

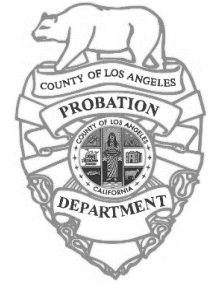


**ADOLFO GONZALES**

Chief Probation Officer

# COUNTY OF LOS ANGELES PROBATION DEPARTMENT

ADULT & JUVENILE SERVICES  
9150 EAST IMPERIAL HIGHWAY – DOWNEY, CALIFORNIA 90242  
(562) 940-2513



April 5, 2022

Board of State and Community Corrections  
Ms. Linda Penner, Chair  
2590 Venture Oaks Way, Suite 200  
Sacramento, CA 95833

## COUNTY OF LOS ANGELES PROBATION DEPARTMENT – BARRY J. NIDORF JUVENILE HALL (BJNJH)

Dear Ms. Penner,

The Board of State and Community Corrections (BSCC) conducted inspections for the county's juvenile facilities in September, October and November 2021. On November 15, 2021, the BSCC provided written notice to the Department regarding noncompliance with Title 15, Section 1354.5 (Room Confinement) at BJNJH. The Department submitted a corrective action plan (CAP) on December 10, 2021. Beginning March 14, 2022, the BSCC began to review and inspect BJNJH to determine compliance with the Department's CAP. The Department was notified by the BSCC on March 29, 2022, that following their inspection it appeared that BJNJH remained out of compliance with Section 1354.5 Room Confinement.

### **Title 15, Section 1354.5 – Room Confinement**

This regulation requires that youth are not placed on room confinement for specific reasons to include, punishment, coercion, convenience, or retaliation. The regulation states that youth may be placed on room confinement for up to four hours if staff take specific action and create a plan to return the youth to general population in consultation with mental health or medical staff.

The BSCC's March 29, 2022 findings specifically focused on violations of the Department's policy that youth may be placed in their rooms as necessary for shift change, but for "no more that 30 minutes at the end of the AM shift and beginning of the PM shift." The BSCC stated that the inspections revealed instances that the 30-minute time limits were exceeded.

The Department took steps to address this issue even before the BSCC issued its findings on March 29, 2022. On March 26, 2022, staff were instructed to refrain from placing youth in their rooms during shift change, except in instances of unit disturbances and/or fights or at the direction of the Officer of the Day or the Director. To ensure that this instruction was

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being followed, the Department reviewed video of shift changes from March 26, 2022 through April 3, 2022. This video review confirmed that room confinement at shift change, as outlined in the March 29, 2022 notice from the BSCC, has been remedied.

Nonetheless, Department Managers continue to conduct and document random video reviews and both managers and supervisors have increased their presence in units within the facility. Every manager and supervisor is required to provide immediate correction and instruction when witnessing non-compliance. In the event of any potential egregious behavior, a referral for disciplinary action is required. Consistent with its efforts to promote accountability and professionalism in its staff, the Department is exploring any retraining and progressive discipline options that might apply to those who violated the prior shift change policy.

In addition to video review, the Department is continually reviewing documentation to ensure procedures are followed. The placement of any youth in room confinement is documented in Unit Logbooks, and justification for room confinement must be provided. If concerns are identified, immediate corrective action is taken, including immediate coaching/training by the Department's Quality Assurance Team and BSCC Subject Matter Experts (SMEs). The Compliance Unit has continued to review documentation to ensure compliance with all BSCC regulations, not just those concerning room confinement. Any documentation requiring additional clarification is immediately referred to the Compliance Unit Supervisor who follows up and ensures training is provided. The Department is also exploring acquiring technology to more effectively track room confinement and safety checks, in an effort to further improve operations and documentation.

To ensure that these important compliance and oversight measures continue to be fully implemented, the Department has made significant leadership changes at both Juvenile Hall facilities. The Department has appointed new Superintendents to supervise each facility, along with several new Directors. These new leadership teams are expected to help the Department maintain its focus on its Title 15 obligations, and generally continue the Department's efforts to ensure the Juvenile Halls are run professionally and in full compliance with the law.

These new leadership teams are scheduled to receive in-person intensive training directly from the BSCC on April 5 and April 6, 2022. The Department's staff also receives, and will continue to receive, extensive training. As outlined in the Department's December 10, 2021 CAP, all sworn staff at BJNJH received a mandatory four-hour BSCC Title 15 training session during the month of October 2021 (10/25/2021 – 10/31/2021). In addition to the four-hour mandatory training, a BSCC refresher course will continue to be provided during the required two-week block training to keep staff apprised of all regulations and policies. Further, the Department's BSCC SMEs will conduct annual training on current and new BSCC regulations and on-going training will continue to be provided during Staff Meetings.

BSCC – BJNJH Response

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The Department takes its compliance obligations seriously. It believes the significant measures it has taken throughout the BSCC inspection process, and regarding the March 29, 2022 findings specifically, have resulted in the Department coming into compliance. The Department is committed to ensuring and maintaining this compliance going forward. Should you have any questions, please do not hesitate to contact my office or Chief Deputy Karen Fletcher at (562) 441-8043.

Sincerely,

A handwritten signature in cursive script that reads "Adolfo Gonzales".

Dr. Adolfo Gonzales  
Chief Probation Officer

cc: Honorable Eric C. Taylor, Presiding Judge Los Angeles County Superior Court  
Honorable Akemi Arakaki, Presiding Judge of the Juvenile Court  
Fesia Davenport, Chief Executive Officer, Los Angeles County  
Celia Zavala, Executive Officer, Board of Supervisors  
Dawyn Harrison, Interim County Counsel, Los Angeles County  
Wendelyn Julien, Executive Director, Probation Oversight Commission