

TWELFTH MONITORING REPORT
FOR THE
MEMORANDUM OF AGREEMENT
BETWEEN
THE UNITED STATES
AND
THE COUNTY OF LOS ANGELES
REGARDING
THE LOS ANGELES COUNTY
PROBATION DEPARTMENT CAMPS

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Background

On November 6, 2006, the United States Department of Justice (DOJ) initiated an investigation to focus on whether youth were adequately protected from harm at the Los Angeles County Probation Department Camps, pursuant to the Civil Rights of Institutionalized Persons Act (CRIPA), 42 U.S.C. § 1997, and the Violent Crime Control and Law Enforcement Act of 1994, 42 U.S.C. § 14141.

On October 31, 2008, the Department of Justice submitted a “Findings Letter” to the Los Angeles County Board of Supervisors, outlining areas requiring remedial attention by the Probation Department and the Department of Mental Health (DMH).

On October 31, 2008, the DOJ and the Los Angeles County Board of Supervisors approved and fully executed the final settlement agreement entitled, “Memorandum of Agreement Between the United States and the County of Los Angeles Regarding the Los Angeles Probation Camps” (hereafter, referred to in this report and future reports as the “Agreement” or “MOA”). The Agreement initially allowed the County to address the areas of concern over a four-year period under the supervision of a mutually agreed upon project monitoring team which included experts in the fields of psychiatry, mental health, safety, juvenile justice programs, and juvenile detention practices.

Amendment to the MOA: The MOA was to terminate on October 31, 2012. Prior to the termination, the parties executed the Second Amendment to the MOA (hereinafter referred to as “Amendment”).

The Amendment recognized the County’s significant reforms in furtherance of the MOA, and significant efforts toward compliance in the Paragraphs that would not have achieved the required level of compliance by the termination date. The MOA, as amended, eliminates the four-year termination requirement, and allows for a termination date of December 31, 2014, subject to specific conditions. With the exception of Paragraphs 9, 10, 19 and 37, any Paragraph that had achieved and maintained Substantial Compliance for one year on or before October 31, 2012, would be fully satisfied and terminate on the date of the completion of the year of sustained Substantial Compliance. To ensure sustainability of the reforms, Paragraphs 9, 10, 19, and 37, which would have completed one year of Substantial Compliance on October 31, 2012, were required to maintain Substantial Compliance through December 31, 2012, after which they would no longer be subject to status reporting.

The Amendment modified Paragraphs 15, 17, 43, and 47 to clarify expectations and facilitate ongoing compliance assessments by the monitoring team, and added a new Paragraph 73 to promote the rehabilitation of youth by increasing access to community-based alternatives to incarceration, consistent with public safety and the best interests of the youth.

Compliance Monitoring: The Agreement stipulated the appointment of Michael Graham as the Lead Monitor. The Lead Monitor is responsible for overseeing the compliance monitoring efforts of four other jointly agreed upon monitoring team members as they assess the County’s progress

toward addressing and complying with the 42 provisions of the Agreement as articulated in Paragraphs 9-47, 58, 59, and 73.

During the first eighteen months of their monitoring responsibilities, each of the Monitors was required to conduct initial visits to each of the 18 Probation Department Camps and the Dorothy Kirby Center to review and report on the County's progress toward complying with provisions within the sphere of their respective monitoring responsibilities. After the initial eighteen months, monitoring team members visited a sample of those and other facilities at varying intervals as necessary to assess the County's progress, or as directed by the Lead Monitor. The Monitors continued to visit the facilities until such time as the County reached compliance with each of the provisions the monitoring team members oversaw.

A report from the Monitors is required twice annually, or as directed by the parties. This Twelfth Monitoring Report covers July 1, 2014 through December 31, 2014.

Progress to Date

Monitoring Visits: Over the course of this Agreement the Monitors toured facilities, met with staff and administrators, interviewed minors, reviewed records, and observed specialized meetings. Where appropriate, their observations were provided to the County and, when present, the Department of Justice during or at the conclusion of these visits. The Monitors also reviewed reports, documents, and audits requested of and provided by the County.

Monitoring Reports: Although the format of these semi-annual reports has changed over the life of the MOA, the format of this Twelfth Monitoring Report remains the same as that of the last report. The four Paragraphs that were being monitored during this period are listed first. Each provision includes the MOA requirement followed by the Monitor's compliance level assessment (Full Compliance, Substantial Compliance, Partial Compliance, or Non-Compliance); the County's self-assessment; the Monitor's discussion of the basis for the compliance level assessment; and the evidentiary basis for the compliance level assessment. The Monitors may also provide recommendations to assist the County in maintaining or increasing the compliance level of the Paragraph the recommendations follow.

Following the reports on the Paragraphs monitored during this reporting period, we have listed the Paragraphs of the Agreement that had achieved Full Compliance during previous reporting periods and are no longer being monitored. Those Paragraphs are included with their compliance completion date so the reader will be able to review the County's previous progress toward achieving compliance with the terms of the MOA. Although not required to do so, the County has chosen to continue reporting on some of the Paragraphs that are no longer subject to monitoring. The County's self-assessments for those provisions can be found following Paragraphs 9 – 24, 25 – 32, 33 – 46, and 58 – 59 in the section of this report that contains those provisions that had previously achieved Full Compliance.

Status: As noted in the Background section, the MOA was intended to terminate on October 31, 2012. Prior to the termination, the parties executed the Second Amendment to the MOA. The MOA, as amended, eliminated the original four-year termination requirement, and allowed for a termination date of December 31, 2014, subject to specific conditions. One of the terms of the Amendment was that in order to ensure sustainability of the reforms, Paragraphs 9, 10, 19, and 37, which would have completed one year of Substantial Compliance on October 31, 2012, were required to maintain Substantial Compliance through December 31, 2012, after which they would no longer be subject to status reporting by the Monitoring Team. Paragraphs 9, 10, 17, and 37 did remain in Substantial Compliance through December 31, 2012, and were determined to be in Full Compliance. Paragraph 43 was determined to be in Full Compliance on June 13, 2014.

As this monitoring period began, 38 of the Paragraphs were in Full Compliance, and only Paragraphs 15, 17, 47, and 73 remained subject to monitoring.

Paragraphs 15, 17, and 47 were placed in Substantial Compliance effective November 1, 2013. The County continued the required level of performance throughout the current monitoring period, and the compliance monitoring of these provisions concluded on October 31, 2014 when they were determined to be in Full Compliance.

After final site visits and a review of audits and supporting documents, Paragraph 73 was determined to be in Full Compliance effective December 31, 2014. The County has now achieved Full Compliance with the terms of the MOA as amended, and is no longer subject to monitoring.

Memorandum of Agreement Provisions

(Paragraphs in Monitoring)

Paragraph 15: Staffing (Probation)

The County shall provide sufficient staff supervision to keep residents reasonably safe from harm and allow rehabilitative activities to occur successfully.

Direct care staff shall include only those staff members whose primary role is the direct supervision of youth.

The County agrees to strengthen its current hiring practices by ensuring that all newly hired staff who have contact with youth in the County's juvenile justice system are subject to an appropriate hiring process and are otherwise qualified to work with youth. The hiring process shall include a background check, including a federal criminal history check and consultation of State and local child abuse registries, and a reference check. For current employees, the County shall either conduct criminal background record checks at least every five years or have in place a system for capturing such information. The County shall directly ask applicants for, and employees in, positions that result in contact with youth in the County's juvenile justice system, about prior criminal misconduct during interviews and reviews. The County shall ensure that employees have a continuing affirmative duty to disclose any criminal misconduct.

On a monthly basis, the County shall gather and analyze data including, but not limited to, staffing ratios at each facility, vacancy rates, and staff turnover. The County shall adjust existing policies and practices as needed to comply with this paragraph based on analysis of this data.

Status: Full Compliance (effective October 31, 2014)

County's Self-Assessment:

Staffing Ratios

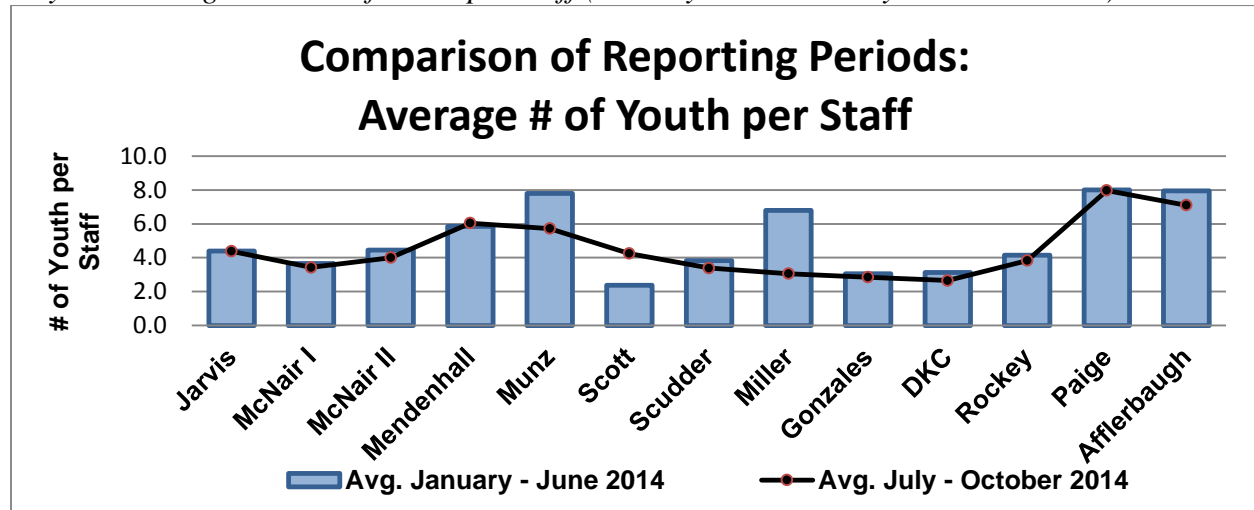
The County determined optimal daytime staffing ratios in Residential Treatment Service Bureau (RTSB) facilities to ensure strong supervision, meaningful casework time, and to enhance the facilitation of Evidence Based treatments and programs. Dorothy Kirby maintains daytime (6 am to 10 pm) targeted staff-to-minor ratios at 1:5 with Camps Scott and Onizuka at 1:6; Camp Rockey at 1:7; Camp Scudder at 1:8; Camp McNair at 1:9; and Camps Afflerbaugh, Paige, Gonzales, Miller, Kilpatrick, Munz, Mendenhall and Jarvis at 1:10.

RTSB has made tremendous strides in staffing since monitoring began and optimal daytime staffing ratios were identified. RTSB continues its endeavor to surpass optimal levels of supervision to enhance program effectiveness and staff morale. Ratios for the reporting period indicate that all camps are maintaining averages at consistent or improved levels of supervision

compared to the last monitoring period with the exception of Camp Scott which is rebounding from staff attrition (see *Figure 15-1*).

Figure 15-1

Daytime Average Number of Youth per Staff (January – June vs. July – October 2014)



Past Monitoring Reports have expressed concern that unanticipated events requiring the transport of a youth may diminish optimal ratios. If the optimal ratios are not maintained the facilitation of treatments and services might be impacted. A review of the reporting period demonstrated that a majority of the camps are surpassing, at high frequencies, optimal staffing ratios with two or more staff during daytime shifts when programming occurs (see *Table 15-1*). Since two staff are required to supervise transports, these findings reinforce the fact that optimal levels are preserved throughout the entire shift during incidents. Those camps experiencing lower rates (Camps Onizuka, Scott, Paige, and Afflerbaugh) are still surpassing, at high frequencies, optimal ratios with at least one additional staff (see *Table 15-1*).

Positive statistical findings are also evident in *Figures 15-2 and 15-3*. A majority of the staffing averages for July through October are substantially below optimal ratios and are in tight proximity to the minimum marker as opposed to the maximum marker. This visually confirms that the camps have been maintaining shifts with greater numbers of staff at high frequencies. Ratios are clustering directly above the minimum point of the range for camps Jarvis, McNair I and II, Onizuka, Scott, Scudder, Miller, Gonzales, Dorothy Kirby and Rockey.

The average's location on the range of each camps ratio provides insight into staffing level consistencies. When the average does not align with the middle point of the range, there is a strong likelihood that the highest or lowest ratios were anomalous occurrences. *Figure 15-3* demonstrates this with Camps Jarvis, Smith, Munz and Mendenhall. The average is skewed to the lower portion of the range, indicating that the highest ratios (less optimal) are anomalies. Furthermore, the range of staffing ratios also shows how consistent staffing is at a camp. This is apparent in the dramatic difference between Dorothy Kirby Center and Munz or Mendenhall ranges. Due to the design of Dorothy Kirby Center, two staff are mandated to supervise a cottage housing up to 10 minors and therefore staffing will have very little variation. The highest ratio

they will ever attain is one staff to 5 minors. There is greater variation with Munz and Mendenhall due to their dormitory set-up and remote location. Hiring overtime staff in the event of absences or unanticipated occurrences can be challenging. RTSB has prepared for this by lowering population sizes in anticipation of staffing shortages, and therefore Munz and Mendenhall average ratios substantially surpassed optimal ratios.

Table 15-1

*Frequency of Daytime Shifts (246 Total) Surpassing Optimal Ratios
(July – October 2014)*

Camp	# of shifts 2+ additional staff	% of shifts 2+ additional staff	* # of shifts 1+ additional staff	* % of shifts 1+ additional staff
North Region				
Jarvis	245	100%		
McNair I & II	246 each	100% each		
Onizuka	133	54%	246	100%
Smith	209	**89%		
Central Region				
Munz	221	90%		
Mendenhall	221	90%		
Scott	89	36%	246	100%
Scudder	244	99%		
West Region				
Miller	246	100%		
Gonzales	246	100%		
DKC	222	90%		
East Region				
Rockey	237	96%		
Paige	117	48%	200	81%
Afflerbaugh	178	72%	231	94%

Note: * Camps staffed with 2+ additional DPOs at percentages higher than 80% were not included in the columns for 1+ additional staff as doing so would not make their percentages more significant.

** Camp Smith opened on July 7th, 2014 and therefore only 234 shifts were counted.

Number of Shifts = (6am – 2pm shifts for July 1, 2014 – October 31, 2014) + (2pm – 10pm shifts for July 1, 2014 – October 31, 2014)

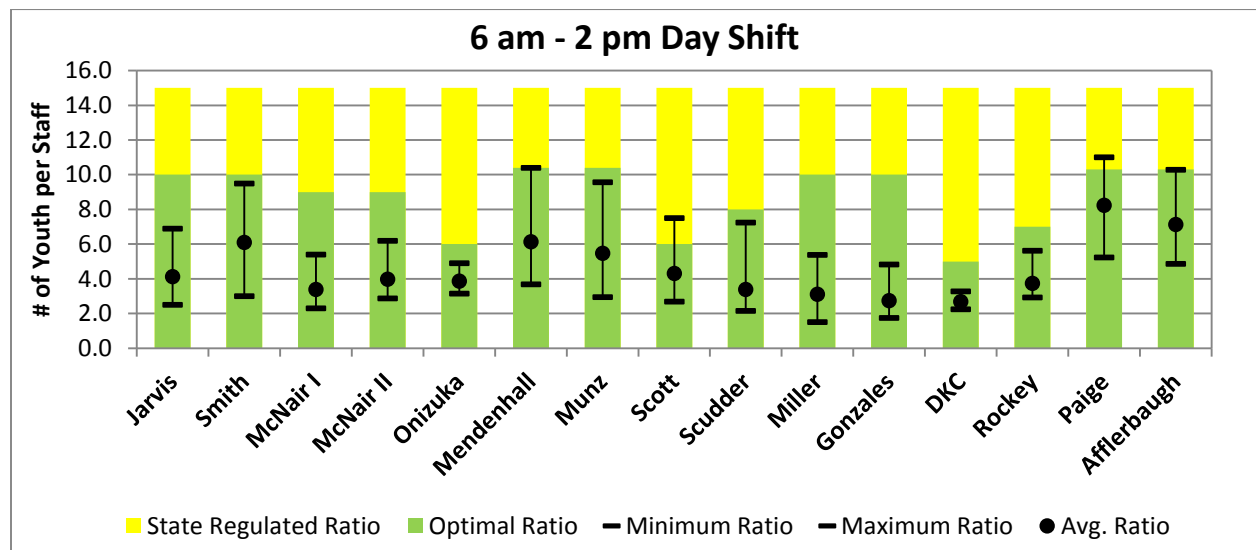
Percent of Shifts = Number of shifts surpassing optimal ratios / Total number of shifts.

Preventative measures discussed in the *Managing Workforce and Addressing Staffing Shortages Memorandum* continue to effectively ensure that the staff-to-minor ratios are sustained during

unanticipated occurrences. The facilities have been partnering with neighboring camps, as instructed in the Memorandum, to pool staffing resources to assist with transportation efforts. The effectiveness of this procedure can be seen in staffing ratios reported in Preliminary Incident Notifications discussed in a later section. Therefore, those camps identified in **Table 15-1** have the added support of their neighbors. Camp Onizuka benefits from the Challenger Memorial Youth Center’s Security Staff and three neighboring camps. The camp has not exceeded optimal levels during the reporting period and has maintained constant staff to minor ratios ranging between one staff per 3.9 – 4.9 youth (see **Figures 15-2 and 15-3**). Camp Scott’s neighboring camp (Scudder) has surpassed optimal staffing ratios with at least two staff during 99% of the reporting period shifts, and is therefore able to assist if needed without critically impacting their program. Sister camps Afflerbaugh and Paige also profit from their facility design and from their proximity to Camp Rockey.

Figure 15-2

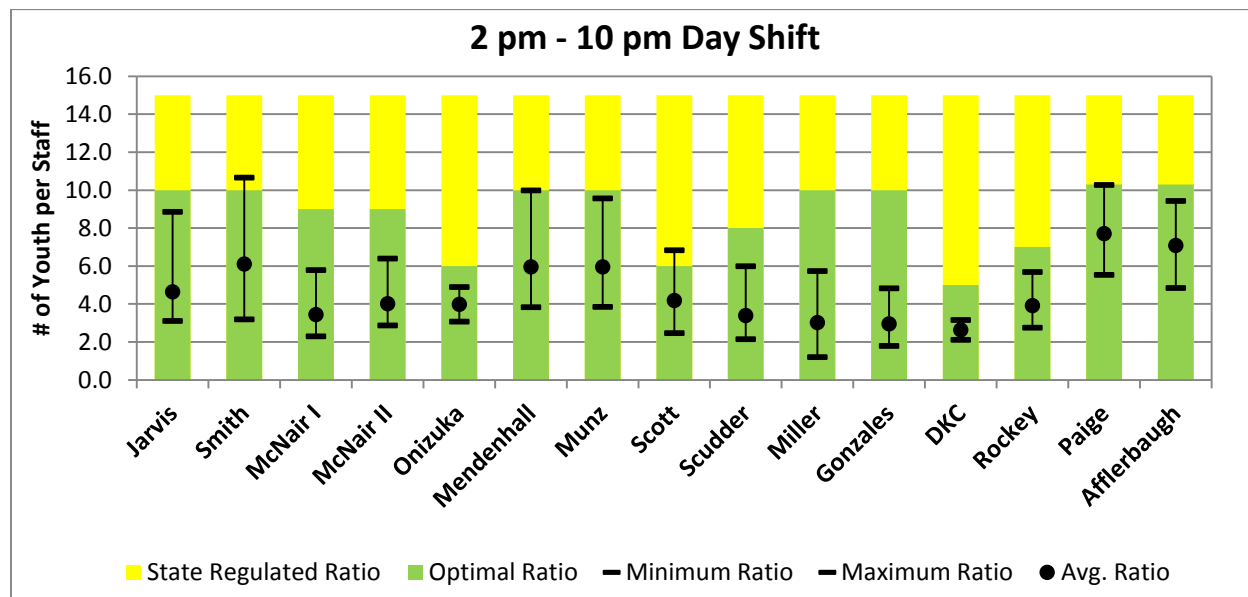
Average Day Time Staff-to-Minor Ratio (6:00 am to 2:00 pm Shift July – October 2014)



Note: Camp Rockey’s Staffing Summary Report was missing AM shift information for September 30th. The missing information has been included in the above range.

Figure 15-3

Average Day Time Staff-to-Minor Ratio (2:00 pm to 10:00 pm Shift July – October 2014)



Note: Camp Rockey's Staffing Summary Report was missing PM shift information for September 30th. The missing information has been included in the above range.

Corrections to the Camp Paige Staffing Summary Report were made for the following dates: Wednesday, July 16th, 71 staff worked was changed to 9 staff and the ratio was changed to 1 to 7.89; Thursday, Oct. 9th, 73 staff worked was changed to 9 staff and the ratio was changed to 1 to 8.11.

Corrections to the Camp Miller Staffing Summary Report were made for Tuesday, October 21st, 19 staff worked with 16 minors was changed to 10 staff worked with 19 minors with a ratio of 1 to 1.9.

Corrections to the Camp McNair II Staffing Summary Report were made for Thursday, August 23rd, 3 minors was changed to 32 minors with a ratio of 1 to 4.0.

Staff-to-Minor Ratio Reports

The County continues to maintain monthly Staff-to-Minor Ratio Reports ensuring the optimal ratios continue to be met. **Figures 15-2, 15-3, and 15-4** illustrate that the camps are consistently meeting both state regulated and Probation Department optimal staffing standards during the four month reporting period.

Shifts beginning with less than optimal levels of staffing are extremely rare and do remain in close proximity to optimal levels. The findings of the *Camp Staff-to-Minor Ratio* reports (see **Table 15-2**) demonstrate that RTSB continues to reduce the incidents of shifts where optimal ratios are not met. As a fraction of a person is not considered critical, only shifts that exceeded ratios by rounding to a number above optimal levels were included (i.e. optimal ratio = 1 to 10: all shifts greater than or equal to 1 staff to 10.5 minors were counted). Eight (0.2%) out of a total of 3,678 camp shifts did not meet optimal levels of staffing. In spite of this extremely small percentage, RTSB recognizes the need to maintain a high standard and will continue to actively work with camps to fill staff vacancies such as Scott, Paige, Afflerbaugh and Onizuka to bolster their ratios.

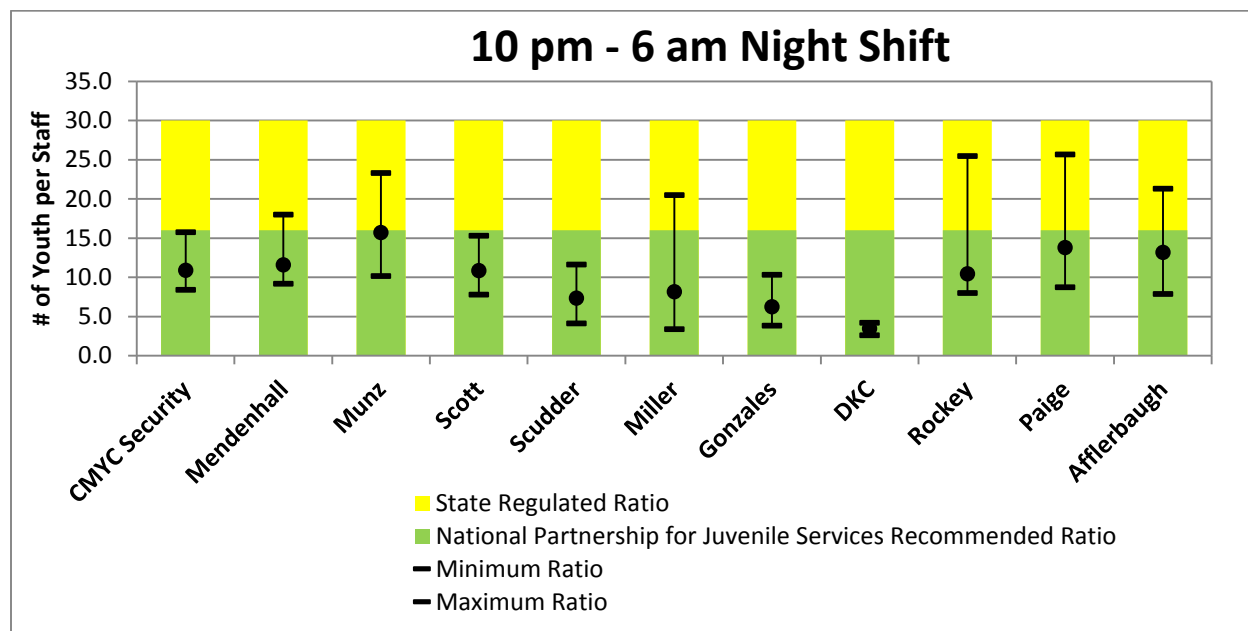
Table 15-2*Daytime Shifts Not Meeting Optimal Ratios (July – October 2014)*

Camp	Optimal ratio	Shift ratio exceeded	Shift ratio exceeded	Shift Ratio exceeded	Shift Ratio exceeded
Scott	1 to 6	7/1/14 PM 1 to 6.6	8/4/14 AM 1 to 7.5	8/22/14 AM/PM 1 to 6.8	8/23/14 AM/PM 1 to 6.8
Smith	1 to 10	7/28/14 PM 1 to 10.7			
Paige	1 to 10	7/28/14 PM 1 to 10.7			

RTSB has endeavored to improve nighttime staff-to-minor ratios beyond what is mandated by the California Standards Authority (one staff to 30 minors). The 11th Monitoring Report expressed a desire for RTSB to consider the National Partnership for Juvenile Services (NPJS) recommended supervision ratio of one staff per 16 youth. RTSB has, as guided by the California Standards Authority, taken into consideration the “size, design, and location of the camp; types of offenders committed to the camp; and the function of the camp... to maintain the safety and welfare of minors and staff.” All camp averages, as a result, have been below the recently suggested one staff to 16 minors ratio. The same statistical rules apply as with the analysis of the daytime shifts. A majority of the camps’ averages are skewed below the middle point toward the lowest ratios in **Figure 15-4**. This indicates that the frequency of shifts with strong staffing ratios is high, with rare exceptions. As with the daytime shifts, RTSB maintains the goal of reducing occurrences of less optimal levels to show greater consistency in staffing and ensure safety and security.

Figure 15-4

Average Nighttime Staff-to-Minor Ratio (10:00 pm to 6:00 am)



Note: Camp Rocky's Staffing Summary Report was missing nighttime shift information for September 30th. The missing information has been included in the above range.

Corrections were made to the Camp Munz Staffing Summary Report for Friday, August 8th, 1 staff worked was changed to 3 staff with a ratio of 1 to 21.33.

Review of Preliminary Incident Notifications

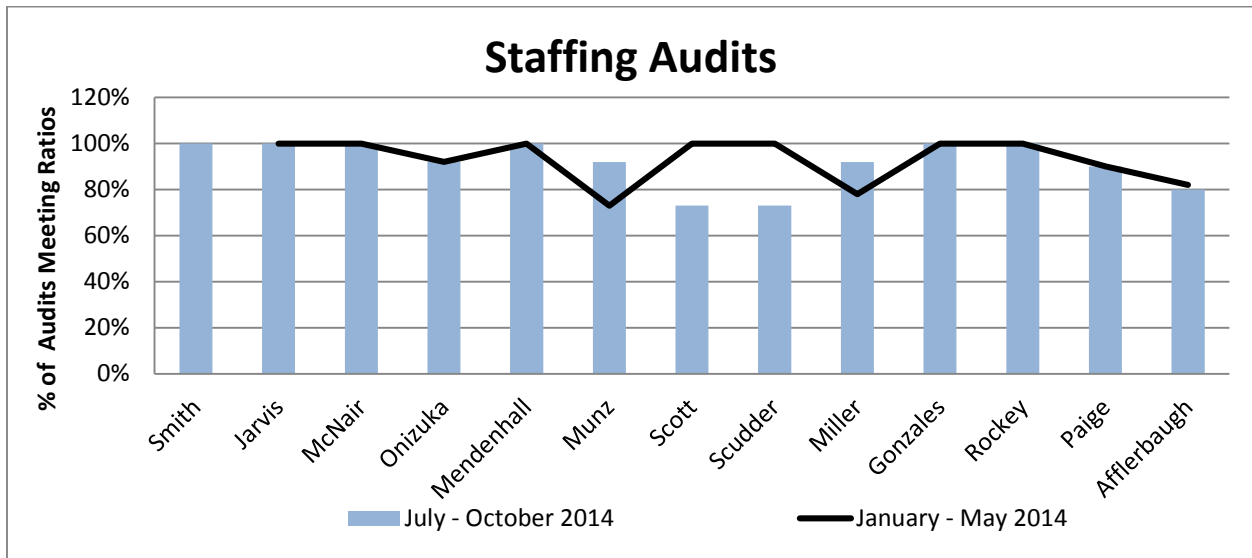
A total of 73 Preliminary Incident Notifications completed for events during the reporting period resulting in a staff injury or youth's transport out of the facility for medical or psychiatric purposes were reviewed. All PINs (100%) reported staffing ratios before and after the transport at or surpassing optimal levels. RTSB's efforts continue to effectively address staffing concerns during emergencies.

Staffing Audits

The County continues to conduct random, unannounced staffing audits at all RTSB facilities to confirm that staff-to-minor ratios are being met throughout the various shifts. The staffing audits for this reporting period were conducted during the day, night and weekend shifts. A tracking system was designed in October 2013 to ensure a minimum of two (2) audits per camp were conducted per month with one being a night or weekend audit to ensure that audits were conducted evenly across all camps. Of the 149 audits conducted during July through October, 92% (141 audits) of the unannounced audits found that the optimal ratios were met at the time of the audit (see **Figure 15-5**). A majority of the camps maintained the same percent compliance as during the previous reporting period, with Munz and Miller improving and Scott and Scudder digressing. Camps Scott and Scudder had the lowest percentage of audits meeting optimal ratios at 73% each, with all other camps above 82%. Any audits not meeting target ratios are referred to the camp manager to conference with staff and implement corrective action, as was done in Camps Scott and Scudder.

Figure 15-5

Percent of Audits Meeting Optimal Ratios (January – May vs. July – October 2014)

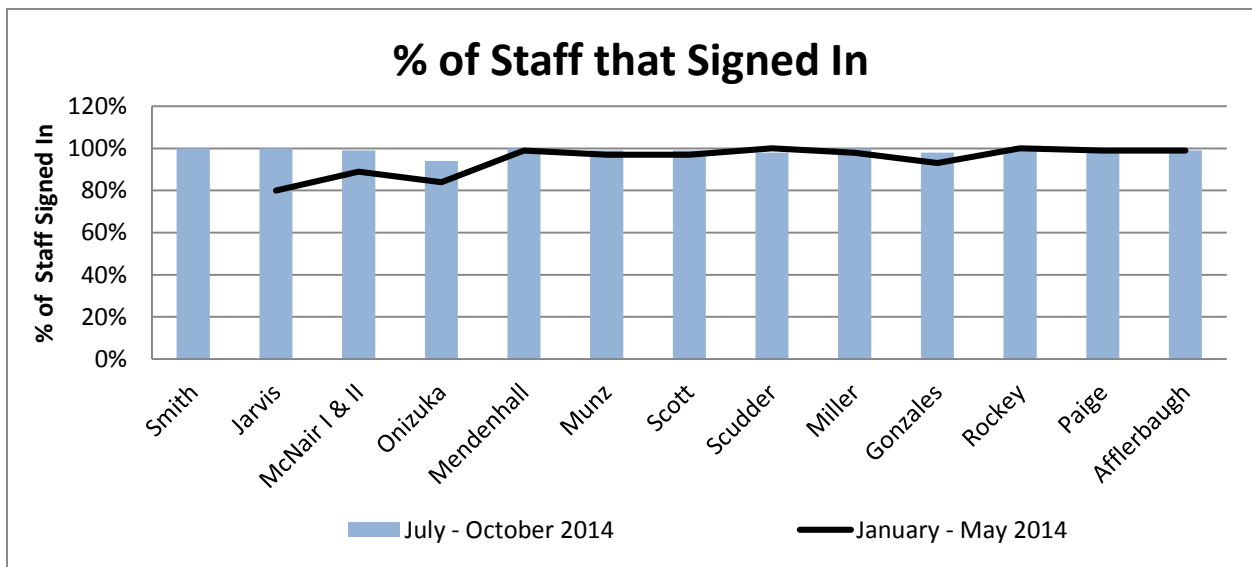


Peace Officer Sign-In Log

During this rating period, the percentage of staff who complied with signing the Peace Officer Sign-In Log was captured. Based on 149 unannounced day- and night-time staffing audits, 90% of staff signed into the Peace Officer Sign-In Log. All camps are maintaining high percentages of sign-ins. Camp Jarvis, McNair, Onizuka and Gonzales have improved their percentages by 5% - 20% (see **Figure 15-6**).

Figure 15-6

Percent of Peace Officers Signed In (January – May vs. July – October 2014)



The County Probation Department will continue to monitor optimal staff-to-minor ratios to ensure that staffing is conducive to a safe, secure and rehabilitative environment.

Background Check Process

During this Monitoring Period the County has continued its efforts to strengthen the background check process in addition to enhance the existing expectation that employees of the Probation Department conduct themselves in a manner consistent with the professional standards governing County employment by updating policy and procedures. Directive 1359, Arrest Notification and Use of Benefit Time, was re-issued on May 6, 2014. On May 12, 2014, this Directive was emailed to all Probation employees with a mandatory requirement that they complete and sign a Law Enforcement Contact (LEC) form and submit it to their Office Head advising whether they have or have not had Law Enforcement Contact as described in the Directive 1359.

This policy and procedure applies to arrests, detentions, citations (except infractions), warrants, suspended/restricted licenses, restraining orders, involuntary psychiatric evaluations or observations or commitments, and all situations where an employee is named as a subject of an investigation. All employees are required to notify their supervisor or manager of the facts related to any arrests, detentions and citations within 24 hours and complete and submit the LEC form to their supervisor. The supervisor is to review and modify the employee's duties, if deemed necessary after consultation with the affected Bureau(s), the Internal Affairs Office and/or Return-to-Work Unit where appropriate.

At the close of the 11th Monitoring Period, June 30, 2014, Residential Treatment Services Bureau (RTSB) had 1,016 staff, of which 88.4% completed and submitted the LEC Form. Taking into account staff that were out on approved leave of absence, LEC Forms were not received from 8.6% of the RTSB staff. September 2014 revealed that RTSB Management ensured that all staff present at the facilities completed and submitted the LEC Form, and staff returning from approved leave immediately completed and submitted the LEC Form. Sixty-eight staff (6.7%) did not complete the LEC Form due to an approved leave as of September 2014. An October 16, 2014 audit of Human Resources Management Office (HRMO) personnel files for RTSB staff revealed LEC Forms were present in 25 out of 25 files sampled. New hire employees also complete the LEC Form as part of their Orientation. Further, many camps have newly assigned staff complete the LEC Form within their first week of transfer or start at the facility. All Probation Department staff are expected to review Directive 1359, and complete and submit the LEC Form annually, after receiving notice from HRMO.

The County continues with its vigorous background process for promotions and new hires. The background investigation process for promotions includes, but may not be limited to: a Live Scan, electronic criminal records check, and internal clearances for significant concerns that may impact the promotion. New hires and transfers into the Probation Department are treated the same and includes, but may not be limited to: a Live Scan, a criminal records review, employment history verification, credit check, medical exam, psychological screening, neighborhood canvassing and polygraph. During the 12th Monitoring Period, the County enhanced its Background Investigations Unit with the addition of four Investigators, increasing the total to ten. The County updated its' recruitment job bulletins by clearly stating the background investigation includes a criminal records check and drug screening. A video was also created that makes the physical arduous

requirements of the sworn institutions positions clear; the video is available on the Probation Department Internet website. For the period December 1, 2013 to December 8, 2014, 1,429 Background Check Packets were sent to potential New Hire candidates. Of that number, 1,112 actually entered the Background Check process, with 716 or 64% of that number disqualified. The remaining 396 candidates were hired or started the Academy (262), or are in various stages of the Background Check Process as of December 8, 2014.

The County continues to take advantage of the State of California legislation, Assembly Bill 2343 – Criminal History Information, which expands the ability of the State Department of Justice to interface with and access nationwide subsequent arrests notices through the Federal Bureau of Investigations national database related to existing employees as well.

Weekly Staffing Meetings

The Probation Department's Executive Level Management Team continues to meet weekly with Human Resources, the Staff Training Office, and the Professional Standards Bureau to review and discuss staffing needs up to and including backfill strategies, recruitment efforts and results, academy schedules, and programmatic impacts as a result of vacancies. In addition to this meeting, the Juvenile Institutions Bureau's (JIB's) Deputy Chief and Bureau Chiefs meet weekly to review staff movement reports prepared by Bureau Special Assistant staff and to forecast staffing needs and issues. Lastly, the Residential Treatment Services Bureau Chief engages Senior Managers weekly regarding staffing and scheduling. Senior Managers are also provided with staff movement forecasts as provided by Human Resources and Bureau staff. Various weekly reports, generated by Human Resources, the Backgrounds Investigations Unit, and Bureau Assistants are closely reviewed at these meetings when making decisions related to staffing.

Discussion by Monitor:

As has been previously noted, the last revision of the Memorandum of Agreement added language to Provision #15 (Probation Staffing). The gist of the changes required the County to improve its hiring and retention practices for the officers who work at the various camps. The new language also requires the County to regularly assess data concerning their levels of staffing at the camps.

The County moved quickly to re-enforce their existing hiring practices in an effort to comply with these new requirements. The County's self-assessment discussion well presents the steps that have been taken in response to the new requirements. In addition, the County has provided the monitoring team with descriptive materials regarding the enhanced hiring practices including enhancements to background checks, reference checks, and other pre-hire processes. The County has also submitted documentation that illustrates their progress in implementing these changes.

In some ways the County's effort in this area extends beyond that which is often seen in the hiring process of similar juvenile justice agencies. For example, the use of Live-Scan fingerprint technology, which has the capability of notifying the agency if an employee has had a potentially serious contact with law enforcement, is not generally in use by other juvenile justice agencies.

While the County uses the Live-Scan technology to receive notifications of law enforcement contact, it continues to put personal responsibility upon each employee by requiring they self-

report any contact with a law enforcement agency. It is noteworthy that the onus of personal responsibility for self-reporting continues to exist for the agency's employees since many of the components of the Probation Camps' programming work to teach the residents of the camps the need to take personal responsibility for one's own actions. This is an important concept that the monitoring team appreciates and supports.

During the previous monitoring period the County completed the required step of "directly asking" employees about contact with law enforcement. The County reports that 4.13% of its Residential Treatment Services Bureau (RTSB - the Probation Department's Bureau that operates the camps) did not provide a response to the "directly ask" requirement. While the County has completed the process for almost 96% of RTSB employees, the County must also work to gain responses from those employees who did not, for whatever reason, respond.

During this monitoring period a member of the monitoring team conducted an audit of the new hiring and retention practices. The audit occurred at the Probation Department's central office in Downey. Over a three-day period the monitoring team member interviewed staff, reviewed various processes and reviewed a sampling of personnel files. The personnel file review was designed to examine the presence of documentation confirming that newly hired employees had been subject to the mandated background check and that incumbent employees had been "directly asked" about contact with law enforcement entities during the previous year.

Eight randomly selected personnel files of newly hired employees were provided to the monitoring team. The eight files to be reviewed were selected from the 71 newly hired direct supervision staff at the camps during 2014. All new employee personnel files reviewed contained information that confirmed the employee had been through the background check process and had passed the pre-employment screening process.

A sample of 47 personnel files of incumbent employees were selected for review to determine if the files included documentation of the employees having been directly asked about contact with law enforcement entities. Within the sample, four employees were on medical leave and had not completed the law enforcement contact form. The remaining 43 files contained the mandated completed contact form. Of the 43 completed forms, 38 had been reviewed and signed by the appropriate supervisor. Of the remaining five files, four supervisors had not signed the form as having been reviewed, and the supervisory review status of one form could not be determined.

The October on-site review confirmed to the satisfaction of the Monitor the County's good faith effort to implement the new requirement of Paragraph 15 (Probation Staffing).

The County's efforts to improve its hiring processes is an impressive and worthwhile effort which, by hiring the most capable and qualified staff possible, will have an impact beyond the life of this agreement. Overall, the County has been diligent and aggressive in implementing the new requirements of Paragraph 15.

The County, the DOJ, and the Monitors agree that the number of direct care staff needed to safely operate a facility is impacted by several factors, including, for example, the population being served by the facility, their social and offense histories, as well as the risk they represent to those

persons who are around them. The physical layout of the building or buildings, and the skill level and training of the staff also influence the kind of staffing pattern that is needed.

The National Partnership for Juvenile Services (NPJS), in its Position Statement on staffing, quoted the Office of Juvenile Justice and Delinquency (OJJDP) *Conditions of Confinement: Juvenile Detention and Corrections Facilities Report*, which states:

“One important element of security is staffing levels. Without sufficient staff, juveniles are more likely to be able to harm each other, staff, or themselves. In addition, lack of staff causes low staff morale and higher levels of stress for staff. When the staff to juvenile ratio exceeds national standards, programming effectiveness will diminish, which increases the likelihood of physical intervention occurring.”¹

The California Corrections Standard Authority (CSA) mandates a ratio of one staff for fifteen residents during waking hours in camp settings in the State. Originally, administrators for the County indicated they have set a goal of having a staff to minor ratio of one staff to ten residents at the camps during waking hours. The ratio during sleeping hours is mandated to be one staff to thirty residents, however the monitoring panel believes this ratio is insufficient to assure safety for the minors at night.

With the closure of three of the CMYC camps in the Spring 2011, the County revised its staffing ratios with its program of staff reinvestment. The staff reinvestment agreement set waking hours staffing levels for Camps Rockey, Scott, Scudder, Onizuka, and the Dorothy Kirby Center at a ratio of from 1:5 to 1:8 staff to wards. At Camp McNair the ratio was set at 1:9, and at 1:10 for the remaining camps.

The County has made significant progress in increasing the number of officers who are providing direct supervision to the minors. The County’s unannounced “staffing audits” have proven to be a positive step forward. The unannounced audits serve several purposes. The audits provide County management with point in time “snapshots” of information concerning potential staffing issues and also serve as a clear message to staff that the County is serious about improving the direct supervision of the minors at the camps. Previously, the monitoring panel has encouraged a faster dissemination of the completed audits. We are pleased to note the timeliness of the distribution of the audits continues to be greatly improved.

The County’s Monthly Staffing Summaries track the numbers of full-duty and limited-duty staff who are present at the start of each shift. Only full-duty staff may be considered as providing direct supervision of minors. Light-duty staff may perform other duties as assigned but are restricted in their ability to directly supervise juveniles.

Using the Monthly Staffing Summary it is possible ascertain a clearer picture of the actual staffing patterns of the camps. The staffing summaries and the charts presented below represent only the numbers of full duty staff and minors at the camps and does not attempt to evaluate the effectiveness of the manner in which staff are deployed, the milieu of the camp or any of the other

¹ National Partnership for Juvenile Services. Position Statement: Minimum Direct Care Staff Ratio in Juvenile Detention Centers. October 25, 1998. Page 1.

factors which come into play in a residential facility. The charts do provide a numerical depiction of the availability of staff to provide supervision to the minors. Having adequate numbers of staff is the first step in providing a safe and secure environment and an effective program.

The data presented below is taken from the Monthly Staffing Summaries for the months of July through October 2014.

CAMP AFFLERBAUGH

STAFFING RATIOS (TARGET RATIO 1 STAFF TO 10 MINORS; WAKING HOURS)

Month	6 A.M.-2 P.M.			2 P.M.-10 P.M.			10 P.M-6 A.M.		
	High	Low	Avg.	High	Low	Avg.	High	Low	Avg.
JULY	10.29	5.58	7.73	9.43	6	7.93	19.25	12.33	14.38
AUGUST	9.71	4.86	6.84	9.43	4.86	6.67	21.33	7.88	12.85
SEPTEMBER	8.71	5.18	6.78	8.86	5.36	6.81	16.25	10	13.17
OCTOBER	10	5.55	7.17	8.86	5.08	6.92	15.5	8	12.43

CAMP PAIGE

STAFFING RATIOS (TARGET RATIO 1 STAFF TO 10 MINORS; WAKING HOURS)

Month	6 A.M.-2 P.M.			2 P.M.-10 P.M.			10 P.M-6 A.M.		
	High	Low	Avg.	High	Low	Avg.	High	Low	Avg.
JULY*	11	6.5	8.21	9.33	6.64	7.91	18.75	8.78	13.7
AUGUST	9.63	6.18	7.85	8.33	6.18	7.22	25.67	8.75	15.19
SEPTEMBER	9.86	6.5	8.44	10.29	6.2	7.79	18	9.29	13.25
OCTOBER	10.43	5.23	8.44	9.43	5.9	7.76	17.75	10.43	13.1

*There was a data entry error on the afternoon shift of July 16. This shift was eliminated from the calculations and the totals have been adjusted.

CAMP MCNAIR 1***STAFFING RATIOS (TARGET RATIO 1 STAFF TO 9 MINORS; WAKING HOURS)****6 A.M.-2 P.M.****2 P.M.-10 P.M.****10 P.M.-6 A.M.**

Month	High	Low	Avg.	High	Low	Avg.	High	Low	Avg.
JULY	4.67	2.78	3.77	5.8	2.78	3.78			
AUGUST	5.14	2.89	3.73	5.14	2.89	3.77			
SEPTEMBER	4.38	2.4	2.92	4.38	2.4	2.98			
OCTOBER	5.4	2.3	3.17	5.6	2.3	3.27			

* Due to the manner in which night staffing is assigned at the Challenger Memorial Complex, the information from that facility is not included. At the Challenger complex overnight staff report to a central command center where the staff are then assigned to their posts for the overnight shift. Staff may not work in the same dormitories each night; thus, the monthly staffing reports for the overnight hours at the Challenger Center do not include the information provided by the other camps and the Dorothy Kirby Center.

CAMP MCNAIR 2***STAFFING RATIOS (TARGET RATIO 1 STAFF TO 7 MINORS; WAKING HOURS)****6 A.M.-2 P.M.****2 P.M.-10 P.M.****10 P.M.-6 A.M.**

Month	High	Low	Avg.	High	Low	Avg.	High	Low	Avg.
JULY	4.71	3	3.97	6.4	3.38	4.05			
AUGUST	4.86	3.25	3.88	4.71	3.25	3.89			
SEPTEMBER	4.5	2.88	3.97	5.14	2.88	3.99			
OCTOBER	6.2	3.33	4.26	5.4	3.1	4.17			

*Due to the manner in which night staffing is assigned at the Challenger Memorial Complex, the information from that facility is not included. At the Challenger complex overnight staff report to a central command center where the staff are then assigned to their posts for the overnight shift. Staff may not work in the same dormitories each night; thus, the monthly staffing reports for the overnight hours at the Challenger Center do not include the information provided by the other camps and the Dorothy Kirby Center.

CAMP ROCKEY**STAFFING RATIOS (TARGET RATIO 1 STAFF TO 7 MINORS; WAKING HOURS)****6 A.M.-2 P.M.****2 P.M.-10 P.M.****10 P.M.-6 A.M.**

Month	High	Low	Avg.	High	Low	Avg.	High	Low	Avg.
JULY	5.18	3.27	3.86	5.18	3.5	4.09	16.33	8.33	10.48
AUGUST	4.91	2.94	3.65	4.55	3.2	3.72	25.5	8	10.93
SEPTEMBER	4.5	3.06	3.67	5.4	2.75	3.92	17.33	8	10.06
OCTOBER	4.82	2.94	3.76	5.7	3.19	3.97	12.5	8.33	10.32

CAMP MENDENHALL**STAFFING RATIOS (TARGET RATIO 1 STAFF TO 10 MINORS; WAKING HOURS)**

Month	6 A.M.-2 P.M.			2 P.M.-10 P.M.			10 P.M.-6 A.M.		
	High	Low	Avg.	High	Low	Avg.	High	Low	Avg.
JULY	10.2	5.5	7.21	10	5	6.67	17	9.8	12.2
AUGUST	10.4	5.1	6.68	8.83	4.25	6.5	17.67	9.8	11.2
SEPTEMBER	8.5	3.69	5.65	9.8	4.45	5.56	17.33	9.6	11.52
OCTOBER	8	3.92	5.01	7.83	3.83	5.1	18	9.2	11.56

CAMP MUNZ**STAFFING RATIOS (TARGET RATIO 1 STAFF TO 10 MINORS; WAKING HOURS)**

Month	6 A.M.-2 P.M.			2 P.M.-10 P.M.			10 P.M.-6 A.M.		
	High	Low	Avg.	High	Low	Avg.	High	Low	Avg.
JULY	9.57	6.5	7.76	9.57	6.4	7.65	23.33	15.25	17.59
AUGUST	6.6	3.11	4.36	7.38	4.14	5.44	21.33	13	16.52
SEPTEMBER	6	2.94	4.16	7.25	3.85	5.11	19	12.25	14.95
OCTOBER	8	4.18	5.63	8.17	4.55	5.64	18	10.2	13.43

CAMP SCUDDER**STAFFING RATIOS (TARGET RATIO 1 STAFF TO 8 MINORS; WAKING HOURS)**

Month	6 A.M.-2 P.M.			2 P.M.-10 P.M.			10 P.M.-6 A.M.		
	High	Low	Avg.	High	Low	Avg.	High	Low	Avg.
JULY	5.67	2.36	3.47	4.57	2.5	3.51	11.33	4.43	7.89
AUGUST	5	2.33	3.32	5	2.36	3.26	11.67	5.33	7.32
SEPTEMBER	5.67	2.21	3.45	5.67	2.33	3.56	11.67	4.86	7.3
OCTOBER	7.25	2.15	3.29	6	2.14	3.24	11	4.14	6.94

CAMP SCOTT**STAFFING RATIOS (TARGET RATIO 1 STAFF TO 6 MINORS; WAKING HOURS)****6 A.M.-2 P.M.****2 P.M.-10 P.M.****10 P.M-6 A.M.**

Month	High	Low	Avg.	High	Low	Avg.	High	Low	Avg.
JULY	6.6	2.69	3.74	6.6	2.47	3.62	14.67	7.8	10.47
AUGUST	7.5	3.25	4.53	6.83	3.08	4.41	15.33	8	10.79
SEPTEMBER	5.5	3	4.31	5.86	3.25	4.19	14.67	8.6	10.82
OCTOBER	6.29	3.33	4.64	6.14	3.33	4.54	14	8	11.39

CAMP ONIZUKA ***STAFFING RATIOS (TARGET RATIO 1 STAFF TO 6 MINORS; WAKING HOURS)****6 A.M.-2 P.M.****2 P.M.-10 P.M.****10 P.M-6 A.M.**

Month	High	Low	Avg.	High	Low	Avg.	High	Low	Avg.
JULY	4.64	3.15	3.84	4.58	3.15	3.86			
AUGUST	4.9	3.23	3.79	4.9	3.58	3.97			
SEPTEMBER	4.82	3.23	3.94	4.73	3.08	4.1			
OCTOBER	4.45	3.42	3.95	4.33	3.67	3.99			

* Due to the manner in which night staffing is assigned at the Challenger Memorial Complex, the information from that facility is not included. At the Challenger complex overnight staff report to a central command center where the staff are then assigned to their posts for the overnight shift. Staff may not work in the same dormitories each night; thus, the monthly staffing reports for the overnight hours at the Challenger Center do not include the information provided by the other camps and the Dorothy Kirby Center.

CAMP JARVIS 1***STAFFING RATIOS (TARGET RATIO 1 STAFF TO 10 MINORS; WAKING HOURS)****6 A.M.-2 P.M.****2 P.M.-10 P.M.****10 P.M-6 A.M.**

Month	High	Low	Avg.	High	Low	Avg.	High	Low	Avg.
JULY	6.1	3.05	4.23	6.1	4	4.86			
AUGUST	6.89	3.17	4.72	8.86	3.63	5.17			
SEPTEMBER	6.2	2.5	4.08	6.2	3.39	4.47			
OCTOBER	5.27	2.68	3.49	5.9	3.11	4.06			

*Due to the manner in which night staffing is assigned at the Challenger Memorial Complex, the information from that facility is not included. At the Challenger complex overnight staff report to a central command center where the staff are then assigned to their posts for the overnight shift. Staff may not work in the same dormitories each night; thus, the monthly staffing reports for the overnight hours at the Challenger Center do not include the information provided by the other camps and the Dorothy Kirby Center.

DOROTHY KIRBY CENTER**STAFFING RATIOS (TARGET RATIO 1 STAFF TO 5 MINORS; WAKING HOURS)****6 A.M.-2 P.M.****2 P.M.-10 P.M.****10 P.M.-6 A.M.**

Month	High	Low	Avg.	High	Low	Avg.	High	Low	Avg.
JULY	3.28	2.45	2.88	3.17	2.6	2.85	4.23	3.38	3.72
AUGUST	3.12	2.5	2.7	3.06	2.13	2.67	4.15	2.63	3.51
SEPTEMBER	3	2.27	2.64	3	2.17	2.59	3.85	3.06	3.4
OCTOBER	2.94	2.25	2.5	2.81	2.14	2.42	3.62	2.93	3.29

CAMP GONZALES**STAFFING RATIOS (TARGET RATIO 1 STAFF TO 10 MINORS; WAKING HOURS)****6 A.M.-2 P.M.****2 P.M.-10 P.M.****10 P.M.-6 A.M.**

Month	High	Low	Avg.	High	Low	Avg.	High	Low	Avg.
JULY	4.83	1.92	2.65	4.83	1.92	3.09	10.33	4.17	6.49
AUGUST	3.86	2.23	3.02	4.83	2.45	3.21	9.67	4.5	6.39
SEPTEMBER	4	1.75	2.61	4.83	1.8	2.82	9.67	4.5	6.37
OCTOBER	4.14	1.87	2.68	4.5	1.8	2.73	9.33	3.86	5.85

CAMP SMITH***STAFFING RATIOS (TARGET RATIO 1 STAFF TO 10 MINORS; WAKING HOURS)****6 A.M.-2 P.M.****2 P.M.-10 P.M.****10 P.M.-6 A.M.**

Month	High	Low	Avg.	High	Low	Avg.	High	Low	Avg.
JULY	7.25	3	4.82	10.67	3.2	5.07			
AUGUST	8.25	4.5	6.03	8.25	4.71	5.95			
SEPTEMBER	9.5	4.5	6.57	7.6	4.63	6.43			
OCTOBER	9	5	7.01	8.8	5.63	7.01			

*Camp Smith is the former Camp Kilpatrick. Camp Smith is located on the campus at the Challenger Memorial Center. It was put into service on July 7, 2014. Due to the manner in which night staffing is assigned at the Challenger Memorial Complex, the information from that facility is not included. At the Challenger complex overnight staff report to a central command center where the staff are then assigned to their posts for the overnight shift. Staff may not work in the same dormitories each night; thus, the monthly staffing reports for the overnight hours at the Challenger Center do not include the information provided by the other camps and the Dorothy Kirby Center.

CAMP MILLER**STAFFING RATIOS (TARGET RATIO 1 STAFF TO 10 MINORS; WAKING HOURS)**

Month	6 A.M.-2 P.M.			2 P.M.-10 P.M.			10 P.M-6 A.M.		
	High	Low	Avg.	High	Low	Avg.	High	Low	Avg.
JULY	5.22	3.15	4.13	5.75	3.14	4.31	20.5	8.8	11.24
AUGUST	5.38	2.31	3.34	5.57	2.19	3.25	13.67	6.6	8.84
SEPTEMBER	4.25	2.27	3	3.43	1.92	2.71	11.33	5	7.02
OCTOBER	3.29	1.5	2.01	3.83	1.21	1.82	11.5	3.4	5.66

The Monthly Staffing Summaries clearly indicate that most of the camps are, on average, meeting the specified ratios as established in the County's "Staffing Enhancement Rationale²," at least at the beginning of the shift. At times exigent circumstances can change the staffing ratio during the shift if something unanticipated occurs. Such an occurrence is often the result of an incident or the need to provide transportation to, for example, a medical facility. However, as noted in the County's self-assessment, there continue to be instances where some camps began waking hour shifts with staffing which exceeded the target staffing ratio. The following chart illustrates how often waking hour shifts start with staffing levels that exceed the target ratio. This information is also taken from the Monthly Staffing Summaries for each camp.

² Undated memorandum issued in the Spring, 2011.

**PERCENTAGE OF WAKING HOUR SHIFTS STARTED
OVER TARGET RATIOS BY CAMP
JULY THROUGH OCTOBER 2014**

CAMP NAME	NUMBER OF SHIFTS	NUMBER OF SHIFTS STARTED ABOVE TARGET RATIO	% OF SHIFTS STARTED ABOVE TARGET RATIO THIS PERIOD	% OF SHIFTS STARTED ABOVE TARGET RATIO PREVIOUS MONITORING PERIOD
PAIGE*	245	7	2.8%	3.6%
AFFLERBAUGH	246	1	.4%	5%
MCNAIR 1**	246	0	0	N/A
MCNAIR 2**	246	0	0	N/A
ONIZUKA	246	0	0	.3%
SMITH***	234	1	.4%	0
KIRBY	246	0	0	0
GONZALES	246	0	0	0
MILLER	246	0	0	0
JARVIS 1**	246	0	0	N/A
ROCKEY	246	0	0	0
MENDENHALL	246	2	.8%	.08%
MUNZ	246	0	0	1.9%
SCOTT	246	10	4%	0
SCUDDER	246	0	0	.3%

* The afternoon/evening shift of July 16, 2014 was not used to calculate the ratio due to a data entry error.

**This data was not calculated during the previous monitoring report.

***Camp Smith is the former Camp Kilpatrick. Camp Smith became operational on July 7, 2014.

Clearly there are still a few occasions when the mandated ratios are not met and the County should continue to work to prevent such occurrences and to correct them when they occur. The rise in the number of above target ratio (too few staff for the number of youth) shifts at Camp Scott is of some concern. During the previous monitoring period there were no shifts at Camp Scott that started with a staffing ratio above the camp's target ratio. While this may be a relatively simple aberration, six of the ten shifts in the monitoring period that started above the mandated ratio occurred in August, the situation warrants careful monitoring to assure staffing numbers at Camp Scott do not deteriorate.

The monitoring team notes and commends the County for the significant improvements that have been made in meeting and often greatly exceeding the mandated ratios. The presence of adequate numbers of staff to provide direct supervision of minors is the first step in delivering services in a safe environment and the County has made great progress in this area.

Occurrences of starting a shift with an insufficient staffing ratio should be rare, or better yet non-existent. The County developed and distributed specific instructions to camp administrators and supervisors regarding the amelioration of staffing shortages. When followed, the instructions have the potential to help staff deal with the staffing shortage situations. This is likely a contributing factor in the continued improvement in the levels of staffing at the camps. However, even with the general improvement in staffing at the camps, there are still instances where the number of officers providing direct supervision to the minors is problematic. It is noted that the number of incidents that occurred while staffing is short does seem to have lessened. The following examples occurred during this monitoring period:

- On July 17, 2014 at approximately 11:30 a.m. at Camp Afflerbaugh the staff were notified by the Camp Nurse that a minor required transport to a medical facility. At the time the medical transport occurred there were 68 minors in the camp being supervised by seven officers. This ratio was within the established one staff to ten minors ratio for the camp. However, when the transport occurred the camp population dropped to 67 minors and six staff (one officer and one administrative staff conducted the transport). This left the camp short of the established ratio. At two p.m. another officer arrived from participating in training and brought the ratio back into compliance.
- On August 15, 2014 at approximately 3:30 p.m. a minor at Camp Paige reported that he had been bitten by a snake. Arrangements were made to transport the minor to a medical facility. This was accomplished by three staff who departed the camp with the minor at approximately 4:25 p.m. Prior to the transport there were 74 minors at the camp being supervised by ten staff. Following the transport there were 73 minors and seven staff. The established staffing ratio at Camp Paige is one staff for every ten minors. Following the Department's established protocol, two additional staff members were called to the camp. The additional staff arrived at the camp at six p.m.
- On September 7, 2014 at approximately 10:48 a.m. there was an incident during a recreational activity at Camp Rockey. The incident report indicates an appropriate supervision level of three staff supervising 15 minors on the recreation field. However, in the dormitory at the same time, four staff were providing supervision for 30 minors. This is above the established staffing ratio of one staff for every seven minors at Camp Rockey.

It is recognized and acknowledged that in juvenile facilities incidents can and do occur even with appropriate staffing. However, having an appropriate number of staff supervising and engaging minors in their daily activities can significantly reduce incidents of youth-on-youth assaults, fights and other kinds of negative behaviors. Adequate staffing also supports the facilities' efforts to implement rehabilitative programming.

While overnight staffing has continued to generally improve within the camp system, the monitoring panel's previously noted concerns about over-night coverage remains in some camps, particularly the larger camps such as Afflerbaugh, Mendenhall, Paige and Munz. As noted above,

the California Standards Authority mandates there be a ratio of one staff to thirty minors during sleeping hours and all the camps surpass the CSA's requirement. However, with the current camps' open dorm settings (at some camps upwards to 75 minors sleep in an open barracks style building) the Monitors continue to consider this to be an inadequate staffing model. The National Partnership for Juvenile Services recommends a one staff to sixteen minors ratio during sleeping hours.

Over-night camp safety and security concerns arise primarily from of a combination of two factors: staffing levels and the open dorm setting. As noted earlier, staffing ratio of one staff to thirty minors concerns the monitoring panel and we are pleased to note the sleeping hour ratios are generally much better than the mandated ratio. The monitoring team's concern about nighttime staffing is because most of the camps have "open bay" dorms where dozens of minors room together, have the ability to possibly overwhelm a small number of staff or other minors, and are can move around the facility (primarily to use the restroom) under minimal supervision.

The County notes most daytime staff assigned to the camps sleep over at the facilities, and are available to provide assistance to the night staff in the event of an incident. Each camp generally has between 8 and 10, and sometimes more, staff sleeping over-night at the facilities. During the sleeping hours, these staff are not actively supervising the residents, but are expected to respond should an incident occur. These officers, who have generally worked a full shift of 16 hours, are then "on-call" during their eight-hour sleep period as first responders in the event of an incident. While this arrangement is illustrative of the challenging nature of the work, it is an unusual staffing pattern in a juvenile justice setting.

The monitoring team continues to be pleased with the improvement in the numbers of staff who are providing supervision to the minors during the sleeping hours. It is incumbent upon the County to work to assure that both minors and staff are safe during the overnight hours. While many camps' nighttime staffing ratios are now within generally accepted professional standards, during this monitoring period a few camps had occasions when nighttime staffing was higher than the generally accepted standards. For example:

- During July the overnight staffing ratio at Camp Munz exceeded one staff to 20 minors seven times. The range of ratios that exceeded 20 was from 20.67 to one on July 23 to 23.33 to one on July 14.
- On July 30 at Camp Miller the overnight staffing ratio was 20.5 minors to one staff.
- During August the overnight staffing ratio at Camp Rockey exceeded 20 minors to one staff two times. The ratio was 24.5 minors to one staff on August 16 and 25.5 minors to one staff on August 30.
- During August at Camp Munz the overnight staffing exceeded one staff to 20 minors seven times. The range of ratios which exceeded 20 was 20 to one (August 14 and 15) to 21.33 to one on August 9.
- On August 8 at Camp Afflerbaugh the overnight staffing ratio was 21.33 minors to one

staff.

- On August 20 at Camp Paige the overnight staffing ratio was 25.67 minors to one staff.

The monitoring team notes most of these examples are from larger facilities. We further note the average ratios for these facilities are lower. We encourage the County to carefully monitor the level of nighttime staffing to assure it does not trend upward.

As noted previously, officers continue to have a variety of duties that may take them away from providing direct supervision of the main body of minors. These duties can include activities such as manning control centers, writing reports or gathering other kinds of documentation, conducting orientation of new residents, providing off-campus transportation for minors, providing supervision or guidance for campus visitors, or a number of other legitimate activities. While such activities are necessary, they do take away from the officers' ability to directly supervise the minors under their care, which should always be their first priority, and may reduce that direct supervision of those minors to an unacceptable level.

During interviews, the line staff at the camps have often commented that while they support the increased direct supervision of the minors, the result is that it has become more difficult for them to do their assigned casework. These comments are supported in both interviews with minors and in many of the grievances filed by the minors. The juveniles note that with more officers providing supervision of necessary movements, dorm supervision and other youth related activities, it is increasingly difficult for the minors to meet with their respective caseworkers.

In reviewing various incident reports, it is clear that some of the camps are operating with staffing patterns that could result in a limited ability to meet the various contingencies that occur during the normal operation of a camp. As illustrated above, one of the situations that has frequently arisen is the necessity of having to provide transportation to a medical facility due to some sort of illness or injury to a minor. The Probation Department always assigns at least two officers to transport a minor who requires such care. This is a routine and appropriate safety precaution at many juvenile facilities. However, if two officers are involved in transporting a minor to a medical facility, this may reduce the ability of the remaining officers to provide adequate direct supervision of the remaining juveniles, or may impact the minors' ability to participate in the mandated treatment activities that are scheduled to occur.

In simple terms, if a camp starts the day with eight full-duty officers and 70 minors on-site they would be compliant with the mandated ratio at a camp where the ratio has been established at one officer to ten minors. However, if staff must be taken offline to perform a medical transport or some other necessary work the staff to minor ratio and safety standards are compromised. This is a frequent topic of conversation among officers, supervisors and administrators at the camps.

Probation Department administrators have said that camp directors and supervisors have the capability of hiring additional staff by use of overtime, or can bring in additional staff from other camps to compensate for any staff shortages, however this has sometimes not been evident in practice. The County has issued specific instructions to staff to assist them in dealing with staffing shortages as they arise. This appears to have helped the camps maintain generally acceptable

staffing levels in the camps.

The challenge and requirements of this provision continue to be threefold:

- First, to assure that an adequate number of officers are on duty at all times.
- Second, to assure that on-duty officers provide a safe environment in which the camp's rehabilitative programs can be carried out.
- Third, to maintain the new requirements for background checks on prospective employees and to periodically re-check the status of current employees, including a mechanism by which the County periodically specifically asks employees who have direct contact with minors about prior criminal misconduct during interviews and reviews.

The County's continued emphasis on providing for the safety of both minors and staff as evidenced by staffing increases is both commendable and necessary. The County has devoted resources and effort into this critical part of the agreement. The monitoring panel was pleased to support the County's request that Provision 15 be moved into Full Compliance effective when the County successfully completed a year of continued compliance on October 31, 2014.

Recommendations:

1. The County should continue its efforts to preserve and strengthen the improvement it has made in the number of officers who are providing direct supervision to the minors at the camps within the agreed upon staffing ratios. The County should work to assure that occurrences of inadequate staff to youth ratios are reduced or eliminated.
2. The County should continue its efforts to merge direct supervision activities with those activities and programs that are intended to provide rehabilitative services. The first priority should be to assure the supervision and safety of minors. Successful juvenile justice programs are rooted in positive relationships between the staff and the minors who are placed in their care. Successful programs place a heavy emphasis on rehabilitative programming while maintaining a safe milieu for both residents and staff.
3. The County should continue to review its overnight direct supervision operations within the camp system in order increase and/or maintain the amount of nighttime supervision to minors available during the sleeping hours.
4. The County should continue its effort to perform both self-evaluation and quality assurance. The County should continue to devote resources to performing unannounced staffing audits.
5. The County should maintain the systems established to implement the newest requirements of Provision 15 regarding background checks for prospective employees and periodic background checks on existing employees. The County has implemented a protocol that meets the requirement in the provision that the County shall directly ask applicants for, and employees in positions that result in contact with youth about contact with law enforcement. The County should work to assure that employees who return from approved leave complete the law enforcement contact verification upon their return to work.

Evidentiary Basis:

- A monitoring team member reviewed the status of this paragraph while on site at the Probation Department's central office October 21-23, 2014.

- Monitoring team members regularly review various incident reports, internal monitoring reports, internal staffing reports, various statistical reports and other documentation provided by the County.
- Monitoring team members routinely participate in conference calls dealing with general and specific program issues.

Paragraph 17: Rehabilitation and Behavior Management

Rehabilitation: *The County shall provide adequate rehabilitative and gender-specific programming, as necessary. The County shall continue to conduct appropriate individualized assessments by qualified staff.*

The County shall develop and provide integrated treatment services that meet the rehabilitative needs of youth at all Probation Camps. These services shall adequately: address youth's educational needs (including access to special education services); provide access to medical and mental health services, including substance abuse treatment; provide a structured living environment that facilitates, reinforces, and provides opportunities for youth to practice pro-social skills and pro-social relationships with other youth and adults; provide access to meaningful recreational and enrichment activities; provide opportunities for family involvement; encourage development of new skills; and include Camp staff as positive role models.

Within 10 business days of a youth's arrival at a Camp, the County shall ensure that the youth receives an individualized assessment of the youth's rehabilitation needs by a multidisciplinary team in all relevant areas, including, but not limited to: education, recreation, psychosocial development, and mental health. This multidisciplinary assessment shall consider the Camps Assessment Unit's ("CAU's") assessment of the youth. Based on this multidisciplinary assessment, the County shall formulate a comprehensive service plan, including case plan goals for rehabilitation and treatment, for each youth.

The County shall ensure that each Camp offers the necessary rehabilitative treatment, programs, and services to meet the needs of youth housed there, consistent with safety and security needs, based on the assessments and treatment plans. Such offerings shall include, but shall not be limited to, group therapy or individual counseling for each youth, as necessary.

At Camps providing an adapted Dialectical Behavior Therapy ("DBT") program, the County shall create a detailed program description for the DBT program to include, but not be limited to, the purpose; goals; desired results; target populations; expectations for staff training and program delivery; and type, intensity, and duration of services to be provided.

The County shall ensure that existing staff demonstrate competency, and new staff receive sufficient competency-based training, to fully implement the rehabilitative interventions.

The County shall ensure that each rehabilitative treatment, program, and service at each Camp offers sufficient capacity to allow youth who need the treatment, program, or service to

participate in it. The County shall ensure that youth attend their prescribed programs, as outlined in their treatment plans. The youth's caseworker shall regularly report to the youth's treatment team and document the youth's progress in meeting his or her case plan goals. Youth who are not meeting their case plan goals shall receive prompt subsequent, individualized assessments and follow-up.

The County shall ensure that its rehabilitation and intervention programs continue to address youth's needs related to peer pressure and gang affiliation.

Behavior Management: *The County shall provide a facility-wide behavior management system that is implemented throughout the day, including during school time. The behavior management system shall encourage meaningful rewards for positive behavior. Discipline and sanctions shall not be arbitrary. The County shall continue to develop the behavior management program in consultation with the Monitoring Team.*

The County shall implement the behavior management system in accordance with the following schedule and based on the effective date of this Amendment:

Within 30 days, the County shall complete detailed, written guidance for its behavior management system.

Within 60 days, the County shall provide staff with competency-based training on the behavior management system.

Within 60 days, the County shall introduce the behavior management system to youth, including by providing youth with orientation and written guidance on the system and initiating the system in all Probation Camps. The written guidance shall be made available to youth in the dorm and at orientation thereafter.

The County shall ensure that its behavior management system includes specific, consistent requirements and behavioral expectations for each part of the day during which youth can earn points. The County shall ensure that each segment of each day is consistently rated for all youth, every day, in every Probation Camp.

The County shall provide a comprehensive array of short- and long-term incentives at each Probation Camp and shall ensure that youth have access to all rewards and privileges to which they are entitled. The ability to purchase items from a store on a weekly basis may be part of this array, but it shall not be the only incentive offered.

The County shall use a continuum of individualized consequences in response to non-compliant behavior or rule violations at each Probation Camp. The County shall ensure that isolation may be used only as a last resort on this continuum, and only in response to violent or aggressive behavior; to prevent violent or aggressive or criminal behavior, including extreme and chronic disruptive behavior; or for the minor's own protection.

The County, with input from the Monitors, shall draft and implement a policy that enumerates the types of behaviors that could result in a referral to isolation and requires detailed justification for sending a youth to isolation, maintaining the youth in isolation, and removing the youth from isolation.

The County shall ensure that the period of isolation is based on the youth's behavior, or the threat to the youth, rather than on a pre-determined period. Youth who are in isolation must receive at least one hour of large muscle activity for every 24 hours in isolation, unless the youth is actively violent or aggressive, such that removing the youth from isolation presents a significant risk of harm to the youth or others. Youth whose isolation extends beyond 24 hours shall receive a due process hearing. The isolation policy shall be subject to DOJ review and approval.

As part of its evaluation to determine whether the implementation of paragraph 17, as amended, is meeting the rehabilitation needs of youth and contributing to improved conditions, the Monitoring Team shall consider factors including the following, as appropriate: Use of isolation and reasons thereof; Rate of youth-on-youth and youth-on-staff violence; Progress toward meeting treatment goals as determined by the multidisciplinary team ("MDT"); Youth transfers to other Probation Camps for security or safety purposes; Rate of self-harming behaviors; Number of youth sent to outside facilities for mental health evaluation or treatment; Use of behavior management rewards and consequences; and Number of early or on-time releases.

Status: Full Compliance (effective October 31, 2014)

County's Self-Assessment:

Rehabilitation

Aggression Replacement Training

Aggression Replacement Training (ART) and Small Group Intervention (SGI) data for the months of July 2013 through September 2014 show that participation completion rates continue to steadily increase (see *Table 17-1*). As part of the ongoing quality assurance process there were 111 observations conducted of ART and SGI groups during the third quarter; of the groups observed, 99% scored competent or above in all areas (fidelity, clarity, objectivity, pacing, engagement, group control, motivation and co-facilitation). Additionally, to continue the County's improvement oriented milieu, over fifteen onsite IFTs were held for all camps focusing on administrative matters and ART protocols. The ART component-specific measures suggest that the Los Angeles County Probation Department's efforts to provide quality rehabilitative services are effectively impacting its participants.

Table 17-1*ART and SGI Overall Completion Rates*

	Quarter III (2013)	Quarter IV (2013)	Quarter I (2014)	Quarter II (2014)	Quarter III (2014)
ART	67%	66%	70%	73%	76%
SGI	49%	73%	72%	73%	81%

Note: Rates = (Number of Participants Who Completed the Group / Number of Youth Who Participated in the Minimum Number of ART or SGI group sessions) * 100

Table 17-2*ART and SGI Individual Module Completion Rates (Quarter III July – September 2014)*

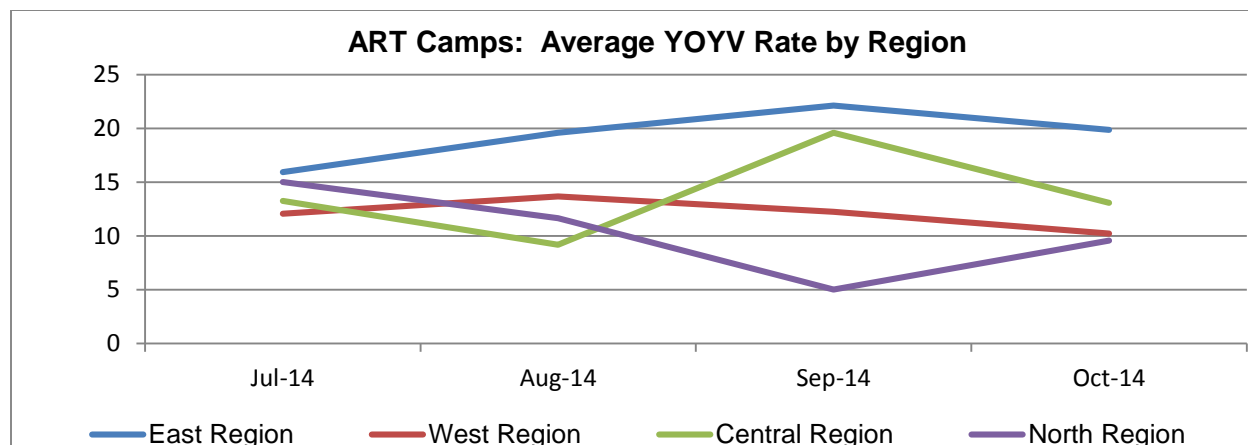
	Skill Streaming	Anger Control	Moral Reasoning
ART	80%	80%	70%
SGI	60%	N/A	66%

Note: Rates = (Number of Participants Who Completed the Module / Number of Youth Who Participated in the Minimum Number of Module sessions) * 100

Similar to those of the preceding reporting period, positive outcomes were associated with all three modules of ART groups across the juvenile camps. Higher completion rates (see **Table 17-2**) appear to have impacted post-test scores. Moral Reasoning groups maintained previous levels of improvement with 85% of the youth showing a decrease in cognitive distortions after completing Moral Reasoning. These results are based on the comparison of the pre and post scores of the *How I Think Questionnaire*. According to the results of the *Skills Streaming Checklist* post-test, 75% of youth showed an increase in pro-social skill usage after completing Skill Streaming. This is a significant increase over the previous quarter's results with 53% of youth improving. The results of the *Aggression Questionnaire post-test* slightly improved to 63% of youth showing a decrease in aggressive responses, and an increase in ability to channel those responses in a safe and constructive manner after completing Anger Control. The overall findings suggest that youth are continuing to use pro-social skills at higher rates and are employing more mature and constructive thought processes after group participation. Hence, a correlation between the ART program completion in the individual camps and youth-on-youth violence (YOYV) rates should be observable when comparing the two data sets.

Figure 17-1

Youth on Youth Violence Rates in ART Camps (July – October 2014)



Note: Rate = (Number of YOYV Incidents per Regional ART Camps / Average Population) * 100
 East Region = Paige and Afflerbaugh
 West Region = Miller and Gonzales
 Central Region = Munz and Mendenhall
 North Region = McNair, Jarvis, and Smith

Table 17-3

Youth-On-Youth Violence Rates per 100 Youth in ART Program Camps

Region/Camp	July	August	September	October
Jarvis	24	13	10	19
McNair	22	16	5	7
Smith	0	6	0	2
North	23	12	8	9
Munz	10	7	15	16
Mendenhall	16	12	24	10
Central	13	10	20	13
Miller	7	3	14	9
Gonzalez	17	25	11	11
West	12	14	13	10
Paige	13	14	13	12
Afflerbaugh	19	25	31	29
East	16	20	22	21

Note: Rate = (Total # of YOYV Incidents / Average Monthly Population) * 100

The east region camps have maintained the highest rates of youth on youth violence (see *Figure 17-1*). ART completion rates in Camp Paige dropped from 100% in the second quarter to 75% in the third quarter; however SGI rates increased from 60% to 90%. YOYV rates have remained consistently moderate at Camp Paige (see *Table 17-3*). Camp Afflerbaugh's completion rates remained approximately the same as the previous quarter at 70% (ART) and 77% (SGI); nevertheless they have experienced increasingly high rates of YOYV. Both camps have maintained higher populations of offenders, averaging in the 70s, and had undergone inconsistent staffing as discussed in Paragraph 15 (see *Figures 15-2 and 15-3*). Their ranges of daytime staffing ratios are larger than most camps and their averages are generally at the midpoint of the range. This indicates that there are relatively equal frequencies of high and low staff to minor ratios. These staffing inconsistencies interrupt programming and casework more frequently than what other camps have experienced. It is to be expected that this might create an impression of instability to which the youth would likely react negatively, leading to the high rates of YOYV.

Camp Afflerbaugh continues to experience the highest rates of YOYV compared to other ART camps. The facility manager informed DOJ Monitors during the last reporting period of potential causes of the significant increases in violence rates. The rendered solution to the higher rate of staff assault has been effective in controlling incidents, as can be seen in *Figure 17-2*. Efforts to control the rate of YOYV, however, appear not as effective as anticipated. RTSB recognizes the correlations between staffing inconsistencies, staff morale and youth behavior. Consequently, the populations in both camps Paige and Afflerbaugh have been gradually and significantly reduced between October and November 2014. RTSB continues to analyze other potential causes and is working to further enhance the programs.

North region camps have steadily reduced their previously high ratios of YOYV over the current reporting period. The YOYV rates in the north region also appear to be reactive in part to the successfulness of the ART and SGI services and staffing. Recently opened Camp Smith has been staffed with experienced ART and SGI facilitators. Of the 34 youth participating in ART and SGI, 90% successfully completed services during their first quarter of operation. YOYV rates at Camp Smith are the lowest of all ART camps. Camp McNair has also substantially reduced their YOYV rate (see *Table 17-3*); staffing ratios have been consistent and strong. Camp Jarvis' ART and SGI completion rates have improved significantly with ART increasing 40% and SGI increasing 17% over the last quarter. The population of youth has been decreased, creating a greater consistency in strong staffing ratios. It is anticipated that a gradual reduction of YOYV will be evident in upcoming months with the continuation of the aforementioned dynamics.

Camp Gonzales' ART completion rates plummeted during the third quarter from 60% to 0% (0 out of 9 participants completed ART). Concurrently, the YOYV rates also increased. It was determined that a change in procedures and the improper application of the Behavior Management Program played a part in the decrease in completion rates and increase in YOYV rates at Camp Gonzales. Corrective action was applied which appears to be positively impacting the YOYV rate.

Figures 17-2 and 17-3 are control charts commonly used in quality assurance to determine whether there is any significance to changes in key performance measures, YOYV and Youth on Staff Violence (YOSV), or if they are due to normal variation. The centerline in the chart is the average of YOYV or YOSV incidents between July 2013 and December 2013. The dotted lines represent

standard deviations from the average, with the red lines representing the upper and lower control limits. The control limits embody the range between which all points are expected to fall if rates are in statistical control. It can be determined that the rate of YOYV incidents in May, August, September and October are not due to normal variation and the source of the problem needs to be identified to bring the rates back under control. The Department will continue to focus resources on Camp Afflerbaugh to determine whether the identified source of the problem and the subsequent corrective action is effective in reducing rate. The process of identifying problems; assessing the source of the problem; designing, implementing and evaluating the effectiveness of the corrective action; and cycling back around when necessary, will continue to be applied to all camps.

Figure 17-2

Youth-on-Staff Violence Rate in Camp Afflerbaugh (January – October 2014)

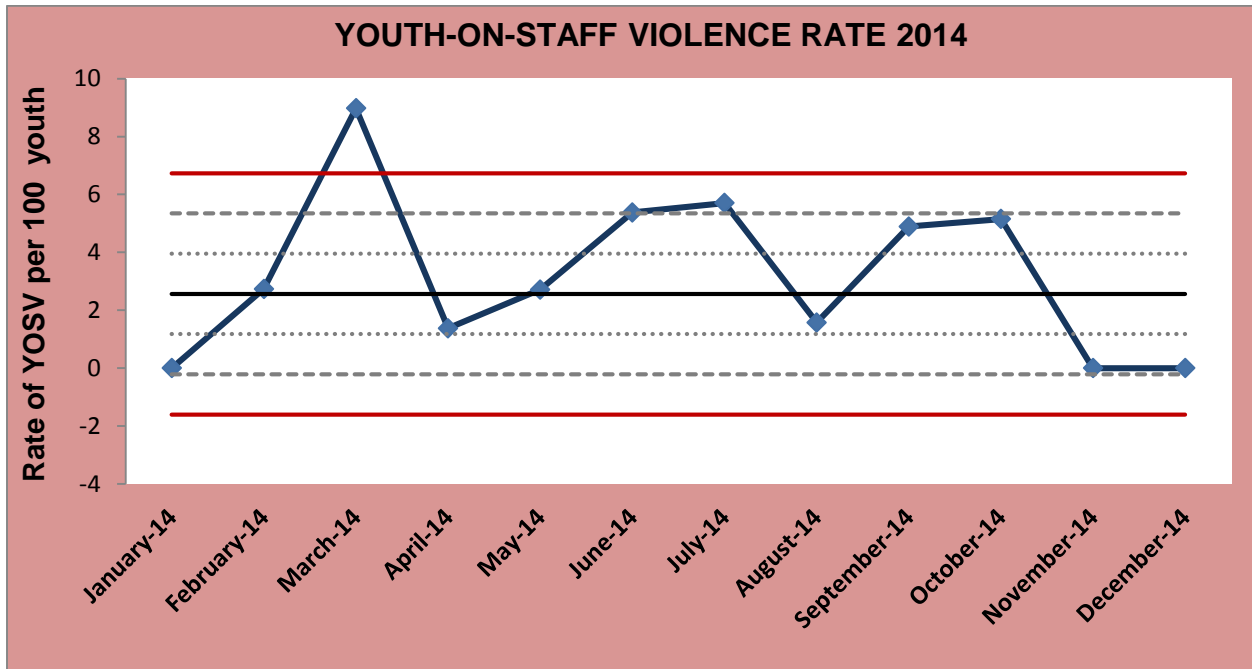
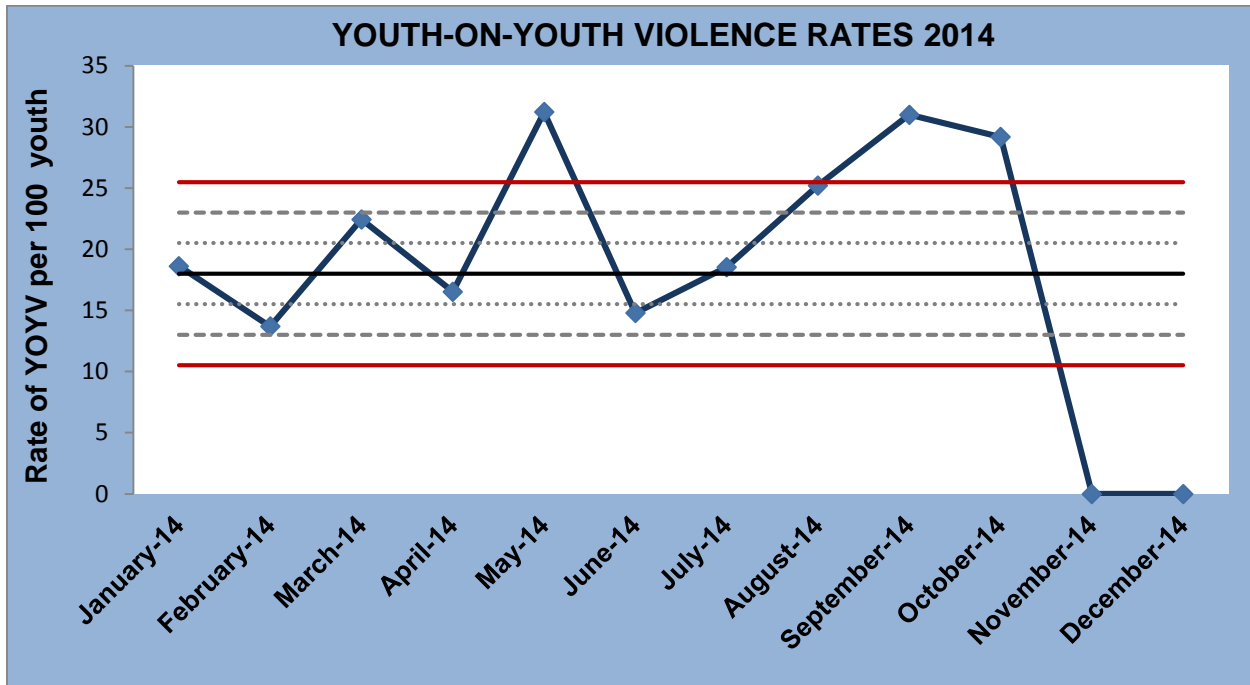


Figure 17-3

Youth-on-Youth Violence Rate in Camp Afflerbaugh (January – October 2014)



Dialectical Behavior Therapy

DMH and Probation have continued to work together on implementing Adapted DBT in the five pilot camps: Onizuka, DKC, Scott, Scudder, and Rocky.

The audit tool introduced in December 2013 captures release cohort data for youth participating in the program (see **Table 17-4**). In May 2014, it was discovered through discussion with Camp Rocky management that documented rates of successful completion have been negatively impacted by the inclusion of youth who had transferred from other facilities with minimal confinement time remaining. Therefore, the time spent in the camp was not long enough for the youth to complete their programs. Youth impacted in this manner who do not have enough time to complete the program are now documented in the comments section of the audit tool. The information is taken into consideration by the camp managers when reported percentages of completion are low. With the exception of Camp Scott, all camps' rates of successful completion have significantly increased. Inconsistencies in Camp Scott's staffing due to attrition, as described in Paragraph 15 (see **Figures 15-2 and 15-3**), may have contributed to the decreased completion rate. As RTSB works to narrow the staffing gaps at Camp Scott, DBT completion rates should show improvement.

Table 17-4*Dialectical Behavior Therapy Release Cohort (July - October 2014)*

Camps	# of youth released	# of youth successfully Completed	%	% January through May 2014
Scudder	27	25	95%	77%
Scott	32	23	69%	87%
Rockey	43	34	79%	72%
Onizuka	23	19	83%	72%
Dorothy Kirby Center	45	40	91%	73%
RTSB Average:			83%	76%

Note: Rate = (Number Youth Released who Successfully Completed DBT – July - October / Number Participating Youth Released) 100*

A review of RTSB's self-injurious behavior (SIB) rates shows that DBT, in connection with other factors, is having a positive impact within the camp community. DBT was designed to address treatment barriers presented by clientele with a history of self-harming behavior and/or co-occurring disorders. Therefore, youth at risk of self-injurious behavior are placed in DBT camps, and it is anticipated that their rates would be higher than that of the ART camps.

Incidents of SIB continue to decrease in all camps (see **Table 17-5**). It is noteworthy that there is little variation between the rates in DBT and ART camps, with the exception of DKC. This indicates that Adapted DBT has been implemented with fidelity and is positively affecting the thoughts and behavior of the participants. Dorothy Kirby Center's rates were expectedly the highest at 15 incidents per 100 youth over the reporting period due to the type of youth served. The rates will continue to be monitored for significant trends.

Table 17-5**DBT vs. ART Camp Rates of Self-Injurious Behavior per 100 youth (July–October 2014)**

Region	Camp	Self-injurious behavior per 100 youth (DBT camps)	Self-injurious behavior per 100 youth (ART camps)
North	Jarvis		2
	McNair		1
	Smith		0
	Onizuka	1	
Central	Munz		1
	Mendenhall		0
	Scudder	3	
	Scott	0	
West	Miller		0
	Gonzales		0
	DKC	15	
East	Paige		0
	Afflerbaugh		0
	Rockey	4	

Note: Rate = (Average Number of Self-Injurious Behavior Incidents July-October / Average Population) * 100

Behavior Management Program

The Behavior Management Program (BMP) is a program that utilizes positive behavior reinforcement as a tool to get desired behaviors repeated. It consists of, daily observing and grading of youths behavior; rewarding desired behavior; sanctioning undesired behavior; and progressing through the program. BMP is a strong tool that encourages all youth to complete their program via incentives for compliance with facility rules, while gaining critical knowledge related to the effects of positive and negative behavior that should lead to improved outcomes for youth once they are released to the community. The most valuable privilege earned through the BMP for most youth is earning consideration for early release.

The BMP components of Daily Merit Ladders (DMLs), Point Mechanics, Daily Rewards, Stage Promotions, and the use of Sanction Forms were identified as areas for monitoring to enhance BMP effectiveness. Probation staff has been fully trained in BMP implementation. Additional daily checks and balances have been put in place by RTSB management to standardize and simplify the calculation of points and the youth's status in the BMP. This change resulted in the newly designed Made Day Tracking Log which replaces the DML. The Made Day Tracking Log results in the camps ability to more accurately document, track, and report the status of youths' stages and eligibility for promotion. This enhanced process resulted in Stage Promotions across the board being granted in a timely manner. There has been a significant improvement in auditing in this area since the last Monitoring Period, which will be discussed in further detail below.

The BMP audit tool was modified in February 2014 to define what findings “Meet Expectations” or conversely requires corrective action. It is departmental standards that points, including school points, are added properly; Sanctions are relevantly assigned, completed, and reviewed by a Supervisor; Daily Rewards are given appropriately, and that Stage Promotions are occurring timely, which is within one (1) week of eligibility. In order to “Meet Expectations”, camps are expected to perform at 80% or better; with no more than 20% rote scoring of 1s and 0s as well as no more than 20% of the youth receiving an unearned reward when not earned is met. Camps or facilities that fall below the “Meets Expectations” threshold are required to develop a Corrective Action Plan (CAP) as to what steps will be taken to achieve the required performance level. These CAPs are followed-up by DOJ/QA Supervisors to ensure compliance is achieved.

School Points

Daily Merit Ladders (DMLs) from the day prior to the audit are reviewed to ensure that the youth are awarded points for the school period and that the points are calculated into the totals to earn daily rewards. The camps’ staff have been consistently including the points on the DMLs with an occasional calculation error. However, all camps meet expectations in this area for July through October 2014.

Daily Merit Ladder Point Mechanics

The camps have been meeting expectations regarding rote grading with 0s, 1s and 2s. The use of rote 0s and 1s are always isolated incidents. The reason for the rote grade is usually documented at the bottom of the grading period’s column indicating the behavior exhibited by all youth in the group. During July through October, all camps met expectations in this area; with the exception of two camps. There were two occurrences of rote grading during the reporting period. Camp Afflerbaugh’s October audit recorded several “squads” participating in an isolated late night disruption resulting in rote grading on 11% of the sampled DMLs. Camp Paige’s August audit reported 18% of the DMLs containing rote grades of 1s due to documented behavioral issues (five DML sheets).

Daily Rewards

A majority of the camps have maintained compliance with rewarding deserving youth and not rewarding youth who have been disqualified or did not meet the point requirements. The number of youth receiving undeserved rewards is very minimal; however, past audits have not taken into consideration small sample sizes. Rewarding one or two undeserving youth may have caused the camp not to meet expectations. In order to remedy this issue the September audits were modified to calculate a percent of the total youth who earned rewards rather than calculating the percent from the youth who were undeserving of a reward.

Camps Miller (August) and Scott (July and August) did not meet expectations as youth were rewarded when undeserving. Camp Scott experienced a reorganization of shifts and the arrival of new staff during these months which resulted in several minors being rewarded after they had received a Special Incident Report or School Referral for poor behavior. Corrective action was implemented which remedied the issue in the following months’ audits. Camp Miller’s incident was not a systemic issue; however, seven youth were rewarded during a shift when they should

not have been. Corrective action also addressed this issue as no further issues were noted in the subsequent months.

Table 17-6 includes an average of youth who received unearned rewards in the months of July through October. The modification of how the percentage is determined will show a downward trend in upcoming audits.

Table 17-6

Use of Sanctions & Completions; Unearned Rewards (July – October 2014)

<i>Region Camp</i>	<i>Average # Sanctions Per 100 Youth</i>	<i>% of Sanctions Completed</i>	<i># Youth Unearned Rewards</i>	<i>% Youth Unearned Rewards Received</i>
<i>Jarvis</i>	<i>4</i>	<i>88%</i>	<i>0</i>	<i>10%</i>
<i>McNair</i>	<i>13</i>	<i>100%</i>	<i>1</i>	<i>7%</i>
<i>Onizuka</i>	<i>14</i>	<i>100%</i>	<i>0</i>	<i>1%</i>
<i>North</i>	<i>10</i>	<i>96%</i>	<i>.33</i>	<i>6%</i>
<i>Munz</i>	<i>8</i>	<i>100%</i>	<i>1</i>	<i>3%</i>
<i>Mendenhall</i>	<i>15</i>	<i>99%</i>	<i>1</i>	<i>0%</i>
<i>Scudder</i>	<i>16</i>	<i>99%</i>	<i>0</i>	<i>0%</i>
<i>Scott</i>	<i>31</i>	<i>98%</i>	<i>4</i>	<i>26%</i>
<i>Central</i>	<i>18</i>	<i>99%</i>	<i>1.5</i>	<i>7%</i>
<i>Miller</i>	<i>7</i>	<i>100%</i>	<i>2</i>	<i>19%</i>
<i>Gonzalez</i>	<i>10</i>	<i>100%</i>	<i>0</i>	<i>0%</i>
<i>DKC</i>	<i>25</i>	<i>96%</i>	<i>0</i>	<i>0%</i>
<i>West</i>	<i>14</i>	<i>99%</i>	<i>1</i>	<i>6%</i>
<i>Rockey</i>	<i>28</i>	<i>100%</i>	<i>1</i>	<i>4%</i>
<i>Paige</i>	<i>67</i>	<i>95%</i>	<i>0</i>	<i>1%</i>
<i>Afflerbaugh</i>	<i>11</i>	<i>100%</i>	<i>0</i>	<i>1%</i>
<i>East</i>	<i>35</i>	<i>98%</i>	<i>0.3</i>	<i>2%</i>

Note: Rate = (Average Number of Sanctions July-October / Average Population) * 100
(Average Number of Sanctions Accompanied by Zero Point July-October / Average Number of Sanctions) * 100

Sanctions

The Behavior Management Program implemented the use of sanctions for youth who engage in rule violations. Sanctions serve as a learning tool and an alternative to removing the youth from the general camp population. Sanctions can range from a written assignment to a privilege or stage drop, and/or the loss of a daily reward. Sanctions are primarily used when the behavior does not justify sending a youth to the Special Handling Unit (SHU) for temporary isolation and the youth is not an immediate danger to self and others. Two camps did not meet expectations during the reporting period; Jarvis in July and Paige in July, September, and October. It is commendable that Camp Paige places great emphasis on the use of sanctions to affect behavior change. The camp has the highest percent of sanction use per population and usually all sanction forms are signed by the supervisor (see *Table 17-7*). However, due to the separate filing of the form and the writing assignments, auditors have not been able to verify that the recommended sanction was in fact completed (see *Table 17-6*). Corrective action has been implemented by the manager which is anticipated to show marked improvement in the upcoming audit. Camp Jarvis did not meet expectations due to the small sample of two sanctions in July. One writing assignment could not be located. The camp has met expectations in the subsequent months.

Several camps rely on the use of sanctions and other camps use sanctions sporadically (see *Table 17-7*). Camp Jarvis appears to rely on points and rewards to avert behavioral problems as their monthly use of sanctions is low. However, in comparison to other similar camps they might be underutilizing sanctions as a tool to assist them in achieving desired behavioral change. Camps Paige, Rocky, DKC, Scott, Scudder and recently Gonzales and Onizuka are applying sanctions at moderate to high percentages.

Table 17-7
Use of Sanction Totals and Rates (July through October 2014)

	Total Number and % of Population			
	July	August	September	October
North Region				
Jarvis	2 / 3%	2 / 3%	5 / 08%	6 / 11%
McNair	8 / 12%	17 / 27%	16 / 28%	11 / 19%
Onizuka	15 / 30%	8 / 17%	10 / 20%	22 / 46%
Central Region				
Munz	6 / 9%	7 / 12%	9 / 17%	10 / 20%
Mendenhall	34 / 68%	13 / 25%	9 / 18%	5 / 10%
Scudder	2 / 6%	32 / 100%	19 / 59%	9 / 30%
Scott	24 / 60%	34 / 81%	38 / 92%	26 / 64%
West Region				
Miller	7 / 16%	7 / 19%	11 / 38%	2 / 9%
Gonzales	4 / 14%	1 / 04%	3 / 11%	32 / 117%
DKC	27 / 50%	27 / 52%	14 / 28%	33 / 71%
East Region				
Rockey	49 / 97%	22 / 44%	23 / 46%	18 / 34%
Paige	59 / 79%	94 / 131%	23 / 34%	91 / 137%
Afflerbaugh	12 / 17%	6 / 09%	8 / 13%	18 / 31%

Note: Rate = (Number of Sanctions for month / Average Population) * 100

Stage Promotions

Youth are granted privileges based on their current stage; , which ranges from one to four. Stage Promotions are obtained by maintaining a series of consecutive “Made Days”. In addition, Made Days are tracked in order to monitor the youth’s progress toward an early release consideration. A youth will obtain a Made Day when a point threshold is achieved, along with the avoidance of a Special Incident Report and/or school referral on a given day.

Stage promotions are now audited against the Made Day Tracker rather than the DML, (with the exception of Dorothy Kirby Center) which resulted in a shift to all camps consistently meeting expectations during this rating period. Previously, information regarding stage promotions was tallied exclusively using the Daily Merit Ladders. Since the shift to comparing the DMLs to the

Made Day Tracker, marked improvement has been documented for Afflerbaugh, Jarvis, McNair, Mendenhall, Miller, Munz, and Onizuka.

Special Handling Unit

Purpose of the Special Handling Unit (SHU)

The SHU is designed to remove youth from the general population due to health and/or safety reasons. The placement in SHU is deemed necessary when a youth commits a Major Rule Violation and the youth is out-of-control or presents an imminent threat to others or due to health and/or safety reasons. SHU should only be utilized for the time necessary to adjust behavior. Major Rule Violations are categorized according to the following descriptors for tracking purposes:

- Fights or “near fights”
- Gang activity
- Repetitious acts of failing to follow instructions (“FFI/Rep Acts”)
- Assaults on staff or minor(s)
- Late night disturbance
- Being out of bounds/supervision or absent without leave (“OOB/AWOL”)
- Possession of contraband (i.e. items that can be used as weapons, drug paraphernalia)
- School Disturbance/Refusal
- Sexual Misconduct
- Theft

During a youths SHU stay, a complete assessment of “Readiness for Release” is to be conducted every shift by a supervisor and appropriately state the youth’s current condition and if applicable, justification as to why they are to remain in the SHU past the assessment.

A youth’s stay in the SHU is not entirely in isolation. Where deemed safe and appropriate, youth continue to participate in school, meals and recreation or full body exercise.

Rate of SHU Referrals

Referrals to SHU as recorded in the SHU Log Database are improving in many aspects. The rate of referral to the SHU, as seen in **Table 17-8** correlates with the type of youth housed at the facility, the population size, style of the facility, and the location of the facility to the SHU.

Camps Munz, Mendenahall, Smith and Dorothy Kirby Center continue to maintain lower referral rates respondent to the aforementioned factors. Dorothy Kirby Center’s cottage style camp influences the low rate of 16 referrals per 100 youth. Camps Munz’ and Mendenhall’s 30 to 45 minute drive to the SHU ensure that the SHU is used sparingly, with a rate of 15 and 10 referrals per 100 youth respectively. Camp Smith influences positive behavior by rewarding the youth with the opportunity to participate in the athletic program. This factor in addition to the smaller population, and the program’s newness helped keep the referral rate low at six referrals per 100 youth.

Camp Jarvis has drastically reduced its referral rate to almost half of the previously reported rate (from 81 per 100 youth in January-June to 46 per 100 youth in July-October). The high referral rate had been a concern as it was substantially higher than the rates of other similar camps. The Jarvis staff have made a concerted effort to improve the camp culture by working with the youth to change behavior rather than sending the youth to SHU for behavior adjustment. This is evidenced by the decrease and stabilization of key performance indicators such as referral rate.

As Camp Afflerbaugh's YOYV rates are statistically sporadic (refer to ART section above), it is expected that the rate would correspondingly increase from 38 to 52 SHU referrals per 100 youth. Camp Gonzales experienced a surge of referrals in August (81 per 100 youth) which, likewise, raised the average rate over the reporting period from 15 to 57 referrals per 100 youth. The discovery of the underlying issue and corrective action, as discussed in the ART section, is addressing the referral rate which is trending downward again (57 in September and 44 in October).

All camps met expectations regarding the reason for referral to SHU and youth being returned to their home camp within four hours of a camp being notified of release readiness.

Table 17-8
Referrals to the Special Handling Unit (Averages of January – June and July - October)

Region Camp	SHU referral rate per 100 youth		% housed less than 24 hours	% and # housed 24 hours +
	Jan. – Jun.	Jul. – Oct.		
North				
Jarvis	81	46	99%	1%, 1
McNair	44	52	95%	5%, 6
*Smith	0	6	100%	
Onizuka	68	91	96%	4%, 6
Central				
Munz	19	15	69%	13%, 3
Mendenhall	19	10	96%	4%, 1
Scudder	20	31	89%	11%, 4
Scott	18	19	100%	
West				
Miller	24	19	90%	10%, 2
Gonzales	15	57	94%	6%, 4
DKC	9	16	96%	4%, 1
East				
Rockey	100	126	94%	6%, 6
Paige	29	32	100%	
Afflerbaugh	38	52	100%	

Note: * Audits of Camp Smith began in September 2014.

Rate of referral = (average of total # of youth referred to the SHU / average of total camp population Jul. – Oct. 2014) * 100

Length of Stay

The vast proportion of youth (97%) stay in the SHU for less than 24 hours, and for many, a large portion of that time is during sleeping hours. The proportion of youth housed in the SHU for 24 hours or longer remained the same as the last reporting period; 3% (34 of 1,129 SHU referrals) were documented as isolated for 24 hours or longer. All camps with the exception of Smith, Scott, Paige and Afflerbaugh housed youth for extended periods due to a variety of reasons ranging from violent gang related behaviors to assaultive behavior (staff/minors). Extended housing may result from continued negative behavior while housed in the SHU or pending investigations to clarify the status of safety and security (refer to the *Major Administrative Action Reviews* section). Each time a youth is detained in the SHU past a review period a supervisor must provide justification, with required authorization from the Director if extended past a 24 hour period. These checks and balances ensure that youth are not frivolously isolated in the SHU for punishment rather than rehabilitative purposes.

A total of 0.6% of the SHU referral's departure times were not documented in the SHU Log Database, all of which occurred at Camp Rockey during the month of August. This was an anomaly and corrective action effectively addressed the issue.

Special Incident Reports and Supervisor's Assessments

Residential Treatment Services Bureau (RTSB) staff have continued to improve their documentation efforts. The sampled Special Incident Reports (SIRs) have justified the reason for referral detailing major rule violations and/or out of control behavior, and therefore have met expectations. The documentation of a supervisor's assessment of a youth's readiness to be released is improving. As youth should only remain in the SHU as long as is necessary to curb the behavior of concern, a supervisor's assessment is required during each shift, (at least every 8 hours) with the exception of sleeping hours, to authorize a youth's continued detention in the SHU. The Release Readiness form provides a standardized method for supervisors to document this assessment of the youth's behavior and continued safety and security concerns. Multiple assessments of a youth may be recorded on the same form, and should include the supervisor's observations with a final notation of the date and time that the youth's behavior was found to be congruent with his / her release to the general camp community. Although the forms documenting the assessments are now consistently filed in the SHU folder, a few camps have experienced difficulty recording all assessments on the form when a youth is held past the first review period. This has been the case with Camps Smith (October), Onizuka (July, September, October) and McNair (July, September) audits of sample cases. It is notable that all of these camps utilize the Challenger SHU. Corrective action has been provided to the camps and will be readdressed if determined to be ineffective in improving documentation. All other camps have meet expectations in this area for the entire reporting period.

Actual Time in Isolation

The audit tool was modified in April 2014 to include the proportion of time spent in isolation. This provides outcome data which can be compared across months or between Special Handling Units (SHUs) to present a more informative analysis of how time was spent in segregation. It is important to note the efforts of Probation, Mental Health and educational staff to work with the youth having difficulty adjusting to life in the general camp community who have been removed to the SHU. Percentages have therefore been broken into three components; daytime hours which youth spent in non-isolation (participating in school, counseling and other activities), nighttime hours which youth spent in isolation, and daytime hours which youth spent in isolation (see **Table 17-9**).

The facilities which house females (Scott, Scudder and Dorothy Kirby) appear to make the greatest efforts to keep youth out of isolation while in the SHU. Between 15% and 30% of their time is involved in rehabilitative and learning activities in the SHU dayrooms. These percentages may correlate with the greater emphasis placed on counseling in these facilities as a majority of the female residents have a history of abuse. Camp Miller showed the highest average number of hours sampled youth were segregated in the SHU; however, their percent of hours in non-isolation (13%) coupled with their percent of sleep hours accounts for a majority of the time (55%).

The camps which experienced the lowest percent of hours in non-isolation (Munz, Mendenhall, Paige) must transport youth to an off-site SHU where staff who have a rapport with the youth do

not have immediate access. Furthermore, youth are brought to the SHU for safety and security purposes which may be negated by a youth's access to the dayroom for activities. Due to the remote location of Camps Munz and Mendenhall to the SHU, only the most severe cases of safety and security concerns are transported to the SHU.

Table 17-9*Segregation vs. Isolation Special Handling Unit (Averages of July – October)*

Region Camp	Avg. # of hours in segregation	% of asleep hours in isolation	% of awake hours in isolation	% of awake hours in non-isolation
North				
Jarvis	13:00	47%	46%	8%
McNair	17:30	44%	49%	7%
Onizuka	17:45	46%	42%	12%
*Smith	9:00	21%	74%	4%
Central				
Munz	17:15	55%	42%	4%
Mendenhall	14:00	66%	31%	4%
Scudder	16:00	45%	40%	15%
Scott	9:38	16%	54%	30%
West				
Miller	21:00	42%	46%	13%
Gonzales	17:45	39%	51%	11%
DKC	5:45	25%	51%	24%
East				
Rockey	16:30	35%	55%	10%
Paige	14:15	60%	35%	5%
Afflerbaugh	16:45	45%	47%	8%

Note: Averages were rounded to a ¼ of an hour. Averages include the sampling of up to five cases (two cases housed for longer than 24 hours when applicable) for the months of July through October.

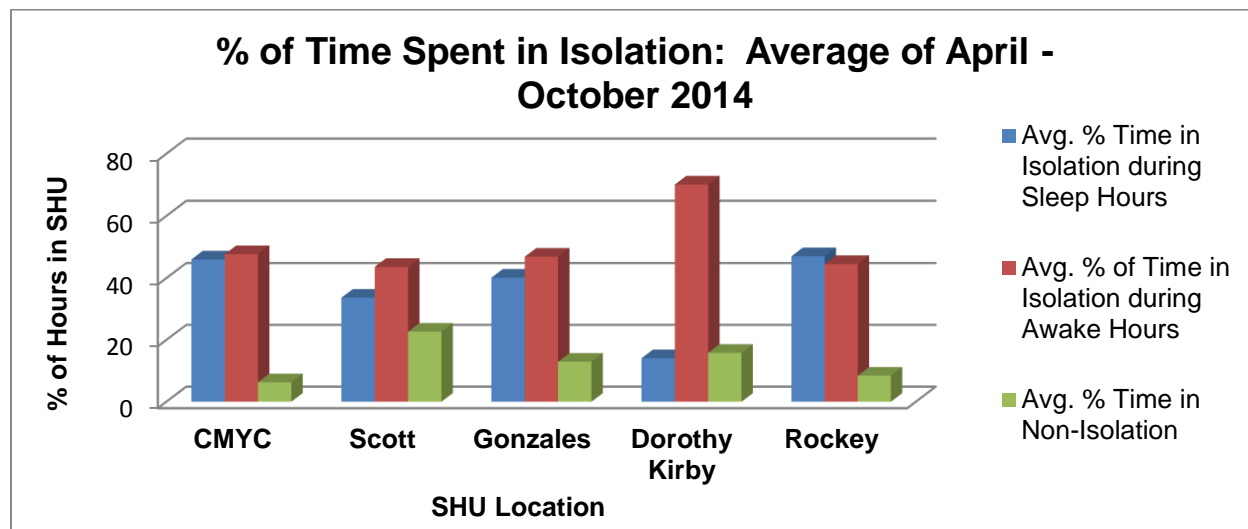
**Camp Smith: Data was not collected for July and August as the camp had opened in July. The average includes September and October.*

There are five SHU's in use throughout the county which the facilities share. Youth from Camps Afflerbaugh and Paige are transported to Camp Rockey; Camps Munz, Mendenhall, Jarvis, Smith, Onizuka, and McNair utilize the CMYC SHU; Camp Miller transport's their youth to Camp Gonzales; and Camp Scudder utilizes the Camp Scott SHU. Dorothy Kirby Center does not share their SHU. **Figure 17-4** provides insight into the operation of each SHU. Dorothy Kirby Center has the greatest percent of time spent in isolation as generally youth are not housed overnight in the SHU. However, their time spent in non-isolation is also higher than other facilities. The

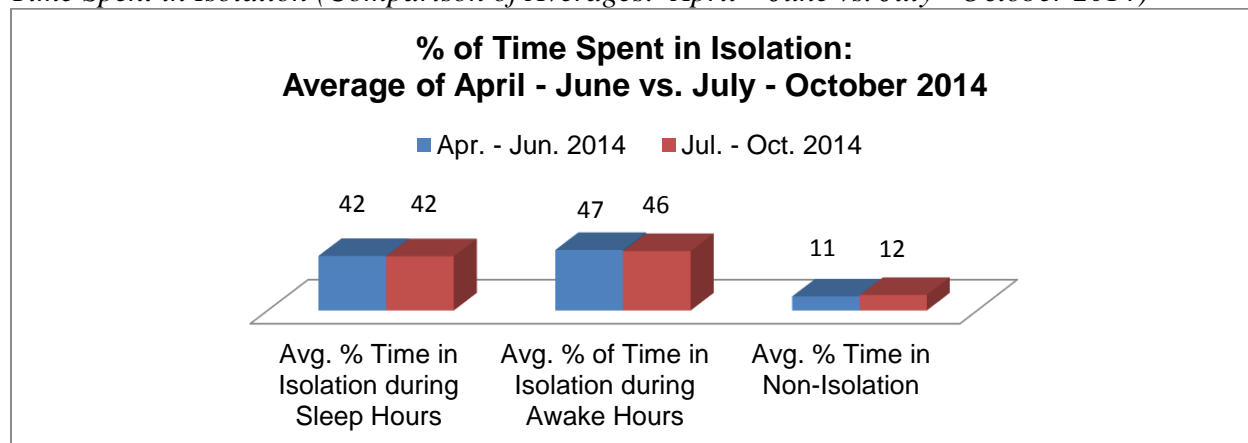
CMYC and Rockey SHUs have the lowest percentages of time spent in non-isolation; however, both have nearly equal percentages of time spent in Isolation during awake and sleeping hours.

Figure 17-4

Comparison of SHUs: Time Spent in Isolation (Averages of April – October 2014)



It is the goal of the Residential Treatment Services Bureau (RTSB) to reduce the amount of time that a youth is segregated and isolated while maintaining the safety and security of the community. As the collection and reporting of times and the associated percentages of isolation is still new, very little variation is apparent between this and the last reporting period’s overall averages (see **Figure 17-5**). RTSB has also recently organized a data collection system to monitor time in the Challenger SHU where each category of major rule violations is taken into consideration. The county has made great strides in minimizing unnecessary referrals and time spent in SHU and is become more reliant on counseling to de-escalate youth. As new procedures, training and experience progress it is expected that the percent of hours spent non-isolation will increase.

Figure 17-5*Time Spent in Isolation (Comparison of Averages: April – June vs. July - October 2014)*

Major Administrative Action Reviews

Since very few youth are housed in the SHU for 24 hours or longer, the Major Administrative Action Review forms are not applicable to most of the audits conducted. However, a very small number of youth have been held in the SHU for extended periods due to continued aggressive behavior, refusal to leave the SHU, pending investigation, and when the safety and the security of the youth or others is at substantial risk of harm pending the start of a Specialized Supervision Plan (refer to *Length of Stay* section).

Camp McNair (July) and Camp Munz (October) did not meet audit expectations as the Major Administrative Action Review forms could not be located in 2 instances, both minors having been isolated for approximately 24 hours and 30 minutes. The incidents appear to be isolated and Challenger SHU staff are actively working on organizing files to ensure that documentation is not lost.

Discussion by Monitors:

The County came into Substantial Compliance with this provision on October 31, 2013. This final stage of compliance monitoring focused on verifying the results of the County's own audits. As demonstrated in the previous monitoring period, the County continues to have a solid internal capacity to identify and respond to problems that may arise with the implementation of its rehabilitative programming and behavior management system. Hopefully, the auditing process will continue to evolve with the programs themselves — it is no longer necessary to monitor basic implementation issues and the County will be well served by an audit system that focuses on youth outcomes once they leave camp and research studies that test the relationship between programming and youth violence while in camp.

In order to verify the Department's audit findings, the Monitor conducted her own review at each camp and then compared the results to the previous months' audit reports. At each camp, the Monitor's results lined up nicely with those the County reported in its self-assessment.

This provision has two requirements and results will be discussed separately: 1) rehabilitative programming that is responsive to youth's individual needs, and 2) the behavior management program, which includes the Merit Ladder, sanctions process and SHU.

Rehabilitative Programming

Audit Methodology. At each of the 14 camps, a sample of youth was identified (i.e., the last 5 youth released in the month prior to the Monitor's visit) and camp staff delivered case presentations by following written guidance provided by the Monitor. The Monitor requested information on the youth's needs, the types and dosage of services received, the frequency and substance of casework, youth's performance in the behavior management program, and whether they were released to the community early/on-time/late than planned. Five cases were reviewed at each camp, for a total of 70 cases, which is an exceptional dataset upon which to draw conclusions about the adequacy of the County's rehabilitative programming.

Findings. As in the previous monitoring period, the Monitor's overall finding is that youth's needs are being assessed comprehensively during the Initial MDT meetings (often adding to what was generated by the CAU) and youth are receiving services that are responsive to those needs. Most often, services include DBT or ART or one of the small group interventions (e.g., Moral Reasoning, Skill Streaming), substance abuse treatment, and individual counseling services for a variety of issues related to a youth's mental health diagnosis or other traumas and stressors in the youth's life. When needed, youth also participated in gang programming, tattoo removal, and parenting programs.

In addition, youth receive a wide array of "extra" programs, some of which directly respond to risk and criminogenic needs, others that provide additional structured time with a pro-social adult, and still others that teach youth new skills and hobbies. When the MOA was first signed, rich program opportunities were a luxury provided to youth at only a few of the County's camps. Now, youth at all of the camps enjoy enriched programming.

Using the information from the 70 case presentations, the Monitor assessed a series of indicators to assess the quality of implementation. These included:

- *Whether Initial MDTs were held within 10 business days of admission.* Initial MDTs were held within 10 business days for 66 of the 70 youth in the sample (94%). Among the four youth whose MDT was not within the required timeframe, 3 were only one day late, and the other was rescheduled so that DCFS could attend.
- *The proportion of youth who completed ART/SGI/DBT.* Among the 70 youth, 27 youth needed ART (39%), 18 needed SGI (26%), and 25 needed DBT (36%).
 - Of the 27 ART youth, 23 completed at least 80% of the sessions (85%).
 - Of the 18 SGI youth, all completed at least 80% of the sessions (100%).
 - Of the 25 DBT youth, all completed at least 80% of the sessions (100%).
- *The proportion of youth who completed substance abuse treatment.* All but one of the 70 youth had a substance abuse treatment need (99%), and all but three of these 69 youth

(96%) completed the substance abuse treatment program that best responded to their needs (i.e., either the 5- or 10- week program). Most youth also received individual substance abuse treatment from a DMH clinician.

- The proportion of youth who received individual mental health treatment at a frequency consistent with their needs. Of the 70 youth in the sample, 68 youth (97%) needed and received individual mental health treatment. The frequency of individual sessions varied—some youth were seen weekly, others were seen less often, as prescribed by their treatment plans. Only rarely were youth not seen for reasons related to a lack of availability of a clinician (e.g., medical leave, vacancy).
- Whether Transitional MDTs were held at least 30 days prior to the youth's release. The Transitional MDT meeting was held at least 30 days prior to release for 65 of the 70 youth in the sample (93%).
- Whether home evaluations were conducted at least 30 days prior to release. Four of the 70 youth in the sample (6%) went to placement following their release from Camp, so a home evaluation was not necessary. Among the remaining 66 youth, a home evaluation was conducted at least 30 days prior to release in 97% of the cases (n=64).
- Whether casework was adequately documented in PCMS. To assess whether youth were being seen for casework on a weekly basis, the Monitor calculated a rate: number of casework sessions in PCMS/total weeks in camp. System-wide, the average was 85%. All but four camps met the 80% threshold (Jarvis, Paige, Onizuka and Gonzales). The proportions may be affected by the timing of the assignment of the youth's caseworker (if it didn't occur immediately, a week or two may elapse without a PCMS entry). All of the camps have implemented rigorous Supervisory reviews of casework and the effort has clearly paid off in terms of the frequency of PCMS entries. The table below shows the average across the 5 youth in the sample for each camp:

Percentage of weeks during which casework sessions were documented in PCMS		
1	Scott	96%
2	Mendenhall	95%
3	DKC	93%
4	McNair	92%
5	Munz	92%
6	Scudder	92%
7	Afflerbaugh	90%
8	Miller	89%
9	Smith	86%
10	Rockey	83%
11	Jarvis	77%

12	Paige	77%
13	Onizuka	64%
14	Gonzales	63%
System-wide		85%

- The level of contact between POs and youth's family members.* In the previous 6-month period, the Monitor reported that about 75% of the youth had documented contact between the family and PO on at least a monthly basis. In an effort to refine this estimate, a weekly rate of family contact was constructed using the same formula as above (rate = number of documented family contacts/number of weeks in camp). The table below shows the significant improvement in this area compared to the previous 6-month period. Percentages represent the proportion of *weeks* in camp during which contact was made with the family by either the PO or DMH (average across the 5 youth in the sample at each camp). The system-wide average is 57% (meaning that contact was made with parents approximately every other week that the youth was in camp). Camps that were visited toward the end of the monitoring period had much higher levels of performance—likely due to the increased emphasis on this issue from Downey, Camp Directors and Supervisors.

Proportion of weeks in Camp during which contact was made with the family, by either the PO or DMH.		
1	Smith	89%
2	Scudder	86%
3	Mendenhall	82%
4	Scott	78%
5	Munz	77%
6	DKC	72%
7	Onizuka	56%
8	McNair	53%
9	Afflerbaugh	45%
10	Rockey	41%
11	Jarvis	33%
12	Gonzales	32%
13	Miller	26%
14	Paige	24%
System-wide		57%

Furthermore, parents are always invited to attend both the Initial and Transitional MDT meetings, along with any As-Needed MDTs that may be scheduled on behalf of their

children. Among the 70 youth in the sample, parents were present at 40 Initial MDT meetings (57%) and at 50 Transitional MDT meetings (71%).

- *The length of time between admission and the youth's first casework session.* The Monitor devised a basic timeframe to assess whether the youth's first casework session was timely—21 days from admission (14 days for the initial MDT, and then 7 days for the PO to come on shift; in retrospect, this timeline seems longer than is necessary or preferred). Each of the 70 youth in the sample (100%) had their first casework session within 21 days. Most often, the casework sessions occurred much sooner after admission, usually within 10 days.
- *Whether early release was considered for the youth, whether it was deemed appropriate, and whether it was granted.* Early release is the lynchpin of the behavior management program (discussed in the next section). All camps have and utilize a formal process to assess youth's readiness for release and to recommend early release to the court when it is warranted. Each of the 70 youth in the sample was considered for early release (100%) and individualized decisions regarding its appropriateness were made. In addition to the number of Made Days earned, the team also considered the youth's program completion, academic needs, and recent behavior to determine whether early release should be recommended.

In the now distant past, a youth's chances of obtaining early release depended largely on whether his/her PO was motivated, organized, and compelled to submit all of the required paperwork to make it happen. Because of differences in POs, in those days, early release was not an incentive that was uniformly available. However, the Monitor's experience at the camps over the past 18 months or so revealed quite a different picture. The formalized structures and procedures now mean that *every youth has an equal opportunity to earn and receive this reward.*

The County's self-assessment presents compelling data on the number of Early Releases that were granted, the number of days early that the youth was returned to his/her family and community, and the dollars saved by the County. These data are congruent with those analyzed from the 70 case presentations:

- Of the 70 youth, 10 youth (14%) were not eligible for early release because they were serving a 3-month program.
- Of the 70 youth, 17 youth (24%) were not recommended for early release due to behavior issues or the need to complete required programming.
- Of the 70 youth, 9 youth (13%) were recommended for early release, but the Judge denied it. Judges generally do not give an explanation for these denials.
- Of the 70 youth, 34 youth (49%) were recommended for early release and the Judge granted it. Youth were released an average of 34 days early (range 5 days to 104 days).

In summary, the County has fully met its responsibilities under this portion of Paragraph 17. All youth's needs are rigorously assessed, programming responsive to those needs is available with

sufficient slots to accommodate the demand, referral mechanisms and program capacities are efficient and sufficient to ensure that youth complete the program before leaving camp, and parents are routinely engaged in decision-making on behalf of their children. In its current self-assessment, the County has done a commendable job of tracking these performance measures and also relating them to youth outcomes such as youth violence and self-injurious behavior.

Behavior Management Program

The Merit Ladder: In 2012, the County designed an exceptional behavior management program (i.e., the Merit Ladder), created written documentation, trained staff and developed audit protocols to support its implementation. These components fully meet the requirements of 2(a)(i) through (iii), 2(b) and 2(c) of this provision.

For quite some time, the Daily Merit Ladder (DML) forms at each camp have been under a high-level of scrutiny. Not only are they reviewed every 3 days and then compiled into a monthly audit, but staff from the RTSB Bureau Chief's office also conduct a very detailed audit *each day*. At each camp, the Monitor reviewed monthly audits from the previous two months and also daily audits from the previous two weeks. Both reviews revealed only small errors (e.g., small math calculation errors, a few youth who did not earn the Daily Reward but received it anyway, etc.). The Monitor did a quick visual scan of the DMLs for the month preceding the site visit and found similar levels of performance. At each camp, the DMLs are complete, accurate, individualized and appear to provide a solid assessment of the extent to which each youth's behavior conformed to expectations throughout the day. They provide stable foundation upon which youth's access to incentives and rewards can be based.

The ML includes both short and longer-term rewards. Youth have dependable access to daily rewards (an evening snack or special activity) and weekly rewards (an opportunity to purchase food or a special hygiene item). They also earn additional privileges when they accumulate multiple days of positive behavior (i.e., a "Made Day") and are promoted to the next stage. Stage promotions bring an array of new rewards (better hygiene products, special activities, priority seating/bed location, etc.). The ultimate reward is the consideration for early release discussed in the previous section. In all cases, the Monitor found that the array of rewards are meaningful and valuable to youth, that the rewards are distributed once earned, and that staff and youth fully understand the thresholds for earning rewards and believe in the system. The implementation of the Merit Ladder system is very solid.

The Monitor is very encouraged by the extent to which both staff and youth have bought into the program. As envisioned by this provision, the Merit Ladder has become the centerpiece of the County's strategy to modify youth's behavior and discourage misconduct.

Sanctions for Rule Violations: The other end of the reward — sanction continuum of the Merit Ladder is the array of options for responding to misconduct. Section 2(d) of this provision requires a "continuum of individualized consequences [to be used] in response to rule violations." The County developed a sanctions process that includes a wide variety of options for staff — essays, apology letters, community service assignments, privilege restriction, Stage demotion, Made Day penalties, etc.

The Monitor reviewed a total of 590 sanctions that were written in the 3 months prior to the site visit to each camp. At most of the camps, the sanctions were procedurally intact (i.e., behavior was described, sanction was identified, written assignment was attached if one was given, all parties signed it). In only one camp (Gonzales) did the sanctions process appear to be poorly implemented — written assignments were generally not attached, very small number of sanctions given even though lots of misconduct was evident on the point sheets and the rates of youth on youth violence had been increasing significantly in the few months prior to the visit. The Department provided intensive technical assistance to this camp to remedy the problem. Although there are some places where the process can be strengthened, overall, the sanctions process is a viable component of the overall behavior management program.

As noted in the County’s self-assessment, the camps have wide differences in the frequency with which sanctions are used. Based on the conversations the Monitor held with Camp Directors, it appears that these differences are mostly intentional. In other words, some of the Directors wanted sanctions to be the primary tool for responding to negative behavior, and other Directors wanted to rely on other tools (e.g., giving zeros on the DML, discussing negative behavior in group, etc.). Either way is legitimate, as long as the low-use camps are not simply suffering from a lack of staff knowledge or a lack of accountability for youth.

A few glitches were evident across the camps that, if addressed, could strengthen the sanctions program and the overall BMP:

- Imposing penalty days for behaviors that do not constitute major rule violations;
- Assigning essays on theoretical topics (e.g., “What is the meaning of quiet time?” “Why should you follow instructions?”) rather than those designed to create insight or to reinforce concepts learned in ART/SGI/DBT;
- Permitting youth to expend very little effort on the written assignment (e.g., answering “I don’t know” to all of the questions on the Thinking Report or simply promising to “never do it again”). Furthermore, some youth flatly refused to complete the sanction but the consequences for their refusal were not documented anywhere.

Limits to the Use of Isolation: Section 2(d)(1) and (2) require the County to limit the use of isolation to those situations in which a youth presents an imminent risk of harm to another youth or staff and must be de-escalated. In 2013, the County issued a Directive for the use of the Special Housing Unit (i.e., SHU; where youth are placed as a disciplinary sanction for serious rule violations). Importantly, this provision requires that the youth’s length of stay must be based on the nature of his/her current behavior and the youth must be returned to the general population as soon as the risk of harm to others has dissipated. Staff training was complete on July 30, 2013 and implementation began on August 1, 2013.

Although all camps send youth to the SHU, the Monitor focused on the implementation of the directive at the five camps with an on-site SHU, as the documentation for all referrals are kept on-site. At each SHU facility, the Monitor reviewed a sample of approximately 10 SHU folders from the month prior to the site visit (total sample was about 50 SHU folders). While there were slight differences among the camps, general findings related to the SHU include:

- *Youth are sent to the SHU only for major misconduct.* A review of the SIRs for each SHU referral indicated that youth are no longer sent to the SHU for failing to follow instructions or other non-aggressive behaviors. Instead, the vast majority of the SIRs provide evidence that the youth presented an immediate and legitimate safety threat and that less restrictive measures had failed. [It is important to remember that all of the camps (except DKC) have dormitory housing and so options for separating youth from the general population are somewhat limited.]
- *Youth are assessed for their readiness to return to the general population according to policy.* While there is some room for improvement in this area, most of the youth received the first Readiness for Release check within a reasonable amount of time (i.e., 2-4 hours). In some cases however, some of the youth were not checked in a timely manner (i.e., they were not checked before the end of the shift during which they were initially placed in the SHU—only on the following shift). At the other SHU facilities (e.g., DKC), Supervisors were very diligent in checking the youth frequently, far exceeding the once-per-shift policy requirement. While the Readiness for Release checks generally occurred at the intervals required by policy, the County was reminded of the evolving standard in the field in this area and was encouraged to shorten the interval to 2-4 hours in order to keep pace with the generally accepted practice.
- *When Supervisors decide not to release a youth, the reasons for that decision are legitimate and clearly articulated.* Supervisors have done a commendable job in describing the words, behaviors and attitudes of the youth that indicate that they are not ready to safely return to the general population.
- *When an Administrative Hold is used to hold a youth in SHU beyond 24 hours, the time is clearly used to devise a plan for release that will enhance safety.* Most of these youth are placed on Special Supervision Plans (SSP), while some are returned to court for new charges or a Change of Plan.
- *The youth's lengths of stay in the SHU are of reasonable lengths.* Because the SHU is used only to de-escalate youth and is no longer used for punishment, the lengths of stay in the SHU are consequently much shorter than in past years. This is definitely in line with best practices and the evolving standards in the field. As discussed in the self-assessment, only 3% of the SHU stays were for 24 hours or more. Collapsing the data presented in Table 17-9, the average length of stay across all camps was 14.6 hours, with 7 of those hours, on average, being during sleeping time. During waking hours, youth were typically in their rooms for 6 hours and out of their room for 2 hours, on average. The LOS and time in isolation has been stable throughout the past 12 months. Based on the Monitor's experience in other jurisdictions, the length of stay during waking hours is reasonable, particularly given the fact that most youth have portions of these waking hours that are spent outside of their rooms to mitigate the harmful effects of isolation. That said, the County's self-assessment discusses ongoing training of Supervisors designed to create closer adherence to policy requirements. If the Supervisors make Ready for Release assessments more often, the length of stay in the SHU can decrease even further.

The quality of processing between staff and youth during the time they are in the SHU will ensure that the youth's reintegration into the general population is executed safely.

The County is in Full Compliance with this provision.

Evidentiary Basis:

- Site visits to Camps Afflerbaugh, Paige, Rockey, Miller, Gonzales, Onizuka, McNair, Jarvis, Smith, Scott, Scudder, DKC, Munz and Mendenhall.
- Case Presentations of 5 youth most recently released at each camp, along with the source documentation, total sample = 70 youth
- Review of Merit Ladder point sheets and supporting documentation for the month prior to the site visit at each camp
- Review of DOJ Audit Bureau's audits, July - October 2014
- Review of Sanctions forms from July 2014 to the date of the site visit
- Review of SHU Folders from one month prior to the date of the visit
- Extensive consultation with Probation and DMH administrators and staff involved in the design, implementation and auditing of the Merit Ladder, Sanctions, SHU and rehabilitative programming

Paragraph 47: System

The County shall continue to collect sufficient and reliable data to evaluate the implementation of the paragraphs of this Agreement. The County shall revise and/or institute quality assurance systems to ensure implementation of the paragraphs addressed in this Agreement. The County shall continue to analyze the data collected in its quality assurance systems and proactively and independently take corrective action, including adjusting the delivery and/or content of programs and collection of performance indicators, when results indicate that such action is needed.

Status: Full Compliance (effective October 31, 2014)

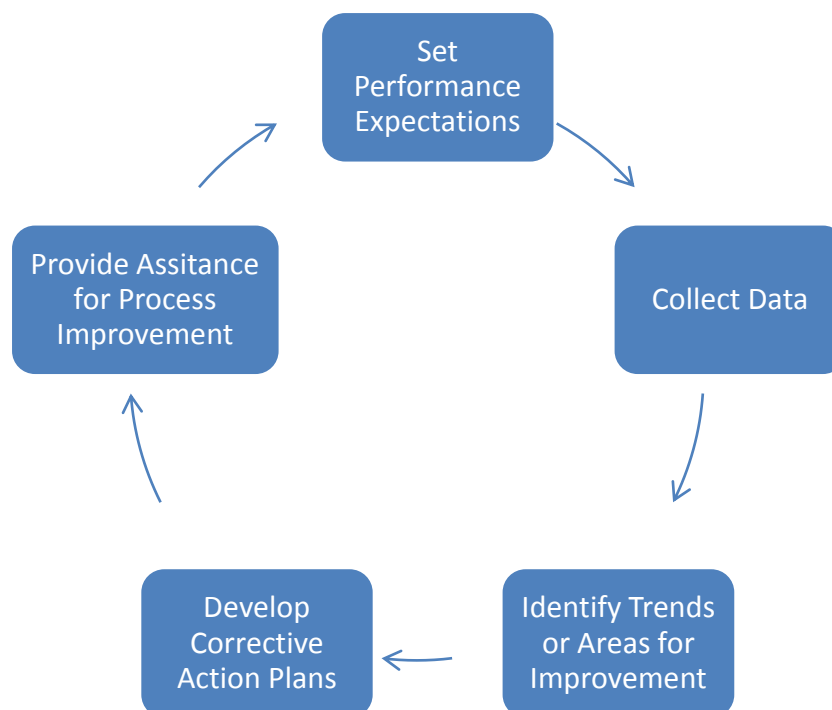
County's Self-Assessment:

Significant progress has been achieved by the DOJ/Quality Assurance Services Bureau since the last Self-Assessment report. A Continuous Monitoring System (CMS) has been implemented to monitor the progress of meeting audit expectations. Control charts in the system are used to plot data and to identify anomalous trends that require corrective measures. The goal is to provide continuous process improvement by establishing performance expectations, monitoring data, and implementing corrective action plans. Corrective action plans are developed in collaboration with program directors for process improvement and accountability when audit expectations are not met.

The results from the Continuous Monitoring System have shown that all camps have met the majority of audit expectations during this period. The Department is identifying camps that are

meeting audit expectations consistently from month to month. The DOJ/Quality Assurance Services Bureau will continue to use the Continuous Monitoring Systems to self-monitor performance measures, collect data, identify trends, develop corrective action plans, and establish accountability.

Figure 47-1
Continuous Monitoring System Cycle



Discussion by Monitors:

The County's auditing and quality assurance activities for Paragraph 15 continue. The County conducts unannounced site visits at the various camps to ascertain the level of staffing as well as to monitor other critical staff related functions at the camps. Since the audits are unannounced and conducted at various times of the day and night, they also serve as a kind of unwritten notice to the staff that the County recognizes and desires the camps to be appropriately staffed at all times.

The County's auditing processes for Paragraph 17 is fully developed and has been refined throughout the past 12 months. Camp Directors report that the new format — one that focuses on key performance measures and an expected level of performance — is useful to their efforts to improve the operation of their camps. As practices evolve, the County is encouraged to modify the audit tools as well, to ensure that best practices are being implemented and that they are achieving the desired results in terms of youth behavior and other outcomes.

As noted in the previous monitoring report, the County's self-assessment was produced with a more analytical focus than in the past. Not only did the County assemble and analyze the data, but also interpreted the meaning of identified trends. Several issues were flagged for additional investigation to understand more about the underlying causes of the problems. The connection to key outcomes such as youth violence and self-injurious behavior is an important evolution of the quality assurance process. The County now demonstrates all of the elements of a solid quality assurance program with regard to structured rehabilitative programming and behavior management.

The discussion of quality assurance measures for Paragraph 73 is contained in the provision's own quality assurance section, 73-7.

Evidentiary Basis:

- Audit reviews.
- Meetings and discussion with DOJ/Quality Assurance Services Bureau.

Paragraph 73: Increased Access to Community Alternatives

To ensure that treatment and services referenced in the MOA are provided in the least restrictive setting, consistent with public safety, the best interests of the youth, and the goal of rehabilitation, the County agrees to take the following steps:

[MONITOR NOTE: To facilitate reporting on Paragraph 73, each of its component sections will be individually assessed and noted in the narrative. The assessments may contain comments related to the progress toward the individual sections compliance, however, the actual compliance status will be determined by compliance with the entirety of the Paragraph.]

Status: Full Compliance (effective December 31, 2014)

73-1: Minimize Juvenile Hall Confinement: *The County shall rely on juvenile hall confinement only for youth who pose a risk to public safety and where the utilization of a less restrictive environment such as home, housing with a relative, assignment to the Community Detention Program, or assignment to a home that provides temporary overnight housing based on the youth's status such as a Pre- Detention Alternative (for youth pending a detention hearing) or a Status Offender Detention Alternative (for youth who is considered to be a non- delinquent status offender), is not appropriate. The following pre-detention alternatives, conducted by qualified staff, or local police agencies, as appropriate, shall be considered for youth prior to juvenile hall detention as appropriate:*

- *Divert Minors from the Juvenile Justice System: Local law enforcement agencies should consistently be encouraged to consider counsel and release for first-time, low-risk offenders to parents, guardians, or other responsible adult in lieu of formal arrest and filing of criminal charges;*
- *Availability of Community Based Services: Probation shall schedule in- service collaborative events with local law enforcement agencies and introduce them to the availability of community-based services to which youth and their families can be*

referred for assistance/service in lieu of arrest and/or detention. For example, youth could be referred to the local School-Based Probation Officer who will work with the youth and his/her family and align him/her with services as well as provide informal supervision to the youth while attending school.

- *Intake and Detention Control Officers shall, after conducting a risk assessment utilizing an evidence-based screening tool, consider the following interventions options for youth:*
 - *Cite-back and release to parents, guardians, or other relatives with a future court date within 60 days;*
 - *Community Detention Program with electronic monitoring pending court hearing;*
or
 - *Detain in juvenile hall due to gravity of offense, screening results, or bench warrant that requires detention pending court hearing in accordance with state law.*

County's Self-Assessment:

LADS Evaluation Study

During the Twelfth Monitoring Period, the LADS evaluation study was completed to assess the effectiveness of the Los Angeles Detention Screener (LADS) risk assessment instrument. The evaluation assessed historical cases (4,746), January 1, 2013 through June 30, 2013, to determine whether the instrument is a strong predictor of failure pending adjudication. The first part of this study examined the detained population (4,256), to determine whether their risk levels were appropriate (i.e., high risk), the impact of overrides, and whether any racial or ethnic disparities were evident in application of overrides. The second part of this study examines youth who were Released Outright and Released to Alternative Services (470) to determine their rates of failure pending adjudication.

Table 73-1**Risk Level for Detained and Released Population³**

	Total		Detained		Released	
Low	2,586	54%	2,275	53%	311	66%
Medium	1,827	38%	1,685	40%	142	30%
High	313	7%	296	7%	17	4%
Unknown	20	1%				
Total Youth	4,746	100%	4,256	100%	470	100%

This evaluation revealed that 90% (n=4,256) of the sample population was detained. However, only 7% of those detained were detained based on a High risk LADS score. The remaining 93% were detained based on Mandatory, Probation Policy and Discretionary Overrides; or, upward overrides as all the youth in these categories scored as either Low or Medium risk on the LADS. Of particular note, upward overrides are those that impose a more restrictive placement than what is thought to be necessary based on the youth's risk score. Despite the Low and Medium risk scores of these cases, legal and policy reasons led to a different detention decision for these youth. The literature states that Low risk youth should be released out right and Medium risk youth should be released to a detention alternative. However, 47% of Low risk youth (1,207 of 2,586 Low risk youth) and 54% of Medium risk youth (978 of 1,827 Medium risk youth) were detained via Mandatory overrides, with the largest subgroup of Mandatory overrides consisting of warrants, 62% (n=1,357). With so many Low and Medium risk scoring youth detained based on a warrant in Los Angeles County, this is an area requiring further exploration, including a review of the types of warrants, delinquency history and other factors associated with this group of youth.

Table 73-2**Pathways to Detention¹**

Detain										
LADS Risk Level	Mandatory		Probation Policy		Discretionary Override		High Risk Score		TOTAL	
Low	1,207	55%	1,029	59%	43	64%	~	~	2,279	53%
Medium	978	45%	705	41%	24	36%	~	~	1,707	40%
High	~	~	~	~	~	~	296	100%	293	7%
Total	2,185	100%	1,734	100%	67	100%	296	100%	4,279	100%

³ Out of the 4,746 youth sampled for the evaluation, there were cases (n=20) where data variables (risk level, ethnicity, etc.) were missing. These youth were still used in **Tables 73-1 and 73-2** if the information needed was present for those youth. Therefore, some of the totals depicted in the tables in this evaluation may vary.

Mandatory Detention Override Categories:

- Warrant (62% of the Mandatory Overrides)
- Welfare and Institutions Code (WIC) 707(b) offense (31% of the Mandatory Overrides)
- Weapons charge (5% of the Mandatory Overrides)
- Camp JH Filing (2% of the Mandatory Overrides).

Probation Policy Detention Override Categories:

- Community Detention Program Violations (40% of the Policy overrides)
- No Parent Available/Appearing (2% of the Policy Overrides)
- Serious Threat to Community (8% of the Policy Overrides)
- Inter-County Transfer (3% of the Policy overrides)
- Pending WIC 777 (Probation Violation) (10% of the Policy Overrides)
- Pending WIC 778 (1% of the Policy Overrides)
- Suitable Placement Order (1% of the Policy Overrides)
- Victim/Witness Safety (16% of the Policy Overrides)
- Likely to Flee (1% of the Policy Overrides)
- Replacement (12% of the Policy Overrides)
- Prostitution (1% of the Policy Overrides)
- LADS 10+ Score (0% of the Policy Overrides)
- Adult Custody (1% of the Policy Overrides)

Forty-one percent (n=1,739) of detained youth were detained due to Probation Policy overrides, with the largest subgroup of Probation Policy Overrides consisting of community detention program (electronic monitoring) violations, 40% (n=721). In addition to the larger proportions detained via Mandatory Overrides (discussed above), large proportions of Low and Medium risk youth were detained via Probation Policy Overrides. Nearly 40% of the Low risk youth (1,029 of 2,586 Low risk youth) and 39% of the Medium risk youth (705 of the 1,827 Medium risk youth) were detained via Probation Policy overrides. Although the literature shows many jurisdictions have adopted similar policies to detain youth who do not comply with community detention program requirements, they generally do so only after ensuring the CDP program is significantly robust and has a sufficient array of options for addressing rule violations. Again, Los Angeles County will need to revisit its policy on how to treat such violations by first reviewing further the type of violation, delinquency history, and other factors associated with this group of youth.

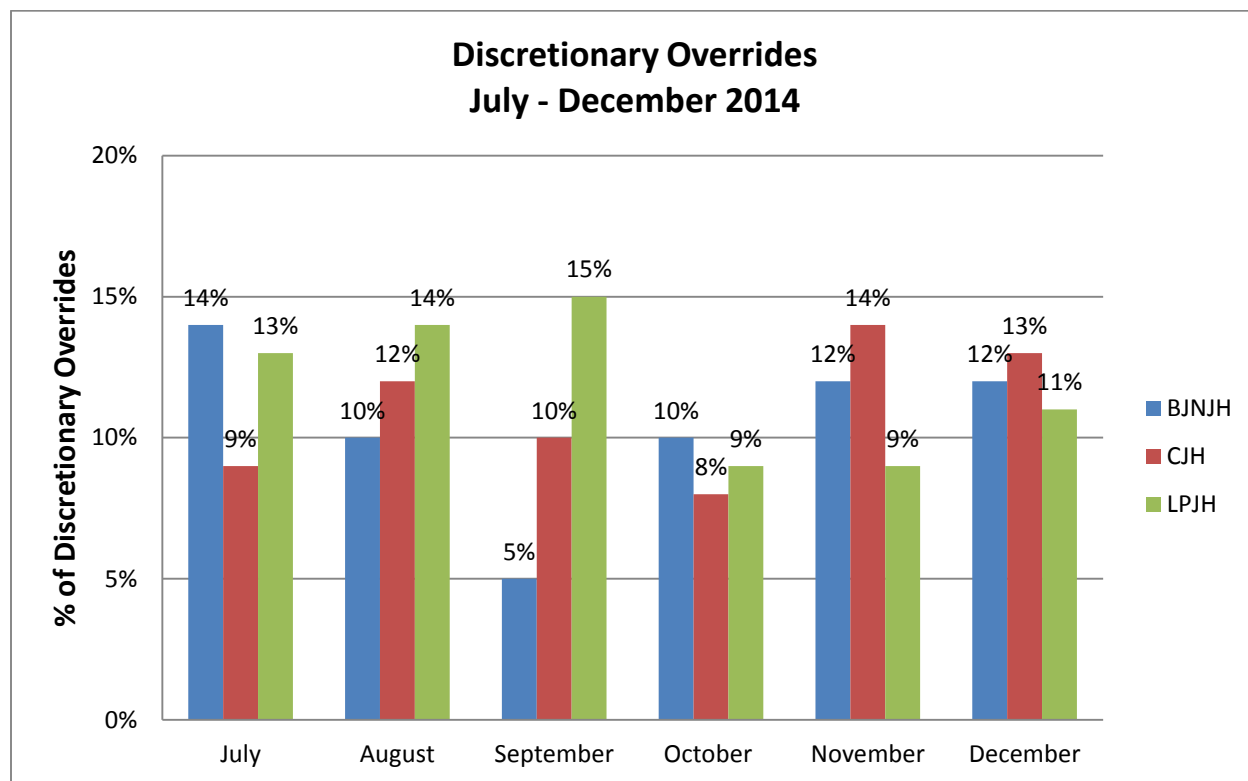
Although not as large a Probation Policy override subgroup as community detention program violations, a significant number of Low and Medium risk youth were detained because of concerns about victim/witness safety. Although victim/witness safety is an important detention override category, care must be taken that it is not abused. Detention intake staff should always be cautioned to ensure, and the instrument should clearly state, whether the minor is a clear, immediate danger to victim/witness. Oftentimes, these concerns arise from domestic violence situations which many jurisdictions have found can be addressed via temporary shelter placements that provide family reunification and crisis services. The County will need to explore whether additional non-secure programs could be implemented to address the concerns for these youth in a manner that is commensurate with their risk to public safety.

The sample release population for this evaluation was 470 youth, with 45% (n=210) in the Release Outright category and 55% (n=257) in the Release to Alternatives to Detention category (Table 14). The overall rate of failure for these youth was 20% (n=95). Two-thirds (66% or n=311) of youth released had Low risk LADS scores with a 17% total rate of failure. On the surface, this rate, when compared to other jurisdictions (Annie E. Casey, 2013), is impressive. Thirty percent (30%) of released youth in our sample scored Medium risk on the LADS with a 25% rate of failure. Medium risk score youth released to detention alternatives in our sample had a total rate of failure (26%) similar to Medium risk score youth who were released outright (27%). One could assume from these rates that Medium risk youth fair the same and detention alternatives have no impact on their post release behavior, but that would be incorrect. Medium risk score youth released outright had a higher rate of arrests (25%) prior to the disposition of their case than Medium risk youth released to detention alternatives (9%) such as community detention (electronic monitoring), which falls in line with the literature. However, further examination is required to determine if that truly is the correct conclusion. Seventeen or 4% of youth released in the sample were High risk, with a 29% rate of failure, even with 88% (n=15) of those released placed in alternatives to detention. Due to the small number of High risk youth released, it was difficult to draw conclusions or complete an analysis. Overall, the Los Angeles County Probation Department will further explore the large Mandatory and Probation Policy Override categories revealed in this study that contribute to detention of Low and Medium risk youth. Clearly, a dialogue is warranted with stakeholders to determine what is needed to effect change.

Intake and Detention Control (IDC)

During the Twelfth Monitoring Period, all three IDC locations continued to use *Directive 1355, Juvenile-Intake and Detention Control-Detained/Non-Detained Tracking Log*. The Tracking Log is mandatory and is utilized to record information on youth referred to IDC via telephonic contact, or brought to juvenile hall for detention consideration by law enforcement personnel. The Tracking Logs are reviewed on-site by the IDC SDPOs, who in-turn submit the logs to IDC administration for review and reconciliation within PCMS. The detention discussions and outcomes related to these contacts (Non-Detained and Community Detention Program- CDP, Cited and Released, Referred Services, etc.) are documented on the Tracking Log and reviewed by Detention Services Bureau (DSB) on a monthly basis.

In June 2014, the IDC audit tool, which is used for measuring performance outcomes, was revised to more readily display captured critical performance measures, which include no more than 15% of the discretionary detention cases overridden. IDC audits were conducted for the months of July – December 2014. During the audit months, 88 youth were sampled regarding overrides. Of the 88 samples, 54 were “up” overrides (61%) and 34 were “down” overrides (39%), with all but one of the sampled “up” overrides appropriately documented in PCMS. In **Figure 73-1** below, each IDC in total, has been able to consistently maintain a detained discretionary override level at or below the goal of 15%.

Figure 73-1*Discretionary Overrides (July – December 2014)*

IDC audits conducted for the months of July – December 2014, revealed that every youth referred to IDC, was placed on the Tracking Log. Additionally, every youth referred to IDC in the aforementioned audit months was assessed using the LADS (100%).

Duplicate entries in PCMS were previously vetted through IDC administration. Information Services Bureau (ISB) has since modified PCMS to recognize duplicate youth entries with more than *one* primary charge, on the same date. PCMS case notes in the Intake section have improved and reasoning for detention and release decisions are clear and succinct. This is attributable to increased training and ongoing supervisory review.

The IDC audits for July – December 2014, (see **Figures 73-2 and 73-3**) reflect that during July 2014 at BJNJH, there were 157 youth referred for detention and of that, 146 were detained (93%). Of those 146 detained youth, 90 were due to State mandate (62%) and 35 were due to Probation Department policy (24%). Automatic detentions per Probation policy never rose beyond 44% in the audit months. This is attributed to the increased training and better understanding of Department policy and criteria for detention; supporting that only youth that need to be detained are accepted by IDC. With the increase in youth referred home on CDP, the number of CDP and related violations are expected to increase, but it must be noted that BJNJH's population also dropped approximately 9% from July to December 2014. The Department is continuing to review policies that will allow the IDC officer more discretion on some identified offenses to cite and release or CDP, when the youth's risk/needs factors allow for it, and adjudicated outcomes in

similar cases is generally Home-on-Probation (HOP). Continued collaborative meetings with Bench Officers to discuss the State mandated detentions (P73.2), as well as meetings with local law enforcement to inform them of detention alternatives *prior* to juvenile hall referrals are ongoing, in an effort to minimize confinement.

Figure 73-2

Percentage Detained per State Mandate (July – December 2014)

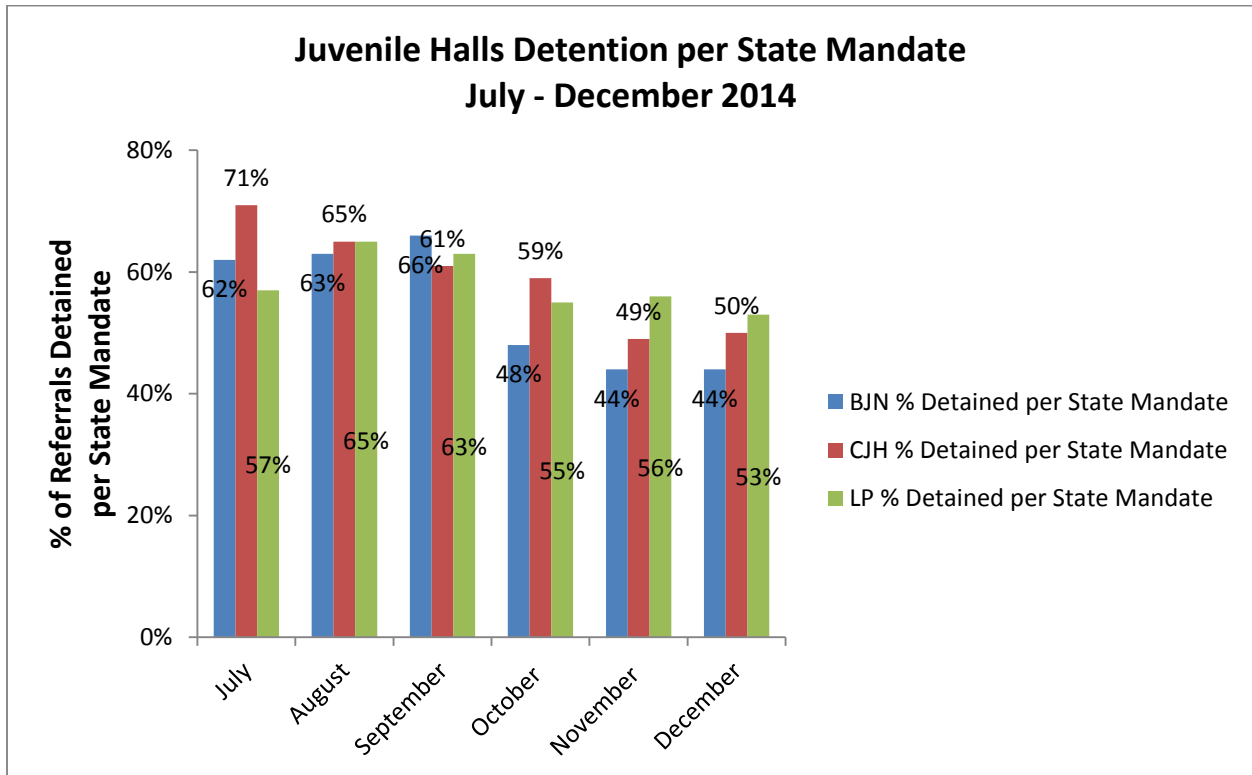
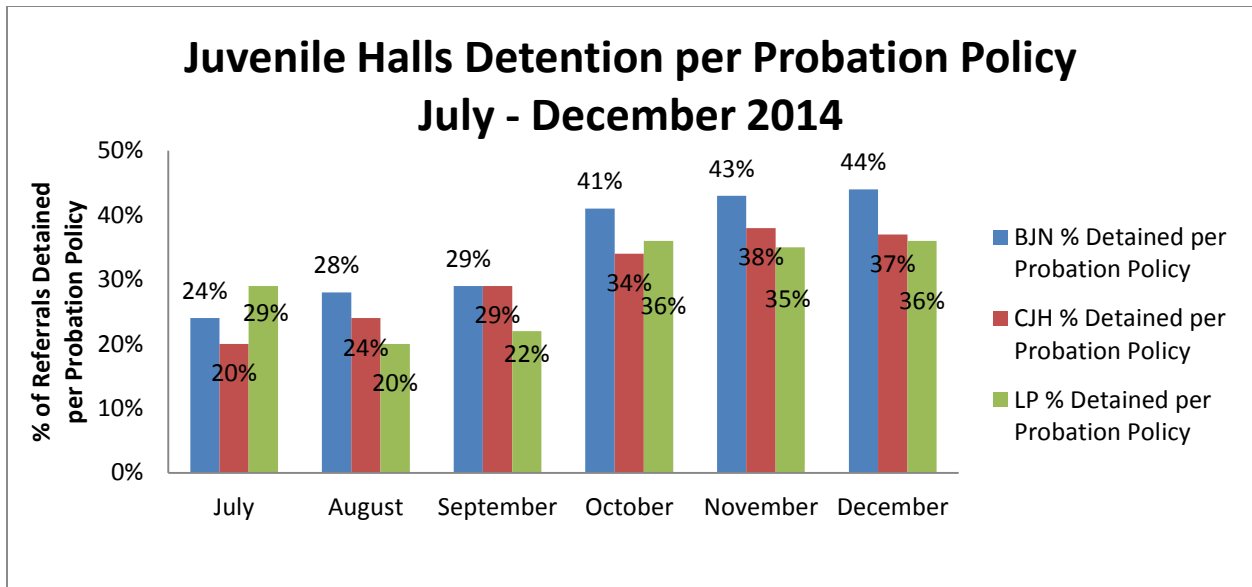


Figure 73-3

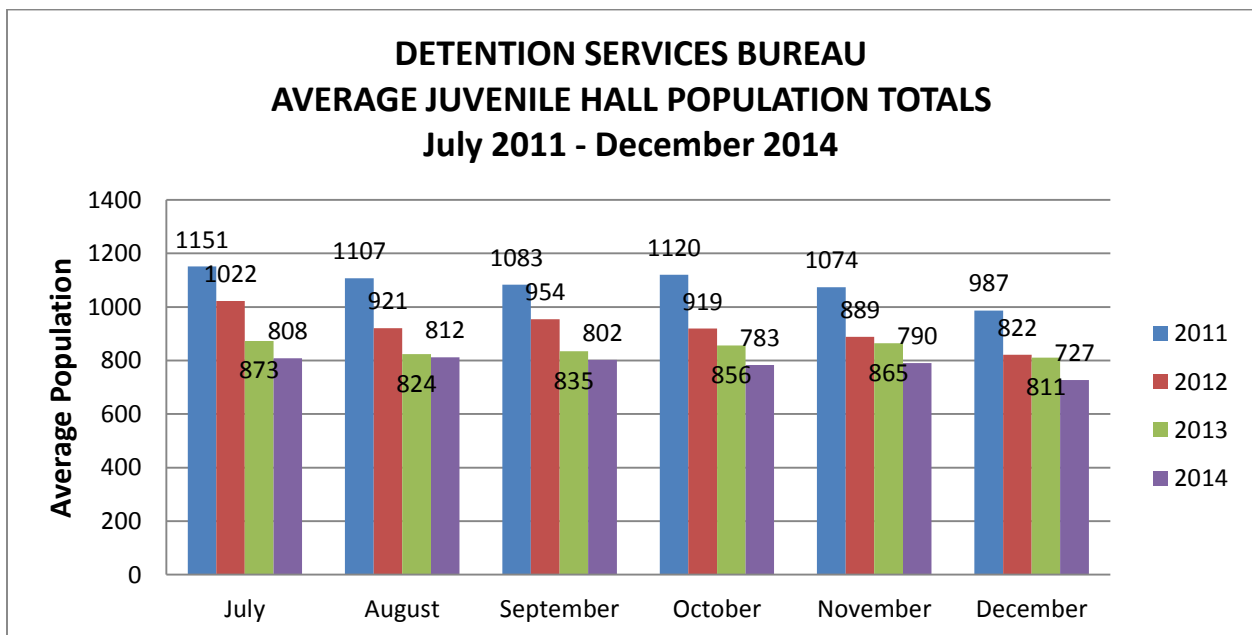
Percentage Detained per Probation Policy (July – December 2014)



As can be seen in **Figure 73-4**, the Juvenile Hall population has significantly decreased in numbers since 2011 and we anticipate it will decrease even more as further alternatives to detention are explored.

Figure 73-4

DSB Average Population (July – December 2014)



Law Enforcement Meetings

During this Monitoring Period, five presentations were made to law enforcement agencies as follows:

- September 17, 2014 – LAPD Juvenile Procedures School
- October 2, 2014 – Law Enforcement Meeting at Central Juvenile Hall (10:00 am)
- October 3, 2014 – Law Enforcement Meeting at Downey Public Library (10:00 am)
- October 15, 2014 – LAPD Juvenile Procedures School
- October 17, 2014 – Law Enforcement Meeting at Barry J. Nidorf Juvenile Hall (10:00 am)

As this was the second round of Law Enforcement Meetings, the Probation Department revised its presentation to include an in-depth discussion of contributing factors to delinquency (theoretical framework), the common public safety goal of Probation and law enforcement agencies, the distinction between the methods by law enforcement agencies and Probation to achieve the goal, and how both methods complement each other. Probation provided a detailed oral presentation on how youth with family and education disruptions tend to gravitate towards negative peers, which leads to contact with law enforcement agencies. The Probation Department stressed how detention for Low risk youth with positive family and education engagement disrupts their family and school network/activities, leads those youth to gravitate towards negative peers, and can lead to continuous law enforcement contact; thus the desire to reduce the detention of Low risk youth. After engaging the attendees in a discussion regarding the various mandatory detention categories, the Probation Department provided an in-depth discussion of community alternatives to detention that can be accessed by law enforcement agencies and families, including the Resources Directory (located on the Probation Department Internet Homepage) and the Probation Information Center. Probation Department Management also reminded the law enforcement agencies to share any community alternatives they are familiar with or have access. The two presentations at the LAPD Juvenile Procedures School were to veteran patrol police officers. The three regional Law Enforcement Meetings were attended by a diverse representation of local law enforcement agencies within Los Angeles County. It was clear that the attendees were engaged in the presentation and discussion, understanding the nexus between detention of Low risk youth and potential continuous law enforcement involvement for those youth. Several agencies have since reached out to the Probation Department to request presentations specifically for their personnel.

Discussion by the Monitors:

The LADS evaluation was completed at the end of 2014. The report highlights the significant imbalance in the system—despite only 7% of the youth screened for detention scoring as high risk, fully 90% of the youth were detained. Enormous portions (e.g., upwards of 80%) of the low and medium risk youth were detained based on a variety of criteria that permit IDC staff to circumvent the LADS score. Although the County completes the LADS for each youth brought to a juvenile hall, it has virtually no bearing on the detention decision that is eventually made. In order to have risk-based detention decisions, the County must address the sources of the imbalance, namely that policy does not permit any discretion in the handling of youth with warrants or who violate the conditions of CDP (these two situations underlie the vast majority of detentions of low and medium risk youth) which leads to an override of the LADS score. The LADS evaluation does include a

bit of good news: the 10% of youth who were released outright or placed on CDP performed well in the community, with relatively low rates of recidivism. This should provide good fuel for the suggestion that many more of the low and medium risk youth can be released to the community pending adjudication *without compromising public safety*. Next steps include studying the behaviors that result in warrants and CDP violations to ascertain whether programs could be strengthened to produce better youth outcomes. Solving these problems will require the County to engage various stakeholders (e.g., Judges, prosecutors, defense attorneys, community based service providers, etc.) and to develop additional non-secure programs that can serve as an alternative to detention. Although the findings of the LADS evaluation create great cause for concern, the study was done well and highlighted the major pathways through which the various problems can be solved.

In addition to bringing stakeholders to the table and addressing the underlying causes of the overrides, the County must also improve its monitoring of the LADS implementation. While the audit tool collects the necessary information for ongoing monitoring, the self-assessment reveals continued difficulty in utilizing the data to monitor the magnitude of the override problem. The self-assessment identifies a goal of *no more than 15% of cases being overridden via a discretionary override*. This is a misstatement of the published research, which suggests that no more than 15% of cases should be overridden into detention *via any type of override*. This distinction is important because looking only the discretionary overrides completely obscures the problem of the LADS score being circumvented. While the self-assessment presents data on the other types of overrides (Mandatory Detention and Probation Policy), it does not interpret these data accurately or highlight that these are the major reason that so many low and medium risk youth are being detained.

Using the 73-1 audits for the month of September 2014, the following table was created to suggest a format for ongoing monitoring of the override problem:

LADS Monitoring, September 2014						
	LP		Central		BJ	
	N	%	N	%	N	%
# screened	366	100	141	100	133	100
<i>Detained</i>	323	88%	138	98%	117	88%
<i>Released</i>	43	12%	3	2%	16	12%
# detained	323	100%	138	100%	117	100%
<i>Via Score (no override)</i>	3	1%	0	0%	7	6%
<i>Via Mandatory Override</i>	203	63%	84	61%	77	66%
<i>Via Probation Policy</i>	69	21%	40	29%	27	23%
<i>Via Discretionary Override</i>	48	15%	14	10%	6	5%
# released	43	100%	3	100%	16	100%
<i>Outright</i>	15	35%	1	33%	11	69%
<i>CDP</i>	28	65%	2	66%	5	31%
<i>SODA/PAD</i>	0	0%	0	0%	0	0%
*Note that the number of youth who were detained based on score may not be accurate. The audit form tracks these as a subset of the probation policy overrides, and so it is unclear whether some of the youth with mandatory overrides also scored high enough for detention based on score. The audit form could be revised to reduce overlap among the categories.						

This table clearly shows that the vast majority of youth who are screened with the LADS are detained (average 91%), and that the majority is detained via one of the three override types (across all three facilities, 98% were overridden). A table such as this would also help the County to track the utilization of non-secure detention alternatives (e.g., CDP, SODA/PAD), which currently appear to be drastically underutilized. The Monitor recommends that the County adopt a monthly monitoring structure similar to this in order to evaluate the positive changes that flow from the LADS evaluation study.

The audits completed through December 2014 show a similar pattern -- that the vast majority of youth brought to juvenile hall for screening are detained (approximately 90%), and that most of these youth are low and medium risk youth who, although their LADS scores suggest that they could be safely released outright or to a non-secure detention alternative, are overridden into secure detention. The primary task for the County is to address the issues and recommendations contained in the LADS evaluation study in order to bring the system into balance.

The Probation Department is also required to schedule in-service collaborative events with law enforcement agencies in an effort to make them familiar with available community-based services as an alternative to arrest and/or detention. In the previous monitoring period we observed that, in the meetings attended by Monitors, the discussion of alternatives to detention was overshadowed by law enforcement participants' complaints about how difficult it was to have arrested juveniles held in the juvenile halls.

During this monitoring period the County held four collaborative events with law enforcement.

At each of these events the County honed its presentation to focus on the law enforcement and community advantages of avoiding arrest and incarceration for low and medium risk youth, and the availability of community-based services. The Probation Department also finalized its Resources Guide of those community-based services available to families and law enforcement within the County. In addition to describing and providing a web link to the Resources Guide there was a print copy available for participants to check, and participants were provided with the phone number of the Probation Information Center should there be any questions or lack of access to the Guide. The law enforcement participants were also encouraged to advise the Probation Department of any additional resources they utilized so that those resources could be vetted for possible inclusion in the Guide.

The discussion that followed these presentations generally focused on the forum's topic, but where they tended to stray the presenter quickly refocused the group on community-based alternatives to arrest and detention.

The County has demonstrated Substantial Compliance with this sub-section of Paragraph 73.

Recommendations:

1. Engage key stakeholders in a discussion about the results of the LADS evaluation study. Identify the critical issues (e.g., lack of discretion in warrant cases, high level of CDP violations, limited range of non-secure alternatives) and devise a work plan to remedy the problems.
2. Monitor the use of all types of overrides on a monthly basis, along with the utilization and failure rates of all non-secure alternatives to detention.
3. Once the override rate is under control and the majority of low and medium risk youth are released to the community, replicate the Outcome Study to ascertain whether these changes were made without compromising public safety.

Evidentiary Basis:

- Reviewed and provided detailed feedback on multiple drafts of the LADS Evaluation Study.
- Consultation with the lead author and researchers involved in the study.
- Attendance at law enforcement collaborative events at LAPD HQ, CJH, and BJNH.
- Review of additional documents provided by the County.

73-2: Minimize Camp Confinement: Prior to the pre-plea being accepted or the petition being sustained, the County shall evaluate all placement options and recommend Camp confinement only for youth who pose a legitimate risk to public safety and where the utilization of a less restrictive environment (e.g., home on probation; housing with a court-approved relative, while on probation; or a specialized community placement, while on probation) is not appropriate. The following pre- Camp-assignment review processes, conducted by qualified staff, shall be used prior to clearing a youth for Camp assignment:

- ***Court Reports: Prior to Disposition, the County shall ensure that Probation staff completes a detailed assessment of the youth that will include pertinent, available***

information about the youth to produce a detailed recommendation to the court regarding the youth's most appropriate disposition in the least restrictive setting, consistent with public safety, the best interests of the youth, and the goal of rehabilitation.

- *Overview of Alternatives to Incarceration for Lower-level Offenders: Probation shall actively collaborate (on an on-going basis) with Bench Officers (judges) and affirm the availability of a formal grant of Community-Based Probation that will be enhanced through referral to community-based services for youth and their families for assistance/service/support as an alternative to incarceration.*
- *Out of Home Screening Unit: All court reports recommending Camp Community Placement ("CCP") shall be reviewed by the "Out of Home Screening Unit." This unit shall assess these recommendations and determine the appropriateness of the recommendation. This unit shall endeavor to recommend placement of youth in community-based alternatives to incarceration to the maximum extent possible.*
- *Camps Assessment Unit: Upon the court issuing an order for CCP, the CAU shall review the recommendation for appropriateness, review the minor's case file, consult with mental health, education and health services and determine the most appropriate Camp placement for the youth consistent with public safety, the best interests of youth, and the goal of rehabilitation, and assign the youth to that Camp.*

County's Self-Assessment:

Court Reports

Deputy Probation Officers continue to prepare court reports that recommend an appropriate disposition for youth in the least restrictive setting, by assessing the youth's needs, including use of the Los Angeles Risk and Resiliency Check-up (LARRC) Assessment Tool. During this Monitoring Period, the Probation Department provided refresher training to all Juvenile Field Supervising Deputy Probation Officers and Deputy Probation Officers on the least restrictive alternatives to incarceration, the role of the Out of Home Screening Unit, how to access and utilize the Prospective Authorization and Utilization Review Unit, and how to appropriately document in court reports that the recommendation presented is the least restrictive. A December 2014 audit of the training efforts showed over 86% of Juvenile Field DPOs and Supervisors had been trained.

The County has always embraced the philosophy of treating youth in their community environments, and this has been reflected in the use of risk assessments, case plans, supervision and treatment. This has also been documented in the Probation Department Juvenile Manual, Sections 905 and 1301.26, which outlines the requirements for court reports to specifically present concise information that supports the case plan and recommendation. A November 20, 2014 audit of eleven court reports demonstrates that 100% of the reports followed the stated policies and procedures of recommending least restrictive community alternatives, with out of home placement recommended after community treatment was unsuccessful. The Monitors were also provided a sample of court reports to review on December 16, 2014.

Overview of Alternatives to Incarceration for Lower-Level Offenders

The Resources Directory remains available electronically on the Probation Department Intranet for use by all staff, and on the Probation Department Internet Homepage, accessible to the public, law enforcement agencies and others. During the recent Law Enforcement Meetings and Regional Forums for Bench Officers held in this Monitoring Period, a printed copy of the Resources Directory was available for viewing purposes to demonstrate the extent of community treatment programs and services to youth and their families. Some law enforcement agencies even requested to make the Resources Directory available on their own Internet Homepage through an electronic link. The Resources Directory includes the following categories of service providers that can be utilized in lieu of detention or other out of home dispositions:

- Alcohol and Substance Abuse
- Anger Management
- Child Abuse
- Child Care
- Counseling and Mental Health
- Disabled Services
- Domestic Violence
- Educational Programs
- Employment
- Food
- Healthcare and Rx Programs
- HIV – AIDS service
- Hotlines
- Housing/Shelters
- Immigration
- Legal Services
- Outpatient Sex Offender
- Parenting Information
- Public Benefits/Assessment
- Recreation
- Self Help and Support Services
- Senior Services
- Tattoo Removal
- Transportation
- Website Links
- Women’s Services
- Youth Services

Meetings with Bench Officers

Three Regional Forums were held with Bench Officers as follows:

- November 19, 2014 – Regional Forum at Long Beach Area Office (12:30 pm)
- November 21, 2014 – Regional Forum at Barry J. Nidorf Juvenile Hall (12:30 pm)

- December 1, 2014 – Regional Forum at Ed Edelman Children’s Court (12:30 pm)

Regional Forums are conducted every four months in the north, south and east regions of the County. Bench Officers within that respective geographic area are invited and encouraged to attend. Each Region has approximately six Bench Officers. Six Bench Officers attended the first Regional Forum; five attended the second; and 5 participated in the last Regional Forum. Probation Department Field Services Managers provided the presentation on the Department’s efforts to reduce the incarceration of youth by recommending to the courts least restrictive community alternatives to out of home placement at each Regional Forum. The presentations further discussed the DOJ MOA Paragraph 73 and how its similar goals of increasing access to, and the use of, least restrictive community alternatives aligns with the Department’s goals. Probation Managers discussed the internal court report recommendation approval process, which is designed to ensure all recommendations for out of home placement are thoroughly reviewed and appropriately presented to the court for a decision. An in-depth overview of community resources was provided to ensure the Bench Officers that a network of services and treatment providers are available to treat youth in the community. These services and treatment programs include cognitive behavioral treatment, mental health, substance abuse, education and employment services, and family support services. The services can be accessed by Field Probation Officers via the Resources Directory, the Out of Home Screening Unit and the Prospective Authorization and Utilization Review Unit.

Out-of-Home Screening (OHS) Unit

In September 2014, *Directive 1368-Out of Home Screening Process – Criteria for Referrals* was issued to supersede the previous Out-of Home Screening (OHS) *Directive 1170*. *Directive 1368* require that all Field DPO recommendations for CCP, Suitable Placement, or DJJ be screened by OHS, without exception. The requirement ensures that all such recommendations comply with applicable laws and Departmental policies. The Directive provides clear and concise criteria for the DPO recommending CCP and instructions for the SDPO reviewing CCP recommendations, prior to submitting referrals to OHS. OHS continued to review all referrals in conjunction with the referring DPO for appropriateness of the out of home recommendation. *Directive 1368* states, in cases which OHS denies an out of home referral (either camp or Suitable Placement) and Home-on-Probation (HOP) is designated as the most appropriate recommendation, the referring DPO *shall* prepare a court report containing content with a HOP recommendation. OHS continued to track all out of home referrals (CCP, Placement, and DJJ) in the OHS Unit Tracking Database, as well as any out-of-home recommendations not referred to OHS as required. For out-of-home recommendations not screened by OHS per requirement, there is written notification sent to the respective office Director for review, and a report of findings is given to the respective Bureau Chief or designee. Additionally, any out-of-home recommendation denied by OHS is referred to the Prospective Authorization and Utilization Review (PAUR) Unit. The PAUR Unit identifies community-level treatment alternatives including, but not limited to Wrap-Around Services, Family Preservation, Functional Family Therapy, Multi-Systemic Therapy, Juvenile Day Reporting Center and/or services provided through the Juvenile Justice Crime Prevention Act (JJCPA). Also, in September 2014, *Notice 1689 – Community-Based Alternative Programs* was issued. In October 2014, *Notice 1691 – Juvenile: Community-Based Alternative Program Services* was issued. Both Notices refer recommending DPOs to community-based services as alternatives

to detention, and are used in conjunction with OHS and the PAUR Unit to increase access to community alternatives.

Audits conducted for July – December 2014 demonstrated out-of-home recommendations that were not referred to OHS were reported to the recommending DPOs' Bureau Chief and/or designee 100% of the time.

Table 73-3

Number of Notifications to Administration by OHS for Referrals Not Reviewed

(July – December 2014)

Month	Total # of Referrals to OHS	# Recommending CCP	%	# Approved by OHS	%	Inappropriate Recommendation	Admin. Reviewer Notified
July	274	169	62%	147	87%	4	4
August	214	114	53%	107	94%	5	5
September	260	130	50%	110	85%	5	5
October	259	126	49%	113	90%	3	3
November	204	108	53%	98	91%	0	0
December	161	71	44%	61	86%	2	2

Table 73-4

Out-of-Home Screening Cases not Cleared (July – December 2014)

Region	Total # CCP Orders	*# of CCP Orders <u>Not</u> Cleared	% of CCP Cases Not Cleared
1st District	170	5	3%
2nd District	141	8	6%
3rd District	24	1	4%
4th District	41	0	0%
5th District	41	4	10%
RTSB	34	0	0%
Suitable Placement	196	5	3%

**Note: "CCP orders not cleared" includes cases that were never referred to the OHS or the DPO made a CCP recommendation contrary to the OHS officer's recommendation.*

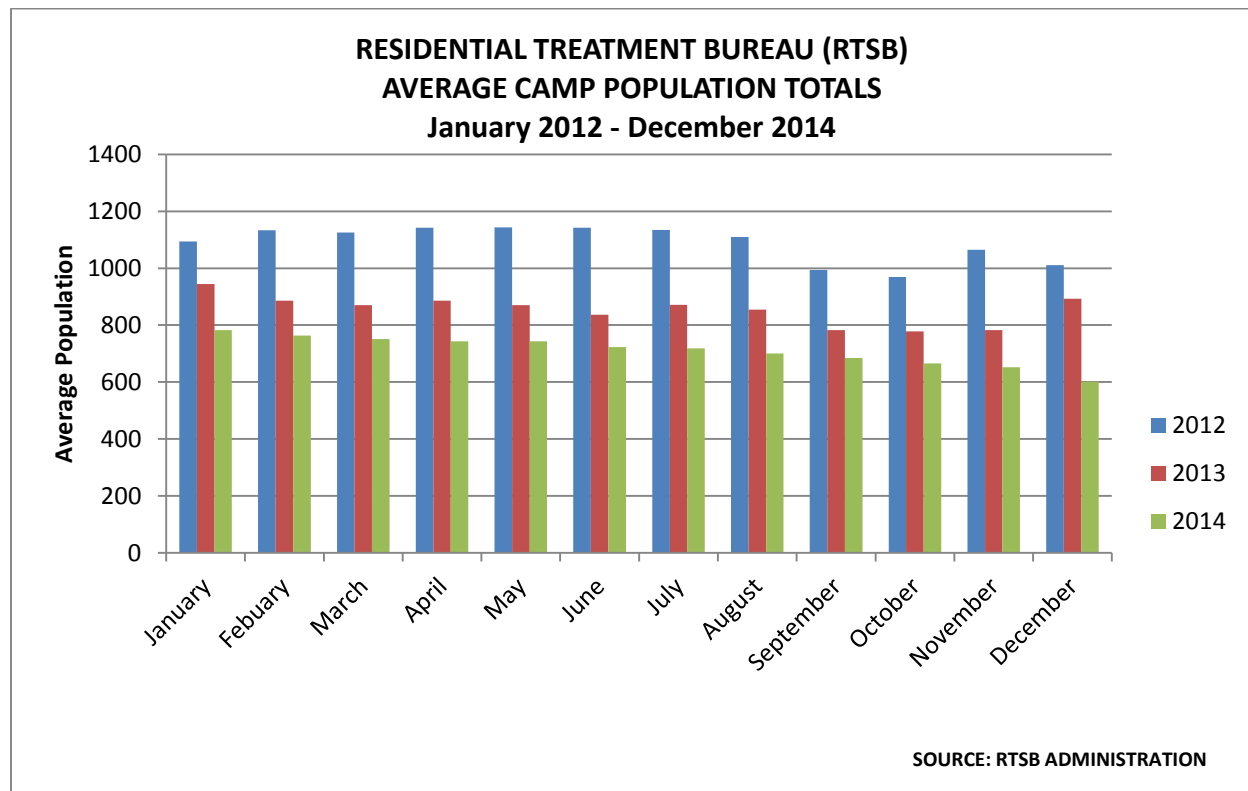
Camps Assessment Unit (CAU)

The Multi-Disciplinary Assessment (MDA) consisting of the CAU Deputy Probation Officer, Juvenile Court Health Services (JCHS), Department of Mental Health (DMH), and the Los Angeles County Office of Education (LACOE) determines appropriateness for camp or camp placement based on medical, mental health, substance abuse, education, criminal history, treatment needs and LARRC score. The CAU MDA continued during this reporting period. CAU audits conducted for the months of July – December 2014 indicated that all **610** CCP ordered-youth received a MDA **100%** of the time.

As can be seen in **Figure 73-5** below, RTSB’s average camp population continues to decrease in numbers as existing processes are more consistently utilized and reviewed.

Figure 73-5

RTSB Average Camp Population (January 2012 – December 2014)



Discussion by Monitors:

Court Reports and Out of Home Screening Unit

Reports written by Probation staff for the courts are complete assessments of an offending youth’s background and other factors that might be relevant to the courts. The primary concern is that the information be fully reviewed and evaluated prior to submission to the court, and that the Probation recommendation to the court represents the best and least restrictive setting for the youth consistent with public safety.

When preparing pre-disposition court reports, Probation Officers have been directed and trained to recommend the least restrictive setting for youth, but the individual officers are not given the authority to make the final recommendation to the court until that recommendation is reviewed and approved. Probation Department Directive 1368 (which supersedes Directive 1170) mandates that the Out-of-Home Screening Unit (OHS) is the single point of contact for DPOs to clear all out-of-home placement recommendations prior to the submission of the court reports. The directive also requires that the recommending DPO's supervisor must review and approve the recommendation prior to submission to OHS. Once the OHS reviews and either approves or rejects the out-of-home placement recommendation, the court report is expected to reflect that determination. As an additional step to avoid out-of-home placements, officers are also directed to the Prospective Authorization and Utilization Review (PAUR) Unit to assist in determining whether there are any additional community resources available for the youth where out-of-home placement has been denied. Both DOJ/Quality Assurance Services Bureau and the OHS utilize a review/audit process to identify violations of the directive.

It should be noted that if a court report recommendation is consistent with the OHS determination, but the bench officer decides differently, there is no issue with the mandated process. The Probation Department, however, is concerned about cases where the DPO failed to clear a recommendation with OHS; ignored the OHS determination that camp placement was not appropriate and recommended CCP; or where the DPO recommended that the youth remain home on probation or placed in suitable placement, but wrote the report in a way, or added materials, that gave the appearance that camp assignment was actually preferable in an apparent attempt to steer the court to a CCP order. The Department has identified different categories of these inappropriate recommendations that they term "exceptions" so that they may be tracked and evaluated and corrective action taken where policy was violated or misapplied. The quality, approval process, and appropriate utilization of the OHS and PAUR are now carefully audited. The DOJ/Quality Assurance Services Bureau has worked with the Monitors to ensure that audits exceed the requirements of the MOA. The review process for any violation is very comprehensive and robust.

In the 11th Monitoring Report, we noted that the compliance rate with this process was very high and improving. A review of the Probation Department reports and audits during this monitoring period confirms that the trend continues with a 99.8% compliance rate.

Collaboration With Courts

This section of Paragraph 73 also requires the Probation Department to engage in an ongoing collaboration with bench officers to ensure that they are aware of community services that are available to support a grant community-based probation. The Probation Department and the courts are now holding collaborative regional forums to address all manner of issues between them. The Probation Department has divided the County into three regions for the purposes of the forums. They have stated their intention to hold these forums for all three regions once every four months, or more frequently if needed. Monitors attended one of the bench officers' meetings held in December. The primary purpose of the meeting was to discuss the availability and use of community services to support a greater utilization of community-based probation. There was a

good on-topic dialogue between the Probation Department and the bench officers. The County's current level of performance meets the requirements of this part of Provision 73.

Camp Assessment Unit

During the previous monitoring period members of the monitoring team visited the CAU, reviewed their operation and discussed their practices with the Director and his staff. The Monitors found that the unit continues to be highly effective. With the enhanced programming at the camps, the greater emphasis on the MDTs and their use of the MDAs prepared by the CAU, our opinion has not changed. The County's current level of performance meets the requirements of this part of Provision 73.

The County is currently in compliance with this sub-section of Paragraph 73.

Recommendations:

1. Work with courts to ensure that the electronic Resources Guide accurately reflects available services and meets their needs. Develop a process to ensure that the resource directory consistently reflects currently available services.
2. Continue the regional forums between the courts and Probation Department to discuss services available to support the granting of community-based probation for lower-level offender, or find some other collaborative means to accomplish the same goal if attendance is inadequate for the dissemination of the information.
3. Continue to audit the OHS screening process, and take appropriate corrective action when violations of the policy are found.

Evidentiary Basis:

- Meetings with Probation Department executives and staff.
- Meetings with DOJ/Quality Assurance Director.
- Monitors' attendance at the December 1st bench officer meeting.
- Review of court reports.
- Review of audits and other documents provided by Probation Department.

73-3: In-Camp Services/Re-entry: The County shall ensure that youth assigned to the Camps receive the following services, that are consistent with the County's goals of ensuring the public safety and rehabilitation of youth, and to ensure that youth are confined to Camps for no longer than necessary:

Each youth shall receive an initial MDT Assessment within fourteen (14) days of arrival at the Camp:

- ***The MDT shall further review the documentation that resulted in the youth's CCP. If the CCP order appears to be contrary to the youth's treatment and service needs, or if the particular Camp assignment appears to be inappropriate, the case will be referred back to the CAU for consideration; and***
- ***This collaborative MDT of Probation, the Department of Mental Health (DMH), Juvenile Court Health Services (JCHS) and Los Angeles County Office of Education***

(LACOE) representatives shall determine the in-Camp programming and service needs of youth, and facilitate initiation of the case plan and community transition plan for the youth;

Each youth's assigned Probation Officer at the Camp shall:

- *Meet with the youth upon the case plan being initiated;*
- *Meet regularly (weekly) thereafter with the youth (and the family, in person or via telephone or other available means, to the extent reasonably possible consistent with the youth's needs and/or case plan) and shall monitor and document weekly, the youth's progress and compliance with the case plan while in Camp;*
- *Closely monitor the youth's behavior and progress to determine eligibility for an early release recommendation to the court to assure that youth are not incarcerated in Camp for any longer than necessary. Upon the youth achieving a specific number of "made" days during which the youth was compliant with the Behavior Management Program, or as otherwise appropriate, the youth will be calendared for an MDT review at the camp. At the MDT, the youth's performance and other factors will be considered, including post-camp community placement and service issues, and a decision will be made regarding whether to petition the court for an early release. Upon a decision being made to petition the court for early release, a Transitional MDT will be initiated; and*
- *In instances where the youth appears eligible for early release: make the appropriate recommendation to the court; and alert the facility's MDT Coordinator regarding the potential early release.*

Each facility shall have a designated MDT Coordinator who shall coordinate discharge transition planning. The MDT Coordinator shall:

- *Use MDT data to initiate community transition planning, and meet with the youth, and his or her family as appropriate, within 30 days of the youth's arrival to initiate the youth's transition plan.*
- *Collaborate with Probation Officers in Camp regarding transition plans for individual youth, and ensure that these plans meet the service needs of youth who are transitioning home or to the community;*
- *Coordinate a Transitional MDT with Aftercare Transition Program Probation Officers to initiate the transition process for the youth's transition back to the community. This process should include ensuring that these transition plans are consistent with the youth's service needs, and coordinating pre-release contacts to the Camp by the designated community Probation Officer at least 30 days prior to the youth's release from Camp. The Aftercare Probation Officer and youth's family shall be involved in the transitional MDT process to the extent reasonably possible;*
- *Coordinate ongoing reviews of youth confined in Camps to evaluate and identify youth who otherwise may be eligible for early release;*
- *Work with all necessary entities and individuals to secure the supports and services identified in the youth's reintegration plan upon the youth's release, with more intensive efforts as the youth's release date approaches. Special efforts shall be made to facilitate any specialized medical or mental health service needs (including immediate access to prescribed medications and working with parents/guardians to schedule contacts and appointments with mental health care providers), the initiation or reinstatement of*

Medicaid or Medi-Cal benefits upon release, school enrollment or referrals for GED services and/or job-related assistance, as applicable.

- *Coordinate the Transitional MDT process at the facility at least 30 days prior to the youth’s anticipated release date.*
- *Collect and analyze monthly and annualized data regarding the number of youth identified for early release, the number of youth actually granted early release, and the number of days these youth who were released early did not remain in custody.*

A qualified Probation Officer shall conduct at least one pre-release home screening visit to the youth’s post-Camp placement within 30 days prior to the youth’s release from Camp.

County’s Self-Assessment:

In-Camp Services / Re-Entry

Audits conducted during the period of July – December 2014 reflect that the Camps continued to exceed expectations in providing youth with the Initial MDT (I-MDT) within 14 days of camp entry as seen in the Figures below. Additionally, audits for this same period demonstrated a significant increase in the Aftercare DPO participation.

Figure 73-6

West Region Aftercare/I-MDT Participation (July – December 2014)

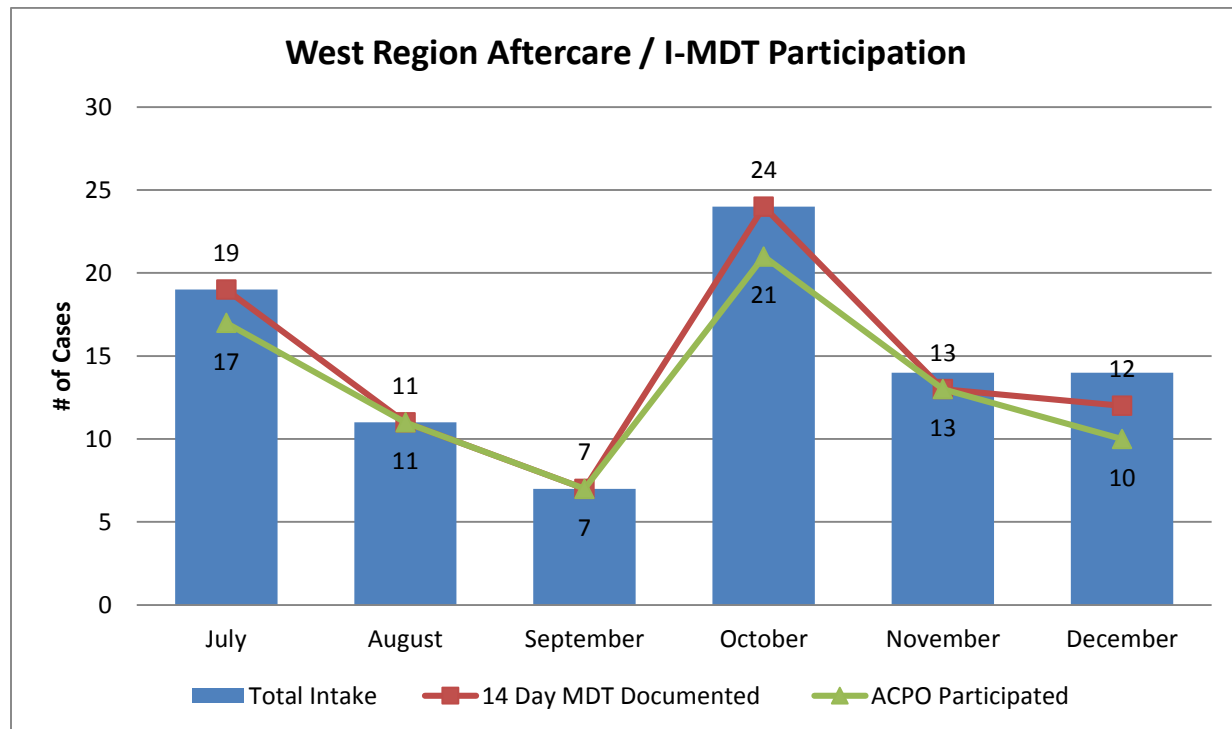


Figure 73-7

North Region Aftercare/I-MDT Participation (July – December 2014)

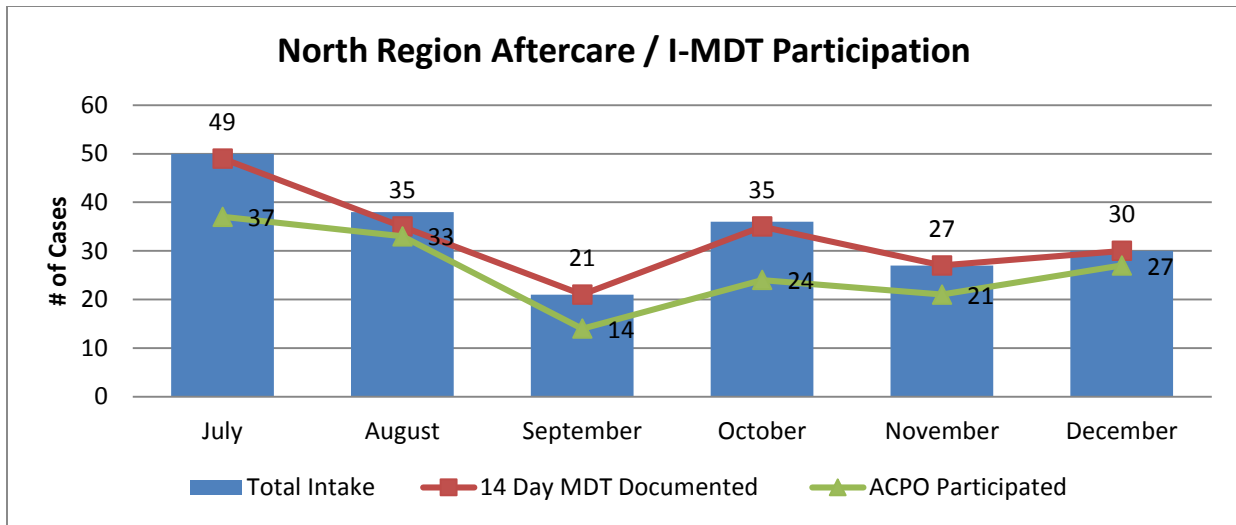


Figure 73-8

East Region Aftercare/I-MDT Participation (July – December 2014)

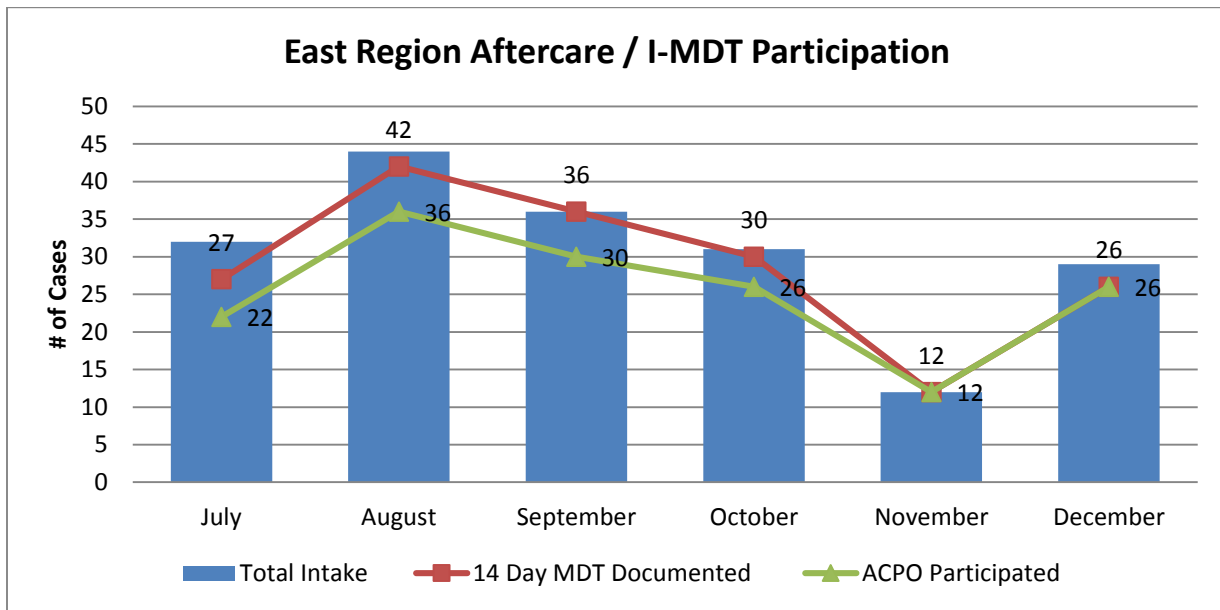
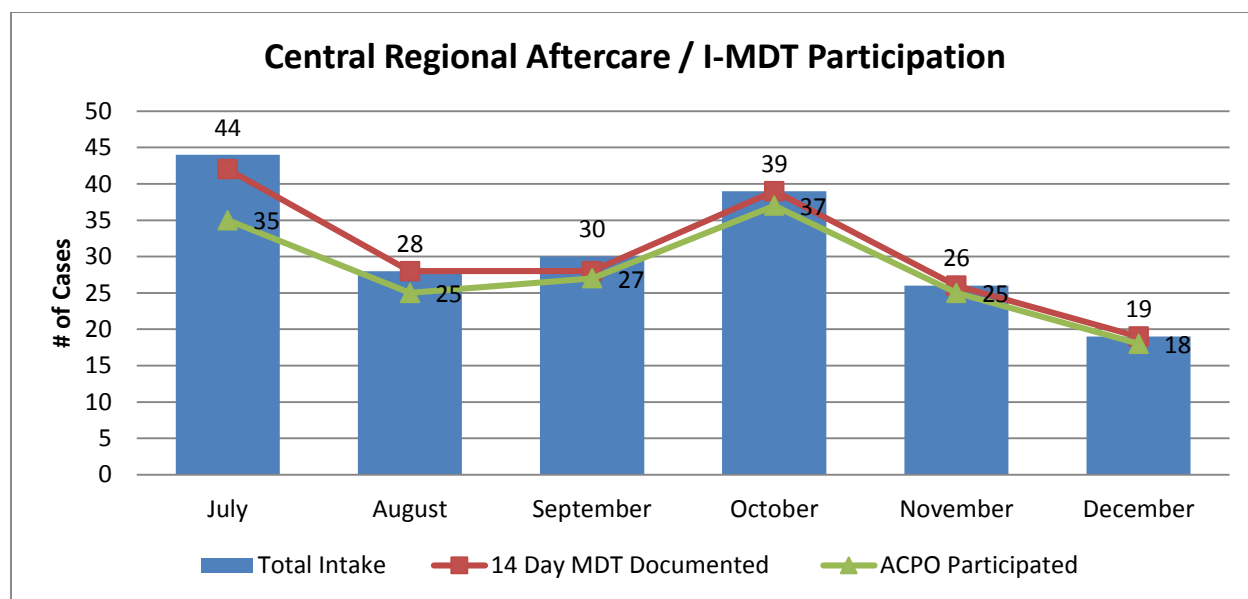


Figure 73-9*Central Region Aftercare/I-MDT Participation (July – December 2014)*

The Aftercare DPO participation in the I-MDT continued to increase throughout this rating period or remained consistently within departmental expectations of 80% or better for all four camp regions in the months audited. The Figures above indicate that in the West Region, for July 2014, Aftercare DPO participation in the I-MDT was at 89% and in December 2014, participation remained above expectations at 83%. In the North Region, for July 2014, participation in the I-MDT was at 76% and rose to 90% by December 2014. In the East Region, Aftercare DPO participation in July 2014 was at 81% and in December participation rose to 100%. In the Central Region, Aftercare DPO participation in the I-MDT was 83% in July 2014 and by December 2014, participation was at 95%. The audit process contributed to increased efforts by MDT coordinators to communicate with Aftercare DPOs in addition to additional CCTP trainings. The audit results are reviewed in detail with the Camp Directors who have all taken on an intense role in ensuring all areas of concern are rectified in a timely manner which is evident with the implementation of the shared MDT calendar between RTSB and CCTP. Overall, the greater communication efforts and CCTP training (discussed in 73.4) allowed for fewer scheduling conflicts, resulting in greater participation.

Camp DPO Casework

Audits of Camp DPO weekly contacts with youth were conducted for July – December 2014. The audit tool was revised to allow time for case plans to be developed (three weeks), which occurs during the I-MDT. In the **Table 73-5**, the average weeks in camp and average weekly documented case work meetings were gathered from a sampling of youth at each camp. The minimum amount of case notes required for a 12-week program is approximately 9.

Table 73-5

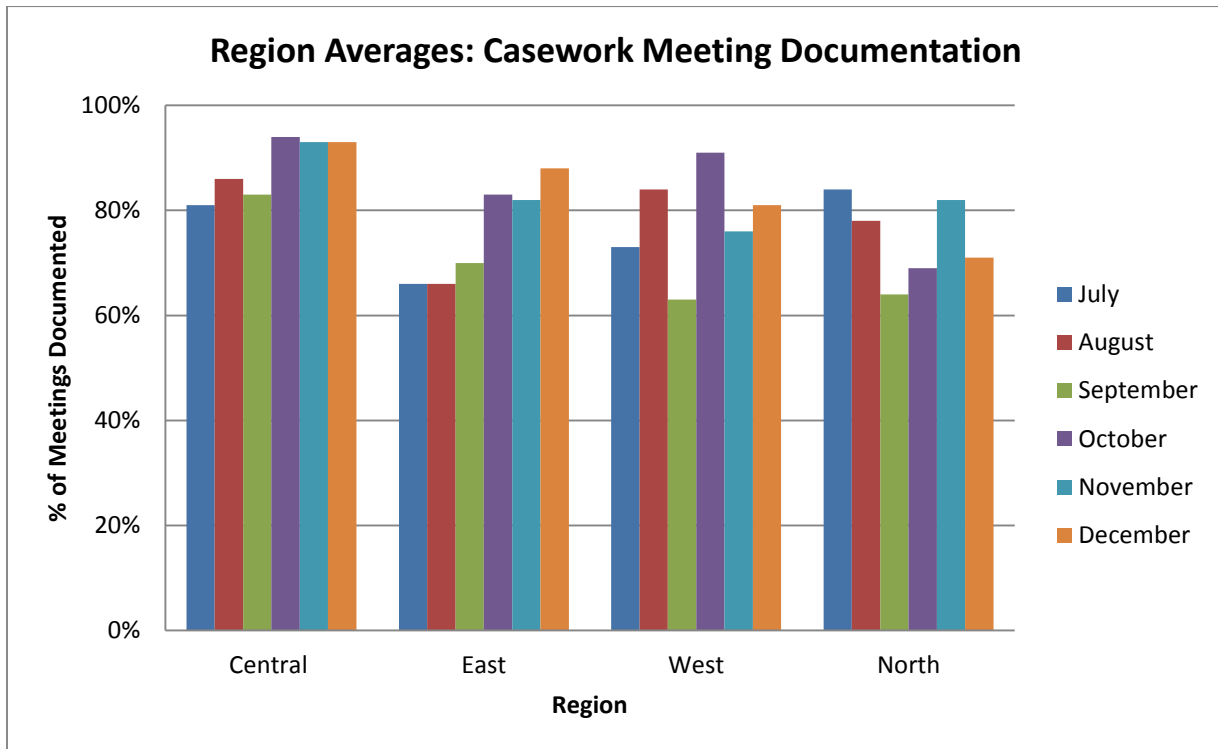
Region Averages: Casework Meetings Documented (July – December 2014)

Region	July		August		September		October		November		December	
	Weekly PO meetings vs. wks. in camp*	Avg. % of meetings doctd.	Weekly PO meetings vs. wks. in camp*	Avg. % of meetings doctd.	Weekly PO meetings vs. wks. in camp*	Avg. % of meetings doctd.	Weekly PO meetings vs. wks. in camp*	Avg. % of meetings doctd.	Weekly PO meetings vs. wks. in camp*	Avg. % of meetings doctd.	Weekly PO meetings vs. wks. in camp*	Avg. % of meetings doctd.
Central	13/18	81%	13/17	86%	15/18	83%	15/16	94%	14/15	93%	14/15	93%
East	12/20	66%	12/20	66%	14/20	70%	15/18	83%	14/17	82%	14/16	88%
West	14/21	73%	16/21	84%	15/24	63%	20/22	91%	19/25	76%	18/22	82%
North	16/21	84%	15/21	78%	14/22	64%	11/16	69%	14/17	82%	12/17	71%

*Note: *Weeks in camp adjusted for case plan development. First three weeks not counted (2 weeks for I-MDT and 1 week for Camp PO to begin shift and initial case plan meeting)*

Figure 73-10

Average Weekly Documentation Graph (July – December 2014)



RTSB continued to improve in documenting casework meetings with youth. Camps are transitioning into more thorough PCMS case note documentation. Regions have developed case note “templates”, to ensure that youth/DPO meetings include discussion of the youth’s specific identified needs, the BMP process, Early Release, program goals, and parent/guardian contacts and attempted contacts. For example, in July the audits revealed of the 39 sampled cases regarding attempted parent/guardian contact, casework DPOs documented monthly attempts 26 times (67%). However, in December it improved to 32 of 39 sampled cases in which Camp DPOs documented attempted contact with parent/guardian (82%). In addition, based on conversations with the Camp DPOs and Supervisors, there is still room for improvement in staff documenting all contacts in order to get full credit for the many additional contacts (e.g. family visits, youth phone calls) that are not always necessarily documented in PCMS. Central Region holds the highest percentage of detailed PCMS case note documentation. Some of the factors are that the smaller camp populations in the Central Region, allows staff more time for documentation (e.g. Camps Scott and Scudder). Additionally, the DOJ/QASB audits allowed time for the Corrective Action Plans (CAPs) regarding more substantive documentation of casework meetings to be developed and implemented. As further enforcement, the Camp Directors have charged the SDPOs with weekly review of PCMS case note entries for thoroughness.

During the audit of case/transition plans created within 30-days of youth’s arrival to camp (July – December 2014), it was found that of the 658 youth admitted to camps 657 had their case/transition plan completed within the required 30-day time frame (99%).

Paragraph 73.3 audits conducted for the months of July through December 2014, sampled Transitional MDT (T-MDT) Participation by the Aftercare DPO for youth that were released (see **Table 73-6**). As shown in **Table 73-6**, in July 2014, of the nine released youth from the North Region, 9 out of 9 times the Aftercare DPOs were notified of the T-MDT. They participated in 9 of the 9 T-MDTs held (100%). The Aftercare DPO participation has improved or remained above expectations in all regions for the sampled youth in the following months. Again, the auditing process and increased collaboration between RTSB and CCTP (MDT calendar) contributed to participation exceeding standards for the randomly sampled cases (not to exceed more than one 3 month CCP order per camp sample).

Table 73-6*Aftercare DPO Transitional MDT Participation (July – December 2014)*

Region (# of Camps)	July			August			September			October			November			December		
	# of Releases*	ACPO Notified vs. Participated	% participated	# of Releases*	ACPO Notified vs. Participated	% participated	# of Releases*	ACPO Notified vs. Participated	% participated	# of Releases*	ACPO Notified vs. Participated	% participated	# of Releases*	ACPO Notified vs. Participated	% participated	# of Releases*	ACPO Notified vs. Participated	% participated
North (4)	9	9/9	100%	9	9/9	100%	9	9/9	100%	11	11/11	100%	12	12/12	100%	9	9/8	89%
East (3)	9	9/9	100%	9	9/9	100%	9	9/8	89%	9	9/9	100%	9	9/9	100%	9	9/8	89%
West (3)	9	9/9	100%	8	8/8	100%	7	7/7	100%	9	9/9	100%	9	9/9	100%	9	9/9	100%
Central (4)	12	12/12	100%	11	11/11	100%	12	12/11	92%	12	12/12	100%	12	12/12	100%	12	12/11	92%
Totals	39	39/39	100%	37	38/37	100%	37	37/35	95%	41	41/41	100%	42	42/42	100%	39	39/36	92%

Note: *The "# of releases" for this table is the # of sampled cases of youth released from Camp and not the total # of Youth released from camp during the month.

Early Releases

The Early Release (ER) Transitional MDT process continued to be utilized by every camp during this period. Youth who became eligible for Early Release based upon "Made Days" were given ER-Transitional MDTs (ER/T-MDT), and all factors of the youth's case plan were considered (complete or incomplete program service needs, education, behavior, etc.) in determining recommendations to the court for Early Release. It should be noted that the County is experiencing a higher number of eligible youth eligible for ER which is a clear demonstration of highly effective programming. The possibility of ER is the motivational driving force for many youth. The individual camps' populations and specific services provided also influence the amount of youth qualifying for early release. However, RTSB has shown consistently that eligible youth received ER/T-MDTs as part of BMP. The audit tool identified any youth who did not receive an ER/T-MDT and the Camp Director was able to address that issue with the MDT coordinator and the DPO caseworker when necessary.

Figure 73-11

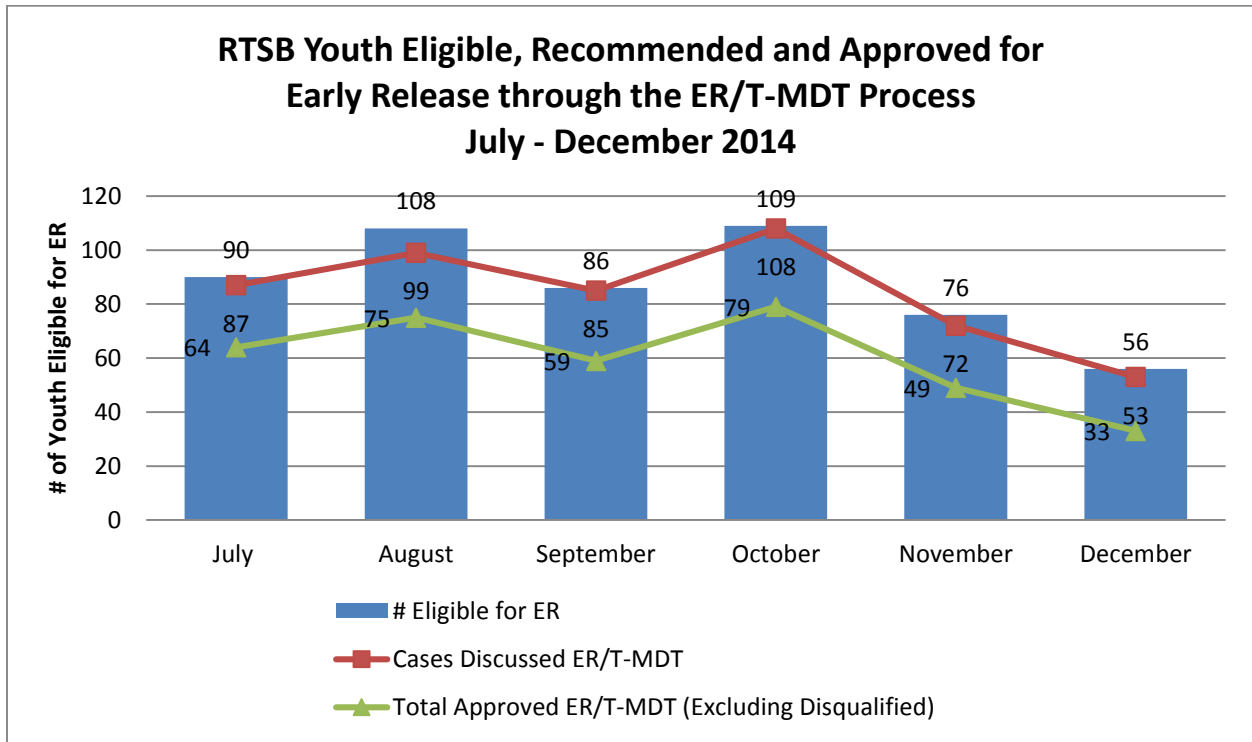


Figure 73-12

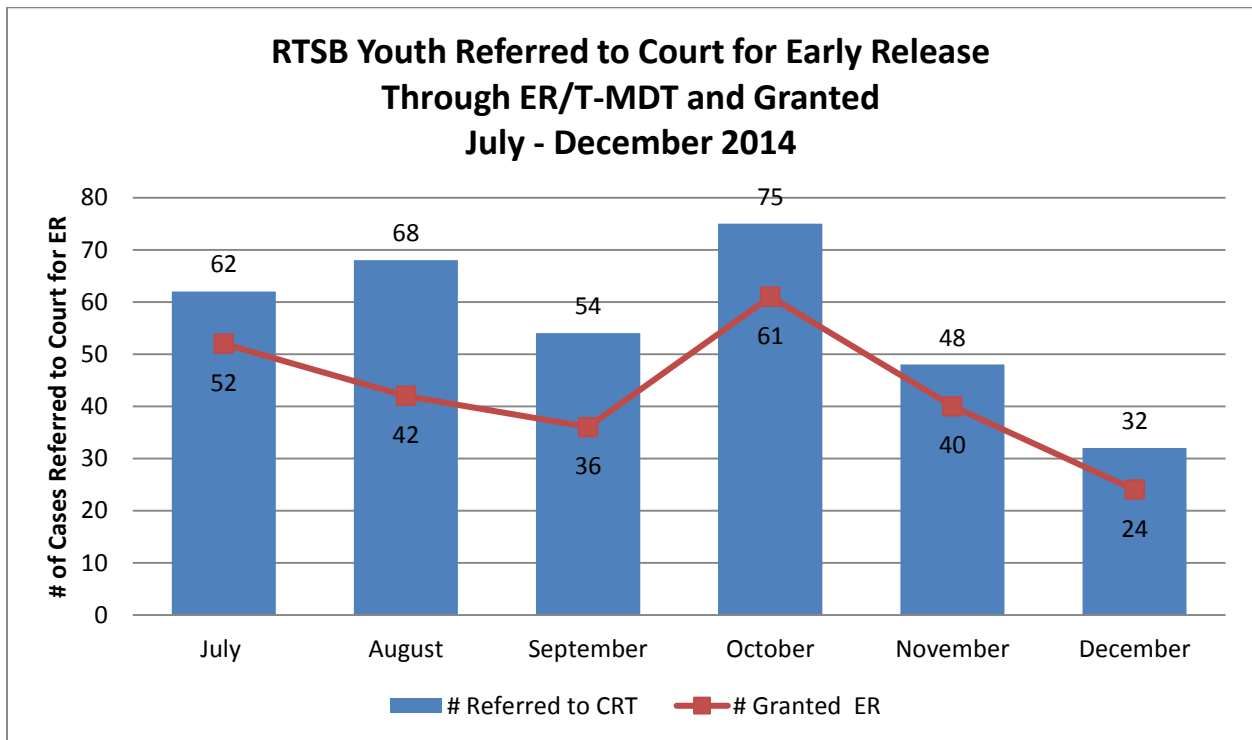


Table 73-7**RTSB Youth Eligible for Early Release (July – December 2014)**

	# Eligible for ER	ER/T-MDT Held	% Rcvd ER/T-MDT	# Disqualified by T-MDT	# Referred to Court	# Granted ER	% Granted ER
July	90	87	97%	23	62	52	84%
August	108	99	92%	24	68	42	62%
September	86	85	99%	26	54	36	67%
October	109	108	99%	29	75	61	81%
November	76	72	95%	23	48	40	83%
December	56	53	95%	20	32	24	75%

While “*Made Days*” begin the process for Early Release consideration, in the previous Figures it was illustrated how every eligible youth is not necessarily recommended to the court upon having an ER/T-MDT. The reasons for a youth becoming ineligible for Early Release varies from youth not completing identified service programs, to youth demonstrating excessive negative behavior (fights, school referrals, etc.) after making their “*Made Days*”.

The MDT process and Early Release recommendations to court have exceeded expectations during the audit months. RTSB Early Release recommendations to court for *eligible* youth never went below 90% (August) during July – December 2014, and reached 98% in the month of November. The Figures also indicated that the courts do not release every youth that are recommended for Early Release such as youth nearing the completion of their educational goals (GED) and requesting time to complete their education in camp. Decreasing camp populations and the exclusion of 3-month camp programs have assisted in stabilizing Early Release recommendations that are dependent upon youth’s behavior and participation in programming, and ultimately the will of the courts. Camp Directors have reinforced the BMP standards through their supervisory staff and that is a key factor for overall Early Release recommendations from line staff caseworkers remaining in the 90th percentile.

The Early Release Program continues to benefit the County by translating into cost savings for every day a youth did not reside in a County facility (see **Table 73-8**). During the period of July through December 2014, the County experienced a **\$5,533,293** in cost savings.

Table 73-8*Amount of Time Saved by Early Releases (July – December 2014)*

Months	Time Saved			
July	2251 Days;	75 Months,	1 Day	\$1,136,755
August	1434 Days;	47 Months,	24 Days	\$724,170
September	1248 Days;	41 Months,	18 Days	\$630,248
October	2928 Days;	97 Months,	18 Days	\$1,478,640
November	1872 Days;	62 Months,	12 Days	\$945,360
December	1224 Days;	40 Months,	24 Days	\$618,120
Total	10957 Days;	362 Months,	47 Days	\$5,533,293

Note: Months were calculated in 30 day increments.

Discussion by the Monitors:

As discussed in the County's self-assessment, audit tools were used to assess the various outcomes required by this provision during June - December 2014. The audit tools track the key outcomes required by this provision and the Department has demonstrated its ability to analyze and interpret the data to identify sites that are not meeting the expected performance levels. This self-assessment presents data according to region, which in the Monitor's opinion obscures important differences that occur among the camps within each region. The audit process *does* collect and report data by camp, and also requires corrective action from camps that do not perform as expected. For this reason, regardless of the style of presentation of the self-assessment, the County's audit process is very solid and clearly shows an ability to identify and resolve problems absent external oversight.

The following discussion is organized according to the key performance measures that are included in the provision and uses data collected and analyzed by one Monitor as part of the Case Presentations that were used to assess compliance with Provision 17. The Case Presentations involved 70 youth across all 14 camps. When relevant, data from the County's audits and self-assessment are included.

Two additional Monitors, responsible for aftercare portions of this section, also reviewed PCMS Case Notes and MDT Minutes for 586 youth released from all camps from May through October, 2014. [Since those Monitors' primary focus was on post-camp aftercare issues, their review necessitated looking at notes that encompassed at least two months of post-camp activity, thus resulting in a review of files for earlier camp releases during this time period.] Their comments are also included, as appropriate, in the following discussion.

73-3(a) requires Initial MDTs to be held within 14 days of admission to camp. Overall, the Initial MDTs for 66 of the 70 youth (94%) were held within the required timelines. Three of the exceptions were only one day late, and the other was delayed so that DCFS could participate for a dual-supervision youth. The County's audits appear to have found similar performance levels, although the use of raw numbers instead of percentages in the bar charts make it difficult to cite a

specific percentage. The December 2014 audits found a 97% compliance rate with the 14-day timeline for initial MDTs. The County's current level of performance meets the requirements of this part of Provision 73.

73-3(a) also requires Initial MDT meetings to include Probation, DMH, LACOE and JCHS. Although the Monitor did not capture specific data on this outcome measure, a review of notes taken on site suggests that for nearly all of the 70 youth, the Initial MDT meetings included the participants required by the provision. Although JCHS frequently did not attend in person, the MDT coordinators generally sought their input before the meeting was held. The County did not analyze data relevant to this position for the self-assessment, although it is available via the monthly audits. The County's current level of performance meets the requirements of this part of Provision 73.

73-3(b) requires camp POs to hold meetings with youth upon case plan initiation. All 70 cases (100%) reviewed by the Monitor revealed a timely meeting between the PO and the youth upon case plan initiation. ["Timely" was defined as within 21 days of admission, given that the MDT must be held within 14 days and then allowing an additional week for the staff to meet with youth.] The County's current level of performance meets the requirements of this part of Provision 73.

73-3(b) also requires camp POs to hold weekly meetings with youth on their caseload. As noted in the discussion for Provision 17, the frequency of PCMS entries documenting casework sessions with youth has increased steadily over the past 12 months. Among the 70 cases sampled by the Monitor, casework sessions were held between the youth and the DPO during 85% of the weeks the youth were in camp. The December 2014 audits found an 84% compliance rate with the weekly casework requirement. The County's current level of performance meets the requirements of this part of Provision 73.

73-3(b) also requires POs to monitor the youth's eligibility for Early Release Recommendations and to file petitions request release as appropriate. In all 70 cases sampled by the Monitor (100%), the youth's eligibility for release was tracked via the number of Made Days accumulated via the Merit Ladder. Once the minimum threshold was reached, MDTs were convened and petitions were filed for youth who were determined to be eligible for this incentive. The County's current level of performance meets the requirements of this part of Provision 73.

73-3(c) requires the facilities to initiate the youth's transition plan within 30 days of the youth's arrival at camp. Each camp visited by the Monitor was asked to describe the initial steps taken to create the transition plan for each of the 70 youth in the Case Presentation sample. Uniformly, this consisted of determining whether the youth would be released to his/her home or would go from camp to suitable placement. If the youth was expected to go to placement, contact with the Placement Unit was established. If the youth was expected to return home, the school district in which the youth would enroll was identified. This information is documented on the Initial MDT documents for each youth. The County's current level of performance meets the requirements of this part of Provision 73.

73-3(c) also requires a Transitional MDT to be held at least 30 days prior to the youth's anticipated release date. Among the youth included in the Case Presentations, the Transitional

MDT was held at least 30 days before the youth's release date in 65 of the 70 cases sampled (93%). Even when the MDT was held later than required, all of the supports and services needed to encourage a successful re-entry were in place prior to the youth's early release. The December 2014 audits found a 97% compliance rate for 30-day prior to release requirement for Transitional MDTs. The County's current level of performance meets the requirements of this portion of Provision 73.

73-3(c) also requires the Aftercare PO and youth's family to be involved in the transitional MDT process to the extent reasonably possible. Members of the monitoring team reviewing the PCMS Case Notes and MDT Minutes for youth released from the camps between May and October 2014 report that the aftercare/placement PO participated in the Transition MDTs, either by phone or, in most cases, in person in an average of 92% of the of the time. This is a significant improvement over previously reported levels. This is not inconsistent with the County data in that participation rates improved in later months.

The County's self-assessment reports a 98% participation rate across all regions for June-December 2014. The Monitor's review of 70 cases across the 14 camps revealed similar results, with the ACPOs participating in 96% of the 70 Transition MDTs. The County's current level of performance meets the requirements of this part of Provision 73.

The County's self-assessment did not report the rate of parent participation in the Transitional MDT, although this information is available via the monthly audit forms. For example, in December 2014, of the 121 youth released system wide, parents participated in 70% (n=85) of the Transitional MDTs. The Monitor's review of 70 cases found that parents were invited to attend 100% of the MDTs and actually participated in 50 of the 70 Transitional MDTs (71%). Given the geographical size of LA County, the fact that most of the youth's parents are working, and the history of tension that characterizes many of the youth's family lives, engaging over 70% of the youth's family in the MDT meetings is a solid accomplishment! County's current level of performance meets the requirements of this portion of Provision 73.

73-3(c) requires a home visit within 30 days of the youth's anticipated release from camp. Of the 70 Case Presentation, 66 youth were returning home. A home visit was conducted within 30 days of the youth's release in 64 of the 66 cases (97%). The May through October PCMS Case Notes documented the required home evaluations were timely conducted in over 99% of the 586 files reviewed. The County is meeting the requirements of this part of Provision 73.

73-3(c) requires the MDT team to secure the necessary supports and services identified in the youth's reintegration plan. The Transition Plans for each youth were summarized during the Case Presentations. In all cases (100%), the transition plans contained the required components, addressing the youth's living situation, mental health needs (e.g., counseling or substance abuse treatment), and medical needs (including prescription drugs, as applicable). Camp Headquarters automatically forwards information to parents for how to enroll/re-enroll youth for Medicaid and MediCal benefits. DMH aftercare specialists were involved in the transition planning for many of the youth. Each facility also has a LACOE transition liaison who provides contact information for the school district in which the youth will enroll. [The district selects the specific school the youth will attend.] When the youth was a special education student, the LACOE representative also

notified the district's Special Education Office of the youth's upcoming release. The County's current level of performance meets the requirements of this part of Provision 73.

73-3 requires the County to collect and analyze data regarding the number of youth identified for early release. The County's self-assessment provides detailed information on the number of youth identified for early release. The Monitor discussed these same performance measures in Provision 17. The County's current level of performance meets the requirements of this portion of Provision 73.

Recommendations:

1. Revisit the timeline for performance measures around Case Plan initiation since the 21-day threshold likely overestimates the time needed for this task.
2. Continue oversight of PCMS Case Note entries to ensure all youth have weekly meetings with their caseworker that discuss their behavior and program involvement and that reinforce the concepts learned in various CBT programs. Ensure the Case Notes accurately reflect the richness of these discussions.
3. Continue to encourage caseworkers to have substantive, weekly contact with parents and to find new ways to engage parents in the decision-making regarding their children.

Evidentiary Basis:

- Site visits to all camps and DKC.
- Case presentations and review of PCMS Case Notes for 5 youth released just prior to the site visit to each of the 14 Camps (total sample = 70 youth).
- Conversations with Camp staff and DMH clinicians surrounding the programming delivered to youth, involvement of aftercare staff and the youth's performance once released
- Additional review of PCMS Case Notes and MDT Minutes for all Camp releases from May through October 2014.

73-4: Out of Camp Transition Services: The County shall ensure that a continuum of community-based services including, but not limited to, substance abuse treatment, mental health treatment, family support services, and educational services is available, as appropriate, to meet the needs of eligible youth in sufficient capacity consistent with the County's goals of ensuring the public safety and rehabilitation of youth.

- ***Probation community supervision services shall be provided by adequately trained Aftercare Transition Program Probation Officers at a level commensurate with the risk posed by youth transitioning into the community, who shall facilitate the service needs of youth and their families.***
- ***The community Aftercare Probation Officer shall:***
 - ***Participate in the pre-release transition planning process for the youth;***
 - ***Ensure that the transition plan is consistent with the youth's service needs;***
 - ***Conduct at least two pre-release meetings with the youth, including at***

least one face-to-face meeting where reasonably possible, or video conference where necessary, at least 21 days prior to the youth's release from Camp;

- *Coordinate with family or community placement for the youth to assure awareness of: anticipated date of release, the post release transition plan, and the youth's service needs;*
- *Facilitate the youth's reintegration into the community and collaborate with community service providers, including educational providers, and coordinate referrals to mental health providers;*
- *Conduct an in-person meeting with the youth and youth's family within three (3) working days after the youth's release from Camp;*
- *Conduct a home visit within 30 days after the youth's release from Camp; and*
- *Monitor and document, through regular face-to-face visits in the community, the youth's behavior and progress with both the transition plan and the case plan and provide intervention services as appropriate, which may include adjustments to the case plan to facilitate compliance with conditions of probation and rehabilitative efforts.*

County's Self-Assessment:

Camp Community Transition Program (CCTP)

During this period CCTP officers continued to complete the DPO Tracking form for youth released from camp to CCTP. CCTP officers participated in on-site and formal trainings regarding the required in-camp contacts. In July – December 2014, CCTP Manager's meetings were conducted to discuss strategies to ensure pre-release and post-release DOJ and Probation requirements continued to be fulfilled and identified where improvement was needed. The requirement remains that a CCTP officer unable to participate in the MDT process must notify their immediate supervisor in a timely manner, and all efforts are made to ensure that another CCTP officer can participate. Also, in November 2014, additional refresher trainings were conducted for *all* CCTP officers for appropriate PCMS case note entries and the completion of the Tracking form. During that time on-site training was also conducted at individual CCTP offices where internal audits identified needed areas of improvement. Caseload realignments and division of duties was implemented, along with the Department's efforts that began late 2013, to supply CCTP with additional vehicles and officer safety training, all combined to allow greater access to youth in camp.

Initial MDT participation has not matched the levels of Transitional MDT participation. However, it continued to rise monthly. Initial MDT participation continued to be a priority in the Department. In August 2014, the Department's *additional* requirements of Initial MDT participation and meeting with youth face-to-face within 30 days of camp arrival were introduced on the CCTP Tracking form. Subsequent training by CCTP SDPOs and constant monitoring in the form of internal audits of PCMS case notes and Tracking forms, have become regular operational work assignments. CCTP Manager's reported bi-weekly on their unit's compliance with the Tracking Form and other in-camp and post-release service objectives for administrative review. CCTP developed their own internal audits separate from the DOJ/QASB audits to assist

individual DPOs that need assistance reaching mandated Departmental aftercare goals. As seen in the Figure below, improvements in MDT participation continued to improve, or remained within expectations, on a monthly basis throughout 2014.

Figure 73-13

CCTP MDT Participation (Source: CCTP) (July – December 2014)

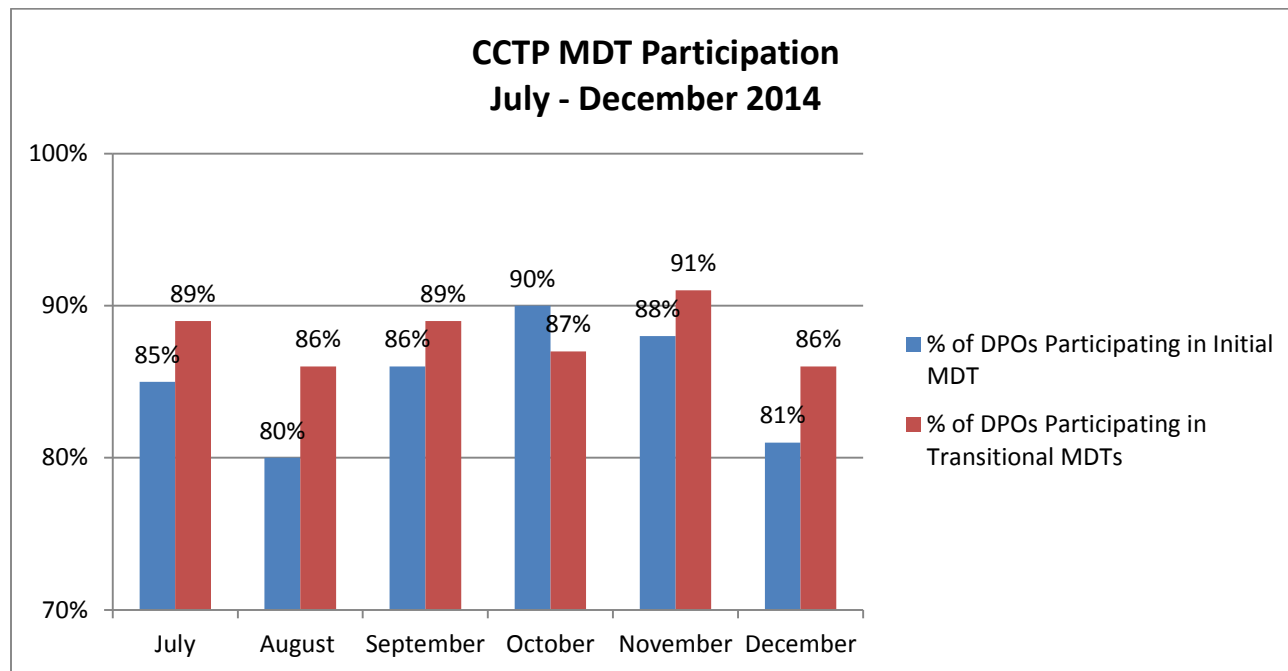


Table 73-9

CCTP MDT Participation (July – December 2014)

	July	Aug	Sept	Oct	Nov	Dec	Total
# of Initial MDTs	129	101	83	90	75	85	563
Participation (Initial)	110	81	71	81	66	69	478
# of Transitional MDTs	98	107	101	115	100	80	601
Participation (Transitional)	87	92	90	100	91	69	529

In October 2014, the audit tool was revised to include tracking of two (2) CCTP officer pre-release meetings, with at least one being face-to-face, and the aforementioned added Department requirements of I-MDT participation and meeting the youth within 30 days of camp entry (I-MDT included). Additionally, the tool was revised to capture data on youth released from camp to the community for at least two months, or sixty (60) days, to better capture the post-release meetings and follow-up on identified services for youth.

In November 2014 an audit of CCTP for July and August 2014 was completed (see **Table 73-16 and Figure 73-15**). There were improvements in all categories in comparison to the previous two months. The audits were conducted using the aforementioned revised tool. There were 130 youth released to, and remaining with, CCTP during the audit months. Of those, 90 met with CCTP within 30 days of camp entry as required by the Department (69%). However, in total, 113 youth had a minimum of two pre-release contacts with at least one being face-to-face to remain in compliance with Paragraph 73.4 expectations (87%). Additionally, the audits found there were 117 face-to-face meetings at least twenty-one days prior to release, which included the Transitional MDT (90%). Post-release contacts for July and August indicated that 128 of the 130 youth released to CCTP, were referred to support services in the community and/or mental health services (98%). In July, 60 out of 63 youth met with a DPO within 3 days post-release (95%) and in August it was 66 out of 67 (99%). Ninety-three of the 130 youth had home visits within 30-days of camp release (72%). Finally, 115 youth had two or more post-release meetings per month as required by CCTP (88%).

Audits conducted for September and October 2014 revealed a combined total of 125 youth released to CCTP. There was an increase in the Department requirement of meeting youth face-to-face within 30 days of camp arrival, as 97 of those youth were met by a CCTP DPO (78%). The Department remained in compliance and experienced a slight increase in the Paragraph 73.4 requirement of two pre-release meetings, with at least one being face-to-face. 113 of 125 youth had two pre-release meetings (90%). CCTP met with the youth at least 21 days prior to release 115 out of 125 times (92%) and all youth were referred to identified services post-release (100%). In September, 57 out of 59 youth met with a DPO within 3 days post-release (97%) and in October it was 65 out of 66 youth meeting within 3 days (98%). Of the 125 youth, 110 had home visits within 30 days post-release (88%). The Department requirement of two or more post-release meetings per month jumped to 123 out of 125 cases (98%). The previously mentioned trainings, equipment and additional supervisory oversight, along with monthly audits contributed to greater compliance with Departmental and Paragraph 73.4 aftercare requirements.

CCTP audits in November and December 2014 showed increases in every aforementioned category except for the slight decrease in the area of the Department-required meetings with youth within 30 days of camp entry. Of the combined total of 164 youth released to CCTP, 124 were met within 30 days of camp entry (76%). This may be attributable to the normal increase of staff vacations during these two audit months. However, of the 164 youth audited, 155 had two pre-release meetings (95%) and 153 had meetings with CCTP at least 21 days prior to release (93%). Post-release data for December 2014 was not completed due to the 60-day threshold for post-release youth not being met at time of reporting (see **Figure 73-15 and Table 73-10**). Although, in November 2014 the audit demonstrated all youth continued to be referred to identified service needs post-release (100%), 80 of the 82 youth released in November met with a DPO within 3 days of post-release and that same number had a home visit within 30 days (98%). All 82 youth released in November met the CCTP requirement of two or more post-release meetings per month (100%).

Figure 73-14

Percent of Youth Released (May – June 2014)

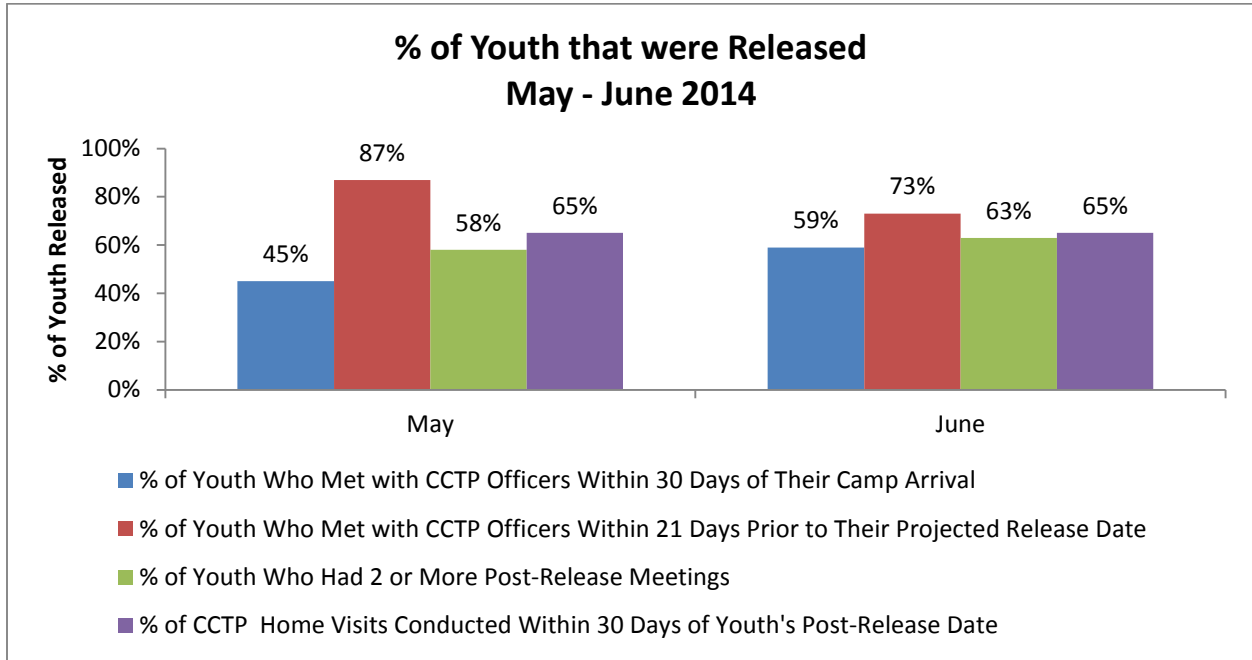


Figure 73-15

Percent of Youth Released (July – December 2014)

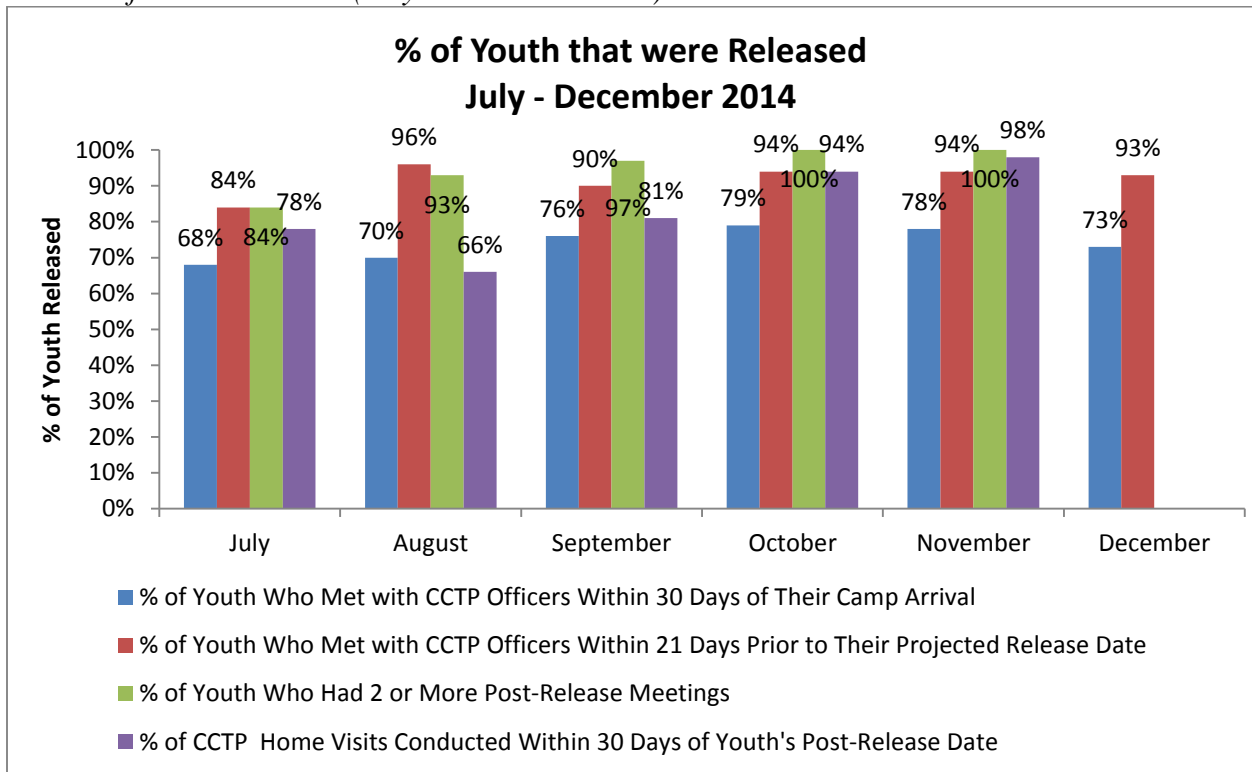


Table 73-10*Percent of Youth Released (July – December* 2014)*

Month	Total # of Youth Released	CCTP Officer met with Youth 30 Days of Camp Arrival	%	CCTP Officer met with Youth 21 Days prior to Projected Release	%	# of Youth who had 2 or more Post-Release Meetings	%	CCTP Conducted a Home Visit within 30 Days of Post Release	%
May	77	35	45%	67	87%	45	58%	50	65%
June	63	37	59%	46	73%	40	63%	41	65%
July	63	43	68%	53	84%	53	84%	49	78%
August	67	47	70%	64	96%	62	93%	44	66%
September	59	45	76%	53	90%	57	97%	48	81%
October	66	52	79%	62	94%	66	100%	62	94%
November	82	64	78%	77	94%	82	100%	80	98%
December	82	60	73%	76	93%	N/A	N/A	N/A	N/A

*December 2014 post-release aftercare data not available at time of reporting (60-day post-release aftercare threshold)

Intensive Gang Supervision Program (IGSP)

In July 2014, the IGSP draft audit tool was finalized. Additionally, in July 2014, IGSP approved the use of the CCTP DPO Tracking form for IGSP officers. Training by IGSP SDPOs and continued monitoring, in the form of internal review of PCMS case notes and Tracking forms, have become regular operational work assignments. Based on the smaller population of youth for this highly specialized caseload, the tool was revised to a quarterly audit. It reflects the youth released from camp, returning or transferred to IGSP within 30 days of release, and were in the community at least 60 days post-release.

Two quarterly audits for IGSP were completed during the reporting period. Audits for July – September and October – December 2014 (the 60-day minimum post-release requirement excluded post-release data for December 2014). While Paragraph 73.4 requires Aftercare DPO participation during the Transitional process, the Department is requiring participation in the I-MDT as well. The July – September quarterly audit revealed that of the 43 youth transferred or returning to IGSP, 17 youth were identified as needing IGSP either during the MDA or prior to the Initial MDT (I-MDT). Of those 17 youth only three had an IGSP Officer (non-CCTP) notified of the I-MDT (18%) and two of the three notified IGSP officers participated (67%).

There was significant improvement in the I-MDT notification process during the second quarterly IGSP audit for months October – December 2014. Of the 63 youth transferred to IGSP, 25 youth were identified as needing IGSP either during the MDA or prior to the I-MDT. Of those 25 youth, 15 had an IGSP Officer notified of the I-MDT (60%), and 10 of the 15 notified IGSP officers attended (67%). During the July – September quarterly IGSP audit, 44% of youth had a minimum

of two pre-release meetings. That percentage increased slightly during the October – December period to 49%.

During the I-MDT, CCTP officers continued to work closely with IGSP officers once IGSP services were identified as a need. The youth's behavior, as it related to gang activity in camp, as documented in PCMS by the Camp DPO, the CCTP officer's recognition of risk factors, and the IGSP officer's community-based field work continue to identify youth for the IGSP caseload well before they *return* to the community. However, the audits suggest the vast majority of newly identified IGSP youth are identified *after* their I-MDT and well after 30 days of camp entry. Some of the factors for this trend include differentiating between gang association and gang membership, as well as youth needing time to adjust to camp before revealing the spectrum of their negative behaviors. In the final quarter of 2014, a corrective action plan was developed so that the notification process will not only include RTSB and CCTP, but IGSP administration has dedicated two full-time staff to monitor the MDT calendar, Camp Placement Notices and camp entry date of IGSP-identified youth to ensure there is increasing I-MDT participation, two pre-release contacts and a face-to-face meeting within 30 days of entry.

The Transitional MDT (T-MDT) notification and participation of IGSP officers continued to exceed standards for both quarterly audits (July – September and October – December 2014). During the July – September audit period IGSP was identified as a need for 21 youth during the transition process prior to the T-MDT. IGSP was notified of the T-MDT 21 out of 21 times (100%) and participated in the T-MDT 20 out of 21 times (95%). During the October – December 2014 audit period, IGSP was identified as a need for 36 youth during the transition process prior to the T-MDT. IGSP was notified of the T-MDT 34 out of 36 times (94%) and participated in the T-MDT 33 out of 34 times (97%).

The July – September quarterly audit indicated that the Department requirement of three (3) post-release meetings per month, including at least one in the community, was completed 31 out of 43 times (72%). Although, 43 out of 43 youth met with an IGSP Officer within 3 days post-release (100%) as required by Paragraph 73.4, and 34 out of the 43 youth had a home visit within 30 days post-release (79%). The October – December quarterly audit did not include post-release data for December 2014, due to the 60-day threshold for post-release not being met at time of reporting. However, in October and November, IGSP continued to demonstrate significant increases in post-release categories for both the Department and Paragraph 73.4 requirements. In October 2014, 18 out of 20 youth met with an IGSP officer within 3 days post-release as required by Paragraph 73.4 (90%). By November, that increased to 17 out of 18 youth meeting within 3 days post-release (94%). Paragraph 73.4 requires a home visit within 30 days post-release and that occurred 15 out of 20 times in October (75%) and 16 out of 18 times in November (89%). In the area of Department required post-release meetings, 16 out of 20 youth released in October had three or more post-release meetings per month (80%). All 18 youth released in November met with an IGSP officer at least three times per month post-release (100%).

During the months of August – December 2014, IGSP conducted additional trainings regarding all in-camp services, most notably I-MDT participation and face-to-face meetings within 30 days of camp entry, as well as post-release meeting requirements. IGSP will develop protocols for I-MDT participation involving administrative review by SDPOs and immediate notification of

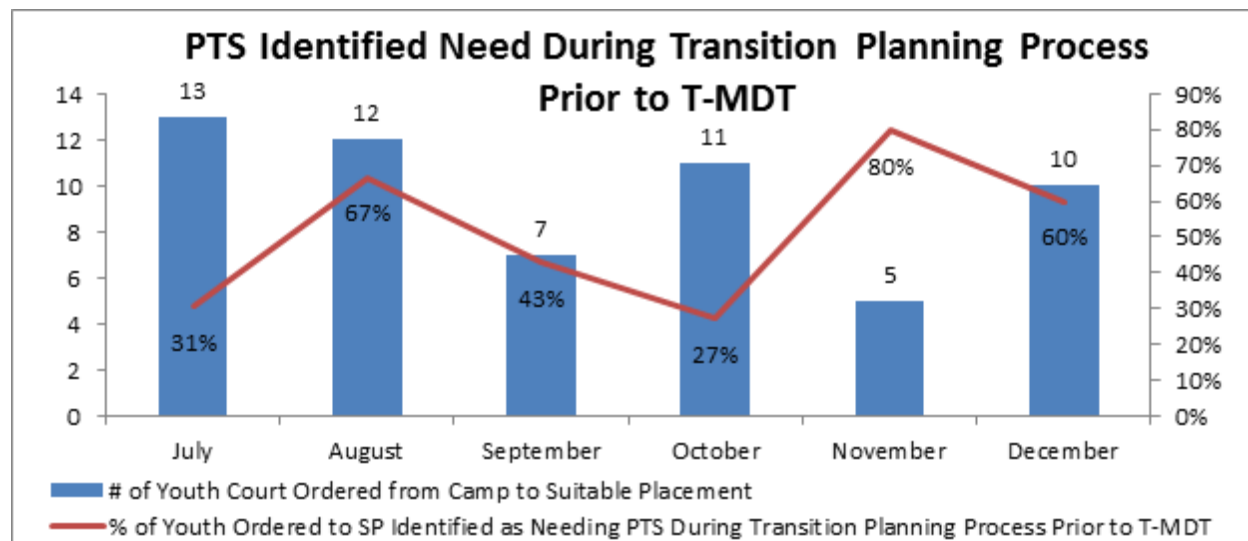
unavailability to participate by IGSP officers. IGSP and RTSB (Camps) will also increase collaboration (MDT calendar, IGSP-specific I-MDT notification procedures) to ensure IGSP officers are notified of the I-MDT in a timely manner.

Placement

Placement continued to exceed expectations in critical service-needs areas, once youth were identified as needing Placement Transition Services (PTS). In July 2014, the Placement – Residential Based Services (RBS) audit tool was revised to a quarterly audit (3 months) based on the amount of youth released from camp to Placement. The audit began to track participation in the I-MDT and two pre-release meetings, with at least one being face-to-face. Youth needed to be out of camp at least 60-days to capture post-release meetings and follow-up on identified services for youth. Audits were conducted for the months of July – December 2014 using PCMS case notes and the previously implemented PSB Transition Process Tracking (TPT) Form (2013). The data findings concluded that new Placement youth were identified well after the I-MDT and in some cases *after* the T-MDT. The general reason for this post-MDA and I-MDT identification of Suitable Placement is most often due to changes in the family’s ability or willingness to care for the youth, as youth near their projected release date.

Figure 73-16

Number of Youth Court-Ordered Suitable Placement from Camp (July – December 2014)



**Excludes cases transferred/terminated within 30 days of camp exit*

There were 58 youth Court ordered to Suitable Placement during the audit months (July – December) and none were identified as needing Placement services during the MDA or I-MDT. Therefore, a RBS DPO (non-CCTP) was not expected to participate in the I-MDTs. However, there were 28 youth identified as needing Placement Transition Services (PTS) during the Transition process or prior to the T-MDT. Of the 28 T-MDTs held, RBS officers were notified of 28 and participated in 28 (100%).

Of the 48 youth ordered to Placement (excluding the 10 youth in December 2014 due to 60-day post-release threshold not met at time of this reporting), 43 met with a RBS officer within 30 days

post-camp release (90%). It should be noted that the five youth who did not meet with a RBS officer within 30 days left (AWOL) Suitable Placement prior to their meeting and went to bench warrant status. Therefore, the RBS officer could not meet with them. Of the ten cases sampled (once again excluding December 2014) all youth were referred to or receiving services consistent with their identified needs (100%). Placement Managers and administration will continue to monitor the TPT forms and PCMS to address any low performance indicators in the future.

Discussion by Monitors:

The supervision of most youth released from camps falls within the purview of the Camp Community Transition Program. A portion of youth released to the community report to Probation Officers (POs) assigned to the schools the youth attend or, if they had been heavily involved in gang activity, to specialized gang POs. During most of the last monitoring period, for the purpose of providing the in-camp aftercare services, CCTP took the lead for all these youth. In addition, a small number of youth released from camps go directly to suitable placement in a group home or some other form of non-parental community setting. The aftercare POs (APO) for these youth are assigned to the Placement Unit. During this monitoring period each separate unit has been responsible for providing the aftercare services required by this provision for youth to be assigned to them at the conclusion of the youths' camp programs.

Prior to the addition of Paragraph 73, CCTP staff were not expected to participate in transition planning for youth until the Transitional MDTs, and then only if reasonably possible. If they were able to participate, it was generally by telephone. Now, aftercare POs are required to participate in, and take a greater role in the transition planning for those youth. In addition to the Transitional MDT, sub-section 73-4 requires aftercare POs to conduct at least two pre-release meetings with the youth (at least one of which is face-to-face, where reasonably possible, or by video conferencing if necessary) at least 21 days prior to their release dates. They are also required to coordinate with the youth's family (or community placement) to ensure that the family is aware of the release date, the transition plan, and the youth's service needs.

As noted in previous monitoring reports, the County committed to increasing the number of CCTP aftercare probation officers in an effort to reduce officers' caseloads to a point where they could become more engaged in the transition planning as required by this provision. Progress toward achieving the required level of engagement has been slow, hindered by old habits and expectations as much as by staffing. We are pleased to note that the corner has been turned, and that through managerial commitment, training, supervision, auditing, and better staffing levels, the aftercare component of this agreement has reached satisfactory compliance levels.

The Monitors reviewed PCMS Case Notes and MDT Minutes for 586 youth released from the camps between May and October 2014. The first month or two after release from camp are critical to a youth's successful transition into the community. The dates covered reflect the need to ensure that at least two full months of post-camp aftercare could be evaluated for compliance with the requirements of this Paragraph. The Monitors also reviewed the aftercare POs compliance with the pre-release meeting requirements. Of the 586 cases reviewed where youth were released from camps to aftercare, the required level of pre-release contact between the youth and the aftercare PO in the camps was observed to increase steadily from month to month. During the previous

monitoring report we noted that the required pre-release contacts had improved from 15% in the 10th monitoring period to 60% compliance in the 11th monitoring period. We also noted that while that represented a substantial improvement, it still fell short of the 80% compliance rate required by this MOA. We are pleased to report that during this monitoring period the compliance rate, which started at 66%, rose steadily through October, the last month we audited. In October the aftercare POs were meeting with 95% of the minors as required. [The level of participation by APOs during camp stays varied widely. Although the required minimum number of contacts occurred for an impressive 95% of the youth released in the final month reviewed, some APOs conducted many more than the required minimum number of contacts with the youth. That is an even more encouraging sign.] The County's current level of performance meets the requirements of this part of Provision 73.

Aftercare POs are also required to ensure that the families of youth about to be released from the camp system are aware of the anticipated release date and transition planning. This can be done at any time, but is probably easiest when the APO and family participate in the Transitional MDT, or when the APO conducts the pre-release home inspection. The PCMS case notes did not always clearly state if the discussions held at either the TMDT or the pre-release home inspection involved a discussion of the transition process, but this appears to be more of documentation failure rather than a compliance issue. It is also possible, however, to gauge compliance by reviewing the MDT minutes. If a family member participated in the Transitional MDT meeting where the release date and transition planning was discussed, then it is appropriate to find compliance with this requirement. Based upon or review of the case notes and minutes, during this monitoring period the documentation of family engagement in the transition plan rose steadily from 59% to 89% of youth released from the camps to aftercare. The County's current level of performance meets the requirements of this part of Provision 73.

73-4 requires that the APO conduct an in-person meeting with the youth and the youth's family within three working days of the youth's release from camp. Based the May through October PCMS case notes review, this occurred for 95% of the youth released to aftercare. The County's current level of performance meets the requirements of this part of Provision 73.

This provision does not set a minimum number of regular face-to-face visits the aftercare POs are required to have in the community to monitor youth behavior and progress, yet it is left to the Monitors to determine if the County is in compliance with the provision. The CCTP manual requires the aftercare PO to "Make contact with the minor and parent/caregiver per CCTP CASE MANAGEMENT STANDARDS. (Two times per month in person. At least one visit should be in the field.)" We concur with the County that a standard of one contact approximately every other week, or two times a month would be sufficient in the average case. Toward the end of this monitoring period we learned that both placement and the gang POs are only required to meet with the youth assigned to them once a month. Nonetheless, we based our compliance requirement on stricter twice a month minimum requirement.

Some of the case files reviewed by the Monitors were for youth who were released from formal probation at or shortly after release, some who were released to probation in other jurisdictions, and even some youth who violated their terms of probation and couldn't be found or were subsequently incarcerated. The compliance levels reported below represent only the files of youth

who remained in the aftercare system long enough for analysis. Although the files reviewed were for the youth released from camps between May and October, those dates were selected to allow the Monitors to assess aftercare contacts for a minimum of two months during this reporting period. So, for example, aftercare contacts with youth released in October were tracked from their release date through December 31.

The PCMS case note reviews documented an increase in aftercare PO compliance with the twice monthly meeting requirement from 71% for the May releases to 83% for the September and October camp releases. Those numbers reflect a substantial increase during this monitoring period, and bring the County into compliance with this requirement.

The case notes reviewed by the Monitors continued to be replete with entries related to referrals to community programs and providers as required by the individual case plans, contacts with the schools and other providers, and entries by providers that had access to the PCMS system. This part of this section is satisfactory.

Aftercare POs are required to conduct a home visit within 30 days of a youth's release from Camp. In the last monitoring report we found that in 26% of the files reviewed there was no documented home visit, and in 14% of the cases the home visit was outside the 30-day window, resulting in only a 60% compliance level where the home visit was timely conducted and documented as required. By the end of the current monitoring period the number of timely home visits increased to 84% of all youth released to aftercare who stayed in the aftercare system for at least 30 days. The County's current level of performance meets the requirements of this part of Provision 73.

The Department now has tracking forms that identify the key areas described above, and the auditing and reporting related to them is comprehensive and diligently monitored. This allows supervisors and managers to track compliance, and leads to corrective action where deficiencies are noted.

The County is in compliance with the requirements of this sub-section of Paragraph 73.

Evidentiary Basis:

- Review of PCMS Case Notes and MDT Minutes for all camp releases between May and October 2014.
- Meetings with the CCTP and DOJ/QA Directors and staff.
- Review of County audits and related documents.

73-5: Community-Based Alternatives to Incarceration: The County shall ensure the availability of, and referral to, a continuum of community-based alternatives to incarceration, in sufficient capacity throughout the County to serve all appropriate youth in their communities of residence, including, but not limited to, youth with disabilities and youth with mental health needs, to the extent reasonably possible, consistent with the County's goals of ensuring the public safety and rehabilitation of youth.

The County Probation Department shall ensure the availability of the following services to enhance youth's access to community-based alternatives:

- ***Probation services, in a range of supervision levels, commensurate with the risk posted by youth, and a sufficient number of adequately trained staff to facilitate the youth's case plan;***
- ***non-secure residential services, including supervised independent living programs, respite, specialized foster care, and group homes; and***
- ***three (3) individual Day Reporting Centers ("DRCs") to serve youth in the community. One (1) DRC is currently open and an additional two (2) DRCs will be opened.***

The County Probation Department shall take all reasonable steps to refer youth to community-based services that are outlined in a youth's case plan. Special efforts shall be made to address any specialized medical or mental health service needs and to establish medical benefits. Referrals shall include, but shall not be limited to, the following services or resources:

- ***Substance abuse treatment; mental health treatment, including crisis intervention services; family services; educational support, including school enrollment and GED services; employment support; vocational support; and services to meet the needs of youth with complex medical needs or developmental delays; and***
- ***Regional Occupation Centers and other similar centers.***

County's Self-Assessment:

The County continues to ensure that a sufficient continuum of community-based alternatives to incarceration, coupled with appropriate supervision and services, is available to serve all appropriate youth in their communities of residence. Community supervision options include, but are not limited to:

- **Juvenile Supervision** Deputy Probation Officers (DPOs) supervise juveniles placed on community-based probation supervision. DPOs assigned to designated communities provide case management services (e.g. assessment, orientation, contacts, service referrals, violations, court reports,) and work with minors, families, schools and other relevant resources to build on minor/family strengths, evaluate and make efforts to minimize risks and monitor compliance with court orders.
- **School Based Supervision** consists of programs that serve youth and families within the five Supervisorial Districts. The programs and services are funded through the Juvenile Justice Crime Prevention Act (JJCPA) designed to provide a full spectrum of community-based services to both probation and at-risk youth. The school based program consists of Deputy

Probation Officers (DPOs) assigned to High schools, Middle schools, Housing Developments and Park (afterschool enrichment) sites.

- Juvenile Dual Supervision (DS) Program supervises minors under the legal jurisdiction of the Department of Children and Family Services (DCFS), through Dependency Court who are placed on probation. Minors receive case supervision from both DCFS and Probation.
- 601 Intake Deputy Probation Officers (DPOs) are assigned to geographic areas that overlap existing field service area office boundaries. Intake DPOs are responsible for responding to referrals for minors exhibiting behavior problems such as incorrigibility, truancy, running away, and other pre-delinquent conduct. Referrals may be initiated by parents, schools, Probation, public, private or community agencies.
- Intensive Gang Supervision Program provides intensive supervision of gang identified probationers and aims to protect the community by closely monitoring a probationer's compliance with the terms and conditions of probation. IGSP Deputy Probation Officers (DPOs) work with school officials, community based organizations, the probation department's specialized units and law enforcement agencies.
- Camp Community Transition Program provides after-care services for youth transitioning from camp back into their own communities. The services begin prior to their release, followed by a 30 to 60-day intensively supervised transition period to ensure prompt school enrollment, community service and participation in selected programs provided by community-based organizations until termination.
- Division of Juvenile Justice Unit Deputy Probation Officers (DPOs) supervise juveniles placed on community-based probation supervision after being released from the State of California's Division of Juvenile Justice. DPOs assigned to this unit work closely with the Probation Departments Special Enforcement Operations to provide case management services (e.g. assessment, orientation, contacts, service referrals, violations, court reports,) and assist probationers in reintegrating back into the community.
- Residential-Based Services Deputy Probation Officers are responsible for case management and monitoring of youth ordered suitably placed by the Juvenile Court in placements. Seventy (70) RBS Deputy Probation Officers work with the youth and families to identify areas of strength and risk in order to develop appropriate case plan to ensure prompt reunification and/or permanency.
- Placement to Community Transition Services supports families as youth transition home from out-of-home care settings and provides intensive in-home supervision and treatment services utilizing Functional Family Probation (FFP) Supervision and/or Functional Family Therapy (FFT) and provides linkage to Wraparound Services. PCTS also provides these services to youth ordered "Home on Probation" in an effort to prevent eventual out of home placement.

- Youth Development Services and Extended Foster Care provides supportive services to transition age youth exiting foster care in an effort to provide foster care youth with the necessary skills, experiences, and assistance to ensure self-sufficiency, productivity and well-being.

The County utilizes several means to ensure that community resources are maximized for the treatment of youth, including but not limited to the following:

- Prospective Authorization and Utilization Review Unit (PAUR) Unit identifies appropriate EBP interventions, such as; Wraparound, Functional Family Therapy, Multi-Systemic Therapy, Family Preservation, Group Home Aftercare Services, Substance Abuse Prevention and Control Services, and Functional Family Probation, with the goal of referring the youth to these programs in lieu of removal from the home. These programs divert youth from incarceration and work with the youth's family to address the issues that are influencing the youth's delinquent behavior.
- Out-of-Home Screening (OOHS) Unit reviews recommendations of Deputy Probation Officers to remove youth from the community. This Unit ensures youth are referred to the least restrictive residential alternative appropriate to their risk and needs including: supervised independent living programs, respite care, specialized foster care, and group homes.
- High Risk/High Needs Home-Based Program provides for youth between the ages of 14 and 17 an intensive family-centered, home-based service intended to avert an ongoing escalation of criminal and delinquent behavior and to promote school success, to high-risk youth and their families. These support services are designed to effectively strengthen the family unit, while fostering parenting practices, promoting responsible youth behavior, and decreasing delinquent activities and recidivism.
- High Risk/ High Needs Employment Services Program offers services to youth between the ages of 16 and 18. The services are intended to increase job readiness and job placement/retention with an aim toward increased youth employment that can lead to successful career paths.
- Educational Pathways and Vocational Opportunity Services, for youth between the ages of 16 and 17, provides services to "credit deficient" probation youth before their eighteenth (18) birth date. The services are intended to increase the number of participants receiving their General Equivalency Diploma (GED) while completing a Career Technical Education (CTE) program.
- Substance Abuse Referral, Southern California Alcohol & Drug Program Services are for youth between ages 12 and 18, providing Outpatient Substance Abuse treatment that includes: random weekly testing, individual/group counseling, and an evidence based curriculum at locations throughout the County.

- Substance Abuse Treatment Program, as part of the Juvenile Justice Crime Prevention Act (JJCPA) is afforded to youth between the ages of 12 and 17. Youth are provided with the skills to resist continued substance abuse use and the associated negative behaviors with the goal of reductions in subsequent arrests, incarceration, and probation violations and an increase in completion of probation, restitution, and community service requirements, by participating youth.

The County has access to over 90 group homes, foster family agencies, and independent living programs within Los Angeles County, as well as outside the County and out of State. These Placements provide non-secure residential treatment programs for youth on probation, including specialized substance abuse and sex offender treatment programs.

Juvenile Day Reporting Centers

During this Monitoring Period, the County maintained the operation of the Van Nuys Juvenile Day Reporting Center (JDRC). Youth referred to the Van Nuys JDRC are between the ages of 14 to 17 and score medium to high risk on the Los Angeles Risk and Resiliency Check-Up (LARRC) risk assessment tool. An average of 15 youth participate in the six-week treatment program. During the school year, the program operates from 3:30 pm to 7:00 pm. During the summer, the program operates from 9:00 am to 3:30 pm.

The East Los Angeles Juvenile Day Reporting Center's (JDRC) Agreement was executed effective May 1, 2014, with an Orientation held for parents and youth on June 27, 2014. The East Los Angeles JDRC is fully operational with 25 youth enrolled as of December 2014. The East Los Angeles JDRC targets medium to high risk youth, ages 14 to 18. With a capacity of up to 60 youth, this JDRC offers a full academic program and the following services:

- Academic Credit Recovery
- Academic Counseling/Vocational Advisement
- Tutoring Services
- Linkages to Support Services
- Substance Abuse
- Mental Health
- Parenting Classes
- Gang Intervention
- Pro-Social Activities/Mentoring Services
- Restorative Justice

The existing school program, consisting of non-Probation youth, has been reduced at this location as Probation youth are phased in. Besides education and treatment services, youth at the East Los Angeles JDRC participate in cultural enrichment and sports activities. As Probation youth are stabilized academically and progress through other requirements, they will have the option to return to their traditional school.

The Lynwood Juvenile Day Reporting Center's Agreement was executed effective July 1, 2014. Prior to this date, an Orientation was held for parents and youth on June 24, 2014. The Lynwood JDRC targets medium to high risk youth, ages 14 to 18. With a capacity of up to 60 youth, this

JDRC offers a full academic program, mental health, substance abuse and cognitive treatment services. The Lynwood JDRC is fully operational with 36 youth enrolled as of December 2014. Besides education and treatment services, youth also have the opportunity to participate in positive pro-social activities such as an artist in residence program and sports activities.

Discussion by Monitors:

A review of case notes and files of youth released from camps in both the prior and current reporting periods, discussions with aftercare officers assigned to Gang, CCTP and Placement units, and site visits to the Boys Republic and Optimist group homes during the previous monitoring period confirms that youth continue to receive a full range of services upon their transition into the community or a placement facility. PCMS case notes document referrals for individual and family services, to programs to meet individual youth's needs, as well as to programs designed to increase the youths' skills and/or job opportunities. The services they receive appear to be consistent with those identified in their Transitional MDTs and case plans, and are modified based on their progress and emerging needs. The County's current level of performance meets the requirements of this part of Provision 73.

During this monitoring period, the County continued to operate a Juvenile Day Reporting Center (JDRC) in Van Nuys, and fully opening two additional JDRCs in East Los Angeles and Lynwood. Members of the monitoring team visited the two newly opened sites in ELA and Lynwood, had an opportunity to speak with the Directors, staff and students, review materials being used in the classrooms, and were briefed on the programming that is being offered at each facility. The ELA and Lynwood JDRCs offer comprehensive educational services, include youth and family support services, and utilize direct services and referrals as needed to each youth. Although each JDRC's maximum capacity for full time instruction is currently estimated to be 60 youth on probation, we were told that the number could be increased. Each of these facilities is also capable of taking additional youth for afternoon programming. The Van Nuys JDRC can offer similar programming, but no school component, to approximately 30 youth. All sites provide transportation services for the youth.

At this time, the County is in compliance with the requirements of this sub-section of Paragraph 73.

Evidentiary Basis:

- Meetings with Gang, CCTP and Placement DPOs, Directors supervisor, managers and staff.
- Meetings and discussions with Probation Department managers and executives.
- Review of files, MDT minutes and PCM notes for all youth released from Camps to aftercare between May and October.
- Site visits to the ELA and Lynwood JDRCs.

73-6: External Partnership: The County agrees to engage an external research entity to conduct a longitudinal study and develop baseline data tracking systems to assist in evaluating systemic outcomes for youth. This collaboration is intended to improve the timeliness, coordination, and effectiveness of Probation services for youth who come in contact with the juvenile justice system, and their families. The study shall assess youth outcomes in both Camp and alternative settings.

At a minimum, the study shall assess the following factors:

- ***One-year recidivism/arrest rates; school graduation rates or GED achievement; employment; substance abuse treatment service availability and participation; drug-testing participation and results; stability of living situation, including family relationships; and youth self-reports regarding success in his/her home community, which may include self-reported drug use in the community.***
- ***The role of aftercare in youth's post-placement experience, including ways to enhance the design and resources of the aftercare system.***

The study shall identify gaps in capacity and services to youth that may contribute to youth being committed to the Probation Camps.

The study shall identify solutions and best practices to overcome or reduce identified obstacles or gaps in service delivery to optimize effective rehabilitative opportunities for youth in their home communities.

County's Self-Assessment:

On March 4, 2014, the Agreement between the County of Los Angeles and California State University, Los Angeles (CSULA) for the Program Outcome Study was executed. The purpose of the Study is to assess the level of services received by each youth and their performance on indicators such as recidivism, education, behavioral health status and employment. The County continues to cooperate with the terms of the Agreement by providing ready access to all data, documentation, and staff needed to move forward with the Study. During the Eleventh Monitoring Period, CSULA completed the collection and analysis of data on the 500 youth that exited placement (250 youth) and camp (250) in 2011. During the Twelfth Monitoring Period, CSULA completed a draft report on the youth released in 2011 and has presented the findings to several stakeholder groups. On December 16, 2014, the CSULA Lead Researcher for the Probation Outcome Study presented the findings to the Monitors during a meeting. Data collection and information technology system enhancements relative to the 2014 Agreement are currently ongoing.

Discussion by Monitors:

In March the County finalized its Agreement with California State University, Los Angeles (CSULA) for the Program Outcome Study intended to satisfy the requirement of this section. Monitors again met with Dr. Denise Herz of CSULA and discussed the scope, intent, and progress to date of the study. Dr. Herz provided the Monitors with a short explanation of some of the preliminary findings, and some information on what work remained to be completed. Dr. Herz

also confirmed that all the data, records, and assistance requested of the County by those involved in the study are being provided in a timely manner. The study will culminate in a full report, and meetings to explain and explore the findings with the County. Dr. Herz indicated that she will be available to discuss the study with all parties to the agreement as requested.

At this time, the County is in Substantial Compliance with the requirements of this sub-section of Paragraph 73.

Recommendations:

- Continue to provide the data and access required to allow CSULA to comply with the terms of the Delegated Authority Agreement for the Program Outcome Study.

Evidentiary Basis:

- Review of the executed Delegated Authority Agreement.
- Meetings with Dr. Herz and Probation executive and management staff.

73-7: Quality Assurance: The County shall develop and implement a quality assurance monitoring tool to assess compliance with items 1-5 of paragraph 73, and shall take steps as appropriate to overcome or reduce any identified obstacles or gaps that prevent it from serving all otherwise qualified youth in their home communities.

County's Self-Assessment:

Audit Performance Expectations

During the Twelfth Monitoring Period, Paragraph 73 audit tools continued to be used to monitor Intake and Detention Control (IDC), Camps Assessment Unit (CAU), Out of Home Screening Unit (OHS), Camps, Camp Community Transition Program (CCTP), Placement Services Bureau, and Intensive Gang Suppression Program (IGSP). Every Paragraph 73 tool was subject to review and revision during this audit period to adjust to all programmatic changes, and to ensure the concerns of the operations managers and the Monitors were addressed. As needed changes to the tools will continue to occur to ensure appropriate collection of data as additional Tracking Logs, Forms, and Databases are created and/or modified throughout the various operations to continue to comply with Paragraph 73. Performance expectations are in place for all programs and operations associated with the Paragraph 73 continuum of care. Due to the unique nature of the Paragraph 73 audits in which it is possible to have performance expectations for two different operations/camps on one tool (P73.3), there will be processes to ensure that each operation receives the pertinent data to improve their services. If an operation does not meet audit expectations, auditors will notify and meet with the operation Manager to develop corrective measures to achieve those expectations during the next audit period. The corrective measures will then be documented on the audit tool to be reviewed by the auditors for progress in the following audit months.

Continuous Monitoring System

Since the last Self-Assessment Report, a new Continuous Monitoring System (CMS) has been developed by the DOJ/Quality Assurance Services Bureau as noted in Paragraph 47. The system is designed to monitor ongoing data such as audit compliance rates, or any other data that the Department chooses to monitor and improve. Control charts in the system are used to plot incoming data and to identify anomalous trends that require inquiry or corrective measures. The goal is to provide continuous process improvement by establishing performance expectations, monitoring data, developing corrective action plans, increasing collaboration between units, conducting recommendation reviews, and establishing accountability. The system is planned to be fully implemented at the beginning of 2015.

Once audit results and program measures have been collected, the data will be entered into the monitoring system. As data are entered, control charts in the system will automatically update and display any anomalous occurrence or trend. Each operation and facility will have a monitoring system file with audit and program data that will be monitored and maintained by DOJ/Quality Assurance Services Bureau. If an anomalous program trend or consistent difficulty in meeting audit expectations is identified, a collaborative meeting will be held between the monitoring reviewers and the facility director to discuss possible causes for the trend or anomaly.

If necessary, a process-related review will be conducted to thoroughly examine program processes for barriers and possible areas for improvement. This review will consist of data collection and data analysis with a report consisting of findings and process recommendations. A widely known and used quality control tool will be used to assist with accurate problem identification. The Fishbone diagram, also known as the cause and effect diagram, will be used to review potential variables that may be producing unfavorable program results. These variables include Manpower (staff), Milieu (environment), Method (process), Materials (documents, etc.) and Machine (technology). After careful review of these variables and collected data, a findings report with process recommendations and corrective action plan will be submitted to the facility director. The specifics of the corrective action plan will be at the discretion of the facility director regarding implementation timeframes and people responsible for implementation.

To ensure accountability and implementation of recommendations, a recommendation review will be conducted at a specified time after the corrective action plan has been agreed upon. The recommendation review may consist of a site visit, process observation, file review, or interviews to determine if recommendations were implemented and the current progress. Feedback will be provided to facility director and documented.

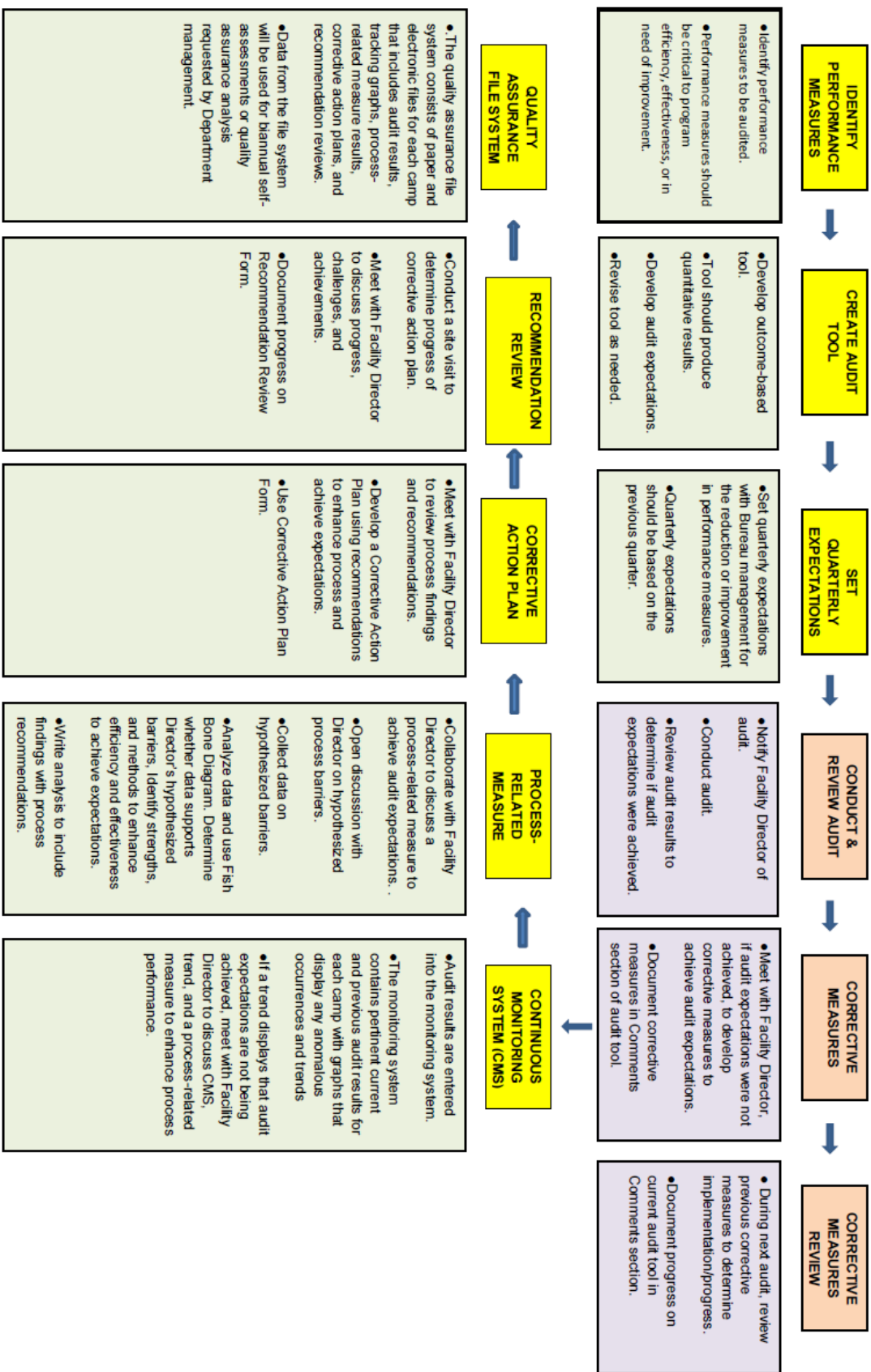
A Quality Assurance File System will be created and maintained for future references. The comprehensive file system will consist of audit results, CMS control charts, process-related reviews, corrective action plans, and recommendation reviews. The data from the file system will be used for biannual self-assessments or quality assurance analysis to identify process barriers, type of intervention taken, and process progress.

Enhancing Efficiency

The results from the Continuous Monitoring System may also be used to enhance efficiency. Camps meeting all expectations in all audit areas for a time period of three months may not require

monthly auditing, rather a quarterly audit review. Graduating a camp to a quarterly audit after demonstrating exemplary audit results for a three month period would allow staff to assist camps in need, as identified by CMS. Staff would be able to conduct process-related reviews and problem identification at camps that have had difficulty meeting audit expectations. This would ensure the eventual graduation of all camps in meeting expectations and transitioning to a quarterly audit. The quarterly audit would consist of a random review of audit data from the auditing quarter. If a camp should not meet quarterly expectations, assistance would be provided where needed, or, the camp may return to monthly auditing if required. The CMS would ensure that the camps graduated to quarterly audits are still monitored during the period to prevent issues from developing and remaining unchecked until the next audit.

COMPREHENSIVE QUALITY ASSURANCE AUDIT PROCESS



Discussion by Monitors:

While the County has a comprehensive audit tool and process for collecting data related to the implementation of the LADS (73-1), the structure of the self-assessment suggests that the protocol for interpreting these data may need additional attention. Most significantly, the self-assessment appears to misstate the generally accepted practice for the use of overrides in objective risk assessment. The self-assessment indicates that no more than 15% of the youth screened by the LADS should be subject to a discretionary override. The research, however, suggests that no more than 15% of the youth screened by an instrument should be subject to any type of override. While the self-assessment reports the data on the large proportions of youth whose LADS scores are overridden by Mandatory Detention and Probation Policy criteria, it does not place these results in a context of an appropriate override rate. The current practice surrounding Mandatory, Probation Policy and Discretionary overrides results in upwards of 80% of the low- and medium-risk youth being detained. This important point is obscured by the way the data are presented and interpreted in the self-assessment. In the discussion of 73-1, the Monitor suggests a template for monthly monitoring of LADS audit data that will highlight the serious implementation issues that currently plague the LADS, so that the County can accurately track the progress being made as it resolves the various issues.

The audit tools for the in-camp transition services are appropriate to the task--they track the key indicators of APO participation and the extent to which youth's transition plans are fully underway before they are released. Data are interpreted and presented in a coherent fashion. The Monitor's only recommendation is to present data by camp, rather than by region, as the Monitor noted important differences among the camps within each region that could be obscured by collapsing them all together.

During this monitoring period the tracking and audit tools for the aftercare portion of this Paragraph were completed and then refined based on input from the Monitors. The tools are now fully implemented and are being utilized to ensure proper quality assurance. The County's current level of performance meets the requirements of this part of Provision 73.

Recommendations:

1. Consider the revisions suggested for audit tools 73-1 and 73-3, as described above.

Evidentiary Basis:

- Review of tracking and audit tools, and subsequent audits performed.

Paragraphs in Full Compliance Monitoring Completed

[NOTE: The County's self-assessments for the closed Paragraphs can be found at the conclusion of each of the following groupings: Paragraphs 9 – 24, 25 – 32, 33 – 46, and 58 – 59.]

Paragraph 9: Protection from Abusive Institutional Practices

The County shall cease use of practices such as “slamming” or “assuming the bob-sled position” for punitive or abusive purposes.

Status: Full Compliance (effective 12/31/12)

Paragraph 10: Uses of Force

The County shall develop and implement a comprehensive policy and accompanying practices governing use of force, ensuring that the least amount of force necessary for the safety of staff, youth residents, and visitors is used on youth.

Status: Full Compliance (effective 12/31/12)

Paragraph 11: OC Spray

The County shall develop and implement policies, procedures, and practices to restrict the use of oleoresin capsicum (OC) spray to appropriate circumstances, enable supervisors to maintain appropriate controls over spray use and storage, restrict the carrying of OC spray to only those individuals who need to carry and use it, prevent wherever possible the use of OC spray on populations for whom its use is contraindicated or contrary to doctors' instructions, and ensure that decontamination occurs properly.

Status: Full Compliance (effective 2/27/12)

Paragraph 12: Use of Force Review

The County shall develop and implement a system for review of uses of force and alleged child abuse by senior management so that they may use the information gathered to improve training and supervision of staff, guide staff discipline, and/or make policy or programmatic changes as needed.

Status: Full Compliance (effective 10/31/12)

Paragraph 13: Threats and Intimidation

The County shall ensure that staff at Probation Camps do not threaten or intimidate youth who report abuse or mistreatment.

Status: Full Compliance (effective 3/30/12)

Paragraph 14: Consumption of Alcohol By Staff

The County shall ensure that staff at the Probation Camps do not maintain or consume alcohol at the Camps.

Status: Full Compliance (effective 2/27/12)

Paragraph 16: Orientation

The County shall ensure that all youth, including those who are disabled or Limited English Proficient, receive orientation sufficient to communicate important information such as how to access the grievance system, medical care and mental health services, or report staff misconduct.

Status: Full Compliance (effective 11/29/11)

Paragraph 18: Staff Training and Supervision of Youth

The County shall ensure that staff who work with youth residents have the knowledge and skills needed to effectively manage youth, including de-escalation techniques, crisis intervention, youth development, and supervision.

Status: Full Compliance (effective 10/31/12)

Paragraph 19: Reduction of Youth on Youth Violence

The County and LACOE shall develop and implement strategies for reducing youth on youth violence that includes training staff in appropriate behavior management, recognition and response to gang dynamics, and violence reduction techniques.

Status: Full Compliance (effective 12/31/12)

Paragraph 20: Child Abuse Reporting

The County shall develop policies, practices and procedures to define those circumstances in which staff must report allegations of child abuse or neglect to the appropriate external agencies.

Status: Full Compliance (effective 10/31/12)

Paragraph 21: Child Abuse Investigation

The County shall develop and implement a system for the timely, thorough, and independent investigation of alleged child abuse. Staff who are the subject of an allegation of child abuse shall be removed from direct youth supervision pending the outcome of the referral or investigation.

Status: Full Compliance (effective 10/31/12)

Paragraph 22: Classification

The County shall develop and implement a classification system that considers factors including youth age, committing offense, gang affiliation, delinquency history and treatment needs to reasonable ensure that youth are safety placed within the Probation Camps, and provides for reclassification in appropriate circumstances.

Status: Full Compliance (effective 10/31/12)

Paragraph 23: Grievance System

The County shall develop an effective grievance system to which youth have access when they have complaints, ensure that grievances may be filed confidentially, and ensure that they receive appropriate follow-up, including informing the author of the grievance about its outcome and tracking implementation of resolutions. The County shall ensure that the grievance system provides youth with a safe avenue to report abuse, staff misconduct, or unfair treatment.

Status: Full Compliance (effective 2/27/12)

Paragraph 24: Youth Movement Between the Probation Camps or Between the Probation Camps and the Los Angeles County Juvenile Halls

The County shall ensure that movement of youth residents between facilities does not interfere with ongoing testing or provision of medical, mental health, or educational services at the camps, unless court proceedings, treatment, or security needs require such movement.

Status: Full Compliance (effective 10/31/11)

County's Self-Assessment (Paragraphs 9 – 24):

On-going Quality Assurance Measures

The County continues to collect data for key performance indicators including but not limited to youth-on-youth violence, youth-on-staff violence, self-harming behaviors, use of force (physical and chemical), special incident reporting of major rule violations and child abuse, and searches (facility, youth and staff). The data captured is monitored for trends as has been discussed in other sections of the Self-Assessment. Furthermore, the Early Intervention System which was designed to identify and monitor staff having difficulty is still in use. The system assists staff with adapting to the various stressors present with working in institutions thereby reducing the likelihood of child abuse. Although these paragraphs are no longer in monitoring the key performance indicators are relational to the overall success of the camps. The Continuous Monitoring System as stated in Provisions 47 and 73, as well as, continued auditing ensures that the conditions of confinement in the camps are maintained as implemented while under Department of Justice monitoring.

Safe Crisis Management Audits

The Probation Department continues to monitor practices in the camps to ensure the safety and security of the youth and staff. There are various checks and balances in place at various levels within the Probation Department. Safe Crisis Management Packets are prepared as previously implemented in accordance with the provisions of this section. Supervisors continue to assess youth for injuries and suspected child abuse to ensure that the level of force used was necessary and appropriate. All relevant affidavits, Physical Intervention Reports, Youth Questionnaires, Youth-on-Youth Violence Contracts, camp schedules and other documents are placed in packets, and summarized by an administrative reviewer. The administrative reviewer conducts an investigation into any subsequently noted gaps or issues, informs the manager and forwards the document to the appropriate parties such as the DOJ/Quality Assurance Bureau or Internal Investigations Office for additional review or investigation.

The DOJ/Quality Assurance Bureau performs a cursory audit of the packet capturing various data for tracking and monitoring. A formal audit is required if the auditor notes any of the following in their cursory audit:

- A minor has made an allegation against a staff (physical & verbal) and it is not addressed properly;

- Staff-to-minor ratio is not met;
- A minor is taken to the hospital due to the restraint and not the preceding events;
- Handcuffs, flex cuffs, leg irons are on the minor for more than 15 minutes, and it is not justified in the report;
- A referral to the Internal Investigations Office is declined and the allegation has not been fully addressed by the camp; or
- Soft Restraints are used.

Quarterly Audits

The DOJ/Quality Assurance Bureau has moved to quarterly auditing of the closed paragraphs to obtain data on performance measures which are otherwise not populated under the key performance indicators discussed previously. Samples of Orientation and Intake/Assessment Packets are audited for completeness. As the quality of the Intake and Assessment packet is important to the well-being of a youth's adjustment to the community, the samples are further scrutinized for the appropriateness of assessed needs; and whether age, special needs, mental health and type of housing were considered. The number of Grievances are captured for the quarter and audited for access to forms and drop-boxes with policy and procedures posted. The number of suspected child abuse referrals and duration of investigations is also captured in the audit. Trends with the number of grievances and suspected child abuse referrals can be monitored and analyzed to provide management with a picture of the perceived camp culture by the youth. Data is also captured for Youth Movement between the Probation Camps and Juvenile Halls which can be used in a trend analysis once it is determined to be relational to an issue occurring in the camp (i.e. drug use in camp vs. high volume of youth exiting camps for short periods – Are staff properly searching youth upon return?). Additionally, the camps have been doing an excellent job of providing make-up sessions to youth who have missed services due to movement. The Intervention Tracking Log has been instrumental in organizing rehabilitative service attendance to ensure that movement does not interfere with the youths' educational and rehabilitative well-being.

A majority of the camps have maintained documentation in the centralized files previously organized while the provisions were in monitoring. It was expected that some camps experiencing loss of staff and influxes of inexperienced staff may not be up to par with filing. However, their willingness to cooperate and corrective actions are proving to effectively address any of the procedural filing issues that have arisen. The initial quarterly audits of the documentation shows that the camps continue to be in compliance with the policies, practices and procedures set forth in the Paragraphs.

Paragraph 25: Development and Implementation of [Suicide Prevention] Policy

The County shall develop and implement adequate policies, procedures and practices related to suicide prevention.

Status: Full Compliance (effective 10/31/11)

Paragraph 26: Assessment

The County shall ensure that licensed mental health professionals provide timely assessment and daily reassessment of youth deemed at risk for suicidal behaviors, or more frequent reassessment as appropriate, as well as appropriate follow-up assessment once youth are discharged from suicide precautions.

Status: Full Compliance (effective 4/30/12)

Paragraph 27: Management of Suicidal Youth

The County shall develop and implement policies, procedures, and practices to ensure that mental health staff is sufficiently involved with probation and education staff in the management of youth exhibiting suicidal behaviors, including creation of individual behavior modification programs, and decisions about appropriate clothing, bedding, and housing.

Status: Full Compliance (effective 10/31/12)

Paragraph 28: Care for Self-Harming Youth

The County shall develop a continuum of services and responses to meet the needs of self-harming youth, including revised supervision practices to minimize incidents of self-harm, and appropriate access to hospital services and specialized residential facilities.

Status: Full Compliance (effective 10/31/12)

Paragraph 29: Documentation of Suicide Precautions

The County shall develop and implement policies, procedures, and practices to ensure that the following information is thoroughly and correctly documented, and provide information to all staff who need to know such information: a) the times youth are placed on and removed from precautions; b) the levels of precautions on which youth are maintained; c) the housing locations of youth on precautions; d) the conditions of the precautions; and the times and circumstances of all observations by staff monitoring the youth.

Status: Full Compliance (effective 10/31/12)

Paragraph 30: Supervision of Youth at Risk of Harm

The County shall sufficiently supervise youth newly assigned to a Camp, youth in seclusion and other youth at heightened risk of self-harm to maintain their safety.

Status: Full Compliance (effective 10/31/12)

Paragraph 31: Suicide Precautions for Youth Pending Transfer to Another Facility

The County shall develop and implement policies, procedures and practices to ensure that adequate suicide precautions are provided to youth who are awaiting transfer to another facility for assessment.

Status: Full Compliance (effective 10/31/12)

Paragraph 32: Training (Suicide Prevention)

The County shall ensure that all Camps staff who work with youth are sufficiently trained in suicide prevention so that they understand how to prevent and respond to crises, including practical matters such as location and use of a cut-down tool in the event of a youth's attempted hanging.

Status: Full Compliance (effective 10/31/12)

County's Self-Assessment (Paragraphs 25 – 32):

Various paragraphs in this section ensured that gaps in policies and procedures were addressed to prevent youth suicides and self-harming behaviors. The policies, procedures and practices were implemented and are still in use. Regular training of all camp staff continues to reinforce the preventative measures introduced. As stated in the previous section, the county maintains the quality of conditions in the camp by collecting data on key performance indicators and through quarterly audits. Data is collected regarding the number of youth assessed and assigned to enhanced supervision. The camps are further audited to ensure that special handling requirements are being documented and the youth are under the active care of the Department of Mental Health. Furthermore, Self-harm folders, Mental Health Logs, and Safety Check Sheets are scrutinized. Data is collected and reviewed for the documentation of youth awaiting transfer to another facility for assessment.

As discussed in the Paragraph 17 Dialectical Behavior Therapy (DBT) section, self-harming behaviors are monitored and analyzed for trends. DBT was specifically introduced in camps

populated with youth who have histories of self-harming behavior and appears to be an effective rehabilitative service. The Departments of Mental Health and Probation actively collaborate to ensure the safety of the youth.

Paragraph 33: Staffing (Mental Health)

The County shall staff the Probation Camps with sufficient qualified mental health professionals to meet the serious mental health needs of the Camps' population. Staff shall be sufficient to screen incoming youth; complete specialized mental health assessments; timely and accurately diagnose mental illness, substance abuse disorders, and mental retardation; provide ongoing treatment; respond to crisis situations and provide follow-up care in a timely manner; coordinate with other staff to meet youths' needs; monitor youth on psychotropic medication; track laboratory results; and develop treatment plans where appropriate.

Status: Full Compliance (effective 10/31/12)

Paragraph 34: Screening

The County shall develop and implement policies, procedures, and practices for initial mental health screening to allow the identification of previously diagnosed and potentially existing mental health or substance abuse disorders, including potential suicidality. Such screening shall take place within 48 hours prior to the youth's delivery to a Camp, or within 24 hours after a youth's arrival at a camp.

Status: Full Compliance (effective 2/27/12)

Paragraph 35: Assessments

The County shall develop and implement policies, procedures, and practices for mental health assessments to timely and accurately diagnose mental illness, substance abuse disorders, and mental retardation, including potential suicidality. The County shall ensure that youth whose serious mental health and developmental disability needs cannot be met at the facility are transferred to settings that meet their needs.

Status: Full Compliance (effective 10/31/12)

Paragraph 36: Identification of Previously Unidentified Youth With Mental Disorders

The County shall develop and implement policies, procedures, and practices consistent with generally accepted professional standards of care to identify and address potential manifestations of mental or behavioral disorder in youth who have not been previously identified as presenting mental health or behavioral needs requiring treatment.

Status: Full Compliance (effective 10/31/12)

Paragraph 37: Recordkeeping

The County shall develop and implement a system to provide for adequate tracking of laboratory results and response to medication including side effects, adequate documentation of mental health services, including adequate tracking to identify youth receiving mental health services, and youth on psychotropic medications, and compilation of complete records. The system shall include documentation of the goals of mental health counseling and progress toward those goals. The County shall ensure that the mental health records for youth transferred from the juvenile halls to the Probation Camps are timely forwarded from the juvenile halls to the Probation Camps.

Status: Full Compliance (effective 12/31/12)

Paragraph 38: Training and Supervision of Mental Health Care Clinicians

The County shall provide ongoing training for, and adequate supervision of, mental health care clinicians at the Probation Camps.

Status: Full Compliance (effective 10/31/12)

Paragraph 39: Evaluations and Treatment

The County shall ensure that all youth referred as possibly needing mental health services are evaluated and treated in a timely manner.

Status: Full Compliance (effective 10/31/12)

Paragraph 40: Treatment Planning

The County shall develop and implement policies, procedures, and practices for interdisciplinary treatment planning for youth with serious mental health needs, which allow for the ongoing identification, goal setting, and monitoring of youths' target symptoms.

Status: Full Compliance (effective 10/31/12)

Paragraph 41: Implementation of the Treatment Plan

The County shall develop and implement policies, procedures, and practices for case management, which would allow for the implementation of the treatment plans and ensure that treatment planning follows each youth from facility to facility.

Status: Full Compliance (effective 10/31/12)

Paragraph 42: Counseling Services

The County shall develop and implement policies, procedures, and practices to ensure the availability of sufficient and adequate counseling services that meet the goal of ameliorating target symptoms of identified mental illness.

Status: Full Compliance (effective 6/30/12)

Paragraph 43: Substance Abuse

The County shall develop and implement policies, procedures, and practices to address substance use disorders appropriately. The County agrees to take the following steps:

Identify youth with substance abuse disorders. Ensure that youth who (1) have a confirmed substance abuse diagnosis/disorder or (2) are otherwise identified as needing substance abuse treatment, receive substance abuse treatment. If a youth refuses treatment, the County shall document the refusal and make reasonable attempts to re-direct the youth back to treatment. Reevaluate for a substance abuse disorder/diagnosis any youth who has not been identified as having such a disorder/diagnosis, upon determination that the youth falls into one of the following categories: youth has a positive screening on the substance abuse scale of any screening or assessment measure used by the County; youth self-reports a significant history of substance use; youth has used illegal drugs at the Camps or in County custody; and/or youth has been referred for substance abuse treatment by staff. Ensure that each Camp offers evidence-based substance abuse treatment services or programs by: identifying the evidence-based treatment service or program to be used at each Camp; implementing the service or program at each Camp; and ensuring that the service or program has sufficient capacity to ensure that all eligible youth at each Camp may participate. Take reasonable steps to prevent youth from having access to illegal drugs at the Camps.

As part of its evaluation to determine whether the implementation of paragraph 43, as amended, is addressing the substance abuse treatment needs of youth and contributing to improved conditions, the Monitoring Team shall consider the following factors, as appropriate: the number of incidents of youth previously treated for substance abuse treatment at the Camps who subsequently use illegal drugs at the Camps; progress toward meeting substance abuse treatment-related goals, as determined by the MDT; number of youth referred for substance

abuse treatment; number of youth who complete substance abuse treatment programming; results of County-administered pre- and post-tests regarding substance abuse.

Status: Full Compliance (effective June 13, 2014)

Paragraph 44: Monitoring of Psychotropic Medication

The County shall develop and implement policies, procedures and practices to ensure that psychotropic medications are prescribed, distributed, and monitored properly and safely.

Status: Full Compliance (effective 10/31/12)

Paragraph 45: Staff Understanding of Mental Health and Developmental Disability Needs

The County shall ensure that all staff working with youth residents have the skills and information necessary to understand behaviors of, engage in appropriate interactions with, and respond to needs of youth with mental illness and developmental disabilities.

Status: Full Compliance (effective 10/31/12)

Paragraph 46: Discharge Summaries

The County shall provide aftercare planning and discharge summaries for youth leaving the facility who have, or have had, open mental health cases at a Camp to facilitate treatment in future placements.

Status: Full Compliance (effective 2/27/12)

County's Self-Assessment (Paragraphs 33 – 46):

The County continues to provide enhanced levels of adequately trained Department of Mental Health clinicians at the camps. As stated in previous sections of the Self-Assessment, youth are readily screened and assessed upon entry to camps to identify all treatment and service needs, including mental health needs. Records of each youth's needs, including medication needs, are carefully documented and maintained, including electronically. Youth's mental health treatment needs continue to be regularly monitored and progress evaluated; changes to the youth's treatment plans are made as needed. The Department of Mental Health offers Aftercare services that assist with transitioning the youth's treatment to the community, linking the youth and family to accessible services, including medication.

Substance Abuse

During this Monitoring Period, the County has continued to provide comprehensive substance use/abuse services for youth at all Probation camps. Each camp has more than sufficient capacity to provide services to eligible youth. This includes those youth with a substance use/abuse disorder, as well as those youth who are otherwise identified as potentially at risk.

For all camps, DMH has been providing services for youth who have been identified as having a co-occurring disorder since the expansion of staff in 2010-11. As part of these services, DMH provides integrated interventions that treat both disorders. An integrated approach is the treatment of choice for those youth who have both a mental health and substance use/abuse disorder. DMH continues to provide services to a high percentage of the youth housed in the Probation camps:

During this Monitoring Period, the County has continued to provide five and ten week groups across the Probation camps to further enhance services and to improve the ease of tracking that youth identified with potential substance use/abuse needs have been provided with services prior to release from camp. The 5 week curriculum is a psycho-educational group series intended for youth who do not have a substance use/abuse diagnosis, but who have been identified as having potential risk factors. The 10 week curriculum is for youth who have open mental health cases and who have been diagnosed with a co-occurring disorder. The 10 week group uses motivational interviewing and cognitive behavior interventions which are evidence-based practices for youth with co-occurring disorders. The 5 and 10 week substance use/abuse groups supplement the individual services provided by DMH clinicians.

Probation Substance Abuse Audits

The importance of substance abuse programming in the camps' rehabilitative setting has become more evident as the Multi-Disciplinary Assessment and Multi-Disciplinary Teams have begun identifying and recording the number of youth with SA needs. These numbers have been captured on the Substance Abuse Audit tool for analysis purposes showing that a majority (81%) of the youth entering camp have an identified need (see *Table 43-1*). The numbers also indicate that there is a greater need for the more intensive 10 week service. The Department of Mental Health has responded to the growing need by using contracted Substance Abuse Treatment providers to increase program capacity.

Table 43-1

Substance Abuse Service Needs (June – October 2014)

Camp	# of youth admitted to camp	% of new admits in need of SA	# in need of 5 week services	# in need o of 10 week services
North Region				
Jarvis	57	98%	12	44
McNair	63	86%	5	49
Onizuka	48	100%	1	47
*Smith	9	67%	2	4

Central Region				
Munz	43	93%	0	40
Mendenhall	49	94%	0	46
Scudder	29	90%	8	18
Scott	58	91%	12	41
West Region				
Miller	26	73%	0	19
Gonzales	22	68%	1	14
DKC	40	100%	9	31
East Region				
Rockey	55	95%	5	47
Paige	62	85%	11	42
Afflerbaugh	62	77%	14	34

Note: % of new admits identified with need = (total # of newly admitted youth June – October 2014 / total number of youth identified with 5 or 10 week program need) * 100
 *Data for September and October 2014, only; Camp opened in July 2014.

During the first quarter of 2014, the Substance Abuse audit tool was modified to define what findings meet expectations and what requires corrective action (refer to **Figure 43-1**). An additional question was included to determine whether youth enrolled in substance abuse services are actively attending. The following performance measures provide statistical data and “meet expectations” when:

- At least 80% of the newly admitted youth are referred to the appropriate SA program (5-week or 10-week) within 14 business days of their arrival to the facility;
- At least 80% of the youth enrolled in SA services attend sessions during the month;
- At least 80% of the instances where a youth refused to attend an SA session are recorded in the Probation Case Management System (PCMS) case notes section;
- At least 80% of the youth identified as needing services, successfully complete their SA program during the audit month with 80% of the group sessions attended; and
- The rate of incidents does not exceed 5% of the population.

The performance expectations allow the County to track progress and the effectiveness of corrective actions. **Figure 43-1** provides an overview of SA performance measures and indicates when expectations were not met during the quarter. Overall, the camps performed well with high rates of 95% or better compliance on a majority of the measures.

Figure 43-1

Substance Abuse Audit Performance Expectations Not Met (June – October 2014)

PERFORMANCE EXPECTATIONS <u>NOT</u> MET																				
Camp by Region	Newly Admitted Youth Referrals					SA Session Refusals					Service Completion					Drug Related Incidents				
	June	July	Aug.	Sept.	Oct.	June	July	Aug.	Sept.	Oct.	June	July	Aug.	Sept.	Oct.	June	July	Aug.	Sept.	Oct.
EAST																				
Afflerbaugh							✓						✓				✓			
Paige								✓												
Rockey						✓														
WEST																				
DKC								✓										✓		
Miller																				
Gonzales														✓				✓	✓	✓
CENTRAL																				
Scott																				
Scudder																				
Munz																	✓			
Mendenhall																	✓			
NORTH																				
Onizuka	✓																			
McNair							✓							✓						
Jarvis																				
Smith										✓										

Newly Admitted Youth Referrals

All of the camps have met expectations consistently in referring youth identified in need of services to their respective five or ten week program within 14 days of arrival except for Camp Onizuka (June) who did not meet expectations on one occasion. On the occasion that expectations have not been met, the camp has identified the problem and has implemented corrective action which reflective in continued compliance thereafter.

Enrollment and Attendance

The audit tool was modified in February 2014 to allow Probation the ability to capture attendance rates. It was discovered during the reporting period that the Intervention Tracking Log did not necessarily match the Department of Mental Health (DMH) session rosters at several camps. A lack of communication resulted in Probation “shorting” session attendance numbers. A process is now in place where a copy of the DMH logs are given to the Director and staff documentation on the Intervention Tracking Log is reviewed for accuracy.

The strides made by the camps in maintaining an updated log has assisted in Probation’s ability to quickly confirm whether the Intervention Tracking Log matches the information provided by DMH.

Substance Abuse Session Refusals

During this reporting period the documentation of caseworkers’ endeavors to counsel youth refusing to attend a Substance Abuse treatment sessions has improved tremendously (refer to *SA Session Refusals* section of **Figure 43-1**). Staff continues to encourage youth’s participation and have improved on documenting these efforts.

Service Completion

Generally, the camps are progressing with successful service completion rates, which demonstrate that the Substance Abuse program is being well received by the youth

Table 43-2**Substance Abuse Audit 5 Week Services (June – October 2014)**

*5 WEEK SERVICES										
Camp by Region	June		July		August		September		October	
	# youth completed	% successful	# youth completed	% successful	# youth completed	% successful	# youth completed	% successful	# youth completed	% successful
East:										
Afflerbaugh	2	67%	0	0%	0	0%	3	100%	1	100%
Paige	6	100%	5	100%	6	100%	0	0%	3	100%
Rockey	0	0%	6	100%	0	0%	0	0%	2	100%
West:										
DKC	4	100%	0	0%	0	0%	3	67%	0	0%
Miller	0	0%	0	0%	1	100%	0	0%	0	0%
Gonzales	0	0%	0	0%	0	0%	0	0%	0	0%
Central:										
Scott	0	0%	1	100%	0	0%	2	100%	0	0%
Scudder	6	100%	2	100%	2	100%	4	100%	0	0%
Munz	0	0%	0	0%	0	0%	0	0%	0	0%
Mendenhall	0	0%	1	100%	0	0%	0	0%	0	0%
North:										
Onizuka	0	0%	6	100%	12	83%	0	0%	2	100%
McNair	2	100%	0	100%	0	0%	0	0%	0	0%
Jarvis	9	100%	7	100%	8	88%	6	100%	4	100%
Smith							0	0%	1	100%

Note: *Percentages noted in red are below the 80% threshold but may have met expectations depending on combined average with the 10 week program.

Table 43-3*Substance Abuse Audit 10 Week Services (June – October 2014)*

10 WEEK SERVICES										
Camp by Region	June		July		August		September		October	
	# youth completed	% successful	# youth completed	% successful	# youth completed	% successful	# youth completed	% successful	# youth completed	% successful
East:										
Afflerbaugh	18	90%	0	0%	1	0%	21	100%	5	80%
Paige	13	93%	1	100%	2	100%	8	100%	6	100%
Rockey	4	100%	3	60%	9	100%	11	91%	4	75%
West Region:										
DKC	0	0%	10	83%	4	100%	5	100%	0	0%
Miller	0	0%	6	100%	9	100%	0	0%	0	0%
Gonzales	0	0%	6	100%	0	0%	0	0%	4	75%
Central:										
Scott	11	100%	5	100%	8	100%	6	100%	13	100%
Scudder	7	100%	3	100%	3	100%	3	100%	0	0%
Munz	6	100%	20	100%	5	100%	4	100%	14	93%
Mendenhall	4	100%	5	83%	14	100%	10	100%	16	100%
North:										
Onizuka	2	100%	17	100%	3	100%	14	100%	0	0%
McNair	3	100%	11	85%	0	0%	12	75%	5	80%
Jarvis	12	100%	12	100%	0	0%	6	100%	0	0%
Smith							9	100%	0	0%

Note: *Percentages noted in red did not meet expectations.

**Percentages noted in red are below the 80% threshold but may have met expectations depending on combined average with the 5 week program.

Drug Related Incidents

During the February audits, the substance abuse audit tool was modified to calculate a rate of drug related incidents per camp average population size. Meeting expectations was defined as the camp not exceeding a 5% rate of incidents per population size.

North Region Met Expectations 100% of the times and West Region 80% of the time, which was a result of Camp Gonzales having high drug incident reports for August through October. This can be contributed to more enhanced drug searches during unannounced times (refer to Table 43-5). A more detailed program evaluation is required to get to the root cause and solution.

Table 43-4*Rate of Drug Related Incidents (June – October 2014)*

Camp by Region	June	July	August	September	October
North Region					
Jarvis	5%	2%	0%	0%	0%
McNair	2%	0%	0%	0%	0%
Onizuka	2%	0%	0%	0%	0%
Smith	N/A	N/A	N/A	0%	0%
Central Region					
Munz	0%	6%	2%	2%	4%
Mendenhall	0%	16%	0%	0%	2%
Scudder	0%	0%	0%	0%	0%
Scott	0%	0%	0%	0%	0%
West Region					
Miller	0%	0%	0%	0%	0%
Gonzales	4%	3%	14%	18%	7%
DKC	0%	0%	6%	0%	0%
East Region					
Afflerbaugh	4%	7%	0%	0%	0%
Paige	1%	3%	1%	3%	3%
Rockey	0%	0%	0%	0%	0%

Note: *Percentages noted in red did not meet expectations.

Paragraph 58: Implementation Plans

Within one hundred twenty (120) days of the execution of this Agreement, the County shall submit to DOJ implementation plans to guide the specific tasks necessary to reach compliance with this Agreement. The implementation plans shall be subject to review and approval by DOJ. If DOJ finds that an implementation plan is not consistent with the terms of this Agreement, DOJ shall promptly notify the County and provide technical assistance in revising the plan. The format and contents, to the extent possible, shall be consistent with previously approved implementation plans submitted under the Memorandum of Agreement between the United States, Los Angeles County, and the Los Angeles County Office of Education regarding the Juvenile Halls.

Status: Full Compliance (effective 2/9/09)

Paragraph 59: Document Review

All written County policies shall be submitted to the DOJ within 180 days of the execution of this Agreement. All other written documents, including procedures, protocols and other items identified in Paragraph 7 of this Agreement, shall be submitted to DOJ pursuant to deadlines to be determined by the Monitor.

Status: Full Compliance (effective 4/29/09)

County's Self-Assessment (Paragraphs 58 – 59):

All Implementation Plans, which provide guidance on the specific tasks necessary to reach compliance with the Agreement have been submitted. The Implementation Plan for Paragraphs 15, 17, 43 and 47 was finalized on May 12, 2014 and the Implementation Plan for Paragraph 73 was submitted on December 1, 2014. Further, all County, Probation, and other policies, manual sections and procedures, are provided to the DOJ and Monitors as required.

Compliance Level Quick Reference

<u>Para.</u>	<u>Description</u>	<u>Compliance Level</u>
9	Protection from Abusive Institutional Practices	Full
10	Uses of Force	Full
11	OC Spray	Full
12	Use of Force Review	Full
13	Threats and Intimidation	Full
14	Consumption of Alcohol By Staff	Full
15	Staffing (Probation)	Full
16	Orientation	Full
17	Rehabilitation and Behavior Management	Full
18	Staff Training and Supervision of Youth	Full
19	Reduction of Youth on Youth Violence	Full
20	Child Abuse Reporting	Full
21	Child Abuse Investigation	Full
22	Classification	Full
23	Grievance System	Full
24	Youth Movement Between the Probation Camps or Between the Probation Camps and the Los Angeles County Juvenile Halls	Full
25	Development and Implementation of Policy	Full
26	Assessment	Full
27	Management of Suicidal Youth	Full
28	Care for Self-Harming Youth	Full
29	Documentation of Suicide Precautions	Full
30	Supervision of Youth at Risk of Self-Harm	Full
31	Suicide Precautions: Youth Pending Transfer to Another Facility	Full
32	Training (Suicide Prevention)	Full
33	Staffing (Mental Health)	Full
34	Screening	Full
35	Assessments	Full
36	ID of Previously Unidentified Youth With Mental Disorders	Full
37	Recordkeeping	Full
38	Training and Supervision of Mental Health Care Clinicians	Full
39	Evaluations and Treatment	Full
40	Treatment Planning	Full
41	Implementation of the Treatment Plan	Full
42	Counseling Services	Full
43	Substance Abuse	Full
44	Monitoring of Psychotropic Medication	Full
45	Staff Understanding of Mental Health and Dev. Disability Needs	Full
46	Discharge Summaries	Full
47	System	Full
58	Implementation Plans	Full
59	Document Review	Full
73	Increased Access to Community Alternatives	Full

Appendix of Acronyms and Abbreviations

ADR:	Adverse drug reaction
APO:	Aftercare Probation Officer
ART:	Aggression Replacement Training
Camps:	Los Angeles County Probation Department Camps Afflerbaugh, Gonzales, Jarvis, Kilpatrick, McNair, Mendenhall, Miller, Munz, Onizuka, Paige, Rockey, Scott, Scudder; and closed Camps Holton, Resnick, Routh, Scobee, and Smith. Dorothy Kirby Center, though not a Camp, is often included.
CASIU:	Child Abuse Special Investigations Unit (now part of Internal Investigations Office)
CAU:	Camp Assessment Unit
CCCP:	Client Coordinated Care Plan
CCTP:	Camp Community Transition Program
CMYC:	Challenger Memorial Youth Center (encompasses Camps Jarvis, McNair, Onizuka, Resnick, Scobee, Smith, and a shared Special Handling Unit)
DBT:	Dialectical Behavior Therapy
DKC:	Dorothy Kirby Center
DMH:	Los Angeles County Department of Mental Health
DOJ:	United States Department of Justice, Civil Rights Division
DPO/PO:	Deputy Probation Officer
EIS:	Early Intervention System
ESOF:	Enhanced Supervision Observation Form
FTE:	Full-Time Equivalent
IIO:	Internal Investigations Office
ITM:	Integrated Treatment Model
JCHS:	Juvenile Court Health Services
LACOE:	Los Angeles County Office of Education
LARRC:	L.A. Risk and Resiliency Check-Up
LOS:	Length of Stay
MDT:	Multi-Disciplinary Team
MHRF:	Mental Health Recording Form
MOA:	Memorandum of Agreement (also referred to as “Agreement”)
NPJS:	The National Partnership for Juvenile Services
OC:	Oleoresin Capsicum spray (also known as pepper spray)
OOHS:	Out of Home Screening Unit (also abbreviated as OHS)
OIR:	Office of Independent Review
OJJDP:	Office of Juvenile Justice and Delinquency Prevention
PCMS:	Probation Case Management System
PEMR:	Probation Electronic Medical Record
PIN:	Preliminary Incident Notification
PIR:	Physical Intervention Report
PMA:	Psychotropic Medication Authorization
QA:	Quality Assurance
RTSB:	Residential Treatment Services Bureau, Probation Department
SCAR:	Suspected Child Abuse Report

SCM: Safe Crisis Management (refers to policy or to reports)
SCS: Safety Check Sheet
SGI: Small Group Intervention
SHU: Special Handling Unit
SIR: Special Incident Report
SSP: Specialized Supervision Plan
TD: Tardive Dyskinesia
WNL: Within normal limits
XR: Extended release
YOYV: Youth-On-Youth Violence

County's Appendix of Selected Source Documents

I. Department of Justice Out-Briefings/Site Notes

US Attorney Erika Johnson-Brooks Van Nuys DRC Site Visit - August 13, 2014
Monitor Kelly Dedel Out-Brief for Site Visit to Camp Paige – September 23, 2014
Monitor Kelly Dedel Out-Brief for Site Visit to Camp Afflerbaugh – September 24, 2014
Monitor Kelly Dedel Out-Brief for Site Visit to Camp Rockey – September 25, 2014
Monitor Kelly Dedel Out-Brief for Site Visit to Camp Miller – September 30, 2014
Monitor Kelly Dedel Out-Brief for Site Visit to Camp Gonzales – October 1, 2014
Monitor Kelly Dedel Out-Brief for Site Visit to Camp Dorothy Kirby Center – October 2, 2014
Monitor Jon Trzcinski Site Visit Downey HQ – October 21, 2014
Monitor Jon Trzcinski Site Visit COC Academy, Stars Center- October 22, 2014
Monitor Jon Trzcinski Site Visit Downey HQ – October 23, 2014
US Attorney Erika Johnson-Brooks, Monitor Robert Spierer, Monitor Michael Graham Site Visit to Lynwood JDRC – November 6, 2014

II. DOJ Monitor Conference Call Minutes

Monitor County Conference Call Minutes for July 29, 2014
Monitor County Conference Call Minutes for August 26, 2014
Monitor County Conference Call Minutes for September 30, 2014
Monitor County Conference Call Minutes for October 28, 2014
Monitor County Conference Call Minutes for November 25, 2014

III. Reports/General Supporting Information

DOJ County-Department's Self-Assessment – 11th Monitoring Report
Behavior Management Program Audits, July – October 2014
Special Housing Unit Audits, July – October 2014
Substance Abuse Program Audits, July – October 2014
Closed Provision Audits, July – October 2014

IV. Directives/Memorandums/Handbooks to RTSB Staff

Directive 1362; Juvenile-Use of The Special Housing Unit (SHU) In Residential Treatment Services Bureau (RTSB) Facilities (Supersedes Directive 1331, issued June 5, 2013)
Directive 1355; Juvenile-Intake and Detention Control (IDC)-Detained/Non-Detained Tracking Log
Directive 1359; Arrest Notification and Use of Benefit Time
Directive 1334; Legal Issue and Time Coding
Law Enforcement Contact Form
Probation Department Policy Manual (PDPM)
Directive 1201; RTSB Peace Officer Sign-In Log
RTSB Memorandum: Managing Work Force and Addressing Staff Shortages
Directive 1331; Juvenile – Use of the Special Housing Unit (SHU) in Residential Treatment Services Bureau (RTSB) Facilities

Behavior Management Program Handbook
Behavior Management Program Youth Handbook
Integrated Treatment Model Adapted DBT Handbook
Department of Mental Health, Juvenile Justice Mental Services, Standard Operating Procedures, Substance Abuse
Directive 1285; Substance Abuse Treatment Services in Camps
PCMS Entries Revised
Directive 1229; Implementation of the Los Angeles Detention Screener (LADS) in Detention Services Bureau, Intake and Detention Control
IDC Contact Tracking Process and Training, Draft
Directive 1046; Implementation of the Out-of-Home Screening Unit (OOHS)
Directive 1170; Out of Home Screening Criteria for Referrals
Out of Home Screening Process – Criteria for Referrals, Draft
Juvenile – Camp Community Transition Program, Draft
Division 31 Requirements – Adoptions and Safe Families Act (ASFA)
Directive 1086; Juvenile – Camp Transition Pre-Release Home Evaluation
Directive 131; Juvenile – Revised: Transitional Independent Living Plan (TILP)
Directive 1080; Juvenile Community Re-Entry Process for Minors Released from Camp
Delegated Authority Agreement for Program Outcome Study between the County of Los Angeles and Cal State Auxiliary Services, Inc., Statement of Work, Final

V. Audit Tools

RTSB – Provision 10: Use of Force, Rev 8/11
RTSB – Provision 11: OC Spray, Rev 5/11
RTSB – Provision 14: Consumption of Alcohol by Staff, Rev 1/13
RTSB – Provision 15: Camp Day/Night Time Staffing Audit, Rev 10/11/13
RTSB – Provision 16: Orientation, Rev 1/13
RTSB – Provision 17: Rehabilitation and Behavior Management, Rev 10/7/14
RTSB – Provision 17: Rehabilitation and Behavior Management – DKC ONLY, Rev 3/26/14
RTSB – Provision 17: Directive#1331 – Use of Special Housing Unit (SHU) in Residential Treatment Services Bureau (RTSB) Facilities, Rev 7/8/13
RTSB – Provision 17: 2D-3 SHU Directive Audit Tool, Rev 1/6/14
RTSB – Provision 17: Rehabilitation and Behavior Management (ART/DBT), Rev 6/26/14
RTSB – Provision 18: Staff Training and Supervision of Youth, Rev 8/12
RTSB – Provision 19: Reduction of Youth on Youth Violence, Rev 8/11
RTSB – Provision 20: Child Abuse Reporting, Rev 1/13
RTSB – Provision 22: Classifications, Rev 1/13
RTSB – Provision 22: Classifications – CMYC SHU Only, Rev 4/12
RTSB – Provision 23: Grievance System, Rev 5/11
RTSB – Provision 24: Youth Movement Between the Probation Camps or Between the Probation Camps and LA County Juvenile Halls, Rev 5/11
RTSB – Provision 25: Development and Implementation of Policy, Rev 5/11

RTSB – Provision 27: Management of Suicidal Youth, Rev 2/11
RTSB – Provision 29(A): Documentation of Suicide Precautions, Rev 5/11
RTSB – Provision 29(B): Documentation of Suicide Precautions, Rev 9/12
RTSB – Provision 29(C): Documentation of Suicide Precautions, Rev 2/11
RTSB – Provision 27, 30, 31 Combined: Management of Suicidal Youth; Supervision of Youth at Risk of Self-Harm; Suicide Precautions for Youth Awaiting Transfer to Another Facility, Rev 7/11
RTSB – Provision 30: Supervision of Youth at Risk of Self-Harm, Rev 2/11
RTSB – Provision 31: Suicide Precautions for Youth Awaiting Transfer to Another Facility, Rev 2/11
RTSB – Provision 32 – Training (Suicide Prevention), Rev 5/11
RTSB – Provision 34: Screening, Rev 1/13
RTSB – Provision 43: Substance Abuse, Rev 05/7/14
RTSB – Provision 43: Substance Abuse (DKC), Rev 04/09/14
RTSB – Provision 45: Staff Understanding of Mental Health and Dev. Disability Needs, Rev 5/11
RTSB – Provision 46: Discharge Summaries, Rev 1/13
RTSB – Provision 73: Increased Access to Community Alternatives, Rev 4/1/14
RTSB – Provision 73.1: ICD, Rev 10/8/14
RTSB – Provision 73.2(c): Out-of-Home Screening, Rev 11/7/14
RTSB – Provision 73.2(d): Camp Assessment Unit, Rev 10/8/14
RTSB – Provision 73.3: Camp Services Re-entry, Rev 12/4/14
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RTSB – Provision 73.4(b)1: CCTP, Rev 10/16/14
RTSB – Provision 73.4(b)2: PTS, Rev 12/4/14
RTSB – Provision 73.4(b): IGSP, Rev 12/4/14
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