

COUNTY OF LOS ANGELES

Overview

- Compliance Items
- Items of Deficiencies
- Request for the Board
 - LA County Proposal

Los Padrinos Juvenile Hall Noncompliance Items

Based upon the findings of the BSCC, the County of Los Angeles is out of compliance with 11 sections of Title 15.

Title 15 Compliance Update

Compliance

- Title 15 § 1325 Fire Safety Plan
- Title 15 § 1322 Youth Supervision Staff
 Orientation & Training
- Title 15 § 1324 Policy and Procedures
 Manual
- Title 15 § 1354.5. Room Confinement
- Title 15 § 1357. Use of Force
- Title 15 § 1360. Searches

Current Deficiencies

- Title 15 § 1321 Staffing
- Title 15 § 1328 Safety Checks
- Title 15 § 1370. Education Program
- Title 15 § 1371. Programs,
 Recreation, and Exercise



Los Padrinos Juvenile Hall Noncompliance Items

Title 15 § 1321.
Staffing.

COUNTY RESPONSE

- At Issue: BSCC' staff findings and conclusions:
 - (1) did not provide sufficient information or details for rebuttal;
 - (2) no evidence to the contrary (i.e., that Title 15 minimum staffing ratios were not met) has been provided; and
 - (3) assumption of facts. Reassigned staff were returned to their original assignment but continued to be deployed to the juvenile facilities to ensure minimum staffing ratios were met.
- Los Angeles County has not fallen below staffing minimums. We are compliant with this regulation.

Title 15 § 1322.
Youth Supervision
Staff Orientation and
Training



- Despite the number of staff trained we continue to have different views on this requirement. LA County did work with our BSCC representative to determine 11 of the 13 topics of orientation are provided in the academy.
- As a result, we provided a 2-hour site specific training to orientate staff on the sections that were not included in their academy.
- To date, <u>849</u> deployed staff have completed training and <u>65</u> require training.
 Of the 65 requiring training, <u>45</u> are on protected leave.
- Please note any deployed staff that have not received the required training have been removed from deployment until training is completed.

Title 15 § 1324. Policy and Procedures Manual



- As required by Title 15 regulations, the County's detention-specific procedure guide was developed, published, and implemented on January 9, 2024, which included a directive for staff to review the procedural manual.
- Once the manual was updated, no substantive changes were made and therefore re-training of staff was unnecessary.
- We are compliant with this regulation.

Title 15 § 1325. Fire Safety Plan

Actions Taken to Come Into Compliance

- The County has an adequate emergency evacuation plan that can safely house all youth from Los Padrinos at other facilities throughout the County.
 The plan requires the movement of youth from different facilities to ensure space for all youth.
- The County requested Technical Assistance from the BSCC on December 5, 2023, and we were advised, "The regulation is performance based in that it requires the facility administrator to consult with the local fire department to develop the safety plan, which shall include an evacuation plan. When BSCC monitors for compliance, we will be looking for evidence of that consultation (which could be a sign off) and that there is an evacuation plan in the policy manual."
- This information did not correspond to what the BSCC audited.
- We are compliant with this regulation.

Title 15 § 1328. Safety Checks

Actions Taken to Come Into Compliance

- The County has addressed the deficiencies to ensure all safety checks comply with Title 15. detention and deployed staff and will continue to monitor and train to maintain the sustainability of this item.
- An external Quality Assurance Team, assigned to Administration did conduct random audits of safety checks and will continue to conduct audits.
- We do not agree this finding rises to the level of substantial noncompliance.

Title 15 § 1354.5. Room Confinement

Actions Taken to Come Into Compliance

- The County issued instructional training memorandums to all staff in November 2023 and January 2024, and confirmed all supervisors ensure their units comply with the regulations.
- Youth were returned to their rooms following single fights, multi subject fights, and incidents of disruption involving multiple youth, which interrupted normal operations.
- Barriers to restoring normal operations included, but was not limited to:
 - Assessing youth and/or staff injuries
 - Clearing medical responses or arranging for required medical responses
 - Decontaminating youth(s)
 - Assessing for imminent or ongoing safety and security issues
- Although describing youth in rooms during this time as "cool downs" may not be the best description, separating c youth for a brief period of time before returning to normal programming is necessary.
- There is no standardized time frame for restoring institutional operations, as each incident is considered on a case by case basis. SCC 2-15-24 Hearing

Title 15 § 1357. Use of Force



- Staff have received the required training.
- Any deployed staff that have not received the required training have been removed from deployment until training is completed.

Title 15 § 1360. Searches



- Searches are conducted of all living units as required by Title 15. Special
 Enforcement Officers conduct facility and room searches daily. Search logs
 were not provided to BSCC in response to the targeted inspection.
- We are compliant with this regulation.

Title 15 § 1370. Education Program

Actions Taken to Come Into Compliance

- The County acknowledges that this is an area where improvement is needed.
 We continue to make aggressive efforts to have youth attend school in the classroom every day and arrive at school on time.
- The County also offers compensatory tutoring for youth when school minutes are missed.



Title 15 § 1371.
Programs,
Recreation, and
Exercise





- The County acknowledges that this is an area where improvement is needed.
 We continue to make aggressive efforts to ensure youth participate in programs and recreation as required under Title 15 CCRs.
- The County was placed in an impossible position. The DOJ court-appointed monitor required the County to create for their approval a new activity log.
 The BSCC determined the log does not accurately document compliance with Title 15 or align with programs being provided.
- Following the targeted inspection on February 3,2024, the DOJ and BSCC met with the County and agreed to revisions to our activity log.

Title 15 § 1390. Discipline

Actions Taken to Come Into Compliance

- The County is compliant in this area.
- The Behavior Management Program has been implemented at Los Padrinos and as with any new program, there is a learning curve for staff along with modifications, adjustments and improvements being made to ensure its success.
- The County is actively working with the Cal DOJ monitoring team on the needed improvements to the program.

Los Angeles County Request

1. The Board not accept the report of February 7, 2024, of non-compliance of the Los Padrinos Juvenile Hall and postpone the hearing on this report.

2. Authorize the creation of an Operational Reconstruction Team (ORT), under some type of agreement between the Board of State and Community Corrections and the Los Angeles County Probation Department, to assist in an extensive operational reconstruction of its juvenile hall noncompliant areas.

THE SOLUTION: Operational Reconstruction Team

- To have an agreement between Los Angeles County and the BSCC
- Launch a six-month Detention Services Reconstruction Plan
- The Probation Department shall convene an ORT to work jointly with BSCC staff in developing recommended improvements
- Initiate a strategic planning process
- Pursue strategies to improve detention services operations

Strike Team Precedent: Placer County

- Placer County Chief Executive Officer (CEO) convened a County Steering
 Committee (CSC) in January 2003
- CSC worked jointly with Board of Corrections now known as the BSCC
- The CSC worked with BOC staff to form workgroups to investigate critical subject areas & to make recommendations in a plan of action.
- Assessment of Placer County Detention Operations
- Outcome was 23 recommendations which included prescribed action steps

Operational Reconstruction Team

- Assessment of Facility Operations at Los Padrinos Juvenile Hall
 - Evaluate and modify youth supervision staff, orientation, and training
 - Evaluate and improve policy and procedure manuals
 - Improve discipline, safety checks, and room confinement
 - Enhance program awareness, development, and provision

QUESTIONS