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DAWYN R. HARRISON
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October 9, 2023

VIA E-MAIL ONLY

Lisa Southwell, Field Representative
Board of State and Community Corrections
2590 Venture Oaks Way, Ste. 200
Sacramento, CA 95833
Lisa.Southwell@bscc.ca.gov

**Re: FINAL Corrective Action Plan for Barry J. Nidorf Secure
Youth Treatment Facility**

Dear Ms. Southwell:

On behalf of the Los Angeles County Probation Department, please find attached the final corrective action plan for Barry J. Nidorf Secure Youth Treatment Facility (BJN-SYTF).

This corrective action plan is submitted to you in response to your initial targeted inspection report dated August 11, 2023, and final targeted inspection report dated September 20, 2023.

The County appreciates your technical assistance in response to our draft corrective action plan submitted to you on September 27, 2023.

As always, please contact me with any questions.

Very truly yours,

DAWYN R. HARRISON
County Counsel

By

A handwritten signature in blue ink that reads "Tyson B. Nelson".

TYSON B. NELSON
Senior Deputy County Counsel
Justice and Safety Division

Barry J. Nidorf – Secure Youth Treatment Facility
Board of State and Community Corrections Corrective Action Plan
Dated: 10/9/23

Title 15. Section	Regulation	Description	Probation Corrective Action Plan	Staff Assigned	Completion Date
§ 1321. Staffing.	Each juvenile facility shall: (a) have an adequate number of personnel sufficient to carry out the overall facility operation and its programming, to provide for safety and security of youth and staff, and meet established standards and regulations; (b) ensure that no required services shall be denied because of insufficient numbers of staff on duty absent exigent circumstances.	<p>Facility shift staffing forms were provided for the week of July 20-July 27, 2023.</p> <p>Some shifts were minimally staffed. Staff are routinely held over with no notice to cover shifts and report they continue to be exhausted as a result. Most staff believe the unscheduled, mandatory holdovers negatively impact attendance.</p> <p>We did note some positive progress in youth getting to school and youth who want to go outside for exercise which was positively confirmed by the youth. However, there continue to be times that youth are not participating in programs or recreation due to lack of staff.</p> <p>We noted instances in which youth were in dayrooms alone because staff were busy with operational requirements (in and out of the office or down the hallway) or they needed to use the restroom.</p> <p>Youth also report not feeling safe due to the lack of staff. Those we spoke to spoke highly of most staff but noted</p>	<p>Barry J. Nidorf Secure Youth Treatment Facility (BJN-SYTF) maintains sufficient staff on daily basis to operate, including the youth attending school daily, programming and recreation. Since July 2023, staffing levels have increased significantly with the reassignment and deployment of field staff to cover shifts. Since that date, staffing ratios have consistently remained within mandated ratios. Educational services, recreation, visitation, religious services, and programming have not been negatively impacted as a result of staffing shortages at BJN-SYTF. These essential functions have been regularly maintained.</p> <p>As a measure to ensure that programing, education, and other essential functions take place, some field officers were temporarily reassigned to the facility. In addition, the Chief Probation Officer reimplemented field officer deployment which mandates field officers to work 1-2 days a week in facility. A Special Recruitment Notices was approved on September 18, 2023, for the recruitment of 14 officers at the level of Deputy Probation Officer II.</p> <p>The efforts around increasing staffing have resulted in youth being able to participate in recreational activities and regular school attendance. Management monitors staffing each shift and ensures that ample staffing are present to provide opportunities to recreation, education and other programs.</p>		January 5, 2024

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			<p>Whereas, BJN-SYTF is operating with sufficient staff and the youth are attending their required programming, education and recreation, the Department will continue to closely monitor to ensure on-going compliance, while also working on the long-term solution to end the deployment of field staff.</p> <p>The monitoring is multi-faceted. The facility will monitor onsite staffing levels and adherence to Title 15 requirements. Facility leadership will also monitor overall staffing numbers and compliance. Further, the Compliance Team in the Chief's Office will monitor education attendance, recreational hours, exercise, and programming. A correction action plan developed in conjunction with the Compliance Team and the facility will be implemented if the facility falls out of compliance. Compliance of the CAP will be monitored by the facility leadership and the Compliance Team.</p> <p>The completion of this corrective action is January 5, 2024.</p>	<p>Sanders / Novak / Compliance Team</p>	

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§ 1322. Youth Supervision Staff Orientation and Training.	(b) Prior to assuming any responsibility for the supervision of youth, each youth supervision staff member shall receive a minimum of 40 hours of facility-specific orientation, including: (1) individual and group supervision techniques; (2) regulations and policies relating to discipline and rights of youth pursuant to law and the provisions of this chapter; (3) basic health, sanitation and safety measures; (4) suicide prevention and response to suicide attempts (5) policies regarding use of force, deescalation techniques, chemical agents, mechanical and physical restraints; (6) review of policies and procedures referencing trauma and trauma-informed approaches; (7) procedures to follow in the event of emergencies; (8) routine security measures, including facility perimeter and grounds; (9) crisis intervention and mental health referrals to mental health services; (10) documentation; and (11) fire/life safety training. (c) Prior to assuming sole supervision of youth, each youth supervision staff member shall successfully	Unable to verify whether certain youth supervision staff have received the 40-hours of required facility-specific training; training records have not been provided.	<p>ATTACHMENT 3 staffing records for assigned staff at BJN-SYTF. The Department is taking a multiple-step approach to training staff on "facility-specific" requirements. BJN-SYTF has identified the staff that have received the Juvenile Corrections Officer Core Course (JCOCC), but not the "facility-specific". A training schedule will be created to ensure the facility-specific training will occur and completed prior to January 5, 2024. The training schedule will be provided to the BSCC.</p> <p>Second, the Department will identify staff deployed to BJN-SYTF who have not received the JCOCC nor the facility-specific training. The Department will prioritize the 40 hour facility specific training and develop a training schedule for the facility specific, then develop a training schedule for these individuals in the JCOCC.</p> <p>Third, the Department will ensure all newly-assigned staff received the 40-hour course. As the Department trains all newly hired juvenile institutions staff on the § 1322 topics in the academy, the Department will work with the BSCC field staff to ensure all requirements of § 1322 are met in the academy, and ensure all facility-specific information is included, or taught onsite at the facility.</p> <p>The Department, under separate cover, will provide the detailed training plans and data to the BSCC for review.</p>	Sanders / Novak / Staff Training Office / Williams	January 5, 2024

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	complete the requirements of the Juvenile Corrections Officer Core Course pursuant to Penal Code Section 6035. (d) Prior to exercising the powers of a peace officer youth supervision staff shall successfully complete training pursuant to Section 830 et seq. of the Penal Code.		The completion date for this corrective action is January 5, 2024.		

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§ 1324. Policy and Procedures Manual.	All facility administrators shall develop, publish, and implement a manual of written policies and procedures that address, at a minimum, all regulations that are applicable to the facility. Such a manual shall be made available to all employees, reviewed by all employees, and shall be administratively reviewed at a minimum every two years, and updated, as necessary. Those records relating to the standards and requirements set forth in these regulations shall be accessible to the Board on request.	The 342-page Draft Secure Youth Treatment Facility (SYTF) Manual was provided the evening prior to the inspection; we were unable to review the manual prior to inspection. Additionally, the policies are in draft status and have not yet been formally approved by upper management. The manual is pending a full review by SYTF staff once approved.	<p>The Department is re-organizing and re-drafting policies department-wide, which will include the creation of an "institutional policy manual" for use at the juvenile hall, camps and SYTF, and the different facilities will have their own procedure manual.</p> <p>At this time, the Department will continue to utilize the Detention Services Bureau (DSB) Manual at BJN-SYTF and the Department will develop the SYTF-specific procedure guide. The procedure guide for BJN-SYTF will be effective by December 31, 2023. Further, the Department will share the procedures with the BSCC field representative for feedback, along with the California Department of Justice monitor. Finally, the Department will create a training plan and schedule to training BJN-SYTF on the procedures.</p> <p>The Department will remove any non-applicable policies from the DSB manual that do not apply to the SYTF youth.</p> <p>The completion date for this corrective action is January 5, 2024.</p>	Sanders / Novak / Barbarin / Harabid /	January 5, 2024

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§ 1328. Safety Checks.	<p>The facility administrator shall develop and implement policy and procedures that provide for direct visual observation of youth at a minimum of every 15 minutes, at random or varied intervals during hours when youth are asleep or when youth are in their rooms, confined in holding cells or confined to their bed in a dormitory.</p> <p>Supervision is not replaced, but may be supplemented by, an audio/visual electronic surveillance system designed to detect overt, aggressive or assaultive behavior and to summon aid in emergencies. All safety checks shall be documented with the actual time the check is completed.</p>	<p>A review of the Guard 1 system report indicates that safety checks exceed 15 minutes. We conducted a review of a random sample of video, which indicates inconsistencies with the Guard 1 report. We also noted that staff are not indicating late checks in the system, as required by policy, nor are there any audits or reviews being completed by seniors or supervisors as required by Directive 1490.</p>	<p>Measures have been implemented as a solution to the Safety Check deficiencies identified by BSCC during the inspection. Effective September 18, 2023, dedicated Guard 1 devices have been programmed to monitor the safety checks in all units where young adults are housed. The SYTF Quality Assurance (QA) team at BJN-SYTF will remotely monitor the dedicated Guard 1 devices.</p> <p>The dedicated Guard 1 devices now ping five (5) minutes before a safety check is due and when the safety check is late. The QA team will contact the unit when a ping is received to ensure the safety check is completed as required or justification is entered in the device when late. The current Security Check Accountability Log will remain in place and track deficiencies with late or missing safety checks. If the late or missing safety check results from a policy violation, corrective action must be taken with the</p>	<p>Sanders / Novak / QA Team / Compliance Team</p>	<p>December 15, 2023</p>

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			<p>staff(s) involved (i.e., training, Supervisor Conference, etc.).</p> <p>Further, the Department has created a new Compliance Team in the Office of the Chief. ATTACHMENT 4 is the compliance unit directive detailing everyone persons role in the safety check system. This corrective action aims to ensure compliance with the safety checks policy and preserve the safety and security of the young adults in our care, and hold accountable staff who do not follow policy.</p> <p>The completion date for this corrective action is December 15, 2023.</p>		
§ 1353. Orientation.	The facility administrator shall develop and implement written policies and procedures to orient a youth prior to placement in a living area. Both written and verbal information shall be provided and supplemented with video orientation if feasible. Provision shall be made to provide accessible orientation information to all detained youth including those with disabilities, limited literacy, or English language learners.	The documentation provided did not include information specific to the SYTF population.	<p>BJN-SYTF is creating an updated orientation document that is specific to the SYTF population. Each youth will receive a new orientation that is specific to SYTF program both verbally and in a booklet form. The updated orientation documentation and the re-orientation schedule will be provided to the BSCC. The orientation will incorporate the new LA Model, Development Stage System (DSS) (discussed more detail below under discipline) so the youth are aware of the reward based system.</p> <p>The completion date for this corrective action is December 15, 2023.</p>	Sanders / Novak	December 15, 2023

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§ 1357. Use of Force.	<p>The facility administrator, in cooperation with the responsible physician, shall develop and implement written policies and procedures for the use of force, which may include chemical agents. Force shall never be applied as punishment, discipline, retaliation or treatment.</p> <p>(7) define the role, notification, and follow-up procedures required after use of force incidents for medical, mental health staff and parents or legal guardians.</p> <p>(c) Facilities shall develop policies and procedure which require that agencies provide initial and regular training in use of force and chemical agents when appropriate.</p> <p>...</p>	<p>This remains an ongoing issue. The directive/policy was implemented despite practices not being implemented. Staff have not been trained for Use of Force, including the use of OC; training requires initial training and an annual refresher. We are aware that training has been developed and scheduling is being planned.</p> <p>The incident documentation reviewed has improved; however, there were a few packets missing the incident debriefs or parent contact as required. This is being addressed through a training memo to the supervisors responsible for the tasks.</p>	<p>BJN-STYF has developed a training plan to comply with this section. A Train for Trainers course on the use of force policy is scheduled for September 23, 2023, 14 staff will be trained. The 14 trainers will begin training staff in Use of Force on September 25, 2023. The training will include the policy and the refresher portion. ATTACHMENT 5 is the use of force training curriculum.</p> <p>The updated training will conform to policy requiring a 24 hour training – 8 hours on the policy and 16 hours of hands-on techniques. The Department will determine that all staff have had appropriate training on use of force either the initial or refresher that conforms to the policy and § 1357. The Department will consult with BSCC field staff to ensure all necessary requirements are met.</p> <p>The Department will also implement a 2-hour training on the appropriate use of OC Spray for all staff that have previously not had the training.</p> <p>In the interim, an instructional memo was issued to all Supervisors on September 7, 2023, as it relates to debriefs and parent contact per policy. See ATTACHMENT 6.</p> <p>The Department, with assistance from the California Department of Justice monitor, has developed a CARE team model that will assist in lower the need for use of force. The Department will provide documentation on</p>	Sanders / Novak / Staff Training / Williams / Compliance Team	January 5, 2024

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			<p>the CARE team approach under separate cover for the BSCC review and feedback. Further, as discussed under Discipline, BJN-SYTF is training on a new Behavior Management Program that will also assist in lower use of force.</p> <p>The completion date for this correction action will be January 5, 2024.</p>		
§ 1360. Searches.	(a) Searches shall be conducted to ensure the safety and security of the facility, public, visitors, youth, and staff.	Room and facility searches are not being completed as required.	<p>An informational memo will be provided to all staff instructing the need to comply with the policy and completing the necessary forms. The QA team will compile the search logs and upload to a Teams folder for the Compliance Team to further review to ensure the facility is meeting the policy.</p> <p>The completion date for this correction action will be December 31, 2023.</p>	Sanders / Novak / QA Team / Compliance Team	December 31, 2023
§ 1370. Education Program.	b(6) The minimum school day shall be consistent with State Education Code Requirements for juvenile court schools. The facility administrator, in conjunction with education staff, must ensure that operational procedures do not interfere with the time afforded for the minimum instructional day. Absences, time out of class or educational instruction, both excused and unexcused, shall be documented.	BSCC receives daily attendance reports from LACOE. While attendance has improved, youth continue to be late to school. We will continue to review LACOE reports; if attendance continues to improve this item will be removed from section 1370. It will, however, continue to be noted under 1321, Staffing.	<p>Measures have been put in place where daily attendance and timely arrivals to school are monitored. The arrival times and number of youth attending school is documented on a school attendance log at the morning and afternoon school drop times. The Facility Superintendent is to ensure that the Director on Duty monitors the attendance and drop off times for quality assurance. Probation and Los Angeles County Office of Education (LACOE) will reconcile the attendance log daily beginning October 1, 2023, to ensure that youth are in attendance and in school on time and that information is accurately reported. Probation has created its independent</p>	Sanders / Novak / Compliance Team	December 15, 2023

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			<p>tracker for school attendance and start times to ensure any issues are immediately addressed by management, staff, and LACOE.</p> <p>The Department will provide, under separate cover, the school attendance logs, including arrival times, for BSCC review to establish the youth are arriving to school on time. The Department continues to meet with the LACOE regularly to reconcile school attendance data.</p> <p>The Compliance Team will be onsite all weekdays to track the arrival times of each unit to independently track times. The Compliance Team will work with the Department executives and the facility if youth are not arriving to school, or not arriving on time in developing a corrective action plan if needed. The regular meetings with LACOE will also include any corrective action plans to ensure teachers are present on time and Probation may need to stagger arrival times of youth requiring LACOE to provide Probation access to classrooms prior to 8:30 am.</p> <p>Further, the Department recognizes youth in its care have missed school hours. The Department has contracted with an agency that provides tutoring services for youth at BJN-SYTF who have missed instructional minutes. The services began in September 2023. The Department will complete a monthly check of the roster of youth at BJN-SYTF and refer any youth that has missed one hour of</p>		

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			<p>instructional minutes. The agency will then connect with youth onsite at BJN-SYTF and conduct an educational assessment and plan for their tutoring hours. This is not a substitute for instructional minutes going forward, but a step to assist the youth in the Department's care who have missed minutes.</p> <p>The Department recognizes that it needs to continue to closely monitor school attendance and will continue to audit the attendance daily to ensure on-going compliance.</p> <p>The completion date for this correction action is December 15, 2023. Even though youth are arriving to school, the Department wants proof of practice prior to labeling this CAP completed.</p>		
§ 1371. Programs, Recreation, and Exercise.	The facility administrator shall develop and implement written policies and procedures for programs, recreation, and exercise for all youth. The intent is to minimize the amount of time youth are in their rooms or their bed area. Juvenile facilities shall provide the opportunity for programs, recreation, and exercise a minimum of three hours a day during the week and five hours a day each Saturday, Sunday or other non-school days, of which	<p>Recreation: The facility does not provide youth with age-appropriate, stimulating recreational activities to engage in during recreation. Youth do not have access to television or age-appropriate movies or entertainment.</p> <p>Staff provide youth with game consoles in some units as they are not provided by the agency. It has been repeatedly noted that “they (the youth) break them or take them apart”, which is why they</p>	<p>The Department is compliant in this section in ensuring youth are provided the requirements of exercise and programming, however, the Department must ensure participation is accurately tracked. Further, the Department must better document appropriate recreation for the youth and ensure recreation is provided in align with Departmental policies.</p> <p>A review conducted and all activities were found to be current, consistent, and relevant to the youth currently housed at BJN-SYTF. Currently, youths have access to television, movies, and videogames. The updated Behavioral Management Plan (BMP) will ensure that</p>	Sanders / Novak / Roman / QA Team / Compliance Team	January 5, 2024

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	<p>one hour shall be an outdoor activity, weather permitting.</p> <p>(a) Programs. All youth shall be provided with the opportunity for at least one hour of daily programming to include, but not be limited to, trauma focused, cognitive, evidence-based, best practice interventions that are culturally relevant and linguistically appropriate, or pro-social interventions and activities designed to reduce recidivism. These programs should be based on the youth's individual needs as required by Sections 1355 and 1356. Such programs may be provided under the direction of the Chief Probation Officer or the County Office of Education and can be administered by county partners such as mental health agencies, community-based organizations, faith-based organizations or Probation staff.</p> <p>(b) Recreation. All youth shall be provided the opportunity for at least one hour of daily access to unscheduled activities such as</p>	<p>are not provided by the agency. This is a supervision issue.</p> <p>It was also noted there is no consistency between units in what items are offered. We understand there are different units and different phases to the facility; however, recreation and related activities should be provided to all youth consistently. Moreover, Probation Managers should have access to replacement items. Youth must have age appropriate, suitable, engaging recreation and recreational activities.</p> <p>Programs: Programs are not consistently being provided. In some cases, sign-in sheets of youth attendance are being provided by program provider, but facility documentation does not consistently match sign-ins. We suggest that staff be retrained in how the form should be completed to ensure compliance going forward.</p>	<p>all units have videogames, movies, and recreational items that are age appropriate.</p> <p>On the programming log, ATTACHMENT 7 is an informational memorandum was sent to staff, which includes the log used by staff. Further, training will begin on November 15, 2023, and will be completed by December 15, 2023. All staff will be trained on the Title 15 programming Log to ensure that they are properly completed. The facility updated the signing sheets for the units and upon arrival by Movement Control for all providers.</p> <p>The Department recognizes it must ensure tracking of the youth's recreation times, exercise time, and programming times separately and not mix an activity into the wrong category and has developed a form – currently called the "programming log" but will be renamed the "activity log" to not confuse between programming, recreation and exercise. The Department will work with the BSCC field representative to ensure activities are appropriately classified.</p> <p>Further, the Department will investigate the feasibility of adding cable television into the units and gaming systems as recommended by the BSCC field representative and is committed to working with the BSCC field representative on other age-appropriate activities. The QA team will compile the programming logs and update to Teams for the Compliance Team</p>		

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	<p>leisure reading, letter writing, and entertainment. Activities shall be supervised and include orientation and may include coaching of youth.</p>		<p>to review to ensure adherence to policy. ATTACHMENT 8 is the recreation schedule for the month of September which lists the numerous age-appropriate programs for youth in each unit. ATTACHMENT 9 is the programming available at BJN-SYTF. ATTACHMENT 10 are the programming schedules for each unit at BJN-SYTF for the month of September.</p> <p>The completion date for this corrective action is January 5, 2024.</p>		

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§ 1390. Discipline.	<p>The facility administrator shall develop and implement written policies and procedures for the discipline of youth that shall promote acceptable behavior; including the use of positive behavior interventions and supports. Discipline shall be imposed at the least restrictive level which promotes the desired behavior and shall not include corporal punishment, group punishment, physical or psychological degradation.</p> <p>The facility administrator shall establish rules of conduct and disciplinary penalties to guide the conduct of youth. Such rules and penalties shall include both major violations and minor violations, be stated simply and affirmatively, and be made available to all youth. Provision shall be made to provide accessible information to youth with disabilities, limited English proficiency, or limited literacy.</p>	<p>The facility continues to operate with no contemporary behavior management process or disciplinary process for negative behavior including assaultive behavior.</p> <p>The facility lacks a suitable discipline process. There were eight (8) SCMs provided, of which, two (2) were missing the Sanctions and Appeals form, one (1) was a Mental Health Incident, and five (5) were not completed correctly. Of the five (5), three (3) did not have sanctions identified and in the other two (2), the form was not completed correctly. A suitable, age-appropriate incentive-based program to encourage positive and proactive behavior and include disciplinary actions as appropriate must be developed and implemented.</p> <p>This section also impacts 1391 and Due Process forms. We strongly suggest reviewing both for implementation purposes and to ensure consistency between the two policies.</p>	<p>A mandatory LA Model, Development Stage System (DSS) training will be conducted during the month of October 2023. All staff will complete training by November 7, 2023. The training will cover BSCC Title 15 regulations as it relates to incentive-based programs that will encourage positive behavior. The DSS provides a new framework to enhance the traditional compliance-based behavior management approach by creating a strength-based developmental system that supports skill building and positive behavioral change. Through a tri-responsive approach and a brand-new stage system, the DSS serves as a roadmap to the young person’s program with benchmarks, goals to keep themselves accountable, and incentives as they advance through the stages.</p> <p>The treatment component of the DSS drives this process forward with an evidence-based program that is in alignment with the risk and needs assessment. Through cognitive behavioral interventions (CBI), specifically Interactive Journaling and Dialectical Behavior Therapy (DBT), and the appropriate level of CBI dosage, young people are guided through a treatment process where they can self-reflect and elicit positive changes to their thoughts, feelings, and behaviors, helping to drive transformation.</p>	Sanders / Novak / Roman	December 31, 2023

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			<p>ATTACHMENT 11 is the DSS Manual that details the entirety of the program that the staff will be trained on by November 7.</p> <p>Whereas staff will be trained in November, proof of practice of the new BMP model is vital to its success, and there must be a youth buy in period, therefore, the completion date considers this buy in period.</p> <p>The completion date for this correction action is December 31, 2023.</p>		