was sent to Juvenile Hall Line Staff on November 16, 2021 reminding staff of Department policy specific to Safety Checks, pursuant to Title 15 Regulations. An Instructional Memorandum (Safety Checks) was also sent to Juvenile Hall Supervisors on November 16, 2021 reminding supervisors of their responsibilities specific to Safety Checks, per Department policy.

Managers and the QA Team are conducting random video reviews to ensure staff have a direct visual observation of youth at a minimum of every 15 minutes, at random or varied intervals, when youth are asleep or when youth are in their rooms. Safety Check Sheets are also being monitored to ensure compliance with Title 15 regulations. Further, the Department is exploring the possibility of implementing technology designed to support the supervision of youth while in their rooms.

The Video and In-Person Observation Log continues to be utilized by managers when conducting random video reviews of Title 15 Programming and/or walking through units. Each manager is required to provide immediate correction and instruction when witnessing non-compliance. In the event of any potential egregious behavior, a referral for disciplinary action is required.

The Department is committed to ensuring and maintaining compliance with Title 15 Regulations. Should you have any questions regarding this Corrective Action Plan, please do not hesitate to contact my office or Chief Deputy Karen Fletcher at (562) 441-8043.

BSCC Corrective Action Plan
December 10, 2021
Page 4 of 4

Sincerely,



Dr. Adolfo Gonzales
Chief Probation Officer

cc:

Fesia Davenport, Chief Executive Officer, Los Angeles County
Honorable Eric C. Taylor, Presiding Judge Los Angeles County Superior Court
Honorable Akemi Arakaki, Presiding Judge of the Juvenile Court
Celia Zavala, Executive Officer, Board of Supervisors
Rodrigo Castro-Silva, County Counsel, Los Angeles County
Wendelyn Julien, Executive Director, Probation Oversight Commission

ATTACHMENT 2



ADOLFO GONZALES
Chief Probation Officer

COUNTY OF LOS ANGELES PROBATION DEPARTMENT

9150 EAST IMPERIAL HIGHWAY – DOWNEY, CALIFORNIA 90242
(562) 940-2501



March 10, 2022

Board of State and Community Corrections
Attention: Allison Ganter, BSCC, Deputy Director
Lisa Southwell, BSCC, Field Representative
2590 Venture Oaks Way, Suite 200
Sacramento, CA 95833

COUNTY OF LOS ANGELES PROBATION DEPARTMENT – CENTRAL JUVENILE HALL CORRECTIVE ACTION PLAN (CAP)

Dear Ms. Ganter and Ms. Southwell:

The Board of State and Community Corrections (BSCC) conducted a site visit and inspection at the Los Angeles County Central Juvenile Hall (CJH) on February 3, 2022. During this site visit, the BSCC identified the following new items of non-compliance:

Title 15, Section 1354.5 – Room Confinement

This regulation requires that youth are not placed on room confinement for specific reasons to include, punishment, coercion, convenience, or retaliation. The regulation states that youth may be placed on room confinement for up to four hours if staff take specific action and create a plan to return the youth to general population in consultation with mental health or medical staff.

Title 15, Section 1371 – Programs, Recreation, and Exercise

This regulation requires that facility managers minimize the amount of time youth are in their room, and that each youth receive time each day for programming, access to unscheduled activities (recreation), and opportunity for one hour of large muscle exercise.

The BSCC provided a written Notice of Noncompliance regarding these two items on February 8, 2022. Since these new findings were similar to those addressed in the Department's December 10, 2021 CAP, the BSCC advised that these new findings would be added to the existing CAP process.

These two items were specifically related to one youth who had been placed in medical isolation status in error. Upon identifying the error, the youth was immediately transitioned from isolation status to quarantine status, per COVID health guidelines provided by the

Rebuild Lives and Provide for Healthier and Safer Communities

BSCC Corrective Action Plan
March 10, 2022
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County's Juvenile Court Health Services (JCHS). Per JCHS guidelines, the youth was required to remain in quarantine status for an additional two days (February 2, 2022 through February 4, 2022). While in quarantine status for the identified two-day period, due to spike in COVID cases and exposures at CJH, it was necessary to adjust youth housing to limit cross contamination and further COVID exposures. In this situation, the youth's activities were limited for a total of 21.5 hours from 4:30pm on February 2, 2022, to approximately 2:00pm on February 3, 2022, at which time the youth was moved to another unit where programming and activities were restored.

Per the solutions outlined in the Department's CAP, all sworn staff at CJH received a mandatory four-hour BSCC Title 15 training session during the month of October 2021 (10/18/2021 – 10/24/2021). This training covered Title 15 Regulations, Updates to BSCC compliance, Safety Checks, Self-Separation, Room Confinement, Specialized Supervision Plans, Unit Classifications, Use of Mechanical Restraints and Title 15 Programming. In addition to the four-hour mandatory training, a BSCC refresher course is being provided during the required two-week block training to keep staff apprised of all regulations and policies. The Department remains committed to the BSCC Subject Matter Experts (SMEs) conducting annual training on current and new BSCC regulations. Additionally, on-going training is occurring during Staff Meetings.

Cool Down Rooms have continued to be utilized as an alternative to the Healing Opportunities and Positive Engagement (HOPE) Centers, which have significantly decreased incidents of room confinement within our facilities. The HOPE Center has established a daily report for documenting the number of youths in room confinement, on a cool down or Specialized Supervision Program (SSP). This report is audited daily by BSCC SMEs to ensure compliance with Title 15 Regulations. Daily reports continue to be provided to Administration to monitor incidents of room confinement.

The placement of any youth in room confinement is documented in Unit Log Books. Documentation continues to be reviewed daily and when concerns are identified, immediate corrective action is taken. The Quality Assurance (QA) Team and BSCC SMEs provide immediate real-time training when corrections are required.

The Video and In-Person Observation Log continues to be utilized by managers when conducting random video reviews of Title 15 Programming and/or walking through units. Each manager is required to provide immediate correction and instruction when witnessing non-compliance. In the event of any potential egregious behavior, a referral for disciplinary action is required.

The Compliance Unit has continued to review documentation to ensure compliance with BSCC regulations, which includes but is not limited to, justification for room confinement. Any documentation requiring additional clarification is immediately referred to the Compliance Unit Supervisor who follows up and provides training.

BSCC Corrective Action Plan
March 10, 2022
Page 3 of 3

The Probation Department has worked diligently to address the items of non-compliance outlined in our CAP dated December 10, 2021, and in the new items of non-compliance identified during the site visit and inspection at Central Juvenile Hall on February 3, 2022. To further address systematic issues and make sustainable enhancements to ensure compliance with Title 15 regulations, the Department plans to suspend the operations at our CJH for ninety (90) days to assist in facilitating leadership changes, training for staff and needed repairs to the facility. This brief suspension of operations will include moving our youth to Barry J. Nidorf Juvenile Hall to accomplish these changes and enhancements. During these ninety (90) days, the Department will maintain an Intake Unit for law enforcement agencies to book youth into custody, a Medical Unit to provide medical screening clearances and services, and a Court holding area for youth appearing at the Eastlake Juvenile Court facility. This Court holding area will also afford attorneys access to their clients before and after Court.

At the conclusion of the ninety (90) days, youth will be returned to CJH in a phased approach to ensure the safety and security of our youth, partners, and staff. Upon return to CJH, the Department will request that the BSCC return to conduct their inspection of CJH with the intent of successfully concluding this inspection cycle. During the week of March 14, 2022, we will expect that BSCC will be on-site to conduct the inspection of Barry J. Nidorf Juvenile Hall and subsequently each of our Camp facilities.

As indicated in our responses to the BSCC during this process, the Department continues to be committed to ensuring and maintaining compliance with Title 15 Regulations. Should you have any questions, please do not hesitate to contact my office or Chief Deputy Karen Fletcher at (562) 441-8043.

Sincerely,



Dr. Adolfo Gonzales
Chief Probation Officer

cc:

Honorable Eric C. Taylor, Presiding Judge Los Angeles County Superior Court
Honorable Akemi Arakaki, Presiding Judge of the Juvenile Court
Fesia Davenport, Chief Executive Officer, Los Angeles County
Celia Zavala, Executive Officer, Board of Supervisors
Rodrigo Castro-Silva, County Counsel, Los Angeles County
Wendelyn Julien, Executive Director, Probation Oversight Commission

ATTACHMENT 3

From: Karen L. Fletcher (Chief Deputy Probation) <KL Fletcher@probation.lacounty.gov>
Sent: Monday, March 14, 2022 11:19 PM
To: EDL-PROB CJH-Directors; EDL-PROB DSB-CJH-SrDSO; EDL-PROB DSB-CJH-Supervisors; EDL-PROB DSB-CJH-DSO; EDL-PROB DSB-CJH-GSN; EDL-PROB DSB-BJNJH-DSO; EDL-PROB DSB-BJNJH-GSN; EDL-PROB BJN-Directors; EDL-PROB DSB-BJNJH-SrDSO; EDL-PROB BJN-Supervisors
Cc: Mark Garcia (Probation); Scott Sanders; John Baima; Janice Jones (Probation); Albert Banuelos
Subject: Update - 90 Day Temporary Suspension of Operations

Dear Staff,

As we continue to transition into our 90-day temporary suspension of operations at Central Juvenile Hall, I want to thank you for your flexibility, patience and professionalism. As previously stated, the Department proposed this temporary suspension in order to ensure that we were in compliance with Title 15 Regulations at Central Juvenile Hall. Unfortunately, the timing of the transition was accelerated due to circumstances which were out of our immediate control. This unanticipated timeline required us to act quickly to get our youth and operation moved, so that no youth were in custody at Central effective today. While this continues to be a major adjustment for both youth and staff, please know that the Department is committed to returning to Central within the 90-day period. We will be working to address all outstanding areas of non-compliance, while making some facility repairs before returning to Central.

It is incredibly important that we work as one united team. The violence in our two juvenile halls, specifically assaults on staff, has significantly increased in both frequency and severity. While I was on-site at Barry J. on Saturday night, I witnessed first hand the defiance and uncontrolled conduct of the youth in Unit N/O. This is unacceptable. We are working on increased staffing levels, response teams, reviewing both the training and policies that impact your work, and the limitations often felt when attempting to intervene in situations that affect the safety and security of our institutions.

I am very grateful for the work you do each and every day as you serve some of the most vulnerable and challenging youth in Los Angeles County. I feel fortunate to work with you.

Take Care,
Karen

Karen L. Fletcher
Chief Deputy Probation Officer
Adult and Juvenile Services
Los Angeles County Probation Department
KL Fletcher@probation.lacounty.gov

ATTACHMENT 4

From: Karen L. Fletcher (Chief Deputy Probation) <KLFletcher@probation.lacounty.gov>
Sent: Friday, March 11, 2022 1:20 PM
To: EDL-PROB CJH-Directors; EDL-PROB DSB-CJH-DSO; EDL-PROB DSB-CJH-GSN; EDL-PROB DSB-CJH-SrDSO; EDL-PROB DSB-CJH-Supervisors
Cc: Bernardo Nieto; Mark Garcia (Probation); John Baima
Subject: Central Juvenile Hall

Dear Staff,

As you are aware, we have been working diligently to address the items of non-compliance at both of our juvenile hall facilities outlined in our BSCC Corrective Action Plan (CAP) dated December 10, 2021 and in the new items of non-compliance identified during a BSCC site visit and inspection at Central Juvenile Hall on February 3, 2022. A formal CAP was submitted to the BSCC yesterday outlining a plan of action to address the specific areas of non-compliance and other improvements to our current operation.

While we have demonstrated improvement in many of our practices, there is still work to be done. As a result, the Department will be temporarily suspending our operations at our Central Juvenile Hall for ninety (90) days to assist in facilitating the necessary changes to ensure compliance with Title 15 Regulations. This brief suspension of operations will include moving our youth to Barry J. Nidorf Juvenile Hall in order to accomplish these changes and enhancements. During these ninety (90) days, the Department will maintain an Intake Unit for law enforcement agencies to book youth into custody, a Medical Unit to provide medical screening clearances and services, and a Court holding area for youth appearing at the Eastlake Juvenile Court facility. This Court holding area will also afford attorneys continued access to their clients before and after Court.

At the conclusion of the ninety (90) days, youth will be returned to Central Juvenile Hall in a phased approach to ensure the safety and security of our youth, partners and staff. Upon return to Central Juvenile Hall, the Department will request that the BSCC return to conduct their inspection of the facility with the intent of successfully concluding this inspection cycle. During the week of March 14, 2022, the BSCC will be on-site to conduct the inspection of Barry J. Nidorf Juvenile Hall and then will proceed to inspect each of our Camp facilities.

The timing and logistics of the movement of youth to Barry J. Nidorf Juvenile Hall is currently being finalized. I will keep you updated on the timing and any other pertinent information.

Thank you for what you do each and every day to support the youth in our custody and care.

Take care,
Karen

Karen L. Fletcher
Chief Deputy Probation Officer
Adult and Juvenile Services
Los Angeles County Probation Department
KLFletcher@probation.lacounty.gov

ATTACHMENT 5



March 11, 2022

Dr. Adolfo Gonzales, Chief Probation Officer
Los Angeles County Probation Department
1601 Eastlake Avenue
Los Angeles, California 90033

Dear Chief Gonzales:

We are in receipt of your letter dated March 10, 2022, outlining the county's plan to temporarily remove youth from the Central Juvenile Hall for a period of 90 days.

As outlined in our December 12, 2021 and February 8, 2022 correspondence, the Los Angeles County Probation Department Central Juvenile Hall was required to remedy the following items of noncompliance no later than March 10, 2022:

Barry J. Nidorf Juvenile Hall

- § 1328, Safety Checks (based on October 15, 2021 notice of noncompliance)

Central Juvenile Hall

- § 1328, Safety Checks (based on October 15, 2021 notice of noncompliance)
- § 1354.5, Room Confinement (based on October 15, 2021 and February 8, 2022 notice of noncompliance)
- § 1371, Programs, Recreation, and Exercise (based on February 8, 2022 notice of noncompliance)

As you are aware, Field Representative Lisa Southwell was scheduled to conduct a reinspection of both Barry J. Nidorf and Central Juvenile Hall on March 14, 2022 to determine whether the items of noncompliance had been remedied by the March 10, 2022 deadline. If either facility remained out of compliance, the Board would then be required to make a determination of suitability at its April 7, 2022 board meeting pursuant to Welfare and Institutions Code section 209, subdivision (d).

In your correspondence, you have indicated that you plan to suspend operations at the Central Juvenile Hall facility to make leadership changes, conduct staff training, and make repairs to the facility. Youth will be moved to Barry J. Nidorf Juvenile Hall for a period of 90 days, but the department will maintain an intake unit, a medical unit, and a

court holding area at the Central Juvenile Hall. To the extent youth are no longer being housed at Central Juvenile Hall and it is no longer operating as a juvenile hall, we would agree that postponing the reinspection process would be appropriate. Under this plan, while Central Juvenile Hall's operations are suspended, we would expect that youth will not be detained longer than necessary to accomplish intake, medical screening, or court appearances (and under no circumstance overnight) and will be transported immediately offsite after those tasks are accomplished.

Based on your correspondence it is not clear when the Central Juvenile Hall will be vacated. As such, if youth remain housed at Central Juvenile Hall on March 14, 2022, Field Representative Southwell will begin the reinspection process of the facility as previously scheduled. In addition, please be advised that BSCC staff will also conduct both announced and unannounced inspections from March 14, 2022 through June 12, 2022 during this 90-day suspension of operations to verify that the facility is not operating as a juvenile hall. We will share the Probation Department's plan for suspension of operations with the BSCC Board at the April 7, 2022 meeting. If, however, youth remain housed at the Central Juvenile Hall and the facility remains out of compliance the above-reference regulations, the Board will make a determination of suitability at the April 7, 2022 meeting.

After the phased return of youth to the facility on June 12, 2022, the BSCC will return to conduct the reinspection of the Central Juvenile Hall for the above noted items of noncompliance. While we appreciate the need to suspend operations to implement a modified Corrective Action Plan, after reinspection, a determination of suitability of the Central Juvenile Hall will be made by the BSCC Board at its next regularly scheduled meeting following BSCC staff reinspection.

Sincerely,

A handwritten signature in blue ink, appearing to read "Allison Ganter". The signature is fluid and cursive, with a large loop at the end.

ALLISON GANTER
Deputy Director

cc:

Kathleen T. Howard, Executive Director
Aaron R. Maguire, General Counsel Allison Ganter, Deputy Director
Lisa Southwell, Field Representative, Board of State and Community Corrections
Honorable Eric C. Taylor, Presiding Judge Los Angeles County Superior Court
Honorable Akemi Arakaki, Presiding Judge of the Juvenile Court
Fesia Davenport, Chief Executive Officer, Los Angeles County
Celia Zavala, Executive Officer, Board of Supervisors
Rodrigo Castro-Silva, County Counsel, Los Angeles County
Wendelyn Julien, Executive Director, Probation Oversight Commission

ATTACHMENT 6

From: Southwell, Lisa@BSCC
Sent: Thursday, January 27, 2022 1:44 PM
To: Adolfo Gonzales <Adolfo.Gonzales@probation.lacounty.gov>
Subject: RE: 2020 2022 Title 15/24 Inspection

Thank you Chief. I look forward to seeing you as well.

From: Adolfo Gonzales <Adolfo.Gonzales@probation.lacounty.gov>
Sent: Thursday, January 27, 2022 3:02 PM
To: Southwell, Lisa@BSCC <Lisa.Southwell@bscc.ca.gov>; Karen L. Fletcher (Chief Deputy Probation) <KL.Fletcher@probation.lacounty.gov>; Mark Garcia (Probation) <MARK.Garcia@probation.lacounty.gov>; Jennifer Kaufman <JENNIFER.KAUFMAN@probation.lacounty.gov>; Janice Jones (Probation) <Janice.Jones@probation.lacounty.gov>; Scott Sanders <SCOTT.SANDERS@probation.lacounty.gov>; Bernardo Nieto <Alex.Nieto@probation.lacounty.gov>; Jocelyn Roman <JOCELYN.ROMAN@probation.lacounty.gov>; James Phelps <James.Phelps@probation.lacounty.gov>; Edie Thompson <EDIE.THOMPSON@probation.lacounty.gov>; Falawn Norwood <FALAWN.NORWOOD@probation.lacounty.gov>; Exinia Lavarreda <Exinia.Lavarreda@probation.lacounty.gov>; Lizet Barboza <lizet.barboza@probation.lacounty.gov>; Dana Carlos <dana.carlos@probation.lacounty.gov>; Neena Boelter <Neena.Boelter@probation.lacounty.gov>; Natalie Cortez <NATALIE.CORTEZ@probation.lacounty.gov>
Subject: RE: 2020 2022 Title 15/24 Inspection

Hi Lisa,

Thank you for this email and requests for materials and data. Our staff will coordinate your requests and meet your timeline.

Our staff has been working extremely hard to maintain the progress made over the last few months and will continue to support our youth and build upon the commitment we all share.

I look forward to seeing you once again.

Thanks again.

Adolfo

From: Southwell, Lisa@BSCC <Lisa.Southwell@bscc.ca.gov>
Sent: Thursday, January 27, 2022 5:01 AM
To: Adolfo Gonzales <Adolfo.Gonzales@probation.lacounty.gov>; Karen L. Fletcher (Chief Deputy Probation) <KL.Fletcher@probation.lacounty.gov>; Mark Garcia (Probation) <MARK.Garcia@probation.lacounty.gov>; Jennifer Kaufman <JENNIFER.KAUFMAN@probation.lacounty.gov>; Janice Jones (Probation) <Janice.Jones@probation.lacounty.gov>; Scott Sanders <SCOTT.SANDERS@probation.lacounty.gov>; Bernardo Nieto <Alex.Nieto@probation.lacounty.gov>; Jocelyn Roman <JOCELYN.ROMAN@probation.lacounty.gov>; James Phelps <James.Phelps@probation.lacounty.gov>; Edie Thompson <EDIE.THOMPSON@probation.lacounty.gov>; Falawn Norwood <FALAWN.NORWOOD@probation.lacounty.gov>; Exinia Lavarreda <Exinia.Lavarreda@probation.lacounty.gov>; Lizet Barboza <LIZET.BARBOZA@probation.lacounty.gov>; Dana Carlos <DANA.CARLOS@probation.lacounty.gov>; Neena Boelter <Neena.Boelter@probation.lacounty.gov>; Natalie Cortez <NATALIE.CORTEZ@probation.lacounty.gov>
Subject: 2020 2022 Title 15/24 Inspection

CAUTION: External Email. Proceed Responsibly.

Dear Chief Gonzales, Chief Deputy Fletcher, Bureau Chiefs, Senior Directors, Directors, BSCC Coordinators and Staff;

I hope this email finds you all well. Please see below for information regarding your 2020-2022 Inspection. Also, I wanted to let you know that I will be coming to LA next week, 1 week from today to be exact. I will be accompanied by my boss, Deputy Director Allison Ganter and colleague, Forest Coleman who is new to our agency. We will visit CJH and BJN. CJH will be on Thursday and BJN will be on Friday. I would like to meet with you all, and specifically, Mr. Nieto and Mr. Sanders as well as Ms. Roman and Mr. Phelps if available at 9am on each day respectively. Also, I will be asking that Ms. Thompson and Mr. Norwood walk us so that Allison and Forest can see the facilities and the operations. We will likely speak to a few youth while there. We understand the COVID status and do not wish to go into the quarantine units. Also, I would like to be able to view video remotely. I would like to discuss Is there a way to provide me with electronic files of your video for both facilities? Either dvd or thumb drive or download to one drive which you can provide me access to? I'm not sure the best way but I would like to have each unit burned for December 10, 2021 from 1pm to 9pm and ready to view.

I think that is about it for that piece.

Regarding the inspection, this email is to inform you that your 2020-2022 inspections have been scheduled. The dates for the 2020-2022 inspections have been provided to the DSB and RTSB leadership team for review and are as follows:

BJN JH and Central JH: March 14-April 1, 2022

Camp DKC: April 11-14, 2022

Camp Scott: April 15-16, 2022

Camp Kilpatrick: April 18-20, 2022

Camp Rockey: April 21-23, 2022

Camp Paige: April 25-27, 2022

Camp Afflerbaugh: April 28-30, 2022

The Board of State and Community Corrections (BSCC) is required to biennially inspect local juvenile detention facilities pursuant to Welfare and Institutions Code Section 209 and 885. A full Pre-Inspection Title 15 training was provided to numerous facility staff (managers and supervisors) in April 2020, followed by ongoing, pre inspection, technical assistance zoom meetings for training, technical assistance and pre inspection purposes over the course of the last year and lastly, a final pre inspection briefing will be held on January 31, 2022 to answer any last minute questions or concerns your staff may have at all facilities.

Please provide your agencies bureau specific policy and procedures to me no later than February 25, 2022. I also ask that you have prepared and returned to me by that same date with the P/P, is the specific cites that identify the specific policy sections to the regulation sections in which you are referring to for both DSB and RTSB. (See attached reporting form) I have discussed this request with your consultant staff previously and they understand the request and have already been provided with the form. If there are any questions, either you or your staff should contact me so that we may resolve any issues as soon as possible. This year, I am asking that in addition to the full manual, the policy documentation be placed in the appropriate audit file section as well. Please ensure that all policy and procedure is current and consistent to regulation. I am unable to assist in any significant corrections as has occurred in the past but will provide you with notice of the discrepancy as able and this will be need to be corrected by the conclusion of the onsite inspection to be considered compliant. If

this occurs, I ask that the corrected copy be highlighted to show the changes made. I will review your updated Policy and Procedures Manual, and will compare with Title 15 and then also with those policies and procedures with documentation to determine compliance with regulation. Any areas which are not in compliance, will be documented accordingly. It is imperative that if you have questions, these are asked prior to the inspection date.

In addition to the cite form, I have included your inspection worksheet. This document is a 5 section worksheet that provides me with information I will be using during your inspection. Please ensure that sections 1-4 are completed by the facility manager ***PRIOR*** to my arrival. Section 5 is the request for documentation. As we are still a ways out, I will provide the specific dates for the documentation to the consultant team as we get closer to the inspection. There are some dates noted that will allow for that documentation to be prepped and pulled and uploaded now. As of today, we are just a bit under 7 weeks out. Please note, this list is neither an inclusive nor an exhaustive list. I encourage and implore your managers to provide whatever documentation they wish to provide to prove proof of practice in the given regulation section. The burden to provide adequate proof of compliance with regulation is on the agency. The intent of documentation is to show compliance through proof of practice with regulation and with the agency policy and procedure. If there is something in addition to what I am asking for that you all feel would better show your compliance, by all means provide it to me. It is imperative you provide me with the best documentation that will show your compliance. I want you to be compliant on inspection day just as much as you want to be. Again, if you have questions, your staff need to ask before inspection, not the day of or during.

Each inspection will include site visits that include communications with youth, staff, and facility partners. I will also be reviewing cameras and will be asking for tape in advance. I will provide feedback to your team at each facility while onsite during my review as well as at the scheduled debrief. A formal debrief will occur for the Juvenile Halls on April 1, 2022 at 1pm. Location TBD. Please let me know where you would like to conduct the debrief. The Camp's debriefs will be held on the Monday following the prior week inspections. DKC and Scott will be held at Kilpatrick on April 18, 2022 at 12PM. Kilpatrick and Rockey will be held

at Paige on April 25, 2022 at 12PM. Lastly, Paige and Afflerbaugh will be held at either Paige/Afflerbaugh at 9 AM on May 2, 2022. Please advise if there are any scheduling conflicts for the debriefs. Please note that this schedule is subject to change due to COVID 19 etc. If this occurs, alternative arrangements after communicating with facility management will be made.

Please begin to upload what documentation you can to the inspection audit binders. If you would like to send the information another way, please contact me asap to make this arrangement. I encourage you all to keep a separate audit binder on your end as well. If you have any questions regarding this process, please contact me by email at lisa.southwell@bscc.ca.gov.

Lisa Southwell

Field Representative

BOARD OF STATE AND COMMUNITY CORRECTIONS

2590 Venture Oaks Way Suite 200, Sacramento CA 95833

<http://www.bscc.ca.gov>

Cell Phone: 916-838-9132

email: lisa.southwell@bscc.ca.gov

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Important: This e-mail message is intended for the exclusive use of the recipient(s) named above. It may contain information that is protected, privileged, or confidential, and it should not be disseminated, distributed, or copied to persons not authorized to receive such information. If you are not the intended recipient, any dissemination, distribution, or copying is strictly prohibited. If you think you have received this e-mail message in error, please notify the sender immediately.

ATTACHMENT 7

From: Southwell, Lisa@BSCC
Sent: Wednesday, February 23, 2022 3:51 PM
To: Gonzales, Adolfo (Probation) <Adolfo.Gonzales@sdcounty.ca.gov>
Cc: Karen L. Fletcher (Chief Deputy Probation <KL.Fletcher@probation.lacounty.gov>; Mark Garcia (Probation <MARK.Garcia@probation.lacounty.gov>; Jennifer Kaufman <JENNIFER.KAUFMAN@probation.lacounty.gov>; Janice Jones (Probation <Janice.Jones@probation.lacounty.gov>; Scott Sanders <SCOTT.SANDERS@probation.lacounty.gov>; Bernardo Nieto <Alex.Nieto@probation.lacounty.gov>; Jocelyn Roman <JOCELYN.ROMAN@probation.lacounty.gov>; James Phelps <James.Phelps@probation.lacounty.gov>; Edie Thompson <EDIE.THOMPSON@probation.lacounty.gov>; Falawn Norwood <FALAWN.NORWOOD@probation.lacounty.gov>; Exinia Lavarreda <Exinia.Lavarreda@probation.lacounty.gov>; Lizet Barboza <lizet.barboza@probation.lacounty.gov>; Dana Carlos <dana.carlos@probation.lacounty.gov>; Neena Boelter <Neena.Boelter@probation.lacounty.gov>; Natalie Cortez <NATALIE.CORTEZ@probation.lacounty.gov>
Subject: Dates for Documentation and Update

Hello Chief Gonzales and Chief Deputy Fletcher;
I hope this email finds you both well. I wanted to touch base with you regarding the upcoming corrective action follow up and Title 15 Inspection.

With regard to the Juvenile Halls, I will not be completing the 2020-2022 Title 15 inspection on the dates previously assigned as I will be focusing only on the areas noted in the corrective action documents as I believe it is imperative to concentrate all my efforts in these areas at this time. I will be providing you with additional dates for the full Juvenile Hall Title 15 inspections at a later date. I will however, still be on site on the dates previously provided.

For the camps, I will move forward as scheduled with the dates as planned and inspect the camps on the dates as previously provided. Below is the notice of documentation to have ready but as noted below it is on the agency to provide proof of practice to show compliance. If you have more, please provide. As noted, the below shows the dates requested. If your staff have any questions, please have them reach out immediately. I am currently out of state, but am available and all have access to me and have my contact information. I will also be returning tomorrow and am still working and for the most part except for airtime, will be available.

If you or Ms. Fletcher have any questions, concerns etc, please also reach out.

For the Halls
I will provide by separate cover exactly what I need in the coming week for the corrective action. The below is specific to the Title 15 inspection for the camps.

Section V. (CAMPS)

DOCUMENTATION AND TO DO ITEMS IN PREPARATION FOR INSPECTION OF JUVENILE DETENTION FACILITIES

NOTE:

1. THE FOLLOWING IS A LIST OF DOCUMENTATION REQUIRED AND OTHER "TO DO" ITEMS TO COMPLETE IN PREPARATION FOR YOUR INSPECTION. IT IS THE EXPECTATION THAT **YOU** PROVIDE WHATEVER DOCUMENTS OR PROOF OF PRACTICE **YOU** DEEM NECESSARY TO SHOW

COMPLIANCE. THIS IS A GUIDE AND A LIST BUT BY NO MEANS INCLUSIVE OR EXHAUSTIVE. FEEL FREE TO ADD TO IT AND PROVIDE ADDITIONAL DOCUMENTATION.

2. ALL DOCUMENTATION SHOULD BE UPLOADED INTO THE ONE DRIVE FILES. PLEASE KEEP AN AUDIT FILE FOR YOUR AGENCY FOR PROPER RECORD KEEPING.

Title 15 Section	Items required based on regulation
1313	<p>County Inspection and Evaluation of Building and Grounds: These are to occur on the calendar year, not fiscal year except as noted below. Please provide for each year of the cycle as appropriate and as noted: 2020, 2021 or 2022</p> <ul style="list-style-type: none"> • Building Inspection • Health Inspections <ul style="list-style-type: none"> ◦ Environmental Health ◦ Nutritional Health ◦ Medical/Mental Health Services • Education (Title 15, § 1370) • Juvenile Court (WIC 209)**Not statutorily mandated for camps • Juvenile Justice Commission (WIC 229) or Probation Commission (WIC 240) • Fire Inspection (HSC 13146.1; Title 15, Section 1325) **Fire may be completed every 2 years <p><i>Please also provide the status of responses to any areas of noncompliance.</i></p>
1320	<p>Appointment and Qualifications</p> <ul style="list-style-type: none"> • Requires CPO certification letter to include the following: <ul style="list-style-type: none"> • Civil service or merit system rules • Medical and physical evaluation • PC 6035 standards met • Criminal records check and psychological evaluation • Contract personnel, volunteers and other non-employees have all clearances, appropriate qualifications, and approvals to be in the facilities. <p>Please provide a letter for each year of the cycle as appropriate: 2020, 2021 or 2022</p>
1321	<p>Staffing</p> <p>Please provide all:</p> <ul style="list-style-type: none"> • Authorized positions/vacancies at the time of inspection <ul style="list-style-type: none"> ◦ Management/Administrators/ Supervisors ◦ Child supervision staff including any extra help positions ◦ Support staff • Provide documentation of staff on long term absences/short term absences or other status's that remove staff from child supervision. • Have staffing levels available for each unit and each shift. Submit Facility schedules as requested and the Facility Information Worksheet for this section. *** Please provide staffing numbers from the 7 days before the inspection. Include any out of building or any other documentation, ie supervisor reports, logs etc to show how staff were used, diverted etc. please ensure that someone is available to discuss full facility staffing. • Identify who oversees the facility if there is a watch or an OD etc. Are there other supervisors on duty, who/what they are responsible for? Include numbers etc to show sufficient supervision. • Provide documentation specific to the facility that will show compliance with ratios AND

	<p>that there is an adequate number of personnel on shift to carry out the overall facility operations and per the language of the regulation.</p>
1322	<p>Youth Supervision Orientation and Training</p> <ul style="list-style-type: none"> • Please have available staff training files to show facility specific training in areas required by the regulations. Include a list of any non-CORE'd staff*** • Have available, the last 5 staff (your newest staff) training files for my review including their facility specific training sign offs
1324	<p>Policy and Procedure Manual</p> <ul style="list-style-type: none"> • Conduct the self-audit of your manual to ensure policies are updated based on regulation language and intent and your procedures are current to regulation and legislation for all sections under 1324 and all T15 regulatory requirements. I will not be available for assistance with corrections. • Please forward your current P&P to me by e-mail prior to the inspection by the date as requested. • Have the manual available during the on-site inspection if possible. • Please ensure your Health Care Manual (developed by your provider) is current and available during the on-site inspection. • If the Food Service Manual is separate from the facility manual, please have it available. (ensure it also is current) Also, if your agency does not prepare food at your location, please provide the manual from the agency that prepares the food. • Provide proof of initial orientation, including safety and security issues and anti-discrimination policies, for support staff, contract employees, school, mental/behavioral health and medical staff, program providers and volunteers;
1325	<p>Fire and Life Safety Please include the:</p> <ul style="list-style-type: none"> • Plan must be detailed in policy manual • Monthly fire and life safety inspections for full 2020-2022 cycle <ul style="list-style-type: none"> ◦ Some facilities do daily or weekly inspections. Please have whatever inspections you conduct available for review. • Evacuation plan and alternative housing plans. • Documentation of fire drills for full 2020-2022 cycle • Fire suppression pre-plan as developed in partnership with the local fire agency responsible for emergency service to the facility.
1326	<p>Security Review</p> <ul style="list-style-type: none"> • Facility administrator shall develop policies and procedures to annually review, evaluate and document security of the facility. Please provide proof of annual review. <p>Can be in any format you choose. (Tip: Memo format is an easy process) Please provide a letter for each year of the cycle as appropriate: 2020 and 2021 and possibly 2022.</p>
1327	<p>Emergency Procedures</p> <ul style="list-style-type: none"> • Please provide example of how staff annually review emergency procedures. Please provided documentation of this review for all facility staff who have child supervision responsibilities. <p>Can be in any format you choose. (Tip: Memo format is an easy process) Please provide for each year of the cycle as appropriate: 2020 and 2021 and possibly 2022.</p>
1328	<p>Safety Checks</p> <ul style="list-style-type: none"> • Please have records of safety checks since the last inspection cycle available for review. ***

	Please provide written safety check records for the dates of February 9-23, 2022.
1329	<p>Suicide Prevention Plan</p> <ul style="list-style-type: none"> • Staff who complete intakes shall be trained... Provide documentation of the staff who complete the intakes have been trained and provide proof of this training. • Please provide blank/completed forms and documentation to show proof of practice for all areas in this regulation as appropriate. Please provide them for December 2021-January 2022 <p>Tip: Remember, this is not just for Suicide, this is inclusive for suicide prevention...risk, referrals, monitoring, safety, attempts, suicide, debriefing etc.</p>
1340	<p>Reporting of Legal Actions</p> <ul style="list-style-type: none"> • If there has been a legal action filed against a person or legal entity responsible for the juvenile facility operation, please provide a copy of the notification provided to the Board.
1341	<p>Death and Serious Illness or Injury of a Youth While Detained</p> <ul style="list-style-type: none"> • If there has been a death or serious injury of a youth while detained, please provide documentation that shows all aspects of regulation have been followed: ie. Proper Notifications and Reporting and Medical and Operation Review
1342	<p>Population Accounting</p> <ul style="list-style-type: none"> • How do you keep track of youth? Unless you use a computer program, please have documentation available. Please provide your current reporters contact information so that we may update our records. • Juvenile Detention Profile Survey reporting current with BSCC?
1350	<p>Admittance Procedures</p> <ul style="list-style-type: none"> • Please provide blank/completed reports/screening forms/documents used or required upon admission, especially those used to inquire about medical conditions and communicable diseases and documentation to show proof of practice for all admission tasks required at admission as appropriate. Please provide them for January and February 2022. (Please contact me to notify me if you have more than 15 total admissions between the two months) • Also provide a copy of your detention criteria form.
1350.5	<p>Screening for the risk of Sexual Assault</p> <ul style="list-style-type: none"> • Please provide blank/completed reports/screening forms required upon admission to address this regulation and documentation to show proof of practice for all areas as appropriate. Please provide them for January and February 2022. (Please contact me to notify me if you have more than 15 total admissions between the two months)
1351	<p>Release</p> <ul style="list-style-type: none"> • Please provide documentation to show proof of practice for sections a-f as appropriate. *** • Please provide documentation to show proof of practice for post-disposition youth to coordinate the provision of transitional and reentry services as required by this section as appropriate. *** <p>Please provide them for January and February 2022. (Please contact me to notify me if you have more than 15 total admissions between the two months)</p>
1352	<p>Classification</p> <ul style="list-style-type: none"> • Please have available blank and completed classification screening forms used during intake. *** • Please have available blank and completed forms used to review previously classified minors (periodic reviews). *** <p>Please provide them for January and February 2022. (Please contact me to notify me if you have more than 15 total admissions between the two months)</p>

1352.5	<p>Transgender and Intersex Youth</p> <ul style="list-style-type: none"> • Please have available the reports/screening forms required to assess how this regulation is operational in the facility upon admission. *** <p>Please provide them for January and February 2022. (Please contact me to notify me if you have more than 15 total admissions between the two months)</p>
1353	<p>Orientation</p> <ul style="list-style-type: none"> • Please provide Orientation handbook and any other information facility staff provide to the youth at orientation, including proof ie. signature pages signed by youth that they understand the Youth Handbook. Please provide them for January and February 2022. (Please contact me to notify me if you have more than 15 total admissions between the two months) <p>Tip: Orientation must be both Verbal and written. What else do you do?</p>
1354	<p>Separation- in cases of separation</p> <ul style="list-style-type: none"> • Please provide incident report or other documentation as to why the youth was separated pursuant to agency policy. *** • Provide documentation that youth participated in general program except for programs that would be contrary to their separation. • Documentation should show the required daily review or review according to policy. <p>Please provide them for January and February 2022. (Please contact me to notify me if you have more than 15 total admissions between the two months)</p>
1354.5	<p>Room Confinement</p> <ul style="list-style-type: none"> • Please provide incident report(s) and all room confinement documentation with mental health input (as appropriate), as well as due process documentation (as appropriate). <p>Please provide them for January and February 2022. (Please contact me to notify me if you have more than 15 total admissions between the two months)</p>
1355	<p>Institutional Assessment and Plan</p> <ul style="list-style-type: none"> • Assessment is based on information collected at admission process. Pls provide documentation/proof of practice. How is this completed? • Show all areas are compliant with regulation. • Be able to show how the IAP is related to regulation requirement that IAP includes information gathered at intake/admission, including history of trauma, and identified family strengths and needs. • Documentation of periodic evaluation of progress and review with youth. • Documentation of transition plan and if possible, with input from family. • Please provide blank/completed forms and documentation to show proof of practice for all areas as appropriate. <p>Please provide them for January and February 2022. (Please contact me to notify me if you have more than 15 total admissions between the two months)</p>
1356	<p>Counseling and Casework Services</p> <ul style="list-style-type: none"> • Staff and youth interviews. Be prepared to discuss as part of interviews. (Communicating and accessing resources to meet the youth needs).
1357	<p>Use of Force</p> <ul style="list-style-type: none"> • Please provide incident reports involving the use of force and follow-up documentation. • Ensure that all areas of regulation that apply are addressed in the incident report including decontamination and debriefing. <p>Please provide them for January and February 2022.</p>
	<p>Use of Physical Restraints</p> <ul style="list-style-type: none"> • Please provide incident reports involving restraint placements. Ensure that all areas of regulation are addressed and provide documentation to show proof of practice for all

1358	<p>Use of Physical Restraints</p> <ul style="list-style-type: none"> • Please provide incident reports involving restraint placements. Ensure that all areas of regulation are addressed and provide documentation to show proof of practice for all areas as appropriate. Please have medical and mental health pull their files on the same incidents for a joint review. <p>Please provide them for January and February 2022.</p>
	<p>Use of Restraint Devices for Movement and Transportation within the Facility.</p> <ul style="list-style-type: none"> • Please provide incident reports or any other documentation to show proof of practice where restraints were used when moving a youth within the facility. *** • This will naturally be in a use of force.. no need to provide separately. <p>Please provide them for January and February 2022.</p>
1359	<p>Safety Room Procedures</p> <ul style="list-style-type: none"> • Please have incident reports resulting in safety room placements available for review. Please ask medical and mental health to pull their files on the same incidents for a joint review. Please provide them for January and February 2022 <p>If you physically have a safety room but staff are not to use it, your policy should say that. Your policy should be consistent with your practice.</p>
1360	<p>Searches</p> <ul style="list-style-type: none"> • Please provide a copy of facility search logs or other documentation. This includes facility searches, searches of youth and visitors. Please provide them for January and February 2022. •
1361	<p>Grievance Procedure</p> <ul style="list-style-type: none"> • Please provide a log of grievances submitted and responses for review. If the grievance was related to an incident, provide accompanying incident report. Please include samples which used the administrator appeal process available at the facility. Please provide them for January and February 2022.
1362	<p>Reporting of Incidents</p> <ul style="list-style-type: none"> • Please have a sampling of informational incident reports available for review. <p>Please provide all non-regulatory incident reports for January and February 2022.</p>
1370	<p>Education Program</p> <ul style="list-style-type: none"> • Please provide a copy of the annual certification letter for 2020, 2021 or 2022 as appropriate. • See item number 1 (Section 1313) requiring completion of Education Checklist by a qualified outside agency or individual. • Please provide a class schedule including subjects, frequency of classes, locations, class sizes and numbers of teachers.
1371	<p>Programs, Recreation and Exercise</p> <ul style="list-style-type: none"> • Please provide documentation to show proof of practice for all regulatory requirements including written annual review for all programs, recreation and exercise activities by responsible agency and daily access to each required activity. Please provide them for February 2022.
1372	<p>Religious Program</p> <ul style="list-style-type: none"> • Please provide documentation to show proof of practice and the availability of religious services and practices including clergy and diet. <p>Please provide proof of practice for religious services from January and February 2022</p>
1373	<p>Work Programs</p> <ul style="list-style-type: none"> • Please provide a list of work programs available.

1358.5	<p>Use of Restraint Devices for Movement and Transportation within the Facility.</p> <ul style="list-style-type: none"> • Please provide incident reports or any other documentation to show proof of practice where restraints were used when moving a youth within the facility. *** • This will naturally be in a use of force.. no need to provide separately. <p>Please provide them for January and February 2022.</p>
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1373	<p>Work Programs</p> <ul style="list-style-type: none"> • Please provide a list of work programs available.
1374	<p>Visiting</p> <ul style="list-style-type: none"> • Please provide a copy of the visiting schedule and who is allowed to visit and when. • Provide visiting logs Please provide logs for January and February 2022
1390-1391	<p>Discipline and Discipline Process</p> <p>Please provide documentation for proof of practice of disciplinary actions including both minor and major rule violations. Please include samples that used the appeal process available at</p>

	the facility. Please provide them for January and February 2022.
General	Facility Schedule Please provide them for January and February 2022. <ul style="list-style-type: none"> Please provide a general facility schedule.
New This Cycle	
1410	Management of Communicable Diseases <ul style="list-style-type: none"> Please provide documentation to show proof of practices of COVID 19 policy and procedure for the following: <p>*Intake health screening procedures *Identification of relevant symptoms *Referral for medical evaluation*Treatment responsibilities during detention. *Coordination with public and private community-based resources for follow-up treatment; *Applicable reporting requirements; and, *Strategies for handling disease outbreaks. Please provide 1 week from January 2022 and 1 week from February 2022.</p>
1433	Requests for Health Care Services (Excerpt) <ul style="list-style-type: none"> Please provide blank and completed documentation of requests for emergency and non-emergency medical/ dental and mental health care. Please provide 2 weeks from January 2022 and 2 weeks from February.
1482	Clothing Exchange <ul style="list-style-type: none"> Please provide documentation of clothing exchange to show proof of practice. Please provide from January 2021.
1484	Issue of Personal Care Items <ul style="list-style-type: none"> Please provide documentation of the provision of personal care items to show proof of practice. Please provide from January 2021.
1486	Personal Hygiene <ul style="list-style-type: none"> Please provide documentation that shows opportunity for personal hygiene per regulation Please provide from January 2021.
1487	Shaving <ul style="list-style-type: none"> Please provide documentation that shows opportunity for shaving per regulation Please provide from January 2021.
1488	Hair Care Services (Excerpt) <ul style="list-style-type: none"> Please provide documentation that shows opportunity for personal hygiene per regulation Please provide from January 2021.
1501	Bedding Linen Exchange Please provide from January 2021. <ul style="list-style-type: none"> Please provide documentation that shows opportunity for bed linen exchange per regulation
1510	Facility Sanitation, Safety and Maintenance Please provide from January 2021. <ul style="list-style-type: none"> Please provide documentation of all required cleaning schedules.

ATTACHMENT 8



February 8, 2022

Dr. Adolfo Gonzales, Chief Probation Officer
Los Angeles County Probation Department
1601 Eastlake Avenue
Los Angeles CA 90033

Notice of Noncompliance at the Los Angeles County Probation Department Central Juvenile Hall: Welfare and Institutions Code section 209

Dear Chief Gonzales:

On February 3, 2022, BSCC staff conducted a site visit and inspection at Los Angeles County Central Juvenile Hall.

While in the Central Juvenile Hall Hope Center, BSCC staff identified a youth who indicated that they had been placed in the Hope Center for 11 days, had not been receiving exercise or recreation outside of their room, and had not tested positive for COVID-19. Subsequent information received from county staff indicated that the youth was in quarantine on 1/23/2022, erroneously placed into medical isolation on 1/28/2022 until 2/2/2022, and placed on quarantine on 2/2/2022 before being removed from the Hope Center on 2/3/2022 at approximately 2:00PM.

Based upon our review of the information related to this incident, the following items of noncompliance were identified:

Title 15, Section 1354.5 Room Confinement. This regulation requires that youth are not placed on room confinement for specific reasons to include, punishment, coercion, convenience, or retaliation. The regulation states that youth may be placed on room confinement for up to four hours if staff take specific action and create a plan to return the youth to general population in consultation with mental health or medical staff.

Title 15, Section 1371, Programs, Recreation, and Exercise. This regulation requires that facility managers minimize the amount of time youth are in their room, and that each youth receive time each day for programming, access to unscheduled activities (recreation), and opportunity for one hour of large muscle exercise.

Upon review of available documentation, it appears as though the youth had been erroneously and unnecessarily placed on medical isolation in a room in the Hope Center between 1/28/22 and 2/2/22 without access to programming, exercise, and recreation outside of the room. Probation staff reported to the BSCC that this was due to an error by Juvenile Court Health Services (JCHS). Probation staff followed JCHS guidelines (last updated 11/24/21) and kept the youth in their room according to JCHS guidelines for medical isolation.

2/8/22
Dr. Gonzales
Page 2

Once the error was discovered, the youth was placed on "quarantine" from 2/2/22 through 2/4/22. According to Title 15 Programming sheets, the youth did not leave their room between 4:30 PM on 2/2/22 and approximately 2:00 PM on 2/3/22, when they were released from the Hope Center. During this time, the youth was placed on room confinement in violation of Title 15 section 1354.5, Room Confinement and without access to required activities outlined in Title 15 section 1371, Programs, Recreation, and Exercise.

Corrective Action Plan

Given the serious nature of the items of noncompliance, we recommend that you submit a corrective action plan as described in Welfare and Institutions Code section 209, subdivision (d), as soon as possible, but no later than March 10, 2022, outlining how the Central Juvenile Hall plans to correct the above issues of noncompliance. Given the concurrent 90-day deadline for remediation identified in the county's December 10, 2021 corrective action plan, our intent is to reinspect for compliance with both corrective action plans prior to the Board's April 7, 2022 board meeting. If you have any questions or concerns with this schedule, please contact me at allison.ganter@bscc.ca.gov.

Sincerely,

**Allison E.
Ganter**

Allison Ganter, Deputy Director
Facilities Standards and Operations Division

Digitally signed by Allison E.
Ganter
Date: 2022.02.08 18:32:08
-08'00'

cc:

Karen Fletcher, Chief Deputy Probation Officer, Los Angeles County Probation
Department
Lisa Southwell, Field Representative, BSCC

ATTACHMENT 9

MEETING DATE: September 16, 2021

**SPECIAL ORDER OF
BUSINESS**

TO: BSCC Chair and Members

FROM: Allison Ganter, Deputy Director, Allison.Ganter@bscc.ca.gov
Lisa Southwell, Field Representative, Lisa.Southwell@bscc.ca.gov
Aaron Maguire, General Counsel, Aaron.Maguire@bscc.ca.gov

SUBJECT: Determination of Suitability –
Barry J. Nidorf Juvenile Hall, Los Angeles County
Central Juvenile Hall, Los Angeles County **Requesting Approval**

Summary

This agenda item requests the Board to make a determination of suitability within the meaning of Welfare and Institutions Code section 209, subdivision (d) for the Barry J. Nidorf Juvenile Hall and the Central Juvenile Hall in the County of Los Angeles.

Background

The Board of State and Community Corrections (BSCC) establishes the minimum standards for juvenile halls and camps and conducts biennial inspections of those facilities. (Welf. & Inst. Code, §§ 209, 210, & 885.) Regulations setting forth these minimum standards can be found in Sections 1300-1511 of Title 15 of the California Code of Regulations.

Welfare and Institutions Code section 209, subdivision (d), provides:

Except as provided in subdivision (e), a juvenile hall, special purpose juvenile hall, law enforcement facility, or jail shall be unsuitable for the confinement of minors if it is not in compliance with one or more of the minimum standards for juvenile facilities adopted by the Board of State and Community Corrections under Section 210 or 210.2, and if, within 60 days of having received notice of noncompliance from the board or the judge of the juvenile court, the juvenile hall, special purpose juvenile hall, law enforcement facility, or jail has failed to file an approved corrective action plan with the Board of State and Community Corrections to correct the condition or conditions of noncompliance of which it has been notified. The corrective action plan shall outline how the juvenile hall, special purpose juvenile hall, law enforcement facility, or jail plans to correct the issue of noncompliance and give a reasonable timeframe, not to exceed 90 days, for resolution, that the board shall either approve or deny. In the event the juvenile hall, special purpose juvenile hall, law enforcement facility, or jail fails to meet its commitment to resolve noncompliance issues outlined in its corrective action

plan, the board shall make a determination of suitability at its next scheduled meeting.

Summary of 2018-2020 Biennial Inspection

On February 11, 2021, following the inspection of Los Angeles County's juvenile facilities, the BSCC notified Los Angeles County's probation department of several items of noncompliance with the Board's regulations. A copy of the inspection report can be found here:

https://drive.google.com/drive/folders/1Vae3aoCNKm461_osebBmHFnsb055Do4M

Pursuant to Welfare and Institutions Code section 209, the agency was required to submit a corrective action plan (CAP) to the BSCC within 60 days or by April 12, 2021.

On April 12, 2021, the BSCC received the agency's corrective action plan. This corrective action plan required the agency to outline how they intended to correct the issues of noncompliance and to come into compliance within a reasonable timeframe, not to exceed 90 days or by July 11, 2021. (Welf. & Inst. Code, § 209, subd. (d).) As of July 12, 2021, and following a series of site visits to the facilities to review progress on the corrective action plan, the agency remained out of compliance with the regulations indicated below. On August 19, 2021, the BSCC notified the County of Los Angeles that the Board would make a determination of suitability at its next scheduled board meeting as required by Welfare and Institutions Code section 209, subdivision (d). (Attachment 1.) As of the date of the notification, the county's juvenile halls remained out of compliance with the following Title 15 regulations¹:

Barry J. Nidorf Juvenile Hall

- § 1313, County Inspection and Evaluation of Building and Grounds
- § 1352, Classification
- § 1353, Orientation
- § 1354.5, Room Confinement
- § 1355, Institutional Assessment and Plan
- § 1358.5, Use of Restraint Devices for Movement and Transportation within the Facility
- § 1371, Programs, Recreation, and Exercise

Central Juvenile Hall

- § 1313, County Inspection and Evaluation of Building and Grounds
- § 1321, Staffing
- § 1352, Classification
- § 1354.5, Room Confinement
- § 1355, Institutional Assessment and Plan
- § 1358.5, Use of Restraint Devices for Movement and Transportation within the Facility
- § 1371, Programs, Recreation, and Exercise

¹ The underlying factual bases for these items of noncompliance are provided in Attachment 1.

In addition, staff was unable to make a final determination of compliance for section 1358, Use of Restraints, at the Barry J. Nidorf facility at the time of the notification. The agency updated its policy and trained staff to comply with this regulation; however, no documentation of use of restraints was available for the timeframe after correction to present.

On September 2, 2021, the BSCC received a letter from Los Angeles County Chief Probation Officer Adolfo Gonzales, responding to the Board's notice of suitability determination. (Attachment 2.)

On September 13, 2021, BSCC staff will conduct a further inspection of Barry J. Nidorf and Central Juvenile Hall to determine the status of the above-referenced regulations. A supplemental report will be posted online prior to the September 16, 2021 Board meeting.

Recommendation/Action Needed

Staff recommends that the Board:

1. Make a determination of suitability within the meaning of Welfare and Institutions Code section 209, subdivision (d), for the following facilities:
 - a. Barry J. Nidorf, Los Angeles County
 - b. Central Juvenile Hall, Los Angeles County

Attachments

[1: August 19, 2021 Notice to Los Angeles County](#)

[2: September 2, 2021 Response from Los Angeles County](#)

ATTACHMENT 10



LINDA M. PENNER
Chair

KATHLEEN T. HOWARD
Executive Director

STATE OF CALIFORNIA

BOARD OF STATE AND COMMUNITY CORRECTIONS

2590 VENTURE OAKS WAY, SUITE 200 • SACRAMENTO CA 95833 • 916.445.5073 • BSCC.CA.GOV



EDMUND G. BROWN, JR.
Governor

October 1, 2021

Dr. Adolfo Gonzales
Chief Probation Officer
Los Angeles County Probation Department
1601 Eastlake Avenue
Los Angeles, California 90033

***** NOTICE OF FACILITY UNSUITABILITY***
Barry J. Nidorf and Central Juvenile Halls
Welf. & Inst. Code, § 209, subs. (a)(4) & (d)**

SENT VIA ELECTRONIC EMAIL AND VIA UNITED STATES POSTAL SERVICE

Dear Chief Gonzales:

This letter is to provide you with written notice and findings that on September 16, 2021, the California Board of State and Community Corrections determined that the **Barry J. Nidorf Juvenile Hall** and the **Los Angeles County Central Juvenile Hall** are not suitable for the confinement of minors pursuant to Welfare and Institutions Code section 209, subdivisions (a)(4) and (d).

A facility is considered "unsuitable for the confinement of minors if it is not in compliance with one or more of the minimum standards for juvenile facilities adopted by the Board of State and Community Corrections..." (Welf. & Inst. Code, § 209, subd. (d).) For each of the minimum standards listed below, the Board of State and Community Corrections found the county facility to be "not in compliance" with the standard.

Please note that pursuant to Welfare and Institutions Code section 209, subdivision (a)(4), commencing **60 days** following this notice or by **November 30, 2021** the facilities shall not be used for the confinement of minors until the Board finds, after reinspection of the facilities, that the conditions that rendered the facility unsuitable have been remedied, and the facility is a suitable place for confinement of minors. The Board will consider whether the items of noncompliance have been remedied at its next scheduled board meeting on **November 18, 2021**. Please contact BSCC Field Representative Lisa Southwell at your convenience to schedule a reinspection, which we recommend should occur no later than November 12, 2021.

Items of Noncompliance

Barry J. Nidorf

§ 1402. Scope of Health Care

Regulation: When health services are delivered within the juvenile facility, staff, space, equipment, supplies, materials, and resource manuals shall be adequate to the level of care provided. (Cal. Code Regs., tit., 15 § 1402, subd. (b).)

Findings: Based on 8/31/2021 Addendum to Medical/Mental Health Evaluation (attached). Real time medication documentation remains as a deficiency. Psychotropic PMA status record remains as a deficiency.

§ 1432. Health Assessment

Regulation: The health assessment shall be completed within 96 hours of admission, excluding holidays, to the facility and result in a compilation of identified problems to be considered in classification, treatment, and the multi-disciplinary management of the youth while in custody and in pre-release planning. It shall be conducted in a location that protects the privacy of the youth and conducted by a physician, or other licensed or certified health professional working within his/her scope of practice and under the direction of a physician. (Cal. Code Regs., tit., 15 § 1432, subd. (a).)

Findings: Based on 8/31/2021 Addendum to Medical/Mental Health Evaluation (attached). Health appraisals were still exceeding the 96 hours requirement.

§ 1434. Consent and Refusal for Health Care

Regulation: All immunizations, examinations, treatments, and procedures requiring verbal or written informed consent in the community also require that consent for confined youth. (Cal. Code Regs., tit., 15 § 1434, subd. (a).)

Findings: General consents are generally not available in the Probation Electronic Medical Record System (PEMRS) immediately upon incarceration.

§ 1438. Pharmaceutical Management

Regulation: For all juvenile facilities, the health administrator, in consultation with a pharmacist and in cooperation with the facility administrator, shall develop and implement written policy, establish procedures, and provide space and accessories for the secure storage, controlled administration, and disposal of all legally obtained drugs. Such policies, procedures, space and accessories shall include, but not be limited to, documenting that prescribed medications have or have not been administered, by whom, and if not, for what reason. (Cal. Code Regs., tit., 15 § 1438, subd. (a)(5).)

Findings: Administration and delivery of medications were not consistently documented and missed medications have been noted as a systemic issue by the local health officer.

§ 1439. Psychotropic Medications

Regulation: Psychotropic medications shall not be administered to a youth absent an emergency unless informed consent has been given by the legally authorized person or entity. (Cal. Code Regs., tit., 15 § 1439, subd. (b).)

Findings: Consent for use of psychotropic medication is not being documented accurately for use of psychotropic medication, which remains deficient.

Central Juvenile Hall

§ 1402. Scope of Health Care

Regulation: When health services are delivered within the juvenile facility, staff, space, equipment, supplies, materials, and resource manuals shall be adequate to the level of care provided. (Cal. Code Regs., tit., 15 § 1402, subd. (b).)

Findings: Based on 8/31/2021 Addendum to Medical/Mental Health Evaluation (attached). Real time medication documentation remains as a deficiency. Psychotropic PMA status record remains as a deficiency.

§ 1432. Health Assessment

Regulation: The health assessment shall be completed within 96 hours of admission, excluding holidays, to the facility and result in a compilation of identified problems to be considered in classification, treatment, and the multi-disciplinary management of the youth while in custody and in pre-release planning. It shall be conducted in a location that protects the privacy of the youth and conducted by a physician, or other licensed or certified health professional working within his/her scope of practice and under the direction of a physician. (Cal. Code Regs., tit., 15 § 1432, subd. (a).)

Findings: Based on 8/31/2021 Addendum to Medical/Mental Health Evaluation (attached). Health appraisals were still exceeding the 96 hours requirement.

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Findings: Administration and delivery of medications were not consistently documented and missed medications have been noted as a systemic issue by the local health officer.

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Regulation: Psychotropic medications shall not be administered to a youth absent an emergency unless informed consent has been given by the legally authorized person or entity. (Cal. Code Regs., tit., 15 § 1439, subd. (b).)

Findings: Consent for use of psychotropic medication is not being documented accurately for use of psychotropic medication, which remains deficient.

§ 1354.5. Room Confinement

Regulation: Room confinement shall not be used for the purposes of punishment, coercion, convenience, or retaliation by staff. (B) Develop an individualized plan that includes the goals and objectives to be met

in order to integrate the youth to general population.

§ 1358.5. Use of Restraint Devices for Movement and Transportation within the Facility

Issue: An individual assessment of the need to apply restraints for movement or transportation that includes consideration of less restrictive alternatives, consideration of a youth's known medical or mental health conditions, trauma informed approaches, and a process for documentation and supervisor review and approval. (Cal. Code Regs., tit., 15 § 1358.5, subd. (c).)

Findings: BSCC staff reviewed incident reports in which restraints were used for movement within the facility between the dates of 08/20/2021 and 9/10/2021. The documentation reviewed does not contain the specific detail for BSCC staff to identify regulatory requirements. Facility staff must consider the youth's known medical or mental health issues and consider trauma informed approaches before placing them in restraints for movement or transportation; this intent is not captured in the documentation.

Sincerely,



LINDA PENNER

Chair

cc:

All BSCC Board Members

Kathleen T. Howard, Executive Director

Aaron R. Maguire, General Counsel

Allison Ganter, Deputy Director

Lisa Southwell, Field Representative, Board of State and Community Corrections

Honorable Eric C. Taylor, Presiding Judge Los Angeles County Superior Court

Honorable Akemi Arakaki, Presiding Judge of the Juvenile Court

Los Angeles County Board of Supervisors

Fesia Davenport, Chief Executive Officer, Los Angeles County

Rodrigo Castro-Silva, County Counsel, Los Angeles County

Christina R. Ghaly, Director, Department of Health Services, Los Angeles County

Jonathan E. Sherin, Director, Department of Mental Health, Los Angeles County

Barbara Ferrer, Director, Department of Public Health, Los Angeles County

Sheila Williams, Senior Manager, Chief Executive Office, Los Angeles County

Wendelyn Julien, Executive Director, Probation Oversight Commission Justice Deputies

Attachments:

Barry J. Nidorf Medical/Mental Health Evaluation

Central Juvenile Hall Medical/Mental Health Evaluation

ATTACHMENT 11



ADOLFO GONZALES
Chief Probation Officer

COUNTY OF LOS ANGELES PROBATION DEPARTMENT

ADULT & JUVENILE SERVICES
9150 EAST IMPERIAL HIGHWAY – DOWNEY, CALIFORNIA 90242
(562) 940-2513



November 17, 2021

Ms. Linda Penner, Chair
Board of State and Community Corrections
2590 Venture Oaks Way, Suite 200
Sacramento, CA 95833

Dear Ms. Penner:

On October 1, 2021, the Los Angeles County Probation Department received written notice from the Board of State and Community Corrections (BSCC) that the Barry J. Nidorf Juvenile Hall (BJNJH) and the Los Angeles County Central Juvenile Hall (CJH) were found not suitable for the confinement of minors pursuant to Welfare and Institutions Code section 209, subdivisions (a)(4) and (d). The notice documented each of the minimum standards for juvenile facilities, adopted by the BSCC, that were deemed to be not in compliance with the standard.

In response to these findings, the Probation Department has worked closely with our partner agencies, Juvenile Court Health Services (JCHS) and the Department of Mental Health (DMH), to update procedures and practices to address specific areas of non-compliance and to align with Title 15 Regulations and Department Policy. As a result of these efforts, we have corrected each of the areas of non-compliance. Further, the Department's Detention Services Bureau (DSB) has implemented numerous quality assurance measures which have enhanced our ability to meet our current and future compliance efforts. The following processes have been implemented to ensure the sustainability of permanent changes required to meet Title 15 Regulations:

Staff Training:

The Department is committed to providing on-going staff coaching and training at each facility, during staff meetings and through Instructional Memorandums. The coaching and training will include, but is not limited to, reviews of Title 15 Regulations, updates on BSCC compliance, Safety Checks, Self-Separation, Room Confinement, Specialized Supervision Plans, Unit Classification, Use of Mechanical Restraints and Title 15 Programming. Staff will receive timely feedback and coaching from their supervisors and/or managers as situations arise that warrant constructive feedback and/or corrective action.

In addition to the four-hour mandatory BSCC Title 15 training provided to all sworn staff in each facility, a BSCC refresher course will be provided during the required two-week block training to keep staff apprised of all regulations and policies. Additionally, the BSCC Subject Matter Experts (SMEs) will conduct annual training on current and new BSCC regulations.

Rebuild Lives and Provide for Healthier and Safer Communities

Section 1402 - Scope of Health Care:

The Medical Consent Coordinator will be responsible for the daily review of the Probation Electronic Medical Records System (PEMRS) banner information to ensure the youth location and admission date is accurate. If any discrepancies are found, the Medical Consent Coordinator will contact the PEMRS Help Desk who will report the issues to the newly created PEMRS Operations Team that will resolve the issues in real-time. The discrepancies will also be reported to JCHS and DMH to ensure they are aware of the discrepancies, pending resolution.

Section 1432 - Health Assessment:

96-Hour Medical Assessment

In addition to JCHS's sustainability plan, Probation's Movement and Control staff and supervisors will receive a daily email from JCHS that lists all incoming youth with the status of their physical examination. Any youth that has not been medically assessed will be monitored and transported to the Medical Unit to ensure health assessments are completed within 96 hours of admission, pursuant to Title 15.

Additionally, JCHS staff will continue to have WiFi access to the PEMRS system while using mobile computers. This will allow JCHS to conduct the initial 96-hour assessment of the youth that are initially housed for quarantine/isolation.

Section 1434 - Consent and Refusal for Health Care:

General Medical Consent

The PEMRS system now produces a daily medical consent tracking log that indicates the status of each detained youth's medical consent. The Medical Consent Coordinator will be responsible for tracking each youth's medical consent and follow up on any outstanding items. Any attempts made to obtain medical consents will be documented.

Section 1438 – Pharmaceutical Management:

In addition to JCHS's sustainability plan, managers at both facilities will communicate with JCHS on tracking and identifying any issues or concerns involving PEMRS as it relates to the administration and delivery of medications.

Section 1439 – Psychotropic Medications:

In addition to DMH's sustainability plan, managers at both facilities will communicate with DMH on tracking and identifying any issues or concerns involving PEMRS as it relates to the documentation of consents for the use of psychotropic medication.

Section 1354.5 - Room Confinement:

Cool Down Rooms in Healing Opportunities and Positive Engagement (HOPE) Centers

Identified Cool Down rooms will continue to be utilized as an alternative to the HOPE Center dayroom. The rooms in the HOPE Centers are currently in the process of being redesigned to support a more therapeutic milieu. Rooms will be repainted in soothing colors with new mattresses and pillows to provide youth comfort during a cool down period. This transformation has been completed at the HOPE Centers for male youth at both facilities and the HOPE Center for female youth at BJNJH. The HOPE Center for female youth at CJH is in the process of being redesigned.

Room Confinement Log

Each HOPE Center has established a daily report for documenting the number of youths in room confinement, on a cool down or Specialized Supervision Program (SSP). This report will be audited daily by BSCC SMEs to ensure compliance with Title 15 Regulations.

The placement of any youth in room confinement, even for brief periods of time necessary to conduct required institutional operations, is documented on a running log. Documentation will continue to be reviewed daily and if any concerns are identified, the facility will be immediately contacted to make the correction. The Quality Assurance (QA) Team and BSCC SMEs are providing immediate real-time training when corrections are required.

Sections 1358 and 1358.5 - Use of Mechanical Restraints Due to Mental Health Crisis or Destruction of Property and Movement and Transportation Within the Facility

Mechanical Restraints for Movement Within Facility Log

The placement of any youth in mechanical restraints for movement within the facility is documented on a running log. Documentation will continue to be reviewed daily by BSCC SMEs and if any concerns are identified the facility will be immediately contacted to make the necessary correction.

Revised the Class B Uniform requirement to include Handcuffs

A memorandum was issued to all Juvenile Institutions staff regarding the revised Class B Uniform requirement to include department issued metal handcuffs and a handcuff case. All staff have been issued handcuffs and a case. A daily audit will be conducted on all shifts as part of the daily uniform inspections to ensure compliance. The DSB Manual will be revised to indicate the mandatory handcuff requirement and training.

Additional Measures to Ensure Sustainability:

Video and In-Person Observation Log

The Video and In-Person Observation Log continues to be utilized by managers when conducting random video reviews of Title 15 Programming and/or walking through units. Each manager is

required to provide immediate correction and instruction when witnessing non-compliance. In the event of any potential egregious behavior, a referral for disciplinary action is required.

Managers and the QA Team at both facilities will conduct random video reviews during critical times of the day such as school, visiting, religious services and in the evenings. Additionally, all videos will be reviewed after an incident has occurred to ensure room confinement is not occurring unless within policy in the HOPE Center.

Additional computer monitors have been provided for managers to conduct real-time video reviews. DSB will continue camera audits to identify and correct any camera obstructions.

Documentation Review

The Compliance Unit at each facility will continue to review documentation to ensure compliance with BSCC regulations, which includes but is not limited to, justification for room confinement and the use of mechanical restraints during transportation of youth within the facility. Any documentation requiring additional clarification will be immediately referred to the Compliance Unit Supervisor who will follow up and provide training.

The Department is confident that the items of non-compliance that rendered the facilities unsuitable have been remedied and meet Title 15 Regulations. Remedies included updated procedures and practices, staff training, and improved quality assurance measures and monitoring that ensure sustainability. However, should the BSCC find that one or both of our facilities continues to be unsuitable, the Probation Department requests that a reinspection of our facilities be conducted within 30 calendar days of the November 18, 2021 Board meeting. Further, we request the BSCC reconvene a Board meeting within 45 calendar days to determine suitability should additional mitigation measures be identified at the November 18, 2021 meeting.

Sincerely,



Dr. Adolfo Gonzales
Chief Probation Officer

c: Los Angeles County Board of Supervisors
Fesia Davenport, Chief Executive Officer, Los Angeles County
Honorable Eric C. Taylor, Presiding Judge Los Angeles County Superior Court
Honorable Akemi Arakaki, Presiding Judge of the Juvenile Court
Rodrigo Castro-Silva, County Counsel, Los Angeles County
Sheila Williams, Senior Manager, Chief Executive Office, Los Angeles County
Christina R. Ghaly, Director, Department of Health Services, Los Angeles County
Jonathan E. Sherin, Director, Department of Mental Health, Los Angeles County
Barbara Ferrer, Director, Department of Public Health, Los Angeles County
Kathleen T. Howard, BSCC Executive Director
Aaron R. Maguire, BSCC General Counsel
Allison Ganter, BSCC Deputy Director
Lisa Southwell, Field Representative, BSCC

ATTACHMENT 12

MEETING DATE: November 18, 2021

**SPECIAL ORDER OF
BUSINESS**

TO: BSCC Chair and Members

FROM: Allison Ganter, Deputy Director, Allison.Ganter@bscc.ca.gov
Lisa Southwell, Field Representative, Lisa.Southwell@bscc.ca.gov
Aaron Maguire, General Counsel, Aaron.Maguire@bscc.ca.gov

SUBJECT: Determination of Suitability –
Barry J. Nidorf Juvenile Hall, Los Angeles County
Central Juvenile Hall, Los Angeles County **Requesting Approval**

Summary

This agenda item requests the Board to make a determination of suitability within the meaning of Welfare and Institutions Code section 209, subdivision (a)(4) for the Barry J. Nidorf Juvenile Hall and the Central Juvenile Hall in the County of Los Angeles.

Background

On September 16, 2021, the Board of State and Community Corrections (BSCC) determined that the Barry J. Nidorf Juvenile Hall and the Central Juvenile Hall in the County of Los Angeles were not suitable for the confinement of minors within the meaning of Welfare and Institutions Code section 209, subdivision (d). On October 1, 2021, the Board provided written notice to the county of that determination within the meaning of Welfare & Institutions Code section 209, subdivision (a)(4). (Attachment X-1.)

Welfare and Institutions Code section 209, subdivision (a)(4), provides:

If either a judge of the juvenile court or the board, after inspection of a jail, juvenile hall, special purpose juvenile hall, or lockup, finds that it is not being operated and maintained as a suitable place for the confinement of minors, the juvenile court or the board shall give notice of its finding to all persons having authority to confine minors pursuant to this chapter and commencing 60 days thereafter the facility shall not be used for confinement of minors until the time the judge or board, as the case may be, finds, after reinspection of the facility that the conditions that rendered the facility unsuitable have been remedied, and the facility is a suitable place for confinement of minors.

Per direction from the Board at the September board meeting, prior to the November 18, 2021, board meeting, Field Representative Lisa Southwell will conduct a reinspection of the Barry J. Nidorf Juvenile Hall and Central Juvenile Hall. It is anticipated that the final date for reinspection activities to occur will be November 12, 2021. A supplemental board report will be posted as soon

as possible prior to the board meeting describing whether the items of noncompliance set forth in the written notice have been remedied.

Recommendation/Action Needed

Staff recommends that the Board:

1. Make a determination of suitability within the meaning of Welfare and Institutions Code section 209, subdivision (a)(4), for the following facilities:
 - a. Barry J. Nidorf, Los Angeles County
 - b. Central Juvenile Hall, Los Angeles County

Attachments

[1: October 1, 2021 Notice to Los Angeles County](#)

ATTACHMENT 13



March 29, 2022

Dr. Adolfo Gonzales
Chief Probation Officer
Los Angeles County Probation Department
1601 Eastlake Avenue
Los Angeles, California 90033

*****PLEASE TAKE NOTICE*****

Dear Chief Gonzales:

This letter is to provide you with written notice that the California Board of State and Community Corrections will make a determination of suitability of the Barry J. Nidorf Juvenile Hall at its next scheduled board meeting on **April 7, 2022** pursuant to Welfare and Institutions Code section 209, subdivision (d).¹

The Board of State and Community Corrections (BSCC) establishes the minimum standards for juvenile halls and camps and conducts biennial inspections of those facilities. (Welf. & Inst. Code, §§ 209, 210, & 885.) Regulations setting forth these minimum standards can be found in Sections 1300-1511 of Title 15 of the California Code of Regulations:

Status of December 10, 2021 Corrective Action Plan

In October and November 2021, following inspection of the county's juvenile facilities, we notified your agency of noncompliance with section 1354.5 of Title 15 of the Board's regulations. A summary can be found in the Supplemental Board Report submitted to the Board for its November 18, 2021 meeting.²

¹ Welfare and Institutions Code section 209, subdivision (d), provides:

[A] juvenile hall, special purpose juvenile hall, law enforcement facility, or jail shall be unsuitable for the confinement of minors if it is not in compliance with one or more of the minimum standards for juvenile facilities adopted by the Board of State and Community Corrections under [Section 210](#) or [210.2](#), and if, within 60 days of having received notice of noncompliance from the board or the judge of the juvenile court, the juvenile hall, special purpose juvenile hall, law enforcement facility, or jail has failed to file an approved corrective action plan with the Board of State and Community Corrections to correct the condition or conditions of noncompliance of which it has been notified. The corrective action plan shall outline how the juvenile hall, special purpose juvenile hall, law enforcement facility, or jail plans to correct the issue of noncompliance and give a reasonable timeframe, not to exceed 90 days, for resolution, that the board shall either approve or deny. In the event the juvenile hall, special purpose juvenile hall, law enforcement facility, or jail fails to meet its commitment to resolve noncompliance issues outlined in its corrective action plan, the board shall make a determination of suitability at its next scheduled meeting.

² <https://www.bscc.ca.gov/wp-content/uploads/Supplemental-Report-to-Board-Suitability-of-LA-County-Juvenile-Facilities-FINAL-11-17-21.pdf>. (Pages 19-20.)

Pursuant to Welfare and Institutions Code section 209, the agency was required to submit a corrective action plan (CAP) to the BSCC within 60 days.

On December 10, 2021, we received the agency's corrective action plan, which was approved. This corrective action plan required the agency to outline how they intended to correct the issues of noncompliance and to come into compliance within a reasonable timeframe, not to exceed 90 days or by March 10, 2022.

Barry J. Nidorf Juvenile Hall

§ 1354.5, Room Confinement

After March 10, 2022, BSCC staff began to review and inspect the Barry J. Nidorf Juvenile Hall to determine compliance with the county's December 10, 2021 corrective action plan. Following inspection, which included reviewing unit documentation and supervisory review of video, interviewing youth housed in in the facility, and reviewing video from 10 randomly selected dates from February 2, 2022 through (and including) March 10, 2022, it appears that Barry J. Nidorf remains out of compliance with section 1354.5, Room Confinement. Specifically, during the referenced time periods, youth were placed in their rooms for periods of time exceeding what the Los Angeles County Probation Department has determined is necessary for required institutional operations.³ This is based on the November 16, 2021 Los Angeles Probation Department memo, which provides that youth shall only be placed in their rooms for the amount of time necessary for shift change, "but no more than 30 minutes at the end of AM shift and beginning of PM shift." Based on our review of 80 shift changes across eight units, these time limits were exceeded over 50% of the time. Consequently, because the juvenile hall has not fully resolved the issues of noncompliance, the Board will make a determination of suitability at its next scheduled meeting pursuant to Welfare and Institutions Code section 209, subdivision (d).

Please note that if the Board finds that the juvenile hall is not being operated and maintained as a suitable place for the confinement of minors, the Board shall give notice of its findings to all persons having authority to confine youth pursuant to Chapter 2 of Part 1 of Division 2 of the Welfare and Institutions Code and commencing 60 days thereafter the juvenile hall shall not be used for confinement of minors until the time the Board finds, after reinspection of the juvenile hall, that the conditions that rendered the facility unsuitable have been remedied, and the facility is a suitable place for confinement of minors. (Welf. & Inst. Code, § 209, subd. (a)(4).)

³ Pursuant to regulations, "Room confinement does not include confinement of a youth in a locked single person room for brief periods as may be necessary for required institutional operations." (Cal. Code Regs., tit. 15, § 1302.)

AGENCY RESPONSE

The agency may, but is not required to, participate at the April 7, 2022 Board meeting as part of the Board's determination of suitability. If the agency wishes to respond in writing, we request that a response be submitted no later than April 5, 2022 to Adam.Lwin@bscc.ca.gov. If the agency anticipates that the facility will be in compliance prior to the Board meeting, or soon thereafter, please include in the response specific facts articulating to what extent the facility is, in fact, in compliance with the Board's regulations and estimated dates of compliance. This response will be included as part of the Board's agenda. The response may include any evidence or testimony rebutting staff's preliminary findings of noncompliance.

Although the Board will be meeting in-person, due to the ongoing pandemic, the Board is allowing public participation via Zoom. A link to the meeting is available at the Board's website at: www.bscc.ca.gov. If you, your staff, or any other agency representative will be participating, please contact Adam.Lwin@bscc.ca.gov and provide the names and contact information of those participating no later than April 5, 2022.

While participation is not mandatory, the Board formally requests that you appear in-person or via Zoom to discuss any outstanding issues of noncompliance.

DETERMINATION OF SUITABILITY

The determination of suitability is a quasi-judicial process in which the Board will determine whether the facilities are or are not in compliance with the Board's regulations. The proceeding is part of the Board's meeting agenda and is not a formal adversarial hearing. Oral testimony, if provided, will not be subject to cross-examination. Board staff will present its findings and recommendations to the Board, which will be followed by questioning by board members through the Chair. The agency will be given the opportunity to provide rebuttal evidence or testimony followed by questioning by board members through the Chair.

Following the presentation of the staff report and agency response, the Board will issue a written decision regarding any items of noncompliance with the Board's minimum standards and the suitability of each juvenile facility. If the Board is unable to make a determination of suitability based on the information provided, the Board may, in its discretion, continue the proceedings to a future board meeting.

The proceedings will be open to the public and is subject to the Bagley-Keene Open Meeting Act. (Gov. Code, §§ 11120-11132.)

Gonzales, Adolfo
Page 4

If you have any questions about this process, please contact our general counsel,
Aaron.Maguire@bscc.ca.gov.

Sincerely,



LINDA PENNER
Chair

cc:

Kathleen T. Howard, Executive Director
Aaron R. Maguire, General Counsel
Allison Ganter, Deputy Director
Lisa Southwell, Field Representative, Board of State and Community Corrections
Honorable Eric C. Taylor, Presiding Judge Los Angeles County Superior Court Honorable
Akemi Arakaki, Presiding Judge of the Juvenile Court
Fesia Davenport, Chief Executive Officer, Los Angeles County
Rodrigo Castro-Silva, County Counsel, Los Angeles County
Wendelyn Julien, Executive Director, Probation Oversight Commission

ATTACHMENT 14

MEETING DATE: April 7, 2022 **Agenda Item H**

TO: BSCC Chair and Members

FROM: Allison Ganter, Deputy Director, Allison.Ganter@bscc.ca.gov
Lisa Southwell, Field Representative, Lisa.Southwell@bscc.ca.gov
Aaron Maguire, General Counsel, Aaron.Maguire@bscc.ca.gov

SUBJECT: Reinspection of Los Angeles County Juvenile Hall – Determination of Suitability – (Welf. & Inst. Code, § 209, subd. (a)(4) & (d))
Barry J. Nidorf Juvenile Hall, Los Angeles County: **Requesting Approval**

Summary

This report provides information regarding the ongoing monitoring of the Los Angeles County Juvenile Halls and requests the Board to make a determination of suitability within the meaning of Welfare and Institutions Code section 209, subdivision (d) for the Barry J. Nidorf Juvenile Hall in the County of Los Angeles with respect to the status of its corrective action plan involving noncompliance with section 1354.5 of Title 15, Room Confinement.

Background

On November 15, 2021, the Barry J. Nidorf Juvenile Hall and Central Juvenile Hall in the County of Los Angeles were notified that they were out of compliance with the following items of noncompliance:

Barry J. Nidorf Juvenile Hall

§ 1354.5, Room Confinement

Central Juvenile Hall

§ 1327, Safety Checks

§ 1354.5, Room Confinement

§ 1371, Programs, Recreation, and Exercise (added 2/08/2022)

On December 10, 2021, we received the agency's corrective action plan, which was approved. This corrective action plan required the agency to outline how they intended to correct the issues of noncompliance and to come into compliance within a reasonable timeframe, not to exceed 90 days or by March 10, 2022 (Attachment H-1).

On March 10, 2022, the BSCC was notified by Los Angeles County Probation that they intended to suspend operations at the Central Juvenile Hall and transfer the youth housed there to the Barry J. Nidorf Juvenile Hall for 90 days to "assist in facilitating leadership changes, training for staff and needed repairs to the facility." (Attachment H-2) The BSCC reinspection for the above noted items of noncompliance was scheduled to begin on March 14, 2022. (Attachment H-3) On March 14, 2022, the BSCC was informed that there were no

longer youth housed in the facility, which BSCC confirmed when BSCC staff conducted a site visit at the Central Juvenile Hall on March 17, 2022.

Because youth were no longer being housed at the Central Juvenile Hall at the time of reinspection, an inspection for the above noted items of noncompliance was not conducted at the facility. When youth are returned to the facility following the 90-day suspension of operations, BSCC staff will conduct a reinspection.

Between March 14 and March 29, 2022, Field Representative Lisa Southwell conducted an inspection of Barry J. Nidorf Juvenile Hall to determine compliance with the agency's corrective action plan related to Title 15, § 1354.5, Room Confinement. The issue of noncompliance cited in November 2021 related to youth being locked in their rooms for longer than "brief periods necessary for institutional operations" during shift change.¹ As part of their corrective action for a previous finding of noncompliance, Los Angeles County issued an internal memo on November 16, 2021, which provides that youth shall be placed in their rooms only for the amount of time necessary for shift change, "but no more than 30 minutes at the end of AM shift and beginning of PM shift" (one hour total).

During this inspection, Ms. Southwell reviewed documentation including unit logbooks, unit status sheets, self-separation logs, supervisor review of video logs and list of corrective action, and supervisor meeting minutes. She also reviewed video from 10 randomly selected days between February 2 and March 10, 2022 and spoke with more than 110 youth housed in the facility to determine if the facility was complying with its policy of placing youth in their rooms for only the amount of time necessary for shift change, and no more than one hour, according to the facility policy.

Based on the information reviewed during inspection, it appears that Barry J. Nidorf remains out of compliance with section 1354.5, Room Confinement. Specifically, youth were placed in their rooms for periods of time exceeding what Los Angeles County Probation Department has determined is necessary for institutional operations. This is based on the November 16, 2021, Los Angeles Probation Department memo, which provides that youth shall be placed in their rooms only for the amount of time necessary for shift change, "but no more than 30 minutes at the end of AM shift and beginning of PM shift." (Attachment H-4) Based on our review of 80 shift changes across eight units, these time limits were exceeded over 50 percent of the time. It should be noted that several shift changes exceeded limits by only a few minutes.

Although the facility appeared to be out of compliance with section 1354.5, Room Confinement through March 10, 2022, the Los Angeles County Probation Department has made significant strides in overall corrective action and system improvement since March 10. When the Central Juvenile Hall suspended operations after March 10, several transitions in leadership were made at both juvenile halls, and an early review of documentation and conversations with youth currently housed at the facility indicate that corrective action and system improvement continue to be made.

¹ The definition of "room confinement" excludes "confinement of a youth in a locked single person room for brief periods as may be necessary for required institutional operations." (Cal. Code Regs., tit. 15, § 1302.)

Youth interviewed during the inspection reported that room confinements at the facility were improved and have not been excessive; youth stated they were out of their rooms for most of the day, with the exception of shift change, and that staff members were removing them from their rooms as soon as the next shift was ready. This is a marked shift from previous reports from youth at the facilities.

Based on the information we have reviewed demonstrating a positive trend toward corrective action, including the temporary suspension of the use of Central Juvenile Hall, BSCC staff is recommending a continuance of the determination of suitability. BSCC staff will reinspect the Barry J. Nidorf Juvenile hall within 30 days to determine compliance with regulations and the agency's corrective action plan.

Recommendation/Action Needed

Staff recommends that the Board:

1. Continue the determination of suitability within the meaning of Welfare and Institutions Code section 209, subdivision (a)(4), for the Barry J. Nidorf Juvenile Hall to the June 9, 2022 board meeting.
2. Direct staff to conduct a reinspection within 30 days to determine compliance with the December 10, 2022 corrective action plan and Title 15 § 1354.5, Room Confinement.

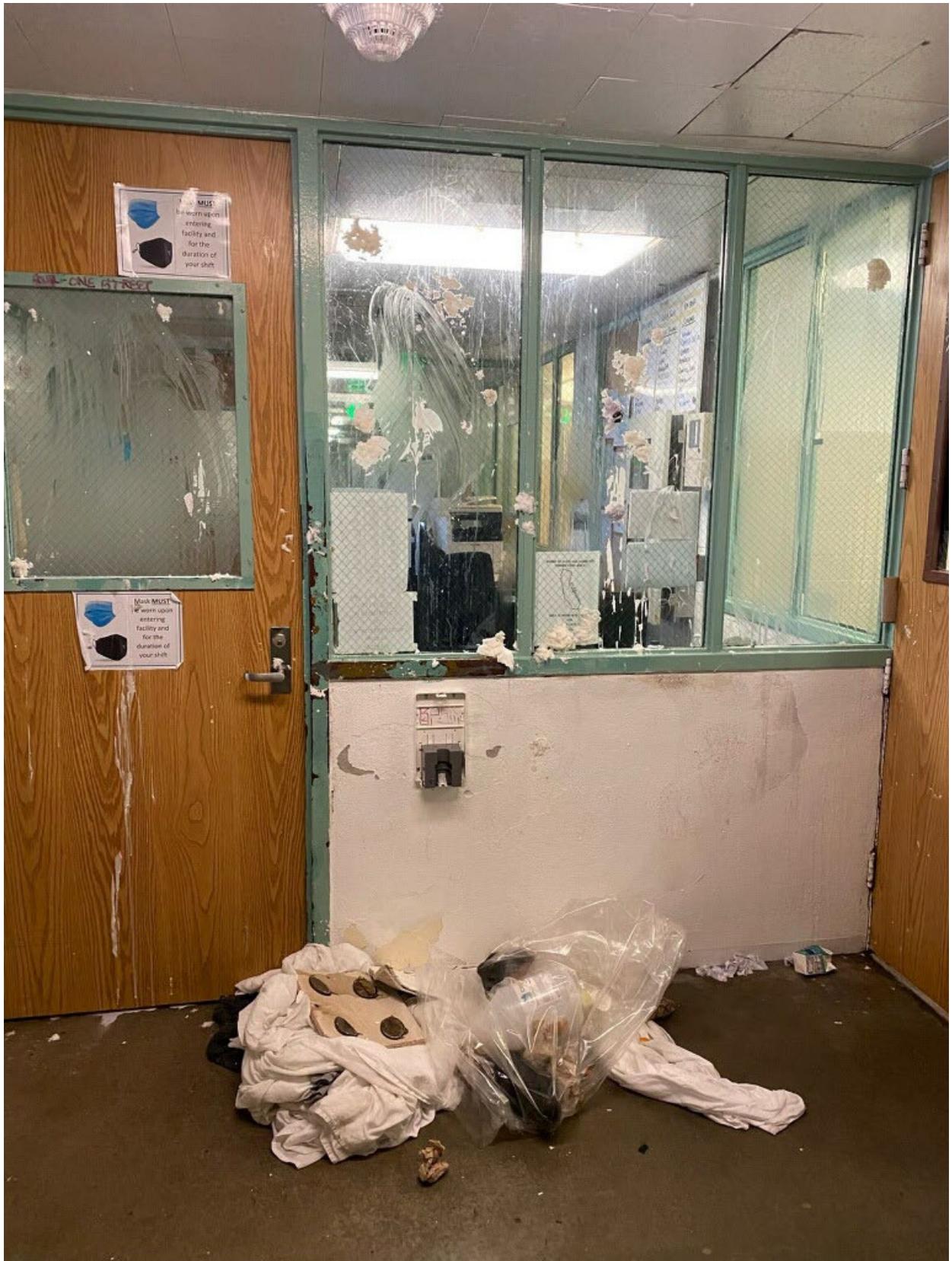
Attachments

- H-1: BSCC Corrective Action Plan: December 2021
- H-2: Corrective Action Plan March 10, 2022
- H-3: Response to Los Angeles County 3-11-2022
- H-4: Memo – BSCC Section 1354.5 Room Compliance Guide
- H-5: Notice of Determination of Suitability Letter to Los Angeles 3-29-2022

ATTACHMENT 15















ATTACHMENT 16

Month	YOYV	Threatening Staff	Assault on Staff	Property Damage	Unit Disturbance	Disruptive Behavior (SIR)	SCM
2/10/2022	1	0	1	0	0	0	2
2/11/2022	0	1	2	0	0	0	1
2/12/2022	1	0	0	0	0	3	1
2/13/2022	1	1	0	0	0	5	0
2/14/2022	1	0	0	1	0	2	1
2/15/2022	0	0	0	0	0	2	2
2/16/2022	0	0	0	0	0	2	0
2/17/2022	1	0	1	1	0	0	2
2/18/2022	2	0	0	0	0	0	1
2/19/2022	1	0	0	0	0	0	1
2/20/2022	2	0	0	0	0	1	6
2/21/2022	1	0	2	0	0	2	3
2/22/2022	2	3	1	1	0	4	3
2/23/2022	1	0	1	0	0	1	2
2/24/2022	0	0	0	0	0	0	0
2/25/2022	0	0	0	1	0	1	0
2/26/2022	1	0	0	1	0	2	1
2/27/2022	0	0	1	1	0	4	2
2/28/2022	3	0	1	1	0	2	3
3/1/2022	2	1	0	0	0	5	0
3/2/2022	1	1	0	1	0	6	0
3/3/2022	0	0	0	1	0	0	0
3/4/2022	1	0	0	0	0	0	1
3/5/2022	2	0	1	0	0	1	4
3/6/2022	3	0	0	1	0	3	2
3/7/2022	1	4	0	0	0	5	1
3/8/2022	2	0	0	0	0	2	0
3/9/2022	0	1	0	1	0	7	0
3/10/2022	0	0	0	2	0	0	0
Pre-CJH Arrival	30	12	11	13	0	60	39

ATTACHMENT 17

Month	YOYV	Threatening Staff	Assault on Staff	Property Damage	Unit Disturbance	Disruptive Behavior (SIR)	SCM
3/11/2022	6	0	1	0	2	0	7
3/12/2022	4	2	1	2	0	2	9
3/13/2022	6	0	0	2	1	1	12
3/14/2022	8	0	1	1	0	6	12
3/15/2022	5	2	1	0	0	4	5
3/16/2022	5	1	1	0	0	4	4
3/17/2022	0	3	2	1	0	0	3
3/18/2022	1	1	0	0	0	0	3
3/19/2022	0	1	1	0	0	2	1
3/20/2022	1	1	1	3	0	6	2
3/21/2022	3	4	1	0	0	5	3
3/22/2022	6	0	1	0	1	1	10
3/23/2022	1	0	1	1	0	5	3
3/24/2022	2	1	3	1	0	0	5
3/25/2022	8	1	1	1	1	0	7
3/26/2022	6	0	0	0	1	2	7
3/27/2022	3	1	1	2	2	5	5
3/28/2022	2	1	1	0	0	0	3
3/29/2022	3	2	2	2	1	7	7
3/30/2022	5	4	0	2	1	8	2
3/31/2022	0	1	0	0	0	0	0
4/1/2022	4	0	2	3	0	1	4
4/2/2022	7	2	1	1	0	7	6
4/3/2022	6	0	0	1	2	2	7
4/4/2022	5	0	1	0	0	2	5
4/5/2022	1	1	2	0	0	4	5
4/6/2022	3	0	2	1	0	6	5
4/7/2022	2	1	1	2	0	5	4
4/8/2022	2	0	1	4	0	5	3
4/9/2022	2	1	1	5	0	0	3
4/10/2022	3	1	1	3	0	5	4
4/11/2022	2	1	2	1	0	1	6
4/12/2022	3	6	0	3	0	2	6
Post CJH Arrival	115	39	34	42	12	98	168

ATTACHMENT 18

CJH 2022 STATS (February 10th - March 11th)

February	YOYV	Threatening Staff	Assaults on Staff	Property Damage	Disruptive Behavior	Unit Disturbance	SCMs
2/10/2022	4	1	0	2	0	0	3
2/11/2022	5	0	2	0	1	0	7
2/12/2022	1	1	0	0	0	0	4
2/13/2022	5	0	0	0	1	0	7
2/14/2022	5	0	0	0	1	0	4
2/15/2022	2	2	1	1	0	0	3
2/16/2022	4	0	3	0	0	0	7
2/17/2022	1	1	0	1	0	0	2
2/18/2022	5	2	2	0	0	0	8
2/19/2022	1	0	1	0	0	0	2
2/20/2022	1	1	1	2	0	0	2
2/21/2022	1	0	0	0	0	0	1
2/22/2022	1	1	1	1	1	0	4
2/23/2022	5	0	0	0	2	0	6
2/24/2022	7	0	0	2	1	0	8
2/25/2022	3	0	3	3	0	0	6
2/26/2022	2	0	0	1	1	0	4
2/27/2022	7	1	0	0	0	0	7
2/28/2022	3	1	0	0	0	0	5
Totals:	63	11	14	13	8	0	90

