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# COUNTY OF LOS ANGELES OFFICE OF INSPECTOR GENERAL

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MAX HUNTSMAN INSPECTOR GENERAL

January 7, 2025

- TO: Supervisor Kathryn Barger, Chair Supervisor Hilda L. Solis Supervisor Holly J. Mitchell Supervisor Lindsey P. Horvath Supervisor Janice Hahn Supervisor Kathryn Barger
- FROM: Max Huntsman Inspector General
- SUBJECT: REPORT BACK ON DIGNITY AND HEALTH FOR PEOPLE WHO ARE INCARCERATED: ENSURING ACCESSIBILITY TO MENSTRUAL PRODUCTS IN THE LOS ANGELES COUNTY JAILS, PATROL LOCKUPS AND COURT HOLDING TANKS

On June 25, 2024, the Board of Supervisors (Board) passed a <u>motion</u> requesting the Los Angeles County Sheriff's Department (Sheriff's Department) and directing the Office the Office of Inspector General, Sybil Brand Commission (SBC), and the Sheriff Civilian Oversight Commission (COC) to:

- a. Review existing LASD policies to ensure compliance and alignment with AB 732 (2020); availability and accessibility of menstrual products; security search concerns; and ensuring all barriers to the products are removed, including asking staff for products.
  - i. In collaboration with Corrections Health Services, develop a policy that would ensure accessibility and availability of menstrual products for people with mental health needs.

- b. Ensure all staff are following AB 732 (2020) and custody management and leadership are making sure policies related to the availability and accessibility of menstrual products are followed, through training and oversight.
- c. Request LASD to provide the OIG, SBC, and COC, with a report back, in writing, in 60 days, on Directive 1, subsections (a) and (b).
- d. Direct the OIG, SBC, and COC to review LASD's report back and provide the Board, with a report back, in writing, in 60 days with recommendations, including areas of improvement.
- e. Request LASD and direct OIG, SBC, and COC to provide presentations on the report back at the Sheriff Civilian Oversight Commission and Sybil Brand Commission meetings, following each of the reports requested in Directive 1, subsection (c) and directed in Directive 1, subsection (d).
- f. Direct the Office of Inspector General to include status on the availability and accessibility of menstrual products and any relevant updates, in its quarterly report to the Board, until further notice.

On September 10, 2024, the Sheriff's Department requested and received an extension. On November 5, 2024, the Sheriff's Department submitted its report back to the Board.

## Background

Individuals in custody throughout the United States report facing considerable challenges in accessing menstrual products. In Los Angeles County, jail oversight organizations have received complaints regarding the inadequate availability of free menstrual products, restrictive supply limits, custodial personnel having discretion over the distribution of these products, and humiliating security search procedures.

In 2020, the California State Legislature passed <u>Assembly Bill (AB) 732</u>, the "Reproductive Dignity for Incarcerated People Act," which requires, among other things,

that jails and prisons provide free tampons and sanitary pads to people in custody.<sup>1</sup> California regulations establish standards for detention and correctional facilities in <u>Title</u> <u>15 of the California Code of Regulations (Title 15)</u>, which require that county jail facilities provide "[e]ach menstruating person" in custody with "sanitary napkins, panty liners, and tampons as requested with no maximum allowance."<sup>2</sup> Sheriff's Department policy requires that "[a]II menstruating inmates shall have ready access to sanitary napkins, panty liners, and tampons." On April 4, 2024,<sup>3</sup> the Sheriff's Department's jail facility for females established a unit order that sets a higher standard by requiring menstrual products to "be readily available in a common space within each module or pod setting."<sup>4</sup> Effective January 1, 2025, <u>AB 1810</u> requires that people in custody have "ready access to...menstrual products without having to request them [from custody staff]."<sup>5</sup>

## Methodology

The Sheriff's Department assigns all women in custody, as well as transgender men and nonbinary people who menstruate, housing at Century Regional Detention Facility (CRDF), except for some individuals with acute medical or psychiatric needs who require inpatient care and are housed in the Correctional Treatment Center (CTC) at Twin Towers Correctional Facility. The Department also temporarily holds women and others who menstruate in patrol station lockups following arrest and in court holding cells while at the courthouse for court proceedings.

Following the Board's motion, staff from the Office of Inspector General examined the availability and accessibility of menstrual products across these different housing areas,

<sup>&</sup>lt;sup>1</sup> <u>AB 732</u> sought to "remedy an array of problems [such as] mandating access to perinatal medical care and banning the use of Tasers and chemical weapons on pregnant inmates [and require] jails and prisons to provide free tampons and sanitary pads." Any person confined in a county jail "shall, upon request, be allowed to continue to use materials necessary for personal hygiene with regard to their menstrual cycle and reproductive system, including, but not limited to, sanitary pads and tampons, at no cost to the incarcerated person." <u>Pen. Code,</u> § 4023.5(a).

<sup>&</sup>lt;sup>2</sup> <u>Cal. Code Regs., tit 15, § 1265.</u>

<sup>&</sup>lt;sup>3</sup> See Los Angeles County Sheriff's Department, Custody Division Manual, <u>§ 6-15/010.00 Inmate Clothing, Bedding,</u> and Personal Hygiene.

<sup>&</sup>lt;sup>4</sup> See Los Angeles County Sheriff's Department, Custody Division Unit Orders, <u>§ 5-16-040 Distribution of Personal</u> <u>Care Items.</u>

<sup>&</sup>lt;sup>5</sup> <u>AB 1810</u> will "require the person [who is incarcerated] to have ready access to...menstrual products without having to request them."

including general population, moderate observation, high observation, restrictive, and disciplinary housing at CRDF, and at five patrol station lockups (Century, Norwalk, Pico Rivera, Lancaster, and Santa Clarita stations), as well as the court holding cells at the Clara Shortridge Foltz Criminal Justice Center. In addition to these direct inspections, the Office of Inspector General's inquiry included a review of Sheriff's Department policies, interviews with people in custody, and conversations with custody personnel.

## Availability and Accessibility of Menstrual Products - Jail Facilities

*Practices for distributing menstrual products.* In most general population and moderate observation housing units at CRDF,<sup>6</sup> menstrual products are distributed to people in custody by having clear plastic bags filled with menstrual products tied to stair railings in common areas. People in these housing classifications can access those products as needed during the time they spend in common areas, which under current CRDF directives should be six hours per day. None of the relevant policies or orders that the Sheriff's Department provided the Office of Inspector General establishes or provides guidelines on this system of distribution, but the practice appears in use throughout CRDF. The few of units that did not use clear plastic bags used cardboard boxes set out in common areas for the same purpose.

Individuals in these housing units at CRDF report that when their menstrual cycle begins while they are in their cell, rather than in a common area for things such as programs or activities, they must verbally request menstrual products if they do not have any in their cell. In such cases, they reported experiencing delays in receiving these products. Grievance forms are available in custody settings (as well as in station jails and court facilities) allowing individuals in custody to submit complaints about menstrual product availability. People in custody can submit complaints using these forms or by verbally notifying personnel.

People in custody in CRDF reported that the current distribution system is relatively recent, and that prior to about July 2024, trustees delivered menstrual products and

<sup>&</sup>lt;sup>6</sup> See Los Angeles County Sheriff's Department, Custody Division Manual, <u>§ 5-01/030.00, Inmate Classification and</u> <u>Identification.</u> ("General Population shall be utilized for all inmates not administratively segregated."); Los Angeles County Sheriff's Department, Custody Division Manual, <u>§ 5-01/050.10, Housing for Mentally III Inmates.</u> ("Level of Care P2 - Moderate impairment. Generally requires moderate observation housing (MOH) in jail with mental health supervision.").

toilet paper directly to individual cells once or twice a week.<sup>7</sup> Some familiar with this practice preferred it to the current system, stating that it ensured everyone in each housing unit received at least some of the necessary products.

People held in high observation housing generally have to request menstrual products. While some high observation units have clear plastic bags in common areas, people in the units do not have access to the common areas for most of the day and may not be able to access products even if they do – for example, if they are escorted to the day room and kept handcuffed while there.

In the CTC, the custodial staff provide menstrual products as needed, as the units are specifically designed to offer medical and mental health care to those requiring more intensive treatment and often houses people with restrictions on property due to mental health conditions.<sup>8</sup> According to personnel from Correctional Health Services (CHS), the number of menstruating individuals in the CTC varies but is typically low. The duration of stays can range from approximately 100 days to permanent residency.

There is no general restriction on menstrual products for individuals in custody who have mental health conditions. However, specific circumstances or needs may necessitate limitations on products for certain individuals, such as those under suicide precautions.

*Types and amounts of menstrual products supplied.* The distribution of menstrual products is managed by custody personnel, who assign this task to trustees in general population and moderate observation housing units, and to Mental Health Assistants in Forensic Inpatient (FIP) Stepdown program.<sup>9</sup> People in custody report varying experiences regarding the availability and accessibility of menstrual products. While some have not encountered any issues, others have pointed out problems such as low quantities, poor quality, and inconsistent restocking procedures.

<sup>&</sup>lt;sup>7</sup> The Sheriff's Department assigns work to some of the people in custody in its facilities. See, *e.g.*, Los Angeles County Sheriff's Department, Custody Division Manual, <u>§ 5-01/025.00</u>, *Housing Area Inmate Workers*. These workers are commonly referred to as trustees.

<sup>&</sup>lt;sup>8</sup> The CTC operates under Title 22 of the California Code of Regulations, which also covers acute care hospitals, acute psychiatric hospitals, and nursing homes.

<sup>&</sup>lt;sup>9</sup> The FIP Stepdown program in the Los Angeles County Jails employs "volunteer, specially-trained, Mental Health Assistants who are incarcerated and live in the modules and care for and mentor patients and assist them in acclimating to the less restrictive environment in the modules." See Board motion, <u>Supporting the Expansion of FIP</u> <u>Stepdown and HOH Dorm Units in the Los Angeles County Jails</u> (June 27, 2023).

The supplies of tampons and sanitary pads provided in common areas of CRDF varied from unit to unit. (Panty liners are not available in most units.) Staff largely appear to leave the restocking of the menstrual products in the common areas to the discretion of trustees, who have access to reserve supplies of menstrual products stored in supply closets that are accessible only to custody personnel and housing area trustees.

Some people in custody complained that trustees arbitrarily refill product bags. Trustees in turn blame limited inventory for inconsistent restocking and reported needing to ration products because warehouse personnel do not fulfill their weekly inventory orders completely, so that they lack the stock necessary to meet the needs of their housing unit.

*Concerns about hoarding and misuse.* Several menstruating individuals have reported feeling as though they must compete for limited supplies of pads and tampons, expressing concern about sporadic hoarding and misuse of these products leading to limited supply. CRDF leadership and custody personnel also voiced concerns that hoarding and misuse may limit availability of menstrual products to those that need them.

Custody staff noted that pads are often misused for purposes such as cleaning cells, cushioning toilet seats, and covering vents. When misuse occurs, custody staff typically address it informally through counseling. However, custody personnel occasionally threaten to confiscate products or withhold them entirely if they suspect someone is hoarding. While requesting that hoarded supplies be returned may be permissible, intentionally withholding menstrual products, even for short periods, violates state regulations and Department policy and therefore caution must be exercised in reaching a decision that a person is hoarding. One deputy suggested that individuals in custody may misuse products due to a lack of access to alternative items like cleaning supplies. Reports from people in custody support the deputy's suggestion, as people expressed frustration with limited access to other supplies. The Sheriff's Department should ensure adequate access to cleaning supplies to discourage misuse and hoarding of menstrual products.

*Concerns with limitations on access to menstrual products.* When menstrual products are limited in supply, menstruating individuals in custody often have no choice but to use them for longer than recommended, reuse products, use toilet paper as a substitute, or even go without altogether, risking bleeding through their jail clothes. Extended or improper use of menstrual products may result in unhygienic conditions,

causing discomfort and increasing the risk of infections, infertility, and cervical cancer.<sup>10</sup> Insufficient inventory of menstrual products also contributes to tension among people in custody who describe feeling like they must compete for scarce supplies.

The Sheriff's Department should avoid limiting access to menstrual products based on perceived reasonableness of need. Individuals in custody who menstruate experience cycles that can vary in length, flow, and regularity. This variability is normal, even for those with regular cycles.<sup>11</sup> Unpredictable menstrual cycles can be particularly difficult to manage while in custody. Those with heavier flows and longer periods typically require more menstrual products and often prefer pads over tampons, as pads are believed to accommodate a larger volume of blood.

## Availability and Accessibility of Menstrual Products - Station Jails

The Office of Inspector General staff visited five station jails to assess the availability and accessibility of menstrual products. The Sheriff's Department station jails are classified as Type I facilities, which are designed to hold individuals in custody for no more than 96 hours.<sup>12</sup>

One station jail offered a variety of menstrual products, including heavy-duty pads, tampons, and panty liners. Another had only pads available, while the remaining three provided both pads and tampons. Personnel at each station jail reported having a sufficient inventory of these products and confirmed they received briefings about the new requirement that people in custody have ready access menstrual products without the need to request them.

One station jail made products readily accessible in dedicated all-female cells placing pads on mattresses, while the other four provided them only upon booking or upon request by individuals menstruating. Although individuals held in the station jail holding cells reported no issues with the availability or accessibility of products, not having them

<sup>&</sup>lt;sup>10</sup> ACLU National Prison Project Period Equity, <u>Menstrual Equity: A Legislative Toolkit</u> (2019).

<sup>&</sup>lt;sup>11</sup> Harvard T.H. Chan School of Public Health, <u>Menstrual cycles today: how menstrual cycles vary by age, weight,</u> <u>race, and ethnicity</u> (2022).

<sup>&</sup>lt;sup>12</sup> <u>Cal. Code Regs., tit. 15, § 1065 (2024)</u>. Under Title 15, a "Type I facility" is defined as "a local detention facility used for the detention of persons for not more than 96 hours excluding holidays after booking. Such a Type I facility may also detain persons on court order either for their own safekeeping or those committed to a city jail or may house people sentenced to the county jail provided such placement in the facility is made on a voluntary basis on the part of the person incarcerated." Id. 1006.

readily available is a violation of the Board's directive and making the products readily available is now necessary by law.

While menstruating individuals held in station jails undergo pat-down searches, personnel do not require that they remove their pads or tampons.

## Availability and Accessibility of Menstrual Products - Court Holding Cells

The Office of Inspector General staff visited the court holding cells at the Clara Shortridge Foltz Criminal Justice Center. While menstrual pads were available, tampons and panty liners were not. All incarcerated individuals arriving at the court facility receive a personal packet that includes pads. Court facility personnel reported that they had previously ordered tampons but did not receive any. Staff store products in a supply closet and indicated that their inventory is often low, necessitating the submission of emergency orders for supplies.

Individuals in custody may bring personal hygiene items, including menstrual products, to court facilities when attending proceedings.<sup>13</sup> According to the Sheriff's Department policy, people in custody are subject to searches at the court facility; however, menstruating individuals are not required to remove their pads or tampons.<sup>14</sup>

## **Security Searches**

The Sheriff's Department's report back to the Board on November 5, 2024, did not address security searches as requested by the Board's motion. The Office of Inspector General's staff contacted CRDF to ascertain whether they had created policies and protocols governing security searches of menstruating individuals.

The Department's policy outlines the procedures that custody personnel must follow when conducting several types of body searches, including pat-downs, strip searches, visual body cavity searches, and physical body cavity searches, but do not provide specific instructions for searching individuals in custody who are menstruating.<sup>15</sup> The leadership at CRDF acknowledges the absence of such policy guidance and stated that they plan to include the necessary guidelines in their Inmate Safety Screen System-B

<sup>&</sup>lt;sup>13</sup> Court Services Division Manual, § 2-06/010.01 Personal Care Items for Female Inmates.

<sup>&</sup>lt;sup>14</sup> Per Court Services Division Manual §2-06/010.30 <u>Strip Searches</u>, there is an exception "When there is reasonable suspicion, based on specific and articulable facts, to believe that the person is concealing a weapon or contraband and strip or visual body cavity search will result in the discovery of the weapon or contraband.

<sup>&</sup>lt;sup>15</sup> See Los Angeles County Sheriff's Department, Custody Division Manual, <u>§ 6-07/010.00, Inmate Searches.</u>

Scanner Unit Order § 3-08-060.<sup>16</sup> As recommended by the Office of Inspector General, a Unit Order should be used temporarily to communicate policy but best practices dictate that such orders be implemented in as policy in the Custody Division Manual or the Manual of Policy and Procedure to better communicate the policy to all Sheriff's staff.

Security searches aim to prevent people in custody from possessing contraband that could threaten the safety of both custody personnel and those in custody. Body scanner searches use imaging technology to detect contraband without requiring the removal of clothing, making them less intrusive than strip searches. Sheriff's Department policy requires personnel to conduct body scan searches on all new bookings, court returnees, and any other person in custody arriving at facilities for housing post-booking. <sup>17</sup> Strip searches involve the removal or re-arranging of clothing to allow a visual inspection of underclothing, breasts, buttocks, or genitalia. Such searches are permitted only under delineated circumstances and only by custody personnel of the same gender unless exigent circumstances exist.18

Individuals in custody report that they are most often subjected to security searches using body scanners or pat-downs by custody personnel when returning from offsite transport, such as court appearances and medical appointments.

According to some individuals in custody, personnel instruct menstruating individuals to remove their pads or tampons and wait in line to go through the facility's body scanner. Custody personnel report that, as a general practice, they make menstrual products available immediately after people in custody pass through the scanner. During a monitoring visit, staff from the Office of Inspector General observed menstrual products in boxes on a table next to the body scanner.

Several individuals reported instances where they had to request new menstrual products from custody personnel after going through a body scanner. While some were given a new pad or tampon, others reported having to wait until they arrived at a holding tank or returned to their assigned housing unit, going without a pad or tampon for between five and thirty minutes – an experience they described as humiliating and

<sup>&</sup>lt;sup>16</sup> See Los Angeles County Sheriff's Department, Custody Division Unit Order, §3-08-060 Inmate Safety Screening System-B Scanner (version obtained via email).

<sup>&</sup>lt;sup>17</sup> Los Angeles County Sheriff's Department, Custody Division Manual, <u>§ 5-08/020.00 *Custody Safety Screening*</u> <u>*Program (B-SCAN)*</u>.

<sup>&</sup>lt;sup>18</sup> See Los Angeles County Sheriff's Department, Custody Division Manual, <u>§ 6-07/010.00, Inmate Searches.</u>

uncomfortable. Many reported experiencing leaks that soiled their clothes, which they were then required to continue wearing until their laundry was exchanged or they could wash their underwear as best as possible in their cell.<sup>19</sup>

Those who had a difficult experience because they were instructed to remove their menstrual products or told to wait expressed feelings of frustration, shame, and anxiety. Additionally, several individuals noted they chose to forgo court appearances and offsite appointments while menstruating to avoid security searches upon re-entering the jail facility.

When body scanners are inoperable, custody personnel perform pat-down searches on individuals in custody. Menstruating individuals are not required to remove their pads or tampons for a pat-down search. If custody personnel deem a visual body cavity search to be necessary – such as to ensure no contraband is concealed in the vaginal cavity – they will instruct menstruating individuals to remove any hygiene products. According to leadership at CRDF, reception personnel, and individuals in custody, these searches occur infrequently.

Current state regulations do not specifically address security searches for menstruating people in custody.<sup>20</sup>

## Gender-Neutral Language in Sheriff's Department Policies

Currently, menstruating individuals are exclusively housed in female facilities, but not all identify as female. Nonbinary people and transgender men may also menstruate and require ready access to menstrual products. During the Office of Inspector General's review of Sheriff's Department policies for this report, staff noted that some policies use "inmates" or "prisoners" while at least one policy uses "female" inmates.<sup>21</sup> Using inclusive and gender-neutral language can help ensure that menstruating individuals in custody who do not identify as women are not excluded from policies and guidance

<sup>&</sup>lt;sup>19</sup> See Los Angeles County Sheriff's Department, Custody Division Manual, <u>§ 6-15/010.00. *Inmate Clothing,*</u> <u>Bedding, and Personal Hygiene.</u>

<sup>&</sup>lt;sup>20</sup> Title 15 regulations only require that facility administrators develop and publish policies and procedures that ensure security and control, including "physical counts and searches of the facility and incarcerated persons, contraband control, and key control."

<sup>&</sup>lt;sup>21</sup> The Custody Division Manual contains two separate sections listing acceptable personal property, one for male inmates and one for female inmates. Only the policy for female inmates lists menstrual products as allowable personal property. See Los Angeles County Sheriff's Department, Custody Division Manual, <u>§ 5-06/010.05</u> <u>Allowable Inmate Property - Male Inmates</u>; and § 5-06/010.10 <u>Allowable Inmate Property - Female Inmates</u>.

designed to ensure compliance with state law and the Board's directive. While menstruating individuals are currently placed only in female facilities, addressing this issue proactively could prevent challenges in the future if menstruating individuals are housed in male facilities at any point.

## Conclusion

The Office of Inspector General staff determined that:

- 1. The Sheriff's Department's existing jail custody and station jail policies comply with AB 732 and the Board's directive.<sup>22</sup> However, issues persist with the availability and accessibility of menstrual products, restocking practices, and security search practices in jail facilities. The Sheriff's Department revised its policy to ensure "unrestricted access" to menstrual products, eliminating the need for individuals to request products from personnel in court facilities. This change aligns the policy with AB 732 and the Board's directive.<sup>23</sup>
- 2. The Sheriff's Department and Correctional Health Services have taken measures to ensure that menstrual products are accessible and available for individuals in high observation housing<sup>24</sup> units and those under suicide precautions. However, they have not yet identified an alternative distribution practice, developed a new policy, or made any policy changes regarding this issue.
- 3. The Sheriff's Department is actively working to ensure that personnel in jail facilities, station jails, and court facilities comply with the requirements of AB 732 and the Board's directive. Sheriff's Department leadership has made progress by providing training through briefings on relevant policies emphasizing the

<sup>&</sup>lt;sup>22</sup> Custody Division Unit Orders, § 5-16-040, *Distribution of Personal Care Items*. CRDF's unit order states that, "Each menstruating inmate housed at CRDF shall be provided with sanitary napkins, panty liners, and tampons. All feminine hygiene products shall be readily available in a common space within each module or pod setting." Custody Division Manual, <u>§ 6-15/010.00, *Inmate Clothing, Bedding, and Personal Hygiene*, states, "All menstruating inmates shall have ready access to sanitary napkins, panty liners, and tampons."</u>

<sup>&</sup>lt;sup>23</sup> The Sheriff's Department revised, Custody Division Manual, <u>§ 2-06/010.01 Personal Care Items for Female</u> <u>Inmates</u>, to reflect that "All female inmates shall have unrestricted access to menstrual products, ensuring they do not need to request such items from custody personnel."

<sup>&</sup>lt;sup>24</sup> See Los Angeles County Sheriff's Department, Custody Division Manual, <u>§ 5-01/050.10, *Housing for Mentally III</u> <u>Inmates.</u> ("Level of Care P3 - Significant impairment. Generally requires high observation housing (HOH) in jail with mental health supervision.")</u>* 

requirement for "ready access" to menstrual products. Additionally, the Sheriff's Department has updated its policies to align with these requirements and has initiated periodic audits to monitor compliance in jail facilities.<sup>25</sup>

#### Recommendations

To uphold the dignity and health of menstruating individuals in custody within jail facilities, station jails, and court holding cells and ensure compliance and alignment with Board directives and California law, the Office of Inspector General recommends the following measures:

- 1. The Sheriff's Department should increase the inventory of menstrual products to meet the needs of individuals in custody. The Department should also resume cell-to-cell distribution of these products at CRDF at least once a week to ensure ready access. Relying solely on either placing the products in common areas or cell-to-cell distribution leaves access largely to the discretion of custody personnel and trustees in the general population and moderate observation housing units. By combining cell-to-cell distribution with accessible products in common areas, the Department will ensure sufficient access without the need to request products, in order to comply with state laws, the Board directive and Sheriff's Department policies. The Department should address inconsistent restocking procedures and optimize the placement of products in common areas to enhance accessibility.
- 2. To comply with CRDF Unit Order § 5-16-040 and Title 15 of the California Code of Regulations § 1265, the Sheriff's Department must provide panty liners to individuals in custody. Staff from the Office of Inspector General observed multiple boxes of panty liners at the CRDF warehouse, but noted availability in only two housing units.

<sup>&</sup>lt;sup>25</sup> The Sheriff's Department reports in-person briefings on CRDF unit order §5-16-040, *Distribution of Personal Care Items*, for jail facility personnel and re-briefs on Custody Division Manual, § 6-15/010.00, *Inmate Clothing, Bedding, and Personal Hygiene* which applies to court holding cells to reflect the requirement of "unrestricted access" and remove the barrier of asking personnel for products. § 2-06/010.01 *Personal Care Items for Female Inmates*, which applies to court holding cells to reflect the requirement of "unrestricted access" and remove the barrier of asking personnel for products.

- 3. The Sheriff's Department should establish standardized procedures for requesting and fulfilling menstrual product orders. Personnel in jail housing areas should include the unit population and an approximate inventory count in their weekly requests. Warehouse staff should document the inventory and provide explanations when orders are not fully fulfilled.
- 4. The Sheriff's Department should establish specific policies for searching menstruating individuals in jail facilities, ensuring that these policies protect their dignity while maintaining facility security. CRDF personnel should assess whether it is necessary for menstruating individuals in custody to remove their pads or tampons during searches, making individual determinations that prioritize the least invasive options and uphold human dignity.
- 5. The Sheriff's Department should assess the individual needs and circumstances of menstruating individuals in custody who are in high observation housing units and CTC, especially if they are on suicide precautions. Alternatives to traditional menstrual products should be provided when necessary. Until a policy change is implemented, the Sheriff's Department and CHS should document the protocols currently in place for providing menstrual products to this population. The policy should ensure the dignity of menstruating individuals in custody while also maintaining facility security and the safety of the people in custody.
- 6. The Sheriff's Department should mandate that personnel at custody jail facilities, station jails, and court facilities document the stocking of products and report any issues, including but not limited to shortages, in the electronic Uniform Daily Activity Log (e-UDAL) under the "Additional Information" section. This requirement should complement the ongoing weekly audits by sergeants and the documentation by watch commanders in the Watch Commander Log at CRDF. The relevant policies, orders, or directives should include guidelines on documenting the stocking and distribution of menstrual products.
- 7. The Sheriff's Department should use gender-neutral language in its policies regarding menstruating individuals to ensure that products are provided to all menstruating people and to ensure inclusivity is communicated in its policy directives.

c: Robert G. Luna, Sheriff Fesia Davenport, Chief Executive Officer Dawyn R. Harrison, County Counsel Edward Yen, Executive Officer Sharmaine Moseley, Executive Director, Sheriff Civilian Oversight Commission