COUNTY OF LOS ANGELES
OFFICE OF INSPECTOR GENERAL

312 SOUTH HILL STREET, THIRD FLOOR
LOS ANGELES, CALIFORNIA 90013
(213) 974-6100
http://oig.lacounty.gov

MAX HUNTSMAN
INSPECTOR GENERAL

July 24, 2018

TO: Supervisor Sheila Kuehl, Chair
               Supervisor Hilda L. Solis
               Supervisor Mark Ridley-Thomas
               Supervisor Janice Hahn
               Supervisor Kathryn Barger

FROM: Max Huntsman
               Inspector General

SUBJECT: REPORT BACK ON THE SHERIFF'S DEPARTMENT'S PLAN TO UPGRADE THE DATA SYSTEMS USED TO TRACK JAIL VIOLENCE

Purpose of Memorandum

This is a report back to your Board on the Sheriff's Department's (Department) plans to upgrade the data systems used to track jail violence. This request was in response to the OIG's July 2017 "Review of the Jail Violence Tracking and Reporting Procedures of the Los Angeles County Sheriff 's Department" (OIG Review).

The OIG Review examined the Department's tracking and reporting of three types of jail violence: (1) use-of-force on prisoners by staff, (2) prisoner-on-prisoner assaults, and (3) prisoner assaults on staff. The OIG Review then identified problematic issues in the Department's tracking and reporting of jail violence data. Lastly, the OIG Review set forth recommendations aimed at improving the accuracy of reported jail violence data. The OIG's primary recommendation was that:

> A single unit should be responsible for compiling, reconciling, verifying, and validating the accuracy of all jail violence data. Any future statistical methods and data reconciliation should adhere to generally accepted record keeping standards. The responsible unit should keep organized *work papers* for later evaluation and replication of its work, and data generated by

this unit should be periodically audited and/or overseen by the AAB.

On August 25, 2017, the Board instructed the Office Inspector General (OIG) and Chief Executive Officer (CEO) as follows:

". . . the Inspector General and Chief Executive Officer, in consultation with the Sheriff, to report back to the Board on whether the Sheriff's Department can identify internal staff candidates that could be dedicated to a single unit responsible for compiling and verifying all jail violence data to ensure accuracy, including best practices; evaluate methodology and data for compiling prisoner assault data to accurately report incidents which include multiple assaults against prisoners and/or staff and include the fiscal and budget implications on upgrading the Sheriff's Department information technology data systems."[1]

Based on the above, the OIG has met with the Department and the CEO regarding the issues requested by the Board. The Department's responses to the Board are set forth below. Please note that the Department's responses do not reflect OIG input or approval. As discussed below, the OIG will supplement this response with a separate review and analysis of each Departtment response.

1.   Has the Department designated a single unit responsible for compiling and verifying all jail violence data to ensure accuracy, including best practices?

Response: No. The Department reports that it has designated the Custody Support Services Bureau (CSS) as the single unit responsible for disseminating all data requests for the Custody Division. The Unit Commander of CSS will determine whether the CSS Data Team can handle the request to conclusion or whether assistance is required from other units (i.e., Criminal Intelligence Bureau, Custody Investigative Services, Population Management Bureau, etc.).

The Administrative Commander for Custody Operations will oversee all data releases. Any information requests which require data to be manipulated in ways outside of normal procedures, or require the use of data collection methods other than those used by CSS, will require the authorization of the Administrative Commander. Public data requests other than for force or crime statistics will also be handled by CSS, unless the requests are part of ongoing data exchanges with other county entities or outside organizations.

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[1]   See Statement of Proceedings, August 15, 2017, item 38, page 33-34 at http://file.lacounty.gov/ SDSInter/bos /sop/1027818_081517.pdf.

Although the Department identified CSS as the single unit to disseminate all data requests, the Department reported that CSS is unable to assume the role as the single source for data compilation and verification as recommended by the Office of Inspector General. The Department stated that because sources for jail violence data originate from various units throughout the Custody Division, CSS must rely on those units to provide accurate data. As a result, the Department intends to reduce the number of data sources it uses for reported jail violence data.

The Department plans to use the LARCIS[2] database as the exclusive data source for compiling and reporting "Inmate-on-Inmate" and "Inmate-on-Staff" assaults. The Department plans to use the CARTS[3] and the PRMS[4] databases as the sole data sources for reported Use-of-Force data. The Department asserts that limiting the sources of reported data to these three databases will eliminate the need for individual jail violence trackers at each facility and will pave the way for the development of a single Departmental unit capable of being the single source for the collection, compilation, dissemination, and verification of jail violence data. However, the Department reports that the actual creation of such a unit will require a request of additional staffing, funding, and office space.

In the interim, the Department reports that the Custody Division is working with the Data Systems Bureau and the Risk Management Bureau to identify and revise existing databases to ensure they are all-encompassing and can be utilized as reliable data sources. The Custody Division has designated the Electronic Line Operations Tracking System (e-LOTS) [5] as the

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[2] "LARCIS" is an acronym which stands for the "Los Angeles Regional Crime Information System" database which tracks investigative reports generated for jail violence incidents. LARCIS contains a summary of pertinent information from LASD reports, including crimes committed; involved people (suspect, victim, witness, informant, etc.); vehicles involved in an incident; property mentioned in reports (e.g. stolen, recovered, or damaged property); crime analysis and modus operandi information; and case management/assignment information.

[3] "CARTS" is an acronym which stands for the "Custody Automated Reporting and Tracking System" database. The information contained in this database includes, but is not limited to the following: incident reference numbers and logs; searches; lock down notifications; inmate requests and complaints; hospital transports; inmates with mental health issues; and facility tours. Line personnel, line supervisors, and administrative staff enter information into this database.

[4] "PRMS" is an acronym which stands for the "Performance Recording and Monitoring System" database. PRMS contains personnel information including but not limited to the following: administrative investigations (including preventable traffic collisions); public commendations and complaints (Service Comment Reports); force review documentation; shooting review documentation; lawsuits; civil claims; and *Pitchess* motions. (See MPP 3-02/085.20 – 085.30).

[5] "E-LOTS" is an acronym which stands for "Line Operations Tracking System." E-LOTS is another database that is used to track uses of force by Department employees. Line supervisors and administrative staff from each facility enter information into this database. The information contained in this database includes,

interim system used to track uses of force. The Custody Support Services Bureau will ensure that all facilities reconcile e-LOTS data on a weekly basis. The Department asserts that with new modifications to e-LOTS, the reports generated by e-LOTS will provide accurate and up-to-date use of force data.

The Department reports that the Custody Investigative Services Unit (CISU) has established new protocols for compiling jail violence statistics using the LARCIS database as the sole data source. The Custody Division has also conducted training classes for both sworn and professional staff involved in the workflow of the criminal report submission process. Included in the training was a workflow and training guide which includes the appropriate methods for deferral of reports.

In addition, the LARCIS database will be modified to generate a Data Exception Report specific to the Custody Division. The custody-specific Data Exception Report which will be used to identify incorrect and/or missing information on the Crime Analysis Supplement Form which is used for prisoner and employee assault data collection.

The Department asserts that the early identification of errors and/or missing information in reports will enable custody facilities to identify and correct data issues in a more timely manner. To assist in ensuring reports are completed and accurately processed, Custody Investigative Services proposes the creation of a Quality Assurance Team and recommends that custody facilities acquire additional staffing at the individual facilities to be dedicated to data collection and entry into LARCIS. Lastly, policy revisions to Custody Division Manual (CDM 4-01/000.00 Crime Reporting Procedures) were implemented to ensure the timely submission, approval, and tracking of jail violence reports.

OIG Analysis: The OIG continues to recommend that the Department place responsibility for both supervising data collection and the verification of the accuracy of the collected data with a single unit or individual. The Department has not specifically set forth all procedures it has set in place to "ensure [the sourced databases] are all-encompassing and can be utilized at reliable data sources." As such, the OIG has requested these "interim" accuracy verification procedures from the Department for analysis and review. The OIG will then supplement this response with an analysis of these interim accuracy verification procedures.

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but is not limited to the following: use of force incidents; inmate extractions; allegations of force by staff on inmates; prevented uses of force by staff; major inmate disturbances; categories of force used in an incident; and tracking force investigations. (See MPP 4-01/025.05).

2.   **Has the Department evaluated the methodology for compiling prisoner assault data to accurately report incidents which include multiple assaults against prisoners and/or staff?**

Response: Yes. The Department reported that the Custody Division is implementing new protocols to track jail violence by incident as well as by victim wherein multiple victims are identified and recorded. As noted above, the Custody Investigative Services Unit (CISU) will no longer use data trackers from individual custody facilities as the source for compiling prisoner assault data. CISU will now use the LARCIS database as the sole data source for compiling prisoner assault data. The Custody Investigative Services Unit will provide data to Custody Support Services. Custody Support Services will then report/disperse the jail violence data. The Department reports that CISU will no longer use their in-house tracker for statistical purposes and will only provide information to CSS obtained from the LARCIS database.

OIG Analysis: The Department has not specifically set forth the new protocols implemented by the Custody Division "to track jail violence by incident as well as by victim." As such, the OIG has requested the new protocols from the Department for analysis and review. After the Department's new protocols have been fully implemented and yielded a sufficient data set for analysis, the OIG will supplement this response with further findings.

3.   **What are the fiscal and/or budgetary implications of upgrading the Sheriff's Department's information technology data systems to address the issues raised by the OIG Report on tracking jail violence data?**

Response: In progress. The Department reports that it is taking a number of steps to upgrade its information technology data systems. The Data Systems Bureau is working to determine the best manner of updating the Department's existing data systems. The Custody Division is working with the Data Systems Bureau to revise and update custody data systems to increase the accuracy of reported data. The Custody Division is also working with the Risk Management Bureau and the Data Systems Bureau to assess the feasibility of building out the PRMS database to better extract and compile custody related data for reports. The Custody Division is also assessing the feasibility of having the Data Systems Bureau handle requests for data extraction and compilation from custody related databases. The Custody Division has also created a new work flow model for entering custody related data into databases in a more accurate and timely manner.

The Department reports that additional staff will be a necessary component of upgrading the Sheriff's Department information technology data systems to address the issues raised by the OIG Report. These staffing requests would extend to CSS, Criminal Intelligence Bureau, Custody

Investigative Services, Risk Management Bureau – Discovery Unit, Custody Compliance and Sustainability Bureau, and individual custody facilities.

The Department asserts that staffing the Data Systems Bureau with personnel of suitable classification and expertise is imperative to achieve the goal of updating the Department's existing data systems. The Department reports that once the Data Systems Bureau is suitably staffed, a better estimation can be given regarding the overall timelines and costs for upgrading existing data systems.

Custody Operations submitted an initial staffing request is for 22 positions.The Department indicates that the staffing request is being reviewed and evaluated to determine if the requsted staffing will achieve the desired outcome and will likely be one component of an overall Department effort to improve data tracking. The additional staff, if approved, will supplement existing personnel in the Custody Information Bureau, Custody Support Services Bureau, Risk Management Bureau, and custody facilities. In addition, the Custody Investigative Services will create a new "Quality Assurance Team" to ensure that reports are thorough, properly submitted, processed in a timely manner, and accurately entered into LARCIS.

OIG Analysis: The ultimate fiscal and/or budgetary implications of upgrading the Sheriff's Department information technology data systems cannot be assessed at this time. The OIG has requested the specific plans/policies the Department intends to implement to upgrade its information technology data systems for analysis and review. This analysis is further complicated by the fact that the Department is already in the later stages of a pre-existing plan to update its data systems. As such, the OIG believes that it would be prudent to wait until the ongoing changes to the Department's data systems have been implemented before making any further assessment.

MH:SN

c: Jim McDonnell, Sheriff
  Sachi A. Hamai, Chief Executive Officer
  Celia Zavala, Acting Executive Officer
  Mary C. Wickham, County Counsel
  Brian Williams, Executive Director, Civilian Oversight Commission