



Los Angeles County

PROBATION REFORM AND IMPLEMENTATION TEAM

**Proposed Authority and Structure for the
Probation Oversight Commission in Los Angeles County**

Submitted to the Los Angeles County Board of Supervisors

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Executive Summary

There is widespread consensus that the Los Angeles County Probation Department is in dire need of oversight. In response, the Los Angeles County Board of Supervisors (BOS) created the Probation Reform and Implementation Team (PRIT) to establish the only civilian oversight body for a Probation Department in the United States. This document articulates a mission for the Probation Oversight Commission (POC) and a prescription for authorities and staffing necessary for transformational oversight.

The PRIT concluded that the following elements were necessary for an authentic and robust oversight body:

- 1) **Advise BOS and Probation Department** – The POC’s principal duties are to advise the Board of Supervisors and the Probation Department and to monitor the Department’s progress on systemic reform on behalf of the Board. Fundamental to this advisory role of the POC is:
 - 1) the authority and duty to review departmental leadership, policies, procedures, practices and workplace culture; 2) the ability to engage the advice of appropriate subject matter experts; and 3) transparency about the recommendations to and decisions by the BOS and Probation Department.
- 2) **Policy and Practice Review and Assessments** – The authority and duty to advise the BOS and Probation Department requires robust policy and practice reviews and assessments. To that end, reviews and assessments shall:
 - 1) address wide-ranging matters that affect the well-being of both staff and youth and adults under the care and supervision of the Probation Department; 2) employ a multilayered approach consisting of POC internal research, fact gathering, public testimony and presentations by the Probation Department and any other relevant source of information; and 3) provide a public report-back on any matter placed on the POC agenda by the POC or the Board for assessment or review.
- 3) **Inspections** - The Probation Department has the grave responsibility of ensuring the physical safety and welfare of youth and adults in its custody, so it is vital that the POC closely monitor the conditions of confinement and the quality of treatment and programming offered to probationers. To facilitate

robust monitoring of locked facilities, inspections must be unfettered, unannounced, and reported publicly.

- 4) **Investigations** – A hallmark of effective oversight is the authority to conduct robust, independent investigations of matters deemed material to the POC. For a fully functional POC, it is equally vital that the POC:

1) monitor investigations on all critical matters brought to its attention; 2) have internal, independent capacity to ensure that all matters are appropriately and fully investigated, and 3) partner with the LA County Office of the Inspector General (OIG) in matters that implicate information not suitable for a Brown Act body to consider.

- 5) **Independent Grievance Procedure** – The POC shall serve as the site of an independent grievance process that is safe, confidential, and responsive for youth and adults under probation supervision, in or out of custody. Nationally recommended best practices, as well as investigations and testimonies about the methods currently administered within the Probation Department for the collection of grievances inside the halls and camps indicate that a meaningful grievance procedure *should not* be administered within the Probation Department alone.

- 6) **Power to Compel** – In order to effectively meet the mandates articulated by the BOS, and to effectuate the authorities and duties outlined above, the POC must have: 1) broad access to discover an expansive scope of documents, data, real evidence and direct testimony-subject to any existing laws; and 2) subpoena power as the only swift, fair and reliable mechanism to ensure the Department complies with information requests in a timely and good faith manner.

- 7) **Public Reporting and Meetings** – Public accountability and transparency are critical features of all oversight models reviewed by the PRIT. Robust public engagement is central to meaningful oversight and critical to delivering genuine transparency and accountability. Thus, it is vital to:

1) provide the public regular and timely reports on the systems, policies and practices of the Probation Department, and 2) facilitate a public meeting process to ensure the community understands and plays a vital role in informing and providing accountability for matters before the oversight body, and 3) provide a forum to increase public literacy on the functioning of the Department and for Probation labor representatives and staff to raise awareness about issues and innovations undertaken with administrators and

any critical gaps in accountability structures, training, or system-wide policy implementation.

- 8) **Public Engagement** – A meaningful, robust and ongoing relationship with the community is critical to both an authentic reform path as well as maintaining a highly functioning Probation Department that well-serves and inspires trust by the community. Per the Board’s directive, the POC serves as “liaison between the department and the community” and shall have the authority to establish a community engagement substructure to fulfill that role.

- 9) **Composition** – The POC’s composition must represent both subject matter expertise and community wisdom. The POC shall consist of 9 members, 5 appointed by the Supervisors and 4 ‘at large’ members, selected by the Supervisorial appointees to balance the skills on the body and reduce delays. Commissioners will be selected using strict criteria that includes expertise in youth development, adult and juvenile justice, and reflects the diversity of the County. All Commissioners shall participate in ongoing training on critical topics, such as adverse childhood experiences (ACE), trauma-informed practices, the use of force, custody regulations, mental health issues, and juvenile justice best practices.

- 10) **Miscellaneous Provisions** – The POC shall rely on a robust, professionalized staffing structure that reflects best practices in civilian oversight, comply with all laws, conduct a self-evaluation, produce an annual report, and offer modest compensation to Commissioners for costs associated with their voluntary service.

I. Introduction

There is widespread consensus that the Los Angeles County Probation Department is in dire need of oversight. In response, the Los Angeles County Board of Supervisors created the Probation Reform and Implementation Team (PRIT) to establish the only civilian oversight body for a Probation Department in the United States. This document articulates a mission for the Probation Oversight Commission (POC) and a prescription for authorities and staffing necessary for transformational oversight.¹

The PRIT reviewed hundreds of documents including, but not limited to, existing recommendations by previous working groups² and a comprehensive survey of national oversight organizations, in search of best practices.³ In addition, the PRIT met with and interviewed members of the current Probation Commission, the Office of the Inspector General (OIG) and the LA County Sheriff's Civilian Oversight Commission (COC). During a public hearing on October 25, 2018, the PRIT heard testimony from: Brian Williams - Executive Director, Sheriff Civilian Oversight Commission; Max Huntsman - LA County Inspector General; Mark Smith - City of Los Angeles Police Commission Inspector General; and Patricia Soung - Director of Youth Justice Policy and Senior Staff Attorney, Children's Defense Fund-CA. The PRIT held a public meeting on the composition of the POC and the criteria for commissioners on February 13, 2019. The COC Executive Director and two COC commissioners, Loyola Law Professors Priscilla Ocen and Sean Kennedy, presented testimony at this meeting regarding their experience on the COC, the advantages and limitations of its existing powers, Commissioner selection processes and criteria, and current and ideal staffing structures.⁴

Additional public meetings regarding the Powers of the POC were held on September 25th (POC Mission Statement and Community Engagement Mandate), December 12, 2018 (Complaints and Inspections), November 14, 2018

¹ Where there was not consensus within the PRIT on specific elements of an oversight body, the positions of voting members are noted in the document, with their competing rationale.

² See, *Report for the County of Los Angeles Board of Supervisors Recommendations for the Establishment of a Civilian Probation Oversight Commission*, Probation Oversight Commission Working Group (Dec. 2016).

³ See, *National Association of Civilian Oversight of Law Enforcement* (<https://www.nacole.org/>).

⁴ This and all PRIT meetings were streamed live and archived for public view at the PRIT Facebook page at: <https://www.facebook.com/lacountyprit/videos/553222788521070/>

(Stewardship over Public Funds and Services), and April 17, 2019 (Grievances/Complaints and Budget Monitoring/Compliance. Public comment was invited and recorded by the PRIT staff at each meeting. Additional public input was collected through the PRIT's social media platforms and e-mail submissions to the PRIT.

II. The Need

Our research on oversight best practices reveals major structural deficits in the system of departmental governance that has evolved in Los Angeles County. Notably, Los Angeles County relies on a probation oversight model conceived and implemented near the turn of the 20th century.⁵ The earliest iteration of the Probation Department had fewer than 17 probation officers with a Chief who earned \$175/year.⁶ This stands in stark contrast with today's department, employing over 6,500 full time employees, involving multiple public and private partnerships, and a budget that exceeds \$1 billion. The Probation Department of 2019 presents a massive oversight challenge, as its charge and bureaucracy are infinitely more complex than the Probation Department of 1904.

Beyond institutional complexity, the PRIT process has revealed profound challenges that a future POC and reform process must address: sharp public mistrust of the Department, a failure in stewardship of public funds, and dysfunctional relationships between the unions, management and the populations they are paid to serve, to name a few.⁷ The following recommendations reflect the PRIT's assessment of the complexity of the oversight problems and the failures of the status quo model to effectively guide the Department successfully into the new century.⁸

⁵ See, ACLU, Children's Defense Fund California, Urban Peace Institute, Anti-Recidivism Coalition, Youth Justice Coalition LA, Arts for Incarcerated Youth Network, Brotherhood Crusade, Inner City Struggle, and Public Counsel, *Robust Independent Oversight of the Los Angeles County Probation Department: A Historical Legacy* [A Coalition White Paper] (2018).

⁶ See, <https://probation.lacounty.gov/history/>

⁷ Video recordings of public testimony and subject matter expert input revealing the magnitude of these concerns throughout 12 public meetings convened by the PRIT from August 2018 to May 2019 are available at: <https://www.facebook.com/lacountyprit/videos/553222788521070/>
See also: <https://www.latimes.com/local/countygovernment/la-me-juvenile-halls-chaos-pepper-spray-detention-probation-20190519-story.html>

⁸ Recognizing that certain terms have official or unofficial connotations, please see Appendix "A," which articulates the specific definitions adopted by the PRIT for the purposes of this document and the accompanying ordinances.

In drafting this document as well as the accompanying organizational chart,⁹ the PRIT was mindful not to replicate the work of any County departments whose duties could overlap with the charge laid out in the following pages for the POC. Instead, the PRIT seeks to complement existing County capacity to actualize the Board's vision of a new model for truly independent oversight focused, and singularly committed to, improving the core competencies of the Probation Department.

The failure of the status quo model of oversight has led to a series of tragic consequences. For example, despite the intervention of the United States Justice Department and a six-year consent decree starting in 2008, the Department remains mired in controversy.¹⁰ It suffers from a dysfunctional culture resulting in repeated litigation, including convictions and settlements for allegations of criminal behavior ranging from sexual assaults of youth by staff while in custody,¹¹ physical beatings,¹² and the misuse of Oleoresin Capsicum (OC) spray in detention facilities.¹³

Finally, the PRIT is cognizant of the potential costs associated with a robust oversight entity. However, it is important to note that, increasingly, civilian oversight is not an anomaly, it is the norm. It is instructive to consider the size of the department the POC is charged with overseeing. Los Angeles is the most populous county in the United States and more populous than 41 other states. The Los Angeles County Probation Department is the largest in the United States. A survey of oversight models revealed those with strong oversight have staffing ratios of 15 to 20 oversight staff for every 1000 departmental staff overseen. Using simple proportionality as a guide suggests a similarly staffed oversight body in Los Angeles would have 97-130 employees. The accompanying organizational chart and staffing structure contemplate approximately 20 positions within the POC, as a point of departure for meaningful and robust oversight.¹⁴

⁹ See Appendix B: Proposed Organizational Chart for the Probation Oversight Commission and Appendix C: Proposed Staffing within the OIG to Support Probation Oversight.

¹⁰ <https://www.latimes.com/local/lanow/la-me-county-juvenile-detention-reform-20190211-story.html>

¹¹ <https://www.latimes.com/local/lanow/la-me-ln-probation-officer-sexual-assault-20170920-story.html>

¹² <https://www.latimes.com/local/lanow/la-me-ln-probation-officer-charged-beatings-20170316-story.html>

¹³ <https://www.documentcloud.org/documents/5724228-Pepper-spray-use-in-L-A-County-juvenile.html>

¹⁴ See Appendix B: Proposed Organizational Chart for the POC.

IV. Probation Oversight Commission Mission Statement

The mission of the Probation Oversight Commission is to re-imagine probation services in the County of Los Angeles to achieve accountability, transparency, and healing of the people served by and working for the Probation Department. The POC creates pathways for community engagement to foster trust between the community and the Probation Department. The POC ensures adherence to the highest ethics and the proper stewardship of public funds to support Probation in achieving the best outcomes for youth and adults on Probation.

V. Proposed Powers and Authority

- 1) Advise BOS and Probation Department** – As directed by the May 1, 2018, BOS motion and Chief Executive Office’s (CEO) report back of April 9, 2018, the POC’s principal duties are to advise the Board of Supervisors and the Probation Department and to monitor the Department’s progress on systemic reform on behalf of the Board.

Fundamental to this advisory role of the POC is: 1) the authority and duty to review departmental leadership, policies, procedures, practices and workplace culture; 2) the ability to engage the advice of appropriate subject matter experts; and 3) transparency about the recommendations to and decisions by the BOS and Probation Department.

To enable the POC to meet the charge articulated by the BOS motion:

- i.) The POC shall advise both the Probation Department and the BOS regarding the following matters:
 - a) The Probation Department’s operational policies and procedures,
 - b) The Probation Department’s progress toward meeting the targets in the systemic reform plan elaborated by the PRIT, as adopted by the BOS,
 - c) The Board’s recruitment and vetting process for the Probation Chief,
 - d) Any issues deemed material by the Executive Director or a quorum of the POC Commissioners.
- ii.) In order to effectively advise the BOS and Probation Department, and as deemed necessary by the Executive Director, the POC shall be staffed with the appropriate subject matter experts, employ consultants and/or experts in any subject matter area, subcontract with non-profit organizations where the organizational structure lacks the capacity or expertise to carry out the mission of the POC.

iii.) Where the POC recommends a policy, protocol or system change rejected in whole or in part by the Probation Department, the department will report-back to the POC and the BOS on the rationale for declining the recommendation.

2) Policy and Practice Review and Assessments – The authority and duty to advise the BOS and Probation Department requires robust policy and practice reviews and assessments. To that end, reviews and assessments shall: 1) address wide-ranging matters that affect the well-being of staff, youth, and adults under the care and supervision of the probation department; 2) employ a multilayered approach consisting of POC internal research, fact gathering, public testimony and presentations by the Probation Department and any other relevant source of information; and 3) provide a public report back on any matter placed on the POC agenda by the POC for assessment or review.

i.) Systems and Policy Reviews

- a) The POC shall have the authority to review any Probation Department system, policy or protocol. Information deemed necessary by the POC to complete policy reviews shall be provided within 30 calendar days following a request by the POC.
- b) Pursuant to the powers to compel in WIC§229,¹⁵ the POC shall have the authority to compel production of documents deemed necessary to complete any audit or review.¹⁶

¹⁵ Conflicting legal analyses exist about whether the power to compel testimony and complete access to data applies to LA County’s probation oversight bodies. The PRIT acknowledges Los Angeles County Counsel’s opinion that the provisions in the California Welfare and Institutions Code would not endow the Probation Oversight Commission with the ability to compel the attendance of witnesses or evidence. However, the PRIT has adopted a reading of the Code which is consistent with the California State Legislative Counsel’s opinion of 2006 indicating the contrary. In addition, the PRIT is compelled that the meticulously researched historical record submitted by the ACLU, Children’s Defense Fund California, Urban Peace Institute, Anti-Recidivism Coalition, Youth Justice Coalition LA, Arts for Incarcerated Youth Network, Brotherhood Crusade, Inner City Struggle and Public Counsel in *Robust Independent Oversight of the Los Angeles County Probation Department: A Historical Legacy* [A Coalition White Paper] (2018) supports the Legislative Counsel’s legal opinion. The PRIT also recognizes that despite differing interpretations of the law, the POC and Probation Department must have a collaborative relationship. Accordingly, the PRIT notes the testimony of the LAPD Police Commission Inspector General at the Oct 25th PRIT meeting, which indicated that, while that body is vested with subpoena power, it has never exercised it because it appears to act as an incentive for cooperation.

¹⁶ The appointee from the 5th district does not support the inclusion of the power to compel as articulated here. The appointee concurs with Los Angeles County Counsel’s opinion that the provisions of the California Welfare and Institution’s Code would not endow the Probation

- c) Upon completion of any assessment or review, the POC shall provide public reports and/or recommendations to the BOS, the Probation Department and the community at large.
- ii.) **Proposed Policy Review**
 - a) The Probation Department shall notify the POC of their intention to initiate any policy change no fewer than 90 days prior to the proposed change.¹⁷
 - b) The policy shall be presented in a manner suitable for public comment.
 - c) Public comment and the POC's position on any proposed policy change shall be reported to the Chief of Probation and the BOS no more than 45 days after the public comment meeting.
- iii.) **Budget/Finance Review**- The POC shall have the authority to review fiscal policies and transactions, including internal resource allocation and procurement.¹⁸
 - a) The POC shall have the authority to review all funding streams, RFPs or contracts involving the LA County's Probation Department.¹⁹
 - b) The POC shall liaise with the Juvenile Justice Coordinating Council (JJCC) as the body that reviews and ensures compliance and effectiveness of Juvenile Justice Crime Prevention Act (JJCPA) funds.
 - c) The role of the Juvenile Justice Coordinating Council and its Community Advisory Committee, which serve to facilitate cross system and community input and collaboration on JJCPA funds, shall become County ordinance.²⁰

Oversight Commission with the ability to compel the attendance of witnesses or evidence. Further, the 5th district appointee position is that, based on practices in the interaction existing between juvenile justice commissions and probation departments throughout the state of California, subpoena power would not be necessary for the proposed POC to fulfil its mission. Moreover, the utilization of the subpoena authority would foster an adversarial relationship between the POC and probation which would be in direct contradiction of the stated POC mission.

¹⁷ If the need arises for a shorter time period to respond to policy changes, the Probation Department shall notify the ED of the POC and seek a departure from the time period.

¹⁸ The PRIT recognizes that the Board of Supervisors has the authority to approve the Department's final budget and that CEO is responsible for overseeing the budget process.

¹⁹ Recognizing that there is an existing process in place with the LA County Auditor/Controller's Office, the PRIT contemplates that there will be coordination with the "Audit Committee" and other oversight entities for adult probationers.

²⁰ This recommendation arises from the PRIT's observation that, despite the JJCPA's mandate that the JJCC produce a plan and a budget for juvenile delinquency prevention, the Board found it necessary to vote unanimously in February 2019 to affirm that the Probation's Department's budget for the JJCPA funding stream align with the public planning process and priorities of the JJCC. The PRIT recommends this codification in County ordinance to ensure that the POC serves as a venue for compliance with this specific requirement in state law and as a means to ensure the Board's embrace of this model is adopted, irrespective of changes to the state law in the future.

- d) The POC shall have the authority to review all funding streams provided to any third party probation service provider who is the custodian of funds dedicated to probation youth or adults, including but not limited to, LA County Office of Education (LACOE), LA County Department of Mental Health (DMH), and LA County Department of Children Family Services (DCFS).
 - e) Before submitting its annual budget to the CEO, the Chief Probation Officer shall come before the POC with its proposed budget to check for compliance with the stipulations of all funding sources, legal requirements, and Board directives, and alignment with the Department's stated priorities as reported to the Board of Supervisors and to the community.
 - iv.) **Education** – The POC shall have the authority to review services rendered by the Los Angeles County Office of Education (LACOE) and/or any third party providing educational resources to any probationer, adult or juvenile.
 - v.) **Mental Health** – The POC shall have the authority to review services rendered by the Los Angeles County Department of Mental Health and/or any third party providing mental health resources to any probationer, adult or juvenile.
 - vi.) **Data** – The Probation Department shall make available upon request, any data collected by the department for review by the POC.
- 3) **Inspections** - The Probation Department has the grave responsibility of the physical safety and welfare of youth and adults in its custody, so it is vital that the POC closely monitors the conditions of confinement and the quality of treatment and programming offered probationers. To facilitate robust monitoring of locked facilities, inspections must be unfettered, not noticed and reported publicly.

Consistent with County Counsel's opinion that the authorities and duties of the existing Probation Commission can be adopted by the new POC, the POC shall be authorized to conduct all necessary inspections of any probation facility:

- i.) Consistent with existing law and local rules governing the probation commission, the POC or its staff shall have unfettered access to any facility where any adult²¹ or juvenile probationer may be held.

²¹ The authors recognize that the Welfare and Institutions Code does not authorize juvenile justice committee or probation commission unfettered access to adult County Jail facilities. However, we recommended all facilities be subject to the same inspection protocol as contemplated in Title 15, regardless of whether the facility houses youth or adults.

- ii.) "Facilities" is understood to mean any area where a probationer can be held and includes any access to any records on site, relevant to the detention or services rendered by the facility to the probationer.
- iii.) Consistent with existing probation commission rules, inspections require no advance notice.
- iv.) Inspection reports shall be made public at POC meetings or on a web portal designed for that purpose.
- v.) Where the POC makes specific recommendations related to an inspection, those findings shall be published to the BOS and Probation Department and provided to the public at a regular meeting.²²

4) Investigations – A hallmark of effective oversight is the authority to conduct robust, independent investigations of matters deemed material to the POC. Currently, the BOS' ability to oversee the Department suffers from a lack of structural mechanisms and capacity designed to provide independently sourced information and conclusions. Periodic audits by the Auditor/Controller lack regularity, consistency and subject matter expertise.

For a fully functional POC, it is equally vital that the POC: 1) monitor investigations on all critical matters brought to its attention; 2) have internal, independent capacity to ensure that all matters are appropriately and fully investigated, and 3) partner with the OIG in matters that implicate information not suitable for a Brown Act body to consider.

- i.) **Internal Affairs (IA) Oversight** – Where the Probation Department has initiated an internal investigation, the relevant POC staff will be notified and, subject to all applicable laws, briefed on the progress of any investigation by the lead IA investigator on all IA cases in a manner and time determined by the Executive Director (ED) or a quorum of the POC.
- ii.) **Independent Investigations** – where a complaint or information of concern to the POC arrives at the POC independently, the POC will have the option of pursuing an investigation independently or referring the matter to the OIG.

²²The Probation Department has expressed concern about the sequencing of publication of POC reports. The PRIT has no opinion regarding the order of the publication of the reports; however, the reports should be published in a manner determined by the ED and the BOS, subject to any existing laws. The Probation Department asserts that the BOS should have the authority to approve reports prior to public dissemination. The PRIT believes that it would not serve the interests of public accountability and the maintenance of an independent POC to require BOS approval before publishing a report based on public information.

- a) Complaints may arrive by any means, including through the community engagement model outlined in section 8 below.
 - b) **OIG-Assisted Investigations** – At the discretion of the POC, where a matter is deemed suitable and appropriate for referral to the OIG for investigation, the matter shall be referred to the OIG for investigation.
 - (i) The OIG shall report back to the POC in a time and manner determined by the Executive Director of the POC.
 - c) **Independent POC investigations** – At the discretion of the POC, where a matter is deemed suitable and appropriate for internal, independent investigation, the POC shall have the authority to investigate the matter independent of the OIG.²³
 - (i) Any independent investigation shall account for potential privileged or confidential information or information otherwise protected by statute. Where the POC’s investigation implicates actual protected information, the POC’s investigation shall be pursued only where the holder of the privilege or confidentiality/privacy right has agreed to waive any protections for the limited purpose of the investigation.²⁴
 - d) Pursuant to the authorities outlined in section 6, *Power to Compel*, the POC shall have the power to compel the attendance of individuals or records in order to effectuate any investigation.
 - e) Pursuant to the authorities outlined in section 3, *Inspections* and section 2, *Reviews*, POC staff shall have complete access to probation facilities, documents and personnel in order to effectuate any investigation authorized by the POC or ED.
- iii.) **Law Enforcement Referral** – Where POC staff learns of allegations of child abuse or other violence that triggers mandatory reporting, the allegations shall be referred to the appropriate law enforcement agency.

²³ The authors recognize there are existing laws that govern the information implicated in this section. However, the PRIT contemplates a workflow which would afford the Probation Department an opportunity to decline to share information where they have a good faith belief disclosure would violate a law. The subpoena process articulated in WIC§229, CCP §§ 1326 and 1328 contemplates a legal process to resolve any conflict between the POC and any party who wishes to prevent disclosure.

²⁴ For example, any complaint involving the personnel records of a Probation Officer will be forwarded to the OIG, except where recent state law carve-outs remove confidentiality protections in specific cases, such as domestic violence, perjury, etc. In addition, the POC would be authorized to handle any case where an individual alleging wrongdoing waives their own confidentiality rights, such as a juvenile in detention or an adult on probation who may have a confidentiality right, but prefers that the POC handle the matter in a public manner, instead of the OIG.

iv.) **Findings** – At the conclusion of any review or investigation initiated by the POC, the POC shall publish its findings and make recommendations where appropriate to the BOS and Probation Department.

5) Independent Grievance Process – The POC shall serve as the site of an independent grievance process that is safe and responsive for youth and adults under probation supervision in or out of custody²⁵. Nationally recommended best practices,²⁶ as well as investigations and testimonies about the methods currently administered within the Probation Department for the collection of grievances inside the halls and camps, clearly suggest that a meaningful grievance procedure *should not* be administered within the Probation Department alone.²⁷ Therefore:

- i.) The POC shall establish and administer the grievance procedures for youth in halls and camps that are confidential and consistent with nationally recommended best practices.²⁸
- ii.) The existing Ombudsman staff handling grievances within the Department should be re-oriented to resolving service complaints, not

²⁵ Independent Monitoring Systems for Juvenile Facilities. (2012, August 12). Retrieved from <http://www.cclp.org/wp-content/uploads/2016/06/IM.pdf>

²⁶ The appointee from the 5th district differs from the view of the majority that there exists a “Nationally Recommended Best Practice.....” that suggests grievance procedures (for juveniles) should not be administered by the probation department. The 5th district appointee notes that all 50 probation departments in the state operate an internal grievance procedure for juveniles in compliance with title XV requirements. Moreover, current ‘evidenced based practice’ literature supports the positive engagement of probation staff with youth under probation supervision. The position of the 5th district appointee is that allowing a grievance procedure to exist only outside of the probation department fosters a counterproductive “us v them” mentality between probation staff and youth under supervision.

²⁷ Significantly, people who have been detained in LA County youth probation halls and camps under current and past grievance protocols explained in detail that youth do not rely on, trust, or get responses from the existing grievance system at the March 16 and April 17 PRIT meetings. In addition, Supervisorial appointees who visited both a boys and girls camp during the PRIT process, reported at the January 26 meeting that, in both facilities, youth reported directly to them that they had never received a reply to grievances when they had been filed. Current Probation Commissioners also provided written testimony at the Jan 26 meeting regarding the inability to file these grievances confidentially and provided oral testimony to this regard at the April 17 meeting.

²⁸ The essential features of an independent grievance procedure that both protects youth and reduces exposure to litigation for the County were described in detail and submitted to the PRIT by its technical experts, existing Commissioners, and the ACLU at the April 10, 2019, PRIT meeting. The POC will draw on the documented research and the testimony collected by the PRIT to establish the independent grievance process. Those issues that trigger privileged information will be forwarded to the OIG.

confidential grievances, in collaboration with the Community Engagement staff of the POC and providing a timely resolution as described in the Public Engagement section of this document.

6) Power to Compel –In order to effectively meet the mandates articulated in the Board Motion and effectuate the authorities and duties outlined above, the POC must have: 1) broad access to discover an expansive scope of documents, data, real evidence and direct testimony-subject to any existing laws; and 2) subpoena power as the only swift, fair and reliable mechanism to insure the department complies with information requests in a timely and good faith manner.²⁹ Therefore:

- i.) The POC shall have the authority to gather all necessary information in order to provide the BOS and Probation Department appropriate guidance regarding the operations, policies and performance of the department.
- ii.) The POC shall have the authority as described in WIC§229 to compel a witness' attendance subject to the notice requirements in CCP §§ 1326, 1328 and any other relevant legal limitations.³⁰ In addition to the authority enabled by WIC§229, this document assumes the POC has, by virtue of being an extension of the BOS, complete access to probation data and information requested as part of any inquiry made by the POC subject to any existing laws.

7) Public Reporting and Meetings – Public accountability and transparency are critical features of all oversight models reviewed by the PRIT. Robust public engagement is central to meaningful oversight and critical to delivering genuine transparency and accountability. Thus, it is vital to: 1) provide the public regular and timely reports on the systems, policies and practices of the Probation Department, and 2) facilitate a public meeting process to ensure the community understands and plays a vital role in informing and providing accountability for matters before the oversight body. To these ends:

- i.) The POC shall be authorized to publicly publish:³¹

²⁹ The appointee from the 5th District does not support this section. Please see rationale in Footnote 16.

³⁰ Conflicting legal analyses exist about whether the power to compel testimony and complete access to data applies to LA County's probation oversight bodies. See Footnote 15 for analysis.

³¹ All data and findings shall be subject to all existing laws regarding confidentiality before publication.

- a) An annual “report card,” documenting progress on key performance indicators, including but not limited to the reform agenda items outlined in the PRIT reform agenda.
 - b) All data and findings recovered through its own investigations or review process.
 - c) Each year, the POC shall organize a ‘Data Statistics and Case Review’ town hall. This will entail choosing a topical or thematic focus (such as ‘AB 109 funding’), conducting research on the overall trends and findings regarding that topic, target populations, outcomes or programs. Utilizing confidentiality waivers and any approvals from specific individuals served by the Department or anonymizing confidential information, this town hall shall include selected ‘case reviews’ to illuminate the findings, trends, and solutions to issues identified collaboratively with the Department prior to the Town Hall.
- ii.) The POC shall have the authority to convene regular public meetings:
- a) At least one meeting each calendar month,
 - b) The format and protocols of which shall be designed to solicit public comment on probation related activities as deemed material by the POC,
 - c) That shall take place in a location that is easily accessed by the public,
 - d) That shall take place in each of the 5 supervisorial districts no fewer than once per year.³²
- iii.) The POC shall serve as a forum for public discussion of vital labor issues and finalized collective bargaining agreements material to the delivery of probation services to adults and juveniles. The PRIT recognizes the need to engender a culture of healing and reconciliation between all levels of the Probation Department, probation staff and the community.³³
- a) The POC shall serve as a venue for probation labor unions to identify critical concerns they feel are unaddressed by, or collaborative innovations undertaken with, the Departmental leadership.

³² Strong consideration should be given to holding regular meetings in each of the LA County Service Planning Areas (SPAs). For a description and map of each SPA, please see: <http://publichealth.lacounty.gov/chs/SPAMain/ServicePlanningAreas.htm>

³³ The appointee from the 5th district does not support the inclusion of practice or authority of the POC to involve itself in labor discussions between the county and the labor unions. The position of the 5th district appointee is that applicable labor law precludes the “public discussion” of collective bargaining discussions between county management and labor unions. In addition, the position of the appointee is that any attempt by an outside body to interject itself into those discussions would complicate and adversely impact the discussions themselves and would not further the POC mission.

- b) The POC shall have the authority to convene hearings and meetings with the purpose of mediating conflicts or grievances between probation line staff and management using a restorative justice model.³⁴
 - c) Subject to existing laws, the POC shall have the authority to review and convene public meetings regarding any existing or finalized collective bargaining agreement entered into by the Probation Department and any represented group of its employees.
 - d) The POC shall serve as a forum for publicly discussing the operation of any unit in the Probation Department and its performance, including critical gaps in the accountability structures, training, or implementation of system-wide policies, procedures, and practices. This includes the power to receive and triage requests for auditing a specific unit brought by labor representatives or the community.
 - e) The POC shall serve as a safe haven for Probation staff who have concerns³⁵ about the Probation Department's Internal Affairs department's handling of a specific matter or patterns that are inconsistent with policy, best practices, or systemic reform. Individual grievances shall be forwarded to the OIG, where confidentiality is implicated, and to the POC's internal investigators, when it is not.
- iv.) The POC shall have the authority to require the Probation Department to provide timely reports on any litigation filed where the Department/County is a named defendant.
- a) The Department shall provide the POC timely notice and documentation of any lawsuits and final legal settlement.
 - b) The Department shall provide a quarterly update to the POC on the implementation of Corrective Action Plans arising out of any legal settlement until final implementation.

³⁴ See Section 8 'Public Engagement' for a full description of the mediation and restorative justice functions proposed for the POC.

³⁵ This recommendation arises due to the lack of confidence in some functions of the Department's Internal Affairs unit expressed by staff to the OIG in the Board's recently requested investigations regarding use of force in the halls and camps. Office of Inspector General, *Report Back on Ensuring Safety and Humane Treatment in the County's Juvenile Justice Facilities*, (Feb. 4, 2019), at page 10: 'Various staff and union representatives further expressed a lack of trust in the Department's accountability protocols. Staff interviewed routinely communicated a belief that internal affairs is poorly staffed and trained. They cited the length and quality of investigations as a serious concern, and a general perception that the results of investigations suffer because of it.'

- c) The POC, in consultation with County Counsel, OIG, and any other relevant County Departments shall provide a historical report tracking all litigation involving the department since 2000.³⁶
- d) The POC shall provide a public report of all costs in current and future litigation involving the Department.

8) Public Engagement – A meaningful, robust and ongoing relationship with the community is critical to both an authentic reform path as well as maintaining a high functioning Probation Department that inspires trust and effectively serves the community. Per the Board’s directive, the POC serves as “liaison between the department and the community” and shall have the authority to establish a community engagement substructure to fulfill that role.

The efforts of the Probation Department to establish its own mechanisms to repair and restore faith and public confidence, such as the establishment of Community Advisory Councils, and use of credible messengers, are important. To complement these, the POC should further establish structures and practices that promote trust, accountability, and transparency and provide the POC, the BOS and the Probation Department with real time feedback on actual probation policy implementation, and generate data to identify patterns, progress, and potential areas for corrective action. Through this Public Engagement structure, the POC will project a non-law enforcement presence in the community and an authentic desire to hear community concerns and the infrastructure to address challenges in the execution of probation policies.

The key elements of a community engagement structure that can facilitate ongoing positive engagement include: (1) staffing empowered to solve service complaints and increase awareness of the POC’s work; (2) meaningful community engagement functions which bridge the grievance, investigations,

³⁶ In the first year, the POC, in collaboration with other relevant departments, shall produce a chronological list of all claims, lawsuits, and other settlement agreements of any kind since 2000 in which the claim or lawsuit involved allegations against the Probation Dept. This list should include, but not be limited to, cases that went to trial and all claims, lawsuits, or any settlement of any kind in which County Counsel recommended the claim or lawsuit be settled in a CAR document or other proposed settlement involving Probation. This report shall include, as to each case, the following: a) date and location of the initial incident causing the claim or lawsuit b) the proposed or actual settlement amount or verdict award, if the case went to trial c) how the Corrective Action Plan has been implemented. The substance of this recommendation mirrors the Board’s approval of a May 2019, motion for a similar accounting of litigation costs related to allegations of gangs within the LA County Sheriff’s Department.

and data analysis functions of the POC to identify trends, root causes, and solutions; and (3) a culture of innovation that encourages deeper engagement of the public and the mission of the POC in the stewardship of public funds and promotes healing for systemic failures. Therefore:

- i.) The POC shall establish a community engagement substructure that will:
 - a) be staffed by Probationer Liaisons who have had experience on probation, and serve as the face of the Commission in this substructure.
 - b) serve as the site for unresolved complaints and grievances.
 - c) adopt a case complaint process structure similar to those established within the Department of Children and Family Services (DCFS) and the Department of Public Social Services (DPSS).³⁷
 - d) allow the POC Probationer Liaisons to lodge unresolved service complaints with dedicated staff within the Probation Department, to resolve matters within 48 hours.³⁸
 - e) handle and track complaints, interface with the POC's data arm to analyze and report trends, and with the POC and OIG to identify cases that may require investigations.
 - f) represent the POC on any community advisory bodies established by the Probation Department, using an equity framework that allocates an initial probationer liaison per Supervisorial district (5), and more POC community engagement positions soon after to those County Service Planning Areas (SPAs) with the zip codes that have the highest concentration of probationers.
 - g) create a meaningful role for community members in ensuring proper stewardship of public funds and increasing accountability and transparency by overseeing pilot programs for participatory budgeting.³⁹ Specifically, the POC's Community Engagement staff shall oversee a replication of the JJCC and JJCPA community

³⁷ These protocols are currently used by the County's Executive Office Customer Service Center <http://bos.lacounty.gov/Services/Customer-Service-Center> and responded to by dedicated staff in DCFS and DPSS.

³⁸ All data and findings shall be subject to existing laws regarding confidentiality and subject to protocols that will protect those rights.

³⁹ Participatory budgeting refers to authorization from the Board of Supervisors to people receiving services from the Probation Department to work with the Probation Department to deliberate and vote on the allocation of some portion of public funds. We believe mechanisms such as these will be an essential vehicle to increased accountability, transparency, and better stewardship of public funds. We believe a pilot program that involves participatory budgeting over a nominal amount of the agency's overall budget would be a significant signal to the community about the Board's commitment to systemic reform.

collaboration process to a funding stream directed at the Adult Probation population in a pilot project.⁴⁰

- h) Establish mediation and restorative justice services to actively engage the Probation Department and the community in order to promote healing and carry out the mission of the POC.⁴¹ The Board indicates that the POC shall serve as the ‘mediator between the Department and the community.’ Mediation⁴² is a confidential process facilitated by a neutral third party to help parties in dispute resolve conflict.⁴³ Restorative Justice is a theory of justice, a framework to address harm, and a movement that seeks to transform people, relationships, and our communities.⁴⁴
- i) The POC Executive Director shall have the authority to contract with qualified non-profit organizations expert at mediation or restorative justice to carry out this function.

⁴⁰ See, footnote 20 for a description of the JJCPA and JJCC and the role of the community in developing priorities and budgeting for a small portion of the Probation budget.

⁴¹ During the PRIT public meetings, we witnessed high levels of misunderstanding and tension between people served by and working for the Probation Department. We also witnessed a willingness for these residents, probationers, and family members of probationers, union representatives, line staff, and management staff of the Department to walk towards each other. We believe that the public servants in the Probation Department, the adult and youth on probation and their families, the service providers, and taxpayers have all been harmed by the failed policies of the War on Drugs and tough-on-crime initiatives that were in vogue for much of the modern era. We do not believe that the POC can achieve improved outcomes for adults and juveniles nor increase transparency and accountability without a recognition of the harms and need for communication, healing, and shared responsibility between the Probation Department’s staff and the community. While the appointee from the 5th district supports the language in section “h”, the appointee does not join in the language of this footnote where it reads “.... have all been harmed by the failed policies of the War on Drugs and tough on crime initiatives that were in vogue for much of the modern era.” It is the position of the appointee that such language represents a political statement or advocacy position rather than an empirical assessment of factors that have impacted justice involved individuals and their families, as well as practitioners in the criminal justice system.

⁴² Chief Executive Office (2018). *Report Back on Options for an Independent Entity Focused on Probation Department Reform and Public Accountability (Item No. 13, Agenda of October 17, 2017)*. Los Angeles: County of Los Angeles.

⁴³ See, State of California Department of Fair Employment and Housing – Dispute Resolution Services, <https://www.dfeh.ca.gov/dispute-resolution/>. The PRIT enlisted the free services of this state agency’s ‘Community Conflict Services’ to address the tension at various points of our process, with positive results. The ED of the POC shall have the discretion to use this entity or other comparable entity to fulfill the mediation mandate.

⁴⁴ See: <https://restorecal.org/restorativejustice/>. This capacity does not currently exist within the County. The PRIT recommends that the ED of the POC have the authority, discretion, and resources to effectuate a meaningful restorative justice function in the POC.

- ii.) **Youth Councils**⁴⁵ – The POC’s community engagement staff shall establish and administer a system of youth councils for youth detained in the County’s juvenile halls and camps.⁴⁶
 - a) The POC Youth Councils shall be developed through the use of best practices nationwide and in collaboration with formerly and currently detained youth,
 - b) The Councils shall serve as vehicle for engagement of the youth regarding the County’s reform effort and serve as a bridge to the independent grievance, investigations, and data analysis procedures,
 - c) The POC Executive Director shall have the authority to decide whether to allocate staff resources to the youth councils or to contract with a qualified non-profit, community organization to carry out this function under the direction of the POC.

9) Composition – The POC’s composition must represent both subject matter expertise and community wisdom.

i.) Membership

- a) The Commission shall consist of 9 members. Each shall be a resident of the County of Los Angeles. The members shall be selected as follows:
- b) Five members shall be appointed by the Board, one nominated by each Supervisorial District.
- c) Four members shall be considered “at large” and will be appointed by a majority vote of the 5 Supervisorial appointees.⁴⁷

⁴⁵ The appointee from the 5th district does support the description or utilization of Youth Councils as articulated here. It is the position of the appointee that Youth Councils themselves are a positive and productive practice for juvenile justices systems. They offer benefits for the youth themselves, provide opportunities for system stakeholders to learn from the unique perspective of the youth, and advance restorative justice practices. However, as apparently proposed in the POC structure-to include youth who are actively on probation or in custody-the position of the appointee is that the proposal is fraught with potential problems that include potential conflicts of interest, complicate relationships between probation staff and probation involved youth, and/or compromise confidentiality protections.

⁴⁶ The County of Los Angeles has committed to establishing youth councils in an existing Corrective Action Plan as part of the settlement of a use-of-force lawsuit in its juvenile facilities. At the March 16 PRIT meeting, technical experts indicated that a best practice is for such councils is that they are under the auspices of a body independent of the Probation Department, but that systems leaders of the juvenile division be required to attend.

⁴⁷ PRIT believes that allowing the Board’s appointees to select the four (4) additional Commissioners will decrease delays and allow the sitting Commissioners to identify existing and needed skill sets and backgrounds. This feature allows the Commission to fill those gaps in a manner that strengthens the collective capacity of the POC and reduce delays in the selection process.

- d) The four at large members shall be nominated through the following process and selected by a majority vote of the rest of the Commissioners, and the Executive Director, when the number of Commissioners is an even number:
- (1) the POC shall create an *at large* appointments advisory committee that will review candidates and make recommendations to the full POC,⁴⁸
 - (2) candidates may self-nominate,
 - (3) candidates may be nominated by any Los Angeles County resident
 - (4) Criteria for *at large* membership:
 - (a) at least one member shall be formerly system involved as a juvenile or adult,
 - (b) at least one member shall be the parent of a formerly system involved youth or adult,
 - (c) at least one member shall be a member of the criminal defense or civil rights bar, with strong consideration given to public defenders or alternate defenders, or members of the legal academy,
 - (5) Criteria for exclusion from membership on the POC as BOS appointees or at large members:
 - (a) current employees of any law enforcement agency, including but not limited to the Los Angeles County Probation Department,
 - (b) current employees of the County of Los Angeles,
 - (c) current employees of any subcontractor of the County providing rehabilitative services to adults or youth in Los Angeles County,
 - (d) current employees of any foundation providing funds or technical assistance to any facet of the Los Angeles County criminal or juvenile justice system.
 - (e) current members of any union representing a bargaining unit of County Employees.
 - (6) Term of Office: Each member shall serve a three-year term. No member may serve on the Commission for more than two full consecutive terms, unless such limitation is waived by the Board of Supervisors. Tenure is also subject to the provision of Section 5.12.050 of the County Code.

⁴⁸ Prior to the creation of the POC, and at the sunseting of the PRIT, it will be necessary for this process to be established by the Executive Office for the composition of the inaugural cohort of Commissioners. The pool of candidates assembled by the Executive Office shall be submitted for the POC Supervisorial appointees to consider immediately upon the convening of the POC.

- (7) Vacancies: Vacancies on the Commission shall be filled by the Appointing Supervisor of the vacating member. For at large members, vacancies shall be filled within 30 days and shall be filled for the balance of the unexpired term, from candidates in the pool established by the POC, and selected by the Supervisorial appointees.
- (8) Appointment to fill a vacancy shall not constitute an appointment for a full term. The term for all members shall begin on July 1 and end June 30. The first term of all persons who are the initial appointees to the Oversight Commission shall be deemed to commence on the date their appointment is approved by the Board.

ii) Selection Process

- (a) The application process can be changed by the Board of Supervisors. Any resident of Los Angeles County may submit an application. The applications shall be submitted to the Executive Office.
- (b) In selecting the members chosen by the Supervisors from those who qualified, weighted consideration shall be given to selection of persons with substantial community involvement (such as active participation in a community organization working on adult or juvenile justice issues or nominated by such organization), background either as a mental health professional, youth development expert, or experienced re-entry practitioner.
- (c) In selecting members of the Commission, each Supervisor shall give weighted consideration to selecting members who would add to the diversity of the Commission including, but not limited to, racial, ethnic, age, geographic, gender, gender identity, religious, sexual orientation, occupational, immigration status, disability, and national origin composition of the Commission.
- (d) The Commission shall develop a comprehensive training and orientation program which each Commissioner must complete within six months of appointment. Failure to do so may result in disqualification. In developing this program, the Commission shall consult with the Probation Department, community groups and other community stakeholders. The initial training program and on-going training shall be robust and cover such topics as adverse childhood experience (ACE), trauma-informed practices, the use of force, custody issues, mental health issues, and juvenile justice best practices. Each Commission member shall complete the initial training program and actively participate in on-going training programs.

- (e) The Commission, working with the County Counsel, shall develop a comprehensive conflicts of interest policy and a code of conduct policy that each Commission member will follow. This shall be evidenced by each Commission member signing the policies.
- (f) Transition Provision: As part of the formation of the Commission only, the initial Commissioners shall be divided in to three groups, with Group A serving an initial three year term, Group B serving an initial two year term and Group C serving an initial one year term. The Los Angeles County Executive Office shall randomly determine which Commissioners shall be placed in which of the three groups.

10) Miscellaneous Provisions

- (i) Compensation
 - (a) Members of the Oversight Commission will be eligible to receive reasonable compensation to be revised from time to time by the Board of Supervisors for each regular and special meeting of the Commission, up to a cap per member of \$5,000 per fiscal year. Commissioners shall be reimbursed for reasonable expenses incurred in performing their duties in accordance with County policies regulating reimbursement to County officers and employees (including parking and transportation in attending meetings of the Commission). Members are encouraged where possible to waive their meeting compensation.
- (ii) Organization: The Oversight Commission shall, with the advice of the County Counsel, prepare and adopt necessary rules and regulations for the conduct of its business subject to approval of the Board of Supervisors. The Commission shall initially follow Robert's Rules of Order. A current copy of the rules and regulations shall be filed with the Executive Officer of the Board of Supervisors.
- (iii) Staff: The Commission shall utilize the staff of the OIG to undertake investigations, inquires, audits and monitoring that trigger confidentiality issues or that fall outside the scope of the POC's internal capacity, and the staff of Commission Services to provide assistance at Commission meetings. The actual staff of the Commission shall be comprised of positions described in the proposed organizational chart, with positions designated in the current salary ordinance of the County of Los Angeles. The Commission will also have the authority to use consultants where the need arises, to be retained by the Executive Office or by the

Chief Executive Officer's delegated authority.

- (iv) Self-governance: The Commission shall elect a chairperson, a vice-chairperson and a secretary and such other officers as it determines appropriate from its membership at its annual meeting. A chair may only serve for two consecutive one-year terms.
- (v) Records: Any personnel records, citizen complaints against County personnel in the Probation Department, and information obtained from these records, which come in to the possession of the Oversight Commission or its staff, shall be deemed confidential and forwarded to the OIG, and shall not be disclosed to any member of the public, except in accordance with applicable law. Copies of records and complaints of the Oversight Commission shall be made available to the Probation Department upon completion of the investigation of the Oversight Commission unless prohibited by applicable law.
- (vi) Annual Report: The Commission shall prepare, submit to the Board of Supervisors and make available to the public an annual report. The annual report will be prepared no later than July 1 of each year. The annual report shall contain background information about the Commission, identify Commission members and senior staff members, detail activity of the Commission in the previous year, provide a budget for the Commission and provide contact information. The annual report will detail what Probation Department policies, procedures or practices if any, were eliminated, modified or created due to the Commission's work.
- (vii) Self-Evaluation: At the end of the third year of its operation and every three years thereafter, the Commission shall undertake a detailed self-evaluation. The detailed self-evaluation shall include a candid assessment about the strengths and the weaknesses, and successes and failures of the Commission. It shall contain a recommendation whether the Commission should continue in existence and if so should its responsibilities and powers change in any way or whether a management audit should be conducted. The self-evaluation should also contain recommendations directed to the Commission itself about how to improve its operations. The self-evaluation shall be submitted to the Board of supervisors and the public.

The Chief Executive Officer of Los Angeles shall, within ninety days of the Commission's audit being transmitted to the Board of Supervisors, review the Commission's self-evaluation and determine whether a management audit should be conducted and shall be incorporated in the self-evaluation transmitted to the Board of Supervisors with a copy to the Probation Chief. Within a year of the issuance of the self-evaluation, the Commission shall provide a written report to the Board of Supervisors and to the general public about its status in implementing the recommendations identified in the self-evaluation.

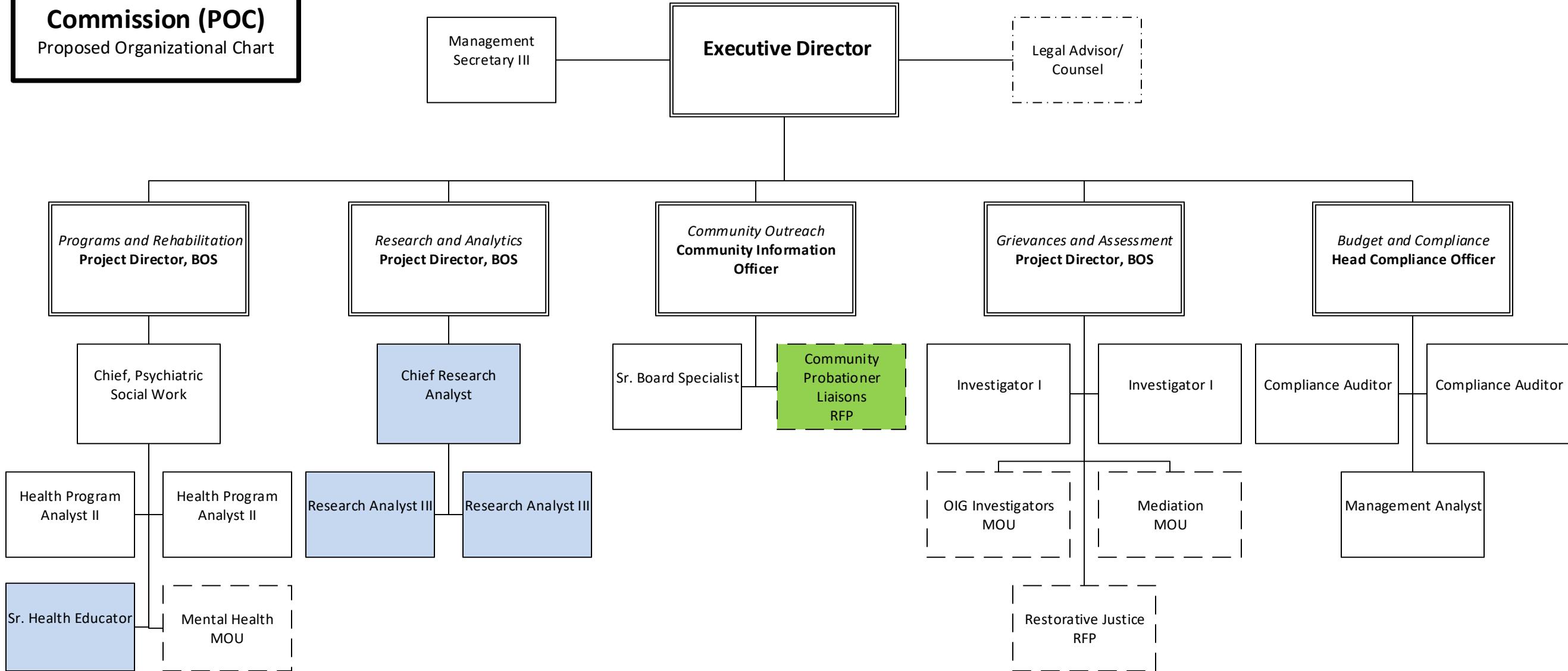
- (viii) Compliance With All Laws: The Oversight Commission shall comply with all applicable State and Federal laws including but not limited to the Ralph M. Brown Act and the Political Reform Act.

VI. APPENDICES

Appendix A:
Definitions

1. Oversight – “To oversee; to supervise.”
2. Review – “To examine or assess formally or officially with the intention of recommending change, if necessary.”
3. Investigation – The action of investigating; the making of a search or inquiry; systematic examination; careful and minute research.
4. Audit – To make an official systematic examination of (accounts), so as to ascertain their accuracy.
5. Inquiry – The action of seeking, esp. (now always) for truth, knowledge, or information concerning something; search, research, investigation, examination.
6. Assessment – Estimation, evaluation.

Probation Oversight Commission (POC)
Proposed Organizational Chart



Legend:
Light Blue – Represented item.
Green – Establishes an RFP for 5 CPL positions
Total # of Budgeted Positions: 20

Office of Inspector General Organization Chart

