

MEETING DATE: June 25, 2026**AGENDA ITEM:** D**TO:** BSCC Chair and Members**FROM:** Le-Mai D. Lyons, Chief Deputy Director and General Counsel
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Campus Vernon Kilpatrick Juvenile Hall, Los Angeles County
Requesting Approval

Summary

This agenda item was deferred from the April 16, 2026 Board Meeting. The item requests that the Board make a determination of suitability within the meaning of Welfare and Institutions Code section 209, subdivisions (a)(4) and (d) for Campus Vernon Kilpatrick (CVK) in the County of Los Angeles and find that it is suitable for the confinement of juveniles.

Background

The Board of State and Community Corrections (BSCC) establishes the minimum standards for juvenile halls, camps, and secure youth treatment facilities and conducts biennial inspections of those facilities. (Welf. & Inst. Code, §§ 209, 210, 875, & 885.) Regulations setting forth these minimum standards can be found in Sections 1300-1511 of Title 15 of the California Code of Regulations.

Welfare and Institutions Code section 209, subdivision (d), sets forth the process and timelines by which juvenile facilities can address items of noncompliance with Titles 15 and 24 regulations. This process requires facilities to submit corrective action plans (CAPs) to the BSCC, which must be approved and on file within 60 days. Items of noncompliance must then be resolved within a reasonable period of time, not to exceed 90 days. If items of noncompliance remain unresolved, the Board is required to make a “determination of suitability” at its next scheduled board meeting. (Welf. & Inst. Code, § 209, subd. (d)(3).)

Summary of November 4, 2025 Unannounced Inspection

As part of its plan to depopulate Los Padrinos Juvenile Hall, Los Angeles County Probation intended to move pre-disposition female and gender-expansive youth to CVK and operate it as a juvenile hall in addition to being operated as a camp and Secure Youth Treatment Facility. Because CVK was previously utilized as a camp for post-adjudicated youth, this required the county to make changes to its physical plant. E.g., juvenile halls are required to have reception/intake areas. (Cal. Code Regs., tit. 24, pt. 2, § 1230.1.1.) These plans were

required to be reviewed by the State Fire Marshal, and CVK, as a facility constructed using financing provided by state lease revenue bonds, was required to obtain pre-opening inspections and clearances before moving youth into the facility. (Welf. & Inst. Code, § 1975, subd. (b)(5); Cal. Code Regs., tit. 15, § 1868, subd. (a)(4); & Cal. Code Regs., tit. 24, § 13-201, subd. (c)4¹.) The county proceeded with construction without the plan approvals. Notable changes to the physical plant included cutting into a fire-rated wall and installing an observation window in the intake building, installing polycarbonate panels over existing windows inside of the cottages and dining commons, remodeling a public restroom into a detention-grade restroom with shower (requiring the reconstruction of an interior wall). As part of the review of these various changes, the State Fire Marshal will need to determine whether the materials used are appropriately fire-rated. On November 3, 2025, without obtaining any of the pre-opening approvals and clearances, the county activated CVK as a juvenile hall and moved pre-disposition youth into the facility.

On November 4, 2025, BSCC staff conducted an unannounced inspection of CVK to evaluate compliance with relevant sections of Title 24 because the facility was opened without prior notice to the BSCC or obtaining necessary clearances. The BSCC notified the county of the following items of noncompliance following that inspection (Attachment 1):

1. § 13-102(c)3. Operational Program Statement
2. § 12-201(c)4. Facilities in Existing Buildings
3. § 13-201(c)6.B(1). Design Requirements: Fire Safety
4. § 13-201(c)6.B(2). Design Requirements: Suicide Hazards
5. § 13-201(c)6.B(2)(h). Design Requirements: Suicide Hazards
6. § 13-201(c)6.B(9). Design Requirements: Security
7. § 13-201(c)6.B(10). Medical/Mental Health Care Housing and Treatment Space
8. § 1230.2.10. Security Glazing

On January 5, 2026, the BSCC received an approved Corrective Action Plan (CAP) for all outstanding items of noncompliance at CVK (Attachment D-2). The CAP indicated a completion date of April 4, 2026, for corrective action and compliance with all outstanding items of noncompliance.

On April 4, 2026, the county provided written verification that all the corrective action items had been completed on the approved CAP “within the department’s control and is in compliance with the applicable sections of Title 24 referenced in the Initial Inspection Report.” However, it further stated that it remained non-compliant with “Facilities in Existing Buildings: 13-201(c)4 and Design Requirements: Fire Safety: 13-201(c)6. B(1) – State Fire Marshal clearance not received, and Unknown Title 19 and Title 24 Design Requirements specific to Fire Safety.”

¹ California Code of Regulations, Title 24, Section 13-201(c)4 provides:

“Facilities in existing buildings. Wherever county, city, city and county, or regional juvenile facility intends to establish a juvenile facility in an existing building or buildings, notice shall be given to the Board whose staff shall complete a survey to determine capacity of such buildings and shall make recommendations for necessary modifications. The proposing local government shall secure the appropriate clearance from the health authority, building official, and State Fire Marshal.”

On April 8, 2026, BSCC staff began reinspection to verify completion of the CAP, and based on review of policy, processes, and documentation received, CVK is in compliance with the following sections of Title 24:

1. § 13-102(c)3. Operational Program Statement
2. § 13-201(c)6.B(2). Design Requirements: Suicide Hazards
3. § 13-201(c)6.B(2)(h). Design Requirements: Suicide Hazards
4. § 13-201(c)6.B(9). Design Requirements: Security
5. § 13-201(c)6.B(10). Medical/Mental Health Care Housing and Treatment Space

As of April 15, 2026, because BSCC staff had not yet completed the CAP, the following sections of Title 24 were pending verification:

1. § 12-201(c)4. Facilities in Existing Buildings (Public Health; Building Official)
2. § 1230.2.10. Security Glazing

As of April 15, 2026, based on the county's admission and BSCC staff's review of policy, processes, and documentation received, CVK remained out of compliance with the following section of Title 24:

1. § 12-201(c)4. Facilities in Existing Buildings (Fire)
2. § 13-201(c)6.B(1). Design Requirements: Fire Safety

While the State Fire Marshal's review timeline is outside of county's control, the county was aware that its fire safety plans were required to be reviewed and approved by the State Fire Marshal before it moved youth into CVK on November 3, 2025. (Welf. & Inst. Code, § 1975, subd. (b)(5); Cal. Code Regs., tit. 15, § 1868, subd. (a)(4); & Cal. Code Regs., tit. 24, § 13-201, subd. (c)4.) The county was reminded of this requirement on November 4, 2025 after the BSCC conducted an unannounced inspection and cited the various noncompliance issues. When the county submitted its CAP on January 5, 2026, it had noted that it would submit its drawings and plans to the State Fire Marshal by January 16, 2026 (See Attachment F-2). But, according to the county, it did not submit the plans for review until March 5, 2026. Regardless of the delayed timeline, these Title 24 noncompliance items implicate fire, life, and safety issues that must be resolved before youth are housed in the facility and should have been resolved before activating CVK as a juvenile hall. Given the serious nature of these noncompliance issues, BSCC staff recommend that the Board determine CVK juvenile hall unsuitable until all the required Title 24 clearances are completed.

Details related to the findings of compliance and noncompliance are in the November 4, 2025 Inspection Report (Attachment D-1), the April 6, 2026 Notice of Suitability Determination (Attachment D-3).

Update Since the April 16, 2026 BSCC Board Meeting

On April 15, 2026, State Fire Marshal conducted an onsite inspection at CVK and issued a Temporary Certificate of Occupancy. The Temporary Certificate of Occupancy was conditional:

- The county must provide a plan outlining how the remaining deficiencies related to the fire doors and windows will be addressed.
- Once the plan is reviewed and approved, the county will have an additional 30 days to complete the necessary repairs.
- In the meantime, CVK is not permitted to occupy the intake room until the repairs are made, inspected, and verified by the State Fire Marshal.
- If the repairs are not completed within the 30-day repair window, the State Fire Marshal will consider if all areas affected must not be occupied.

Due to the Temporary Certificate of Occupancy, the BSCC Board voted to defer this suitability determination to the June 25, 2026 board meeting.

On May 1, 2026, the State Fire Marshal issued CVK's Certificate of Occupancy after the county completed its required repairs.

On May 18, 2026, the county confirmed the other two outstanding Title 24 clearances from the Department of Public Works and Department of Public Health were obtained. (§ 12-201(c)4. Facilities in Existing Buildings (Public Health; Building Official).)

On May 28, 2026, the county verified it completed the installation of the security glazing (§ 1230.2.10. Security Glazing) in the intake room, and the glazing was approved by the State Fire Marshal.

No further items of noncompliance remain, and CVK's Title 24 CAP was completed.

Because the county did not complete the corrective action for all sections of Title 24 by the timeline set forth in section 209, subdivision (d), the Board is required to determine if the facility is suitable for the confinement of juveniles. If the Board determines that the facility is unsuitable and that it cannot be used for the confinement of juveniles, the Board will notify the county that the facility is unsuitable and that it cannot be used for the confinement of juveniles commencing 60 days after the county receives the notice. The facility then cannot be used for the confinement of juveniles until the Board reinspects the facility and determines that the conditions that rendered the facility unsuitable have been remedied and the facilities are a suitable place for the confinement of juveniles. (Welf. & Inst. Code § 209, subd. (a)(4).)

Recommendation/Action Needed

Staff recommend that the Board:

1. Make a determination of suitability within the meaning of Welfare and Institutions Code section 209, subdivision (a)(4) for Campus Vernon Kilpatrick, and find that the facility is suitable for the confinement of juveniles.

Attachments

D-1: November 4, 2025 Initial Inspection Report – Juvenile Hall

D-2: January 5, 2026 Corrective Action Plan – Campus Vernon Kilpatrick Juvenile Hall

D-3: April 6, 2026 Notice of Suitability Determination

D-4: May 1, 2026 Certificate of Occupancy – Camp Kilpatrick