ORANGE COUNTY
OC Probation

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DATE: November 11, 2025

TO: Board of State and Community Corrections -- Attention: Lisa Southwell

FROM: Regina Martinez -- Division Director Youth Leadership Academy

SUBJECT: Corrective Action Plan -- Youth Leadership Academy

Dear Mrs. Southwell,

The Board of State and Community Corrections (BSCC) conducted its inspection for the 2025-2026 Biennial Inspection Cycle at the Orange County Youth Leadership Academy in late July 2025. During the inspection process, the BSCC identified several areas of non-compliance as outlined below:

Title 15, Sections:

- 1324 – Policy and Procedures Manual
- 1325 – Fire Safety Plan
- 1353 – Orientation
- 1354 – Separation
- 1354.5 – Room Confinement
- 1355 – Institutional Assessment and Plan
- 1358.5 – Use of Restraint Devices for Movement and Transportation Within the Facility
- 1361 – Grievance Procedure
- 1390 – Discipline

Please find the attached Corrective Action Plan prepared by the Orange County Probation Department for the Youth Leadership Academy.

Sincerely,

Regina Martinez
Orange County Probation Department
Assistant Division Director
Youth Guidance Center/Youth Leadership Academy
YGC: (714) 836-2708, YLA: (714) 935-7095

Orange County Youth Leadership Academy Corrective Action Plan

Regulation	Deficiency	Responsible Party	Action Plan	Proof of Practice	Date to Be Completed	Final Resolution Date
§1324: Policy and Procedure Manual	1. Several Policies were found to be incomplete or missing regulatory language.	Division Directors Kevin Moore and Regina Martinez	1. Review, update, train and implement all policy sections including Section 1324 found to be missing regulatory language.			February 6, 2026
		Division Directors Kevin Moore and Regina Martinez	2. Facility administrators will divide policy documents, complete reviews and updates, and provide them to the internal working group for review and ensure full compliance with the regulation.	Policy updates to the executive team by January 16, 2026. This timeline will allow for policies to be updated and regulatory language to be added.	January 16, 2026	February 6, 2026
		Division Directors Kevin Moore and Regina Martinez	3. Finalized drafts to be sent to Executive Management for final review/approval and submission to the Labor Union.	Policy update to labor union by January 30, 2026. This timeline will allow for executive team to review and make any necessary changes before sending on to the labor union.	January 30, 2026	February 6, 2026

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	2. Unable to verify that staff had reviewed the policy and procedure manual as required by regulation.	Division Director Kevin Moore	1. Implement an electronic read acknowledgement in ProbNet – Document Acknowledgement section to ensure all officers have reviewed the policy. Email directive on use of document acknowledgement provided to officers.	1. Policy update, training, meetings, and emails to all officers to ensure understanding.	January 30, 2026	February 6, 2026

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Regulation	Deficiency	Responsible Party	Action Plan	Proof of Practice	Date to Be Completed	Final Resolution Date
§1325: Fire Safety Plan	1. Facility Fire Safety Plan including emergency housing information was not included in the Agency Policy/Procedure Manual.	Division Director Kevin Moore and Risk Management Administrator Kent Mitchell	1. Review, update, train and implement facility Fire Safety Plan including emergency housing information and all other required areas of regulation specific to Section 1325: Fire Safety Plan. Add completed document to Agency Policy and Procedure Manual.	1. Policy implementation to be complete by January 30, 2026. This timeline will allow for sufficient time to make all necessary additions to the newly created PMI. Fire Prevention Plan will be added to the Agency Policy and Procedure Manual and go live by January 30, 2026. This timeline will allow for sufficient time to have consultation with the local fire agency.	January 30, 2026	January 30, 2026
	2. No documentation of consultation with the local fire agency for fire prevention.	Division Director Kevin Moore and Risk Management Administrator Kent Mitchell	1. Facility Safety Coordinator liaison to set meet and confer with the City of Orange Fire Captain for the facility administrator.	1. Meetings will be scheduled by December 19, 2025. Consultations will be completed by January 30, 2026.	December 19, 2025 / January 30, 2026	January 30, 2026

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§1353: Orientation	1. Policy was found to be incomplete or missing regulatory language. Orientations must occur prior to movement into a living unit.	Division Director Regina Martinez and Assistant Division Director Tracy Duran	1. Review, update, train and implement policy and procedure to include all sections of 1353.	1. Policy implementation to be complete by February 6, 2026. This timeline will allow for policies to be updated and reviewed by the executive team and labor union.	January 23, 2026	February 6, 2026
	2. Orientation handbook not current and reflective of all required regulatory areas.	Division Director Regina Martinez and Assistant Division Director Tracy Duran	1. Complete all updates to Orientation Handbook to comply with Title 15 and agency policy and procedure including appropriate proof of practice.	1. Handbook corrections and proof of practice document to be completed by February 6, 2026. This timeline will allow for all necessary corrections and additions to be added to the handbook, orientations to be implemented and time to ensure corrective action is successful.	January 23, 2026	February 6, 2026
				2. Conduct townhalls by unit to provide updated facility orientation for all youth to ensure that all youth are current and understand the rules and expectations of their facility.	January 23, 2026	February 6, 2026

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		Division Director Regina Martinez and Assistant Division Director Tracy Duran	Conduct Quality Assurance Reviews of Documentation	Orientation documentation will be reviewed to ensure that all regulatory and policy expectations are being met as required.	January 23, 2026	February 6, 2026

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Regulation	Deficiency	Responsible Party	Action Plan	Proof of Practice	Date to Be Completed	Final Resolution Date
§1354: Separation	1. Policy was found to be incomplete or missing clear, well defined and regulatory language. Further, policy lacks the specific types of separation or implementation in compliance with required regulations.	Division Director Regina Martinez and Assistant Division Directors Kerri Carvo and Erick Bieger	1. Review, update, train and implement all policy sections in 1354.	1, Policy implementation to be complete by February 6, 2026. This timeline will allow for policies to be updated and reviewed by the executive team and labor union.	February 6, 2026	February 6, 2026
	2. Self-separations are not being consistently documented.	Division Director Regina Martinez and Assistant Division Directors Kerri Carvo and Erick Bieger	1. Provide training on standardized documentation processes and regularly audit officers' documentation.	1. Reinitiate daily supervisory audits with weekly administrator review by December 19, 2025. Documentation of audits will occur in electronic case notes. This timeline will allow for administrators to work with the supervisors on proper documentation into our ICMS.	December 19, 2025	January 2, 2026

	2. Inconsistent application of disciplinary/separation guidelines.	Division Directors Kevin Moore and Regina Martinez and Assistant Division Directors Kerri Carvo, Tracy Duran, Jason Doud and Erick Bieger	1. Develop, train and implement disciplinary matrix to guide discipline decision making.	1. Discuss, develop, train and implement consistent sanction/disciplinary action matrix for use in all facilities by January 30, 2026. This timeline will allow for a complete and thorough review of the disciplinary matrix with the executive team.	January 30, 2026	February 6, 2026
				2. Staff training to occur via combination of unit meetings, updates and emails. All staff will be trained by February 6, 2026. This timeline will allow for the disciplinary matrix to be created and implemented throughout the facilities.	February 6, 2026	February 6, 2026
		Division Director Regina Martinez and Assistant Division Directors Kerri Carvo, Tracy Duran, Jason Doud and Erick Bieger	Conduct Quality Assurance Reviews of Documentation	Separation documentation will be reviewed to ensure that all regulatory and policy expectations are being met as required.	February 6, 2026	February 6, 2026

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Regulation	Deficiency	Responsible Party	Action Plan	Proof of Practice	Date To Be Completed	Final Resolution Date
§1354.5 Room Confinement	1. Records did not adequately explain the reasons for some initial and continued room confinements, approvals for extensions, and in several cases, lacked sufficient information regarding integration plans.	Division Directors Kevin Moore and Regina Martinez and Assistant Division Directors Kerri Carvo, Tracy Duran, Jason Doud and Erick Bieger	1. Review and update policy to ensure consistency with Title 15, Section 1354.5.	1. Policy updates and implementation to be complete by January 30, 2026. This timeline will allow for policies to be updated and reviewed by the executive team and labor union.	January 30, 2026	February 6, 2026
		Division Directors Kevin Moore and Regina Martinez and Assistant Division Directors Kerri Carvo, Tracy Duran, Jason Doud and Erick Bieger	2. Re-train staff including supervisors regarding any updates made and to the expectations of proper documentation of all areas of Section 1354.5.	2. Reinitiate daily supervisory audits with weekly administrator review by December 19, 2025. Documentation of audits will occur in electronic case notes. This timeline will allow for discussions with supervisors about audits moving forward.	December 19, 2025	February 6, 2026
		Division Director Regina Martinez, Assistant Division Directors Kerri Carvo, Tracy Duran, Jason Doud and Erick Bieger and all SPCO's	Conduct Quality Assurance Reviews of Documentation	Room Confinement documentation will be reviewed to ensure that all regulatory and policy expectations are being met as required.	December 19, 2026	January 2, 2026
	2. Room Confinement During Visits: Youth were confined to their rooms during visitation periods due to limited visiting space, which constitutes a violation of room confinement regulation.		2. Identify and implement appropriate visiting space for YLA youth/parents.	YLA visiting moved to MRC on September 15, 2025. Issue Resolved	November 24, 2025	November 24, 2025

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Regulation	Deficiency	Responsible Party	Action Plan	Proof of Practice	Date To Be Completed	Final Resolution Date
§1355 Institutional Assessment and Plan	The documentation for the transition plans is inadequate, and there is a lack of consistency regarding the timelines and the individuals responsible for executing the plan.	Division Directors Kevin Moore and Regina Martinez, Assistant Division Directors Kerri Carvo, Tracy Duran, Jason Doud and Erick Bieger and all SPCO's	Review and update policy to ensure consistency with Title 15, Section 1355 and to provide clear procedural direction	Policy update implementation to be complete by February 6, 2026. This timeline will allow for administrators to work with officers on proper documentation for transition plans.	February 6, 2026	February 6, 2026
			Re-train staff including supervisors regarding the expectations of proper documentation of all areas of Section 1355.	Officer training to occur via combination of unit meetings, updates and emails. All officers will be trained by February 6, 2026. This timeline will allow for both officers and supervisors to be re-trained regarding proper documentation.	February 6, 2026	February 6, 2026
		Division Directors Kevin Moore and Regina Martinez and Assistant Division Directors Kerri Carvo, Tracy Duran, Jason	Conduct Quality Assurance Reviews of Documentation	Documentation will be reviewed to ensure that all regulatory and policy expectations are being met as required.	February 6, 2026	February 6, 2026

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		Doud and Erick Bieger and all SPCO's				

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§1358.5 Use of Restraint Devices for Movement/Transportation within the Facility	1. Documentation is insufficient regarding the completion and documentation of an individual assessment for the need to apply restraints for movement or transportation within the facility that includes consideration of a youth's known medical or mental health condition.	Assistant Division Director Erick Bieger	1. Review and update policy to ensure consistency with Title 15, Section 1358.5.	1. Policy update implementation to be complete by February 6, 2026. This timeline will allow for policies to be updated and reviewed by the executive team and labor union.	February 6, 2026	February 6, 2026
		Assistant Division Director Erick Bieger	2. Develop standardized language for incident reports to document the	2. Standardized language to be developed and implemented by January 30, 2026. This timeline will allow for officers and supervisors to be re-trained regarding proper documentation.	January 30, 2026	February 6, 2026

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		Division Director Regina Martinez and Assistant Division Directors Kerri Carvo, Tracy Duran, Jason Doud and Erick Bieger	3. Re-train officers including supervisors regarding the expectations of proper documentation of all areas of Section 1358.5.	3. Staff training to occur via combination of unit meetings, updates and emails. All staff will be trained by February 6, 2026. This timeline will allow for both officers and supervisors to be re-trained regarding proper documentation.	January 30, 2026	February 6, 2026
		Division Director Regina Martinez, Assistant Division Directors Kerri Carvo, Tracy Duran, Jason Doud and Erick Bieger and all SPCO's	Conduct Quality Assurance Reviews of Documentation	Use of Restraint Devices for Movement/Transport within the Facility Documentation will be reviewed to ensure that all regulatory and policy expectations are being met as required.	January 16, 2026	February 6, 2026

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Regulation	Deficiency	Responsible Party	Action Plan	Proof of Practice	Date To Be Completed	Final Resolution Date
§1361 Grievance Procedure	1. Grievances reviewed did not always receive a written response with the reasons for the final finding(s).	Division Director Regina Martinez	1. Review and update policy to ensure consistency with Title 15, Section 1361.	1.Policy update implementation and updated grievance forms to provide for more space for written responses to be complete by February 6, 2026. This timeline will allow for policies to be updated and reviewed by the executive team and labor union.	February 6, 2026	February 6, 2026
			2. Re-train officers including supervisors regarding the expectations of proper documentation of all areas of Section 1358.5.	2. Officer training to occur via combination of unit meetings, updates and emails. All officers will be trained by February 6, 2026. This timeline will allow for both officers and supervisors to be re-trained regarding proper documentation for grievances.	February 6, 2026	February 6, 2026

			3. Review/audit grievances by facility Administration.	3. Completed grievance forms will be submitted to Administration for review. Implementation to be complete by February 6, 2026. This timeline will allow for policies to be updated and both officers and supervisors to be re-trained regarding proper documentation for grievances.	February 6, 2026	February 6, 2026
		Division Director Regina Martinez, Assistant Division Directors Kerri Carvo, Tracy Duran, Jason Doud and Erick Bieger and all SPCO's	Conduct Quality Assurance Reviews of Documentation	Grievance documentation will be reviewed to ensure that all regulatory and policy expectations are being met as required.	January 23, 2026	February 6, 2026

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§1390 Discipline	Policy does not define clear and consistent discipline guidelines for youth or articulate discipline expectations.		1. Review and update policy to ensure consistency with Title 15, Section 1390.	1. Policy update implementation to be complete by February 6, 2026. This timeline will allow for policies to be updated and reviewed by the executive team and labor union.	February 6, 2026	February 6, 2026
			2. Develop, train and implement disciplinary matrix to guide discipline decision making.	2. Discuss, develop, train and implement consistent sanction/disciplinary action matrix for use in all facilities by February 6, 2026. This timeline will allow for a complete and thorough review of the disciplinary matrix with the executive team.	February 6, 2026	February 6, 2026

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			3. Provide training on standardized documentation processes and regularly audit officers' documentation.	3. Staff training to occur via combination of unit meetings, updates and emails. All staff will be trained by February 6, 2026. This timeline will allow for both officers and supervisors to be re-trained regarding proper documentation.	February 6, 2026	February 6, 2026
				Reinitiate daily supervisory audits with weekly administrator review by January 23, 2026. Documentation of audits will occur in electronic case notes. This timeline will allow for administrators to work with the supervisors on proper documentation into our ICMS.	January 23, 2026	February 6, 2026

			4. Complete and Implement Phase System enhancements.	4. Discuss, develop, train and implement Phase System Enhancements by January 23, 2026. This timeline will allow for modifications and more consistency to the current phase systems in the facilities.	January 23, 2026	February 6, 2026
				5. Review and finalize Youth Phase Packets for distribution by January 23, 2026. This timeline will allow for modifications to the current phase systems in the facilities.	January 23, 2026	February 6, 2026
		Division Director Regina Martinez, Assistant Division Directors Kerri Carvo, Tracy Duran, Jason Doud and Erick Bieger and all SPCO's	Conduct Quality Assurance Reviews of Documentation	Discipline documentation will be reviewed to ensure that all regulatory and policy expectations are being met as required.	January 23, 2026	February 6, 2026