ELEVENTH 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.

The Amendment is included in the appendices to this report.

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. Currently, monitoring team members visit 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 will continue to visit the facilities until such time as the County reaches compliance with each of the provisions the monitoring team members oversee.

A report from the Monitors is required twice annually, or as directed by the parties. This Eleventh Monitoring Report covers January 1, 2014 through June 30, 2014.

Progress to Date

Monitoring Visits: The Monitors continue to visit the County facilities to assess compliance with the Agreement. During their visits, the Monitors may tour the facilities, meet with staff and administrators, interview minors, review records, and observe specialized meetings. Where appropriate, their observations are provided to the County and, when present, the Department of Justice during or at the conclusion of these visits. The Monitors also review 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 Eleventh Monitoring Report remains the same as that of the last report. The five Paragraphs that are currently being monitored are listed first. Each Paragraph 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 also provide recommendations to assist the County in maintaining or increasing the compliance level of the Paragraph the recommendations follow. However, the recommendations are not to be construed as substitutes for the requirements of the MOA, or as a complete listing of actions to be taken in order to gain full compliance with any provision.

Following the reports on the Paragraphs currently being monitored, we have listed the Paragraphs of the Agreement that have already achieved Full Compliance 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 progress toward achieving compliance with the terms of the MOA.

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 allows 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. As this monitoring period began, 37 of the Paragraphs were in Full Compliance, and only Paragraphs 15, 17, 43, 47, and 73 remained subject to monitoring.

Paragraph 43 was placed in Substantial Compliance on June 13, 2013. The County demonstrated its commitment to high-quality substance abuse services during the current monitoring period and has successfully completed the 12-month compliance monitoring period. This provision is no longer subject to monitoring.

In previous reports' discussion of Paragraph 15, we have cited a lack of adequate staffing to provide necessary programming and to properly supervise youth. Staffing levels have continued to improve and concerns about the adequacy of staffing have lessened. There are still, however, occasions when staffing issues do surface. This is an area that requires the continued vigilance of the County. Having an adequate number of staff to assure the safety of the minors in a facility is the foundation of any successful juvenile program. Without a safe environment the County's efforts to build a rehabilitative milieu at the camps cannot succeed.

During this monitoring period the County has continued to work to re-enforce and enhance its personnel practices in an effort to improve the hiring and retention of Camp Probation Officers. It is also working to improve the pre-employment screening process. The County has implemented an improved hiring process that should assist in achieving the County's goal of hiring the most qualified applicants. The County has implemented use of the Live-Scan fingerprint system that has the capability to notify the Probation Department of contact between its employees and a law enforcement agency. The County has also established and implemented a process whereby current employees are directly asked about any contact with a law enforcement agency, and retained a policy by which each employee is required to report any contact with law enforcement officials. Paragraph 15 was placed in substantial compliance effective November 1, 2013.

The County continues to provide the high-quality behavior management program and rehabilitative services required by Provision 17. Using a system of auditing and corrective action planning, the Camps solidified practices surrounding the mechanics of the Merit Ladder's point sheets, Stage promotion and Early Release tracking, the use of Sanctions, and procedures to limit youths' exposure to isolation. At all Camps, youths' needs are rigorously assessed and they are enrolled in rehabilitative programming that is responsive to those needs. Camps have a sufficient range of program types and sufficient capacity within those programs to meet the needs of youth. The audit tools for this provision have been redesigned to ensure an adequate focus on outcomes.

As noted above, the County continues to be in substantial compliance with the requirements of Paragraph 43, and has now achieved Full Compliance. Camps have a variety of treatment modalities (groups of varying intensities and individual treatment) available to respond to youth's needs for substance abuse treatment. Completion rates for the various substance abuse treatment groups are 80% or better, and youth demonstrate increased knowledge of the harms associated with their drug use as a result of these interventions. The audit tools were revised to ensure they accurately capture program completion data and various glitches in the source documents were resolved to provide a dependable foundation for the audits.

Paragraphs 15, 17, and 47 were placed in Substantial Compliance effective November 1, 2013. The County demonstrated the required level of performance throughout the current monitoring period. If appropriate performance levels are maintained, the compliance monitoring period for those provisions will conclude on October 31, 2014.

We commend the County for its continued emphasis on outcomes as it revises its policies and procedures, and its tracking and audit tools. Although covered as part of Paragraphs 47 and 73-7, some specific recommendations for these quality assurance tools may also be found in the discussions of the other Paragraphs.

The County is making progress in addressing the requirements of Paragraph 73. While some of the Paragraph's sub-sections are in or are closer to being in Substantial Compliance than others, all of the sections must be determined to be in Substantial Compliance to end monitoring of the provision. There remain some significant hurdles.

While the County is on track to complete the validation of the LADS (its detention screening instrument) by the end of 2014, the analysis has uncovered some significant hurdles to the proper implementation of the LADS that will need to be articulated in detail. The extremely high rate of overrides of the youth's LADS score compromises the County's ability to reduce its reliance on secure detention for low and medium risk offenders. Some of the override categories are outside of the County's control, but many more are within the County's authority to adjust. While the County does not have to actually make changes to the override policies or create the non-secure alternative programs that are needed to house medium risk offenders appropriately in order to fulfill its obligation under the MOA, it ***does*** need to draft a credible validation report that shines a light on the issues that contribute to the poor implementation of the LADS. The Monitor will continue to work closely with the County as they develop this final product.

Although the County has been holding the collaborative events with law enforcement agencies as required by Paragraph 73-1, the meetings did not satisfy the intent of the section. The Monitors will continue to work with the County to ensure compliance in future training material and meetings.

With regard to 73-3, the County has met most of the requirements of the MOA. However, it must continue to increase the rate of participation by Aftercare POs in the Transitional MDT meetings, and increase their overall level of contact with youth prior to release. Finally, audit tools need to be adjusted slightly to capture the outcomes required by the MOA and to adequately monitor program performance.

Aftercare POs also need to make more timely post-release home visits, and make follow-up contacts with youth, their families, and service providers on a more consistent basis. Finally, audit tools still need to be implemented or modified to demonstrate the County's internal capacity to monitor program performance in this area.

In past reports we commended the County for continuing to report compliance data for some of the paragraphs that had already completed monitoring. It demonstrated the County's commitment to sustaining its reforms. The County has not provided similar compliance data for this report. It has been the sincere hope of the Monitoring Team that the important auditing and compliance oversight efforts of the Probation Department's Quality Assurance Services Unit, and the Auditor-Controller continues beyond the life of this MOA to prevent a recurrence of the abuses and lapses that resulted in this MOA. The County assures us, however, that they have not abandoned their efforts to monitor the areas already in compliance. They explain that the lack of data was the temporary result of an effort to substantially refine and update their audit tools.

Memorandum of Agreement Provisions

(Paragraphs in Monitoring)

Paragraph 15: Staffing (Probation)

The County shall provide sufficien t staff supervis ion to keep resid ents reasonably safe fro m harm and allow rehabilitative activities to occur successfully.

Direct care staff shall include only thos e s taff membe rs whose primary ro le is the d irect 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 su bject to an appropriate hiring process and are otherwise qualified to work w ith youth. The hiring process shall include a background check, including a federal criminal history check and consultation of State and local child abuse registries, an d a reference check. For current employees, the County shall either con duct crimin al backgrou nd record checks at lea st every five years o r have in place a system for cap turing such information. The County shall direc tly ask applicants for, and employees in, positions th at result in contact with youth in the County' s juvenile justice system, about prio r criminal misconduct during interviews and reviews. The County shall ensure that employees have a con tinuing affir mative duty to disclose any criminal misconduct.

On a monthly basis, the County shall gather an d analyze data including, but not limited to, staffing ratios at each facility, vacancy rate s, and staff tu rnover. The County shall adjust existing policies and practices as needed to co mply with this paragraph based on analysis of this data.

Status: Substantial Compliance (effective November 1, 2013)

County's Self-Assessment:

Background Check Process

During this Monitoring Period the County has con tinued its efforts to strengthen the background check p rocess in additio n to enhance the existing expectat ion that em ployees of the Probation Department conduct them selves in a m anner c onsistent with the pr ofessional standards governing County employm ent by updating policy and procedures. Directive 1359, Arrest Notification and Use of Benefit Tim e, was re-issued on May 6, 2014. On May 12, 2014, this Directive was em ailed to all Pr obation em ployees with a m andatory requir ement that they complete and sign a L aw Enforce ment Contact (LEC) form and subm it it to th eir Office Head advising whether they have or have not had Law Enforcem ent 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.

As of June 30, 2014, out of 5,435 employees, 4,454 or 82% LEC Forms were received. Of those, 19 reported some type of law enforcement contact within the last 12 months. Taking into account staff that are out on approved leave of absence, LEC Forms were not received from 13.2% of the staff. Residential Treatment Services Bureau (RTSB) has 1,016 staff. As of June 30, 2014, 88.4% of RTSB staff completed and submitted the LEC Form. Taking into account staff that are out on approved leave of absence, LEC Forms were not received from 8.6% of the RTSB staff. As staff that are out on approved leave of absence returns to work, they will be required to complete the Form when they return. All new employee's will be issued a copy of this Directive during orientation and will be required to complete and sign a LEC form as part of the new hire process. Corrective action will be taken for those employees that do not comply with completing the Form.

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.

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.

Staffing Ratios

The County implemented target staffing ratios in Residential Treatment Service Bureau (RTSB) facilities based on the number of staff needed to provide proper 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

The County continues to maintain consistent staff-to-minor ratios on a daily basis within optimal levels and at a higher standard than state regulated ratios. Preventative measures are effectively ensuring that the staff-to-minor ratios are sustained in the event of an unanticipated occurrence. The *Managing Workforce and Addressing Staffing Shortages Memorandum* issued during the last reporting period continues to provide direction to RTSB Managers and Supervisors with methods to maintain target ratios during unanticipated events impacting staffing ratios. Within the Memorandum, the facilities are instructed to partner with neighboring camps to pool staffing resources in order to assist with the transportation of youth and to identify staff willing to work at a neighboring camp on short notice.

Staff-to-Minor Ratio Reports

The County continues to maintain monthly Staff-to-Minor Ratio Reports ensuring the target ratio continues to be met. All camps maintained staff to minor ratio averages between January and June 2014 at optimal levels, often surpassing the expected levels. As can be seen in Figures 15.1, 15.2, and 15.3 all camps met both state regulated and Probation Department optimal staffing standards as indicated by the maximum staff to minor ratio reported during the 6 month period.

The percentage of shifts with actual staffing ratios not at optimal levels, are minimal and remain in close range to optimal levels. The following are the findings of the *Camp Staff-to-Minor Ratio* reports (only ratios that exceeded the optimal targets or could be rounded to the next number above optimal levels were included):

- Camp Afflerbaugh experienced six out of 362 shifts (1.7% of all daytime shifts) where staffing ratios exceeded 1 : 10 supervision levels and reached 1 : 11.6 (January 17, 2014 AM shift; February 24, 2014 AM shift; April 30, 2014 AM shift; May 23 and 29, 2014 AM shifts; and June 5, 2014 AM shift). Notably, all of these shifts were during the AM period on weekdays where youth are in school and auxiliary staff are assisting in the supervision and counseling of the youth.

- Camp Paige experienced five out of 362 shifts (1.4% of all daytime shifts) where staffing ratios reached up to 1 staff per 11.6 youth (January 17, 2014 AM shift; January 31, 2014 AM shift; February 2, 2014 PM shift; February 3, 2014 AM shift). Optimal levels for Camp Paige are 1 : 10.

- Camp Scudder experienced three out of 362 sh ifts (0.8% of all daytim e shifts) where staffing ratios were exactly on par with optimal levels at 1 : 8 or 1 : 8.3 (January 24, 2014 AM shift; January 27, 2014 AM shift; and June 19, 2014 PM Shift). All other shifts were at better than optimal levels.

- Camp Munz experienced six out of 362 shifts (1.7% of all daytime shifts) where a shift's staff to m inor ratio slig htly exceed ed th e optim al 1 : 10 ratio and reached 1 : 10.6 (January 3, 2014 AM shift; January 18, 2014 AM and PM shifts; January 25, 2014 AM and PM shifts; and January 26, 2014 AM shift).

- Camp Mendenhall experienced three out of 362 shifts (0.8% of all daytim e shifts) where a shift's sta ff to m inor ratio exce eded the op timal ratio of 1 : 10 and supervision was provided with 1 staff pe r 11 youth in th e cam p (March 10, 2014 AM s hift; March 17, 2014 PM shift; and March 21, 2014 AM shift). All other shifts during the reporting period had better than optimal levels of staffing.

Figure 15.1
Average Day Time Staff-to-Minor Ratio (6:00 am to 2:00 pm Shift)

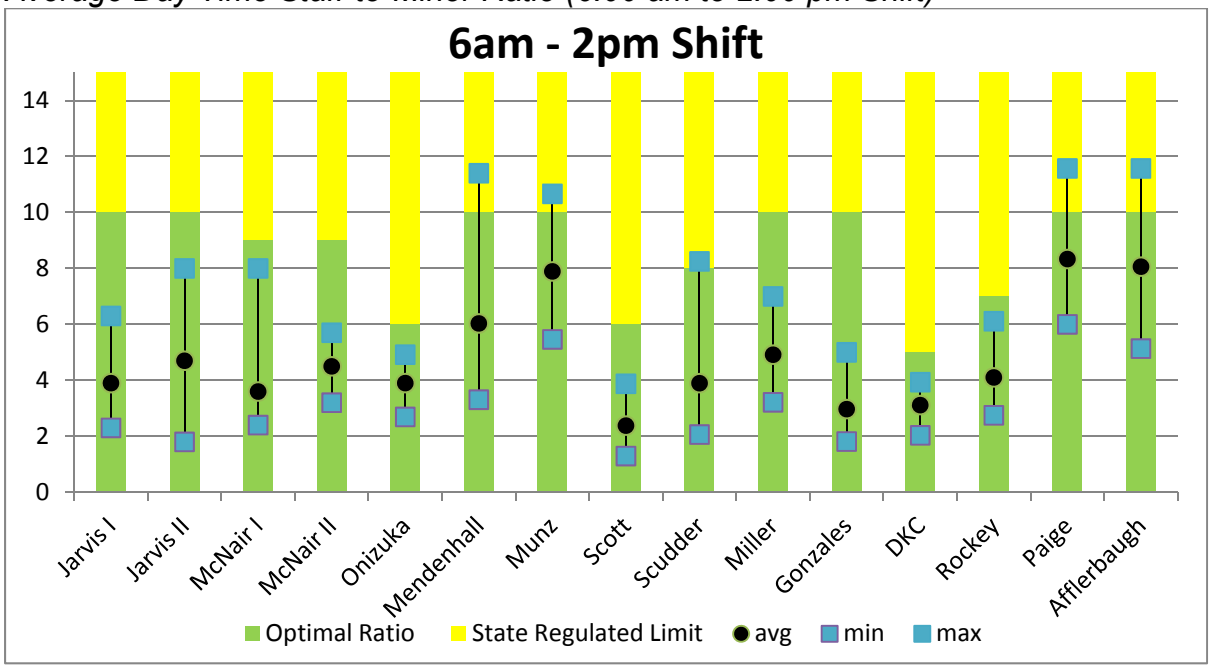


Figure 15.2
Average Day Time Staff-to-Minor Ratio (2:00 pm to 10:00 pm Shift)

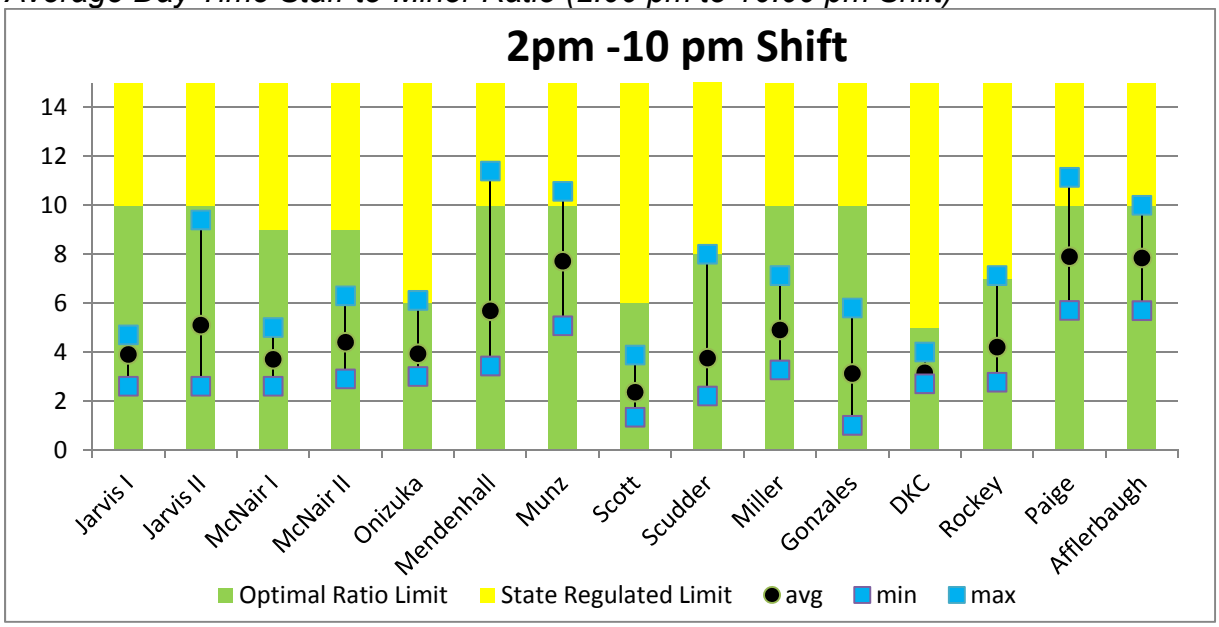
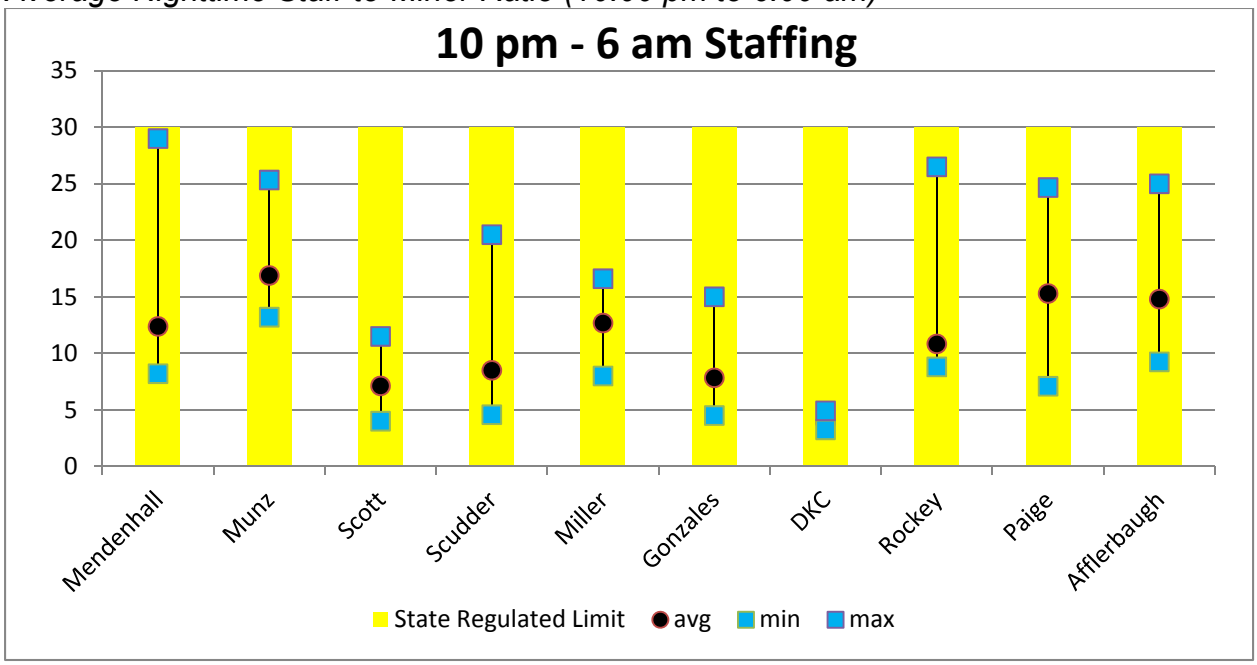


Figure 15.3
Average Nighttime Staff-to-Minor Ratio (10:00 pm to 6:00 am)



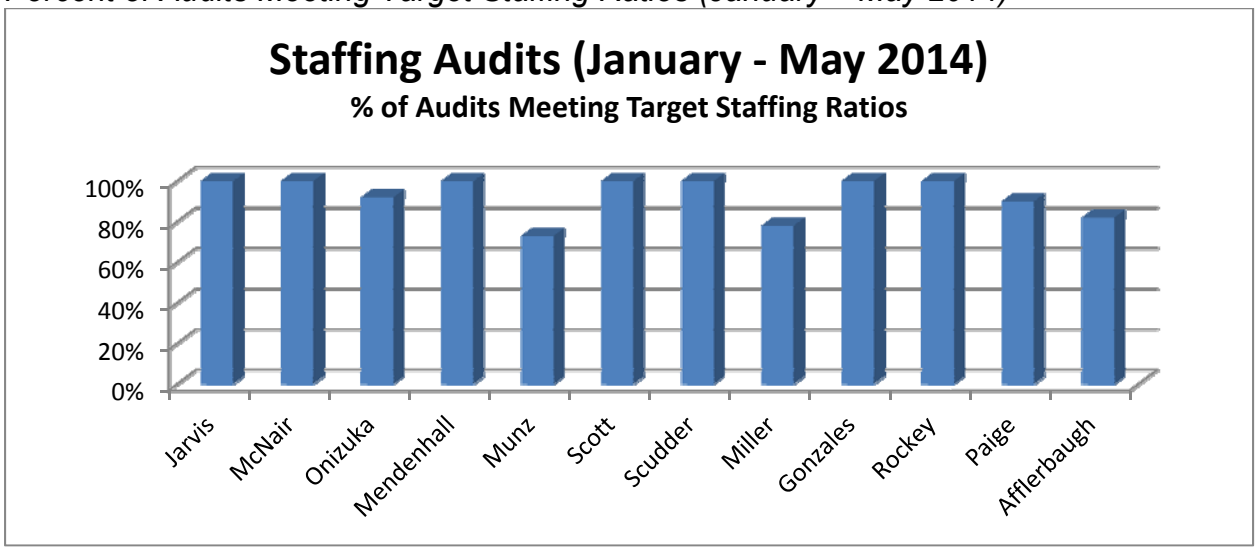
Nighttime staff-to-minor ratio averages are below one staff per 16 youth, almost half the 1 : 30 ratio required by the state. As with the daytime shifts, there are anomalous occurrences of higher ratios and those are not the norm.

Staffing Audits

To confirm that staff-to-minor ratios are being met throughout the various shifts, the County also continues to conduct rando m, unannounced staffing aud its at all RTSB facili ties. The staffing audits for this reporting period were conducted during the day, night and weekend shifts. In order to ensure that audits were conducted evenly across all cam ps, a tracking system wa s designed in October 2013 to ensure a m inimum of two (2) a udits per camp were co nducted per month with one being a night or weekend audit. Of the 156 audits conducted during the reporting period, 87% of the unan nounced audits found that th e target ratios were m et at the tim e o f the audit (refer to Figure 15.4). Camps Munz and Miller had the lo west percentage of audits meeting target ratios at 73% and 78%, respectively, with all other camps above 80%. Any audits not m eeting target ratios are referred to th e cam p manager to con ference with staff and implement corrective action.

Figure 15.4

Percent of Audits Meeting Target Staffing Ratios (January – May 2014)



Review of Preliminary Incident Notifications

A total of 87 Preliminary Incident Notifications completed for events during the reporting period resulting in a youth's transport out of the facility for m edical o r psy chiatric pu rposes were reviewed. A lmost a thir d of the tra nsports oc curred during nighttim e s hifts. All PINs reported staffing ratios bef ore and af ter th e transpo rt at optim al levels, de monstrating that RTSB management's efforts with th e issu ance of the *Managing Workfor ce and Addressing Sta ffing Shortages Memorandum* is effectively addressing staffing concerns during emergencies.

Peace Officer Sign-In Log

During this rating perio d, the percentage of staff who complied with s igning the P eace Officer Sign-In Log was captured. Based on 156 unannounced daytim e staffing audits, 90% of staf f signed into the Peace Officer Sign-In Log (Figure 15.5). Camp Jarvis h ad the lowes t percent of compliance at 80%, however, this was due to lo w percentages at the b eginning of the reporting period. For the past several m onths the Camp Jarvis staff have been in 100% com pliance

demonstrating that corrective measures employed after the last Self-Assessment were effective. This was generally the case for all other camps with percentages below 95 also.

Figure 15.5
Percent of Peace Officers Signed In (Average January through June Audits)

The County Probation Department will continue to conduct staffing audits to ensure that the targeted staff-to-minor ratio are met. In addition, the County will continue to review PINs and SCMs to ensure that camps are maintaining their staffing ratios at optimum levels.

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 require 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 performing background checks, reference checks and other pre-hire processes. The County has also submitted documentation that illustrates its progress in implementing the 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 juvenile justice agencies.

While the County uses the Live-Scan technology to receive notifications of law enforcement contact, it continues to put a 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 personal actions. This is an important concept that the monitoring team appreciates and supports.

During this 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; which is 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.

The County's improved hiring and retention practices are an impressive and worthwhile effort that, 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.

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

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 daytime 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 during 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 as certain 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 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.

Two camps at the Challenger Memorial Center are not included in this depiction. Camps McNair and Jarvis have each been split into two separate camps but with some shared resources. This sharing of resources makes it difficult to clearly depict their staffing in this format; thus, they have been omitted. It is noted, however, staffing at both Camps Jarvis and McNair are consistently within the staffing ratios established by the County. The data presented below is taken from the Monthly Staffing Summaries for the months of January through June 2014.

CAMP AFFLERBAUGH
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.**
January	11.57	6.55	**8.03**	9.86	6.90	**7.87**	25	13.8 0	**16.60**
February	10.57	6.55	**8.39**	9.50	7.20	**8.33**	18.75	14	**15.52**
March	10	6.20	**8.09**	10	6.30	**7.85**	24.67	9.71	**14**
April	10.71	6	**8.02**	9.63	6.09	**7.74**	38	12	**14.75**
May	11.14	5.54	**8**	9.75	5.69	**7.72**	19.25	5.69	**14.19**
June	11	5.13	**7.93**	8.89	5.85	**7.61**	15.60	11	**14.19**

CAMP PAIGE
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.**
January	11.29	6.73	**8.51**	10.13	6.55	**8.25**	20.25	14.8 0	**16.45**
February	11.14	7.09	**8.99**	11.14	7.09	**8.69**	24.67	13	**15.74**
March	10	6.91	**8.32**	9.50	7.30	**8.01**	19.50	11.5 0	**14.93**
April	9.75	6.82	**8.28**	8.89	6.82	**7.68**	20	12	**15.78**
May	9.50	6.55	**7.96**	8.56	6.18	**7.49**	19.25	11	**15.27**
June	10.57	6	**7.95**	8.75	5.67	**7.29**	18	11.3 3	**13.97**

*There was a data entry error on the afternoon shift of May 10. This shift was eliminated from the calculations and the totals have been adjusted.

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.**
January	4.82	2.93	**3.63**	4.64	2.76	**3.65**	14	8.80	**10.43**
February	5	2.88	**3.69**	4.80	3.36	**3.87**	11	8.80	**9.59**
March	6	3.20	**4.40**	6.33	3.43	**4.50**	14	10	**11.09**
April	5.90	3.67	**4.42**	7.13	3.31	**4.51**	13.75	9.33	**11.15**
May	5.45	3.56	**4.35**	5.50	3.29	**4.41**	18.33.	9.33	**11.38**
June	6.11	3.18	**4.13**	5	3.60	**4.25**	26.50	8.83	**11.38**

CAMP MENDENHALL
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.**
January	8	3.57	**5.64**	7.86	3.86	**5.19**	17	10	**12.94**
February	7	3.31	**4.93**	7.25	3.43	**4.60**	29	11	**13.04**
March	11.40	5.60	**7.17**	11.40	4.83	**6.64**	19.67	10.2 0	**13.76**
April	8.50	4.67	**5.92**	8.50	4.20	**5.77**	16.67	9	**11.57**
May	8.17	4.67	**6.36**	8	4.20	**6.19**	16.33	8.20	**11.70**
June	9.80	4.89	**6.54**	9.40	4.64	**6.22**	17	9.20	**12.18**

CAMP MUNZ
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.**
January	10.67	5.73	**8.17**	10.57	5.42	**7.79**	18.50	13.6 0	**16.19**
February	9.13	5.46	**7.80**	9.13	5.46	**7.40**	23.67	13.2 0	**16.07**
March	9.86	5.83	**7.51**	9.86	5.38	**7.56**	23	13.4 0	**16.07**
April	9.86	6.25	**8.05**	9.75	6.25	**7.95**	25.33	13.2 0	**16.72**
May	9.13	6.33	**7.98**	9.38	5.07	**7.87**	25	14	**17.53**
June	9.86	6.55	**7.83**	9.38	6.50	**7.70**	25	17.2 5	**18.75**

CAMP SCUDDER
STAFFING RATIOS (TARGET RATIO 1 STAFF TO 8 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.**
January	8.25	2.64	**4.09**	4.86	2.82	**3.81**	11.33	5.17	**8.56**
February	6.60	2.75	**3.92**	4.63	3	**3.69**	11.67	5	**8.14**
March	6.17	3	**4.29**	5.29	3	**3.88**	20.50	5.67	**9.08**
April	5	2.06	**3.21**	4.38	2.20	**3.13**	11.67	4.57	**7.68**
May	5.57	2.92	**4.11**	5.43	2.82	**4.01**	17	5.50	**9.05**
June	7.60	2.54	**3.77**	8	2.43	**3.98**	13	4.71	**8.50**

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.**
January	3.71	1.64	**2.32**	3.25	1.71	**2.25**	8.67	5	**6.70**
February	3.29	1.29	**2.05**	3.67	1.62	**2.28**	11.50	5	**6.34**
March	3.33	1.62	**2.30**	3	1.38	**2.27**	9.67	4	**6.53**
April	3.88	1.38	**2.34**	3.88	1.33	**2.26**	11.33	5.80	**8.32**
May	3.88	1.56	**2.40**	3.30	1.81	**2.42**	9.67	5.80	**7.30**
June	3.88	2.08	**2.88**	3.88	1.71	**2.65**	10	6	**7.55**

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.**
January	4.92	2.69	**3.76**	6.11	3	**3.71**			
February	4.58	3.31	**3.89**	4.33	3.13	**3.78**			
March	4.75	3.62	**4.15**	5.60	3.40	**4.24**			
April	4.58	3.14	**3.88**	5	3.38	**3.98**			
May	4.15	3.43	**3.84**	4.42	3.47	**3.90**			
June	4.42	3.50	**3.88**	4.42	3.36	**3.96**			

* 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 Ce nter 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.**
January	3.53	2.87	**3.21**	4	3	**3.29**	4.92	3.28	**4.10**
February	3.39	2.85	**3.16**	3.59	2.83	**3.23**	4.29	3.43	**3.85**
March	3.93	2.81	**3.21**	3.65	2.79	**3.23**	4.69	3.69	**4.05**
April	3.39	2.03	**3.10**	3.33	2.73	**3.14**	4.29	3.53	**3.89**
May	3.17	2.74	**3.02**	3.29	2.74	**3.02**	4.67	3.25	**3.78**
June	3.28	2.70	**2.99**	3.29	2.70	**2.99**	4.58	3.24	**3.78**

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.**
January	4.14	2.55	**3.17**	4.29	2.60	**3.23**	10	7	**8.68**
February	4.83	2.67	**3.32**	5	2.64	**3.38***	10	5.8	**7.59**
March	5	2.45	**3.26**	5.80	2.55	**3.56**	15	6.75	**8.91**
April	4	1.81	**2.68**	4	2	**2.85**	9.67	5.40	**7.53**
May	4.67	1.93	**2.74**	4.83	1.93	**2.97**	10	4.83	**6.80**
June	4.14	2	**2.67**	4.67	2.17	**2.92**	10.33	4.50	**7.48**

*A data entry issue was identified for February 25 and 26 in the afternoon shift. The report showed 9 minors and 8 minors on campus for the afternoon shift for each day respectively. However both the morning and night shift reported 30 minors on campus on both days. The staffing average for the 2 p.m. to 10 p.m. shift has been adjusted to reflect this correction.

CAMP KILPATRICK*
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.**
January	6.78	2.82	**4.52**	7.33	2.71	**4.51**	13.20	8.17	**10.61**
February	5.75	1.44	**2.81**	5.11	1.33	**2.76**	11.50	4.33	**7.22**
March	3.67	0.50	**1.53**	3.67	0.33	**1.50**	6.25	1.17	**3.44**

*Camp Kilpatrick was closed during this monitoring period. The last minors left during the afternoon shift of March 28, 2014.

CAMP MILLER
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.**
January	6.82	4.45	**5.59**	7.50	3.77	**5.49**	20.25	9.80	**15.93**
February	6.75	4.45	**5.40**	7.13	4.55	**5.40**	14.25	10	**13.40**
March	6.11	4	**5.16**	6.22	4.15	**4.97**	14.75	11.20	**14.02**
April	6.22	3.86	**4.87**	6.33	3.93	**4.76**	14.75	9.33	**11.73**
May	6	3.73	**4.87**	6.88	4.33	**5**	14.75	8	**11.87**
June	5.44	3.21	**4.27**	5.44	3.27	**4.26**	16.60	8	**12.01**

The Monthly Staffing Summaries clearly indicate most of the camps are on average meeting the specified ratios as established in the County's "Staffing Enhancement Rationale[2]" 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.

[2] Undated memorandum issued in the Spring, 2011.

However, 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.

PERCENTAGE OF WAKING HOUR SHIFTS STARTED OVER TARGET RATIOS BY CAMP JANUARY THROUGH JUNE 2014

CAMP NAME	NUMBER OF SHIFTS	NUMBER OF SHIFTS STARTED ABOUT TARGET RATIO	% OF SHIFTS STARTED ABOVE TARGET RATIO THIS PERIOD	% OF SHIFTS STARTED ABOVE TARGET RATIO PREVIOUS MONITORING PERIOD
AFFLERBAUGH	362	11	3%	.5%
PAIGE*	361	13	3.6%	1.4%
MENDENHALL	362	3	.08%	9.2%
MUNZ	362	7	1.9%	1.6%
GONZALES	362	0	0	0
KILPATRICK**	174	0	0	0
MILLER	362	0	0	0
SCUDDER 362		1	.3%	.3%
ROCKEY	362	0	0	.3%
SCOTT	362	0	0	0
ONIZUKA	362	0	0	3.5%
KIRBY	362	0	0	.3%

* The afternoon/evening shift of May 10 at Camp Paige was not used to calculate the ratio due to a data entry error.
**Camp Kilpatrick was taken out of service March 28, 2014.

It should be noted these figures differ somewhat from the figures the County cited in their self-assessment. At first glance this anomaly is mildly disconcerting. However, in terms of the overall picture, the differences are not all that significant. The largest discrepancy is from Camp Paige where the County noted five waking hour shifts that were out of compliance with the mandated staffing ratio while the monitoring team found 13 shifts that were out of compliance with the mandated ratio. Using the County's figure, Camp Paige was out of compliance 1.4% of the time; using the monitoring teams the figure rises to 3.6%.

Again using the Camp Paige example, the County cited the following dates as being out of compliance: January 17 A.M., January 31 A.M., February 2 P.M., February 3 A.M., a fifth date was not listed. The monitoring team found that Camp Paige exceeded the one to ten ratio 13 times during the monitoring period. These occurred on the following dates:

1.	January 17 A.M.	11.29 to 1*
2.	January 23 A.M.	10.13 to 1
3.	January 23 P.M.	10.13 to 1
4.	January 24 A.M.	10.13 to 1
5.	January 27 A.M.	10.13 to 1
6.	January 27 A.M.	10.13 to 1
7.	January 28 A.M.	10.13 to 1
8.	January 28 P.M.	10.13 to 1
9.	January 29 A.M.	10.13 to 1
10.	January 31 A.M.	11.57 to 1*
11.	February 2 P.M.	11.14 to 1*
12.	February 3 A.M.	11.14 to 1*
13.	June 25 A.M.	10.57 to 1

*Connotes dates listed by the County in the self-evaluation.

The other discrepancies between the figures cited by the County and the monitoring team are similar. While the discrepancies between the County's calculations and those of the monitoring team are noted, the overall impact of the discrepancy is minimal. At most, the discrepancy results in a small difference in the overall percentage of compliance with the mandated ratio for a facility.

The following is a listing of the other discrepancies. It appears that in some cases the County listed dates where a camp was exactly at the mandated ratio and, in other instances, in other instances did not include the dates. In at least one instance, the wrong date was cited (Camp Afflerbaugh May 29 should have been May 28). Some of the discrepancies may have been the result of rounding numbers.

CAMP AFFLERBAUGH:

The County listed six dates as non-compliant. They were January 17 A.M., February 24 A.M., April 30 A.M., May 23 A.M., May 29 A.M. and June 5 A.M.
The monitoring team found 11 instances of not meeting the ratio. They were January 17 A.M., February 6 A.M., February 24 A.M., April 2 A.M., April 23 A.M., April 30 A.M., May 12 A.M., May 23 A.M., May 28 A.M. and June 5 A.M.

CAMP PAIGE is discussed above.

CAMP MENDENHALL:

The County listed three dates as non-compliant. They were March 10 A.M., March 17 A.M., and March 21 A.M. The monitoring team's results matched those of the County.

CAMP MUNZ:

The County listed six dates as non-compliant. They were January 3 A.M., January 18 A.M., January 18 P.M., January 25 A.M. and P.M. and January 26 A.M. The monitoring team found the same dates plus January 16 on the P.M. shift.

CAMP SCUDDER:

The County listed three dates as non-compliant. They were January 24 A.M., January 27 A.M., and June 19 P.M. Two of the shifts listed were at the mandated ratio. The monitoring team found only one shift to be non-compliant (January 27 A.M.).

Clearly there are still occasions when the mandated ratios are not met and the County should continue to work to correct such shortages when they occur. The monitoring team notes the significant improvements that have been made in meeting the mandated ratios. The most notable improvement came at Camp Mendenhall. Both the County and the monitoring team agree Camp Mendenhall met the mandated ratio during this reporting period 99.2% of the time. During the previous monitoring period (July 1-December 31, 2013) the compliance level was a troubling 90.8% of the time. The County administration and the staff and leadership at Camp Mendenhall are to be congratulated on the improvement.

Occurrences of starting a shift with an insufficient staffing ratio should be rare or better yet non-existent. During the previous monitoring period the County developed and distributed specific instructions to camp administrators and supervisors specific directions regarding the amelioration of staffing shortages. When followed, the instructions have the potential to help ameliorate the staffing shortage situation. This may be one of the reasons for the continued improvement in the levels of staffing at the camps. 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 February 9, 2014 at approximately 6:48 P.M. there was a physical altercation between two minors in Dormitory A/B at Camp Onizuka that resulted in an eye injury to one of the minors. At the time of the incident three staff were supervising 25 minors. The mandated staffing ratio at Camp Onizuka is one staff to six minors.
- On March 6, 2014 at approximately 3:30 P.M. in Dormitory A/B at Camp Onizuka there was an incident of alleged marijuana smoking by a minor. At the time of the incident four staff were supervising 26 minors. The mandated staffing ratio at Camp Onizuka is one staff to six minors.

- On March 15, 2014 at approximately 2:50 P.M. on the outdoor recreation area at Camp Munz there was an incident where a minor was injured while engaging in horseplay. The minor suffered a possible dislocated shoulder or fracture. At the time of the incident three staff were supervising 34 minors. The mandated staffing ratio at Camp Munz is one staff to ten minors.
- On April 2, 2014 at approximately 8:10 P.M. in Dormitory A/B at Camp Onizuka there was an incident involving five minors. The incident appeared to have been racially motivated. At the time of the incident four staff were supervising 25 minors. The mandated staffing ratio at Camp Onizuka is one staff to six minors.
- On April 19, 2014 at approximately 9:15 A.M. in the dormitory at Camp Afflerbaugh a minor allegedly assaulted a staff member during head calls. At the time of the incident six staff were providing supervision in the dormitory to 63 minors. The mandated staffing ratio for Camp Afflerbaugh is one staff to six minors. Following the incident the minor was transported to a Special Housing Unit. This left the camp with a total population of 75 minors with only seven full duty staff on-duty.

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 Camps 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 do 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. The 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 generally accepted standards. For example:

- On February 3 the overnight staffing ratio at Camp Paige was one staff to 24.67 minors.
- On February 7 the overnight staffing ratio at Camp Munz was one staff to 23.67 minors.
- On March 1 the overnight staffing ratio at Camp Afflerbaugh was one staff to 24.67 minors.
- On April 13 the overnight staffing ratio at Camp Munz was one staff to 25.33 minors.
- On April 18 the overnight staffing ratio at Camp Afflerbaugh was one staff to 38 minors.
- On both May 30 and May 31 the overnight staffing ratio at Camp Munz was one staff to 25 minors.
- On June 1 the overnight staffing ratio at Camp Munz was one staff to 25 minors.
- On June 28 the overnight staffing ratio at Camp Rockey was one staff to 26.5 minors.

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 often comment that while they support the increased direct supervision of the minors, they also note that it has become more difficult for them to do their assigned casework. This comment is 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 many of the camps are sometimes 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, there are times when staff must provide transportation off campus to a Special Handling Unit (SHU) or to a medical facility. The Probation Department always assigns 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 another location, 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. During the previous monitoring period the County 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 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 implement and maintain the new requirements for background checks on prospective employees and a system to periodically re-check the status of current employees including a periodic mechanism by which the County directly 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 compliance monitoring effective November 1, 2013.

Recommendations:

- 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.

- 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 place a heavy emphasis on rehabilitative programming while maintaining a safe milieu for both residents and staff.

- The County should 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.

- 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.

- The County should continue 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. Additionally, the County should obtain the required verifications from the remaining 4.13% of RTSB employees who did not submit the law enforcement contact reporting forms.

Evidentiary Basis:

- A monitoring team member reviewed the status of this paragraph while on site at Camps Paige, Rockey and Afflerbaugh April 8-10.
- 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

<u>Rehabilitation</u>: 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 w ith other youth and adults; provide access to meaningful recrea tional and en richment a ctivities; p rovide opp ortunities f or family involvement; encourage develop ment of new s kills; and include Camp staff as p ositive ro le 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 multid isciplinary assessment shall consider the Camps Assessment Unit's ("CAU's") assessmen t of the youth. Based on this multidisc iplinary assessment, the County shall formulate a compre hensive service plan, including case plan goals for rehabilitation and treatment, for each youth.

The County shall ens ure that ea ch Camp o ffers the necessary re habilitative trea tment, programs, a nd servic es to mee t the needs of y outh housed there, co nsistent w ith safety an d security needs, based o n the asses sments and tr eatment plans. Such offer ings sh all include, but shall n ot be limited to, grou p therapy or individu al counseling for each youth, as necessary.

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

The County shall ensu re that ex isting sta ff d emonstrate competency, and new staff receive sufficient competency-based training, to fully implement the rehabilitative interventions.

The County shall ensure that each rehabilita tive tr eatment, program, and service at each Camp offers sufficient capacity to allow youth who need the tr eatment, program, or service t o participate in it. The County shall ensure that youth attend their prescribed programs, as outlined in their treatment plans. The yout h's case worker shall regularly report to th e youth's treatment team and docum ent the youth's progress in meetin g his or her case plan goals. Youth who are not meeting their case plan goals shall receiv e prompt subsequent, individualized assessments and follow-up.

The County shall ensure that its rehabilitatio n and intervention programs contin ue to address youth's needs related to peer pressure and gang affiliation.

<u>Behavior Management:</u> The County shall provide a fac ility-wide behavio r manageme nt system that is imp lemented throughout the day, including during school time. The behavior management sys tem shall encoura ge meaning ful rewards for positiv e behavior. Discip line and sanctio ns shall no t be arb itrary. The County shall continue to develop the behavio r management program in consultation with the Monitoring Team.
The County shall implemen t th e behavior ma nagement system in accordance with th e following schedule and based on the effective date of this Amendment:

Within 30 days, the County shall comp lete detailed, written guidance for its behavio r 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 intr oduce th e behavior management system to youth , including by providing youth with orientat ion and written guidance on the system and initiating the system in all Probation Camps. The written g uidance shall be made a vailable to youth in the dorm and at orientation thereafter.
The County shall ensure that its behavior ma nagement s ystem inclu des specific, consisten t requirements and behavioral expectations for each part o f the day d uring which youth can earn points. The Count y shall ensu re that each segment of each day is consisten tly rated for all youth, every day, in every Probation Camp.

The County shall provide a co mprehensive a rray of short- and long-term incentives at each Probation Camp and shall ensur e that you th ha ve access to all rewards and privileges to which they are entitled. The ability to purchase items fro m a store o n a weekly basis may b e part of this array, but it shall not be the only incentive offered.

The Count y shall use a continuum of individu alized consequences in response to non - compliant behavior or rule violations at each Probation Camp. The Co unty shall ensure that isolation may be used only as a last resort on this con tinuum, and only in response to violent or aggressive behavior; to prev ent 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 t ypes of be haviors t hat c ould r esult i n a refe rral to isola tion 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 p eriod of iso lation is based on the youth's behavior, or the threat to the youth, rather than on a pre-dete rmined period. Youth who are in isolation must receive at least one hour of large muscle activ ity fo r every 24 hours in isolatio n, unless the youth is actively violent or aggre ssive, such that removing the youth from isolation presents a significant risk of har m to the yo uth or othe rs. Youth whose isolation extends beyond 24 hours shall receive a due process hearing. The isolation po licy shall be subject to DOJ review and approval.

As part of its evaluation to determine wh ether the implemen tation of paragraph 17, as amended, is meeting the rehabilitation need s of youth and contributing to improved conditions, the Monitoring Tea m shall c onsider fac tors inc luding the fo llowing, a s appropriate: Use of isolation and reasons thereo f; Rate of youth-on-youth and youth-on-staff violence; Progress tow ard meetin g treatmen t goals as determined by the multidisciplinary team ("MD T"); Youth transfers to other Probatio n Camps for security or safety purposes; Rate of self -harming b ehaviors; N umber of y outh sent to outside fac ilities for mental health

evaluation or treatment; Use of behavior management rewards and consequences; and Number of early or on-time releases.

Status: Substantial Compliance (effective November 1, 2013)

County's Self-Assessment:

REHABILITATION AND BEHAVIOR MANAGEMENT

Aggression Replacement Training

Aggression Replacement Training (ART) and Small Group Intervention (SGI) data for the months of July 2013 through March 2014 show that participation completion rates continue to steadily increase (see ***Table 17-1***). The ART component-specific measures suggest that the Los Angeles County Probation Department ART programs continue to effectively impact those youth participating in the groups.

Table 17-1
ART and SGI Overall Completion Rates

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

*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*

There were positive outcomes associated with all three modules of ART groups across the juvenile camps. Higher completion rates (***Table 17-2***) appear to have impacted posttest scores. Moral Reasoning groups showed a significant level of improvement with 86% 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 posttest for the *Skills Streaming Checklist*, 58% of youth showed an increase in pro-social skill usage after completing Skill Streaming. According to the results of post-test for the *Aggression Questionnaire*, 60% of youth showed 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.

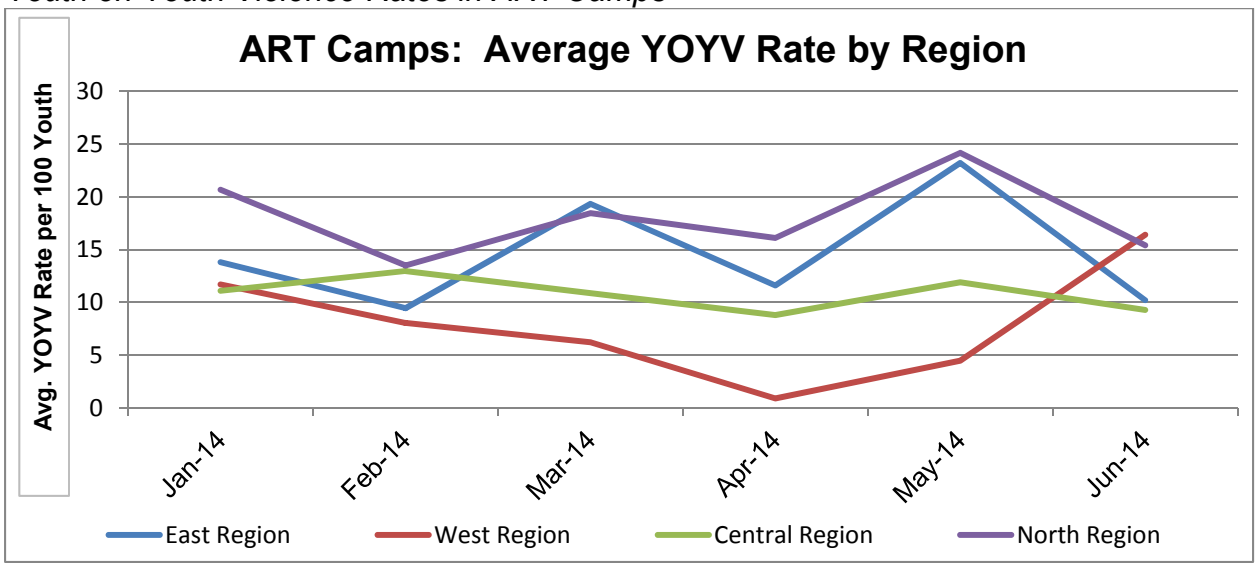
Table 17-2
ART and SGI Individual Module Completion Rates

	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*

This can be generally seen in the stabilization of youth-on-youth violence (YOYV) rates in the ART camps for the reporting period; the camps generally maintained within 10 to 20 incidents per 100 youth in camp (see ***Figure 17-1*** below). The Central Region maintains fairly low and constant rates. The West Region's rate is significantly lower than other camps for most of the reporting period; however due to the lower population numbers in the region a few YOYV incidents can dramatically affect the rate as seen in June.

Figure 17-1
Youth on Youth Violence Rates in ART Camps



*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 and Jarvis

The fluctuation in the rates of violence in the ART camps East Region may be of concern. ***Figure 17-1*** above shows greater variability in YOYV rates from month to month; Camp Paige's YOYV rates are fairly constant which reduced the even greater fluctuations presented by Camp Afflerbaugh. The Department's new quality improvement tool, the Continuous Monitoring System (CMS) as described in Paragraph 47, quantitatively shows Camp Afflerbaugh's need for

further assessment. The source of the problem has not been determined and may be attributed to various factors from youth not participating in ART to the underlying camp culture.

Figure 17-2 and ***Figure 17-3*** below 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 number of violent incidents in May (YOYV) and March (YOSV) 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 focus resources on Camp Afflerbaugh during the next reporting period to identify the source of the problem and reduce the presenting risks through corrective action.

Figure 17-2

Youth on Youth Violence Rates in Camp Afflerbaugh

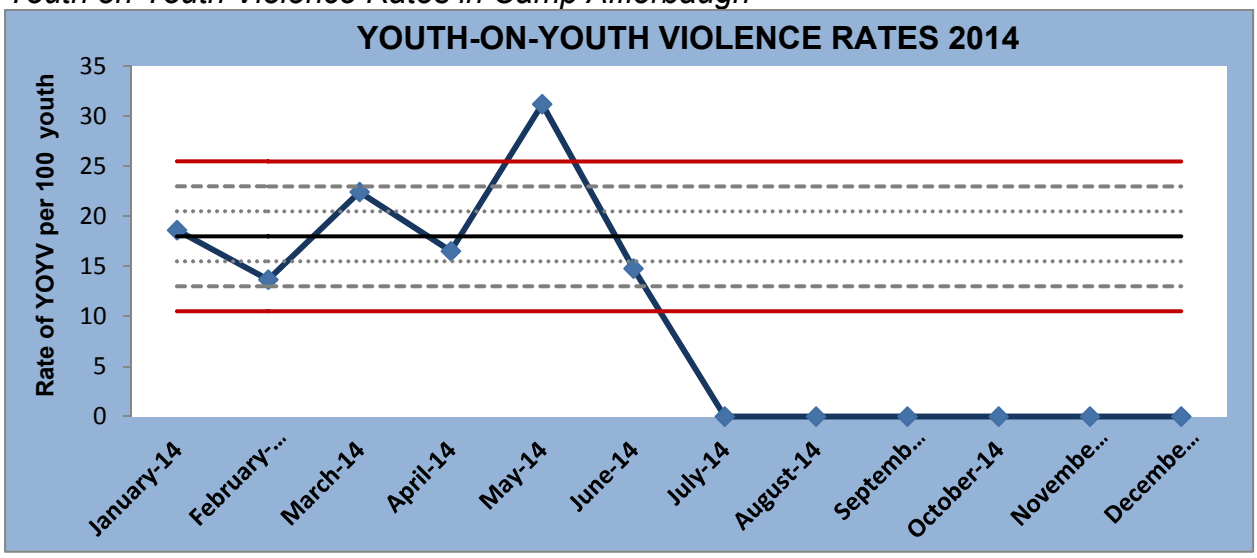
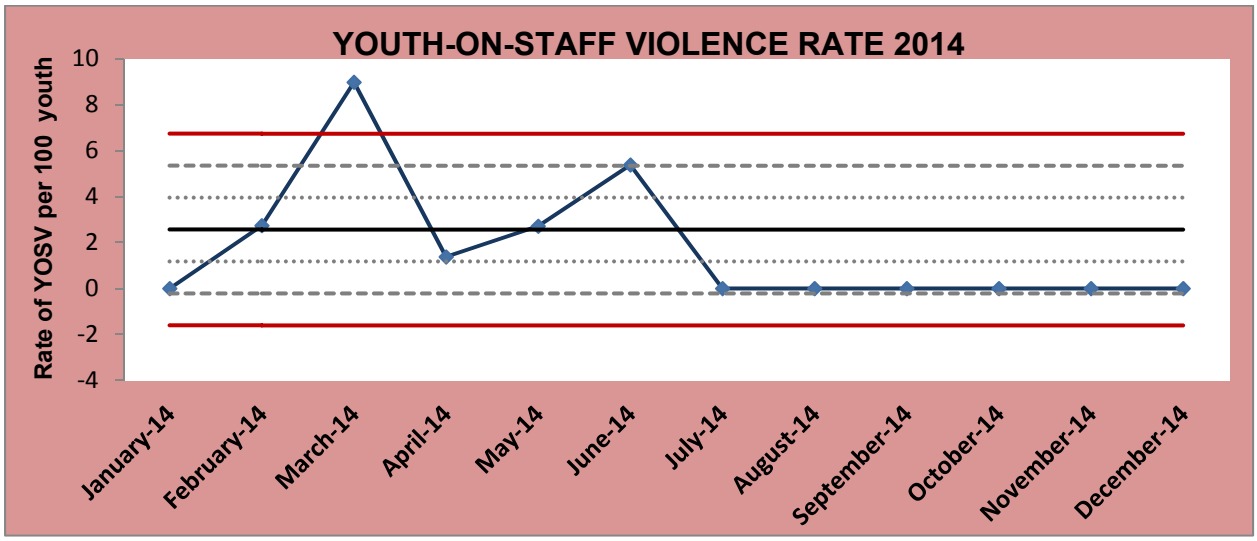


Figure 17-3
Youth on Staff Violence Rates in Camp Afflerbaugh



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 Rockey.

In January 2014, all clinicians who completed the Adapted DBT Train-the-Trainer sequence (in 2013) were given access to their choice of Behavioral Tech, LLC "On-Line Learning Courses" to further expand their expertise in the model and enhance the JJMHS program capacity for sustaining DBT interventions with fidelity. DMH and Probation have continued to pilot a measure to standardize the observation of groups by supervisory staff. The purpose of this measure is to enhance the supervision provided to clinicians conducting Adapted DBT groups. The measure continues to be piloted throughout the Adapted DBT camps.

The audit tool introduced in December 2013 captures release cohort data for youth participating in the program. Over the course of the monitoring period, improvements have been made to the audit tool and training provided to the auditors to ensure consistency in the reporting of numbers. In May it was discovered through discussion with Camp Rockey 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. This factor will be explored during the next monitoring period to determine the extent of impact on all DBT camps. Auditors have been instructed to document on the audit tool the reason for a youth's failure to successfully complete the program.

Table 17.3
Dialectical Behavior Therapy Release Cohort (January through May 2014)

Camps	# of youth released	# of youth successfully completed	%
Scudder 31		24	77%
Scott	31	27	87%
Rockey 43		31	72%
Onizuka	18	13	72%
Dorothy Kirby Center	49	36	73%
		RTSB Average:	76%

Note: Rate = (Number Youth Released who Successfully Completed DBT – Jan. - May. / Number Participating Youth Released) 100*

A review of RTSB's self-injurious behavior rates over the last quarter show 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.

As with the last reporting period, DBT Camps have maintained very low rates of self-injurious behavior with DKC at 4 incidents per 100 youth and camps Onizuka, Scott, Scudder and Rockey averaging less than 1 incident per 100 youth (see ***Table 17.4***). Although Camps Jarvis and Mendenhall are not DBT Camps, their rates averaged 1 and 1.33 incidents of self-injurious behavior per 100 youth, respectively. As is discussed in the *Referrals to SHU* section of this report, Jarvis is having difficulties in other areas and will be further assessed to determine whether the issue stems from their higher concentration of youth with psychotropic medication needs. Camp McNair has a similar population, however, experienced no self-injurious behavior incidents during the reporting period. Although the rate of incidents at Camp Mendenhall are slightly higher than other ART camps they remain very low overall. Self-injurious behavior may be related to anger management issues as well. Circumstances beyond RTSB's control can change the findings of an initial Multi-Disciplinary Assessment. A Multi-Disciplinary Team will convene as-needed to reassess a minor's suitability for their current program based on the discovery of new behavior. Camp Mendenhall's rates will be monitored and assessed during the next reporting period.

Table 17.4
DBT vs. ART Camp Rates of Self-Injurious Behavior Per 100 youth (January – May)

Region per	Camp	Self-injurious behavior per 100 youth (DBT camps)	Self-injurious behavior 100 youth (ART camps)
North Region	Jarvis		1
	McNair		0
	Onizuka	0.3	
Central Region	Munz		0.7
	Mendenhall		1.33
	Scudder	0	
	Scott	0.9	
West Region	Miller		0
	Gonzales		0
	DKC	4	
East Region	Paige		0
	Afflerbaugh		0
	Rockey 0.3		

*Note: Rate = (Average Number of Self-Injurious Behavior Incidents Jul.-Dec. / Average Population) * 100*

Behavior Management Program

The Behavior Manage ment Program (BMP) is a program that utilizes positive behavior reinforcement as a tool to get desired behaviors repeated. It consists of, daily obs erving a nd grading of youths behavior; re warding desired behavior; sanc tioning undesired behavior; and progressing through the program . BM P is a strong tool that encour ages all youth to com plete their program via incentives for compliance with facili ty 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 comm unity. The most valuable privilege earned through the BMP for most youth is earning consideration for early release.

The BMP com ponents of Daily Merit L adders (DMLs), Point Mechanics, Daily Rewards, Stage Promotions, and the use of Sanction For ms wer e identified as areas for monitoring to enhance BMP effectiveness. Pro bation s taff has been fully trained in BMP im plementation. Additional daily checks and balances ha ve been put in place by R TSB m anagement March 2014 to standardize and sim plify the calculation of point s 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 resu lts in the c amps abili ty to m ore a ccurately docum ent, tra ck, and report the status of youths' stages and eligibility for prom otion. This enhanced process resulted in Stage Prom otions across the board being gr anted in a tim ely m anner. There has been a significant improvem ent 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 being added properly; Sanctions are being relevantly assigned, completed, and reviewed by a Supervisor; Daily Rewards are being 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 a 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.

These established performance expectations allow the County to track progress and the effectiveness of corrective actions. ***Figure 17-4*** below provides an overview of BMP performance measures and indicates when expectations were not met during the quarter.

Figure 17-4: *March through May Performance Expectations Not Met*

Camp	School Points			DML Point Mechanics			Sanctions			Daily Rewards			Stage Promotions		
	Mar	Apr	May	Mar	Apr	May	Mar	Apr	May	Mar	Apr	May	Mar	Apr	May
EAST REGION:															
Afflerbaugh							✓								
Paige															
Rockey															
WEST REGION:															
Dorothy Kirby Center															✓
Miller															
Gonzales															
CENTRAL REGION:															
Scott															
Scudder															
Munz															
Mendenhall												✓			
NORTH REGION:															
Onizuka											✓				

McNair												✓				
Jarvis									✓		✓					
% Not Met							8%		8%		15%	15%				8%

School Points

Daily Merit Ladders (DML) from the day prior to the audit is reviewed to ensure that the youth are being awarded points for the school period and that the points are being calculated into the totals to earn daily rewards. The camp staff has been consistently including the points on the Daily Merit Ladders with an occasional calculation error. However, all camps meet expectations in this area for February through May 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 February through May 2014, all camps met expectations in this area. There was only one occurrence (January) where rote grades resulted in Camp Onizuka not meeting expectations. This was an isolate occurrence which warranted all disciplinary removals receive "1" point due to a camp disturbance.

The audit tool was modified in April for the March audits to include a question regarding the appropriateness of grades for youth not housed with the general population (i.e. youth housed in SHU, Infirmary, SSPs, or Youth on Trans). With the exception of camp Jarvis in the Month of May, all camps met expectations in this area. Camp Jarvis did not consistently document and add points for minors housed in the SHU. As the Challenger SHU staff also record youth's points on a DML, the corrective action entailed the respective camp staff, which would normally be responsible for the youth, contacting the SHU for an update on points.

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. In January, 69% of the camps met expectations according to current standards with four camps (McNair, Munz, Onizuka and Scudder) failing to meet expectations. In April and May, 85% of the camps "Met Expectations." Camp McNair failed to meet expectations in January due to three out of 24 youth receiving a reward for which they did not qualify. The issue at Camp Munz in January was a result of two out of 13 minors receiving a reward when they did not qualify. At Camp Onizuka in January, five youth qualified to receive a reward, but did not sign off as receiving the reward. It was later noted that this occurrence was due to the referral of the five youth to the SHU prior to the issuance of rewards. Therefore, the five youth actually no longer qualified. The sample population of youth who do not earn a reward can be so small that just one or two minors who receive a reward when they should not have cause inflated percentages as was the case with Camps Scudder in January. Furthermore, because a youth can be disqualified after rewards are dispersed, creating the false impression that they received a reward that they had not earned, the small population size was considered an isolated incident and corrective action was not required.

Table 17.5 increases the sam ple size by including January through May totals of youth who received unearned rewards and shows that the five m onth average in all cam ps would have m et the 80% threshold. Currently, trends in regard to m eeting expecta tions in the Daily Reward section are positive as reflected in ***Table 17.5***.

Table 17-5
Use of Sanctions; Completions & Unearned Rewards

Camp	Average # Sanctions Per 100 Youth	% of Sanctions Completed	# Youth Unearned Rewards	% Youth Unearned Rewards Received
Jarvis 15		86%	19%	10%
McNair 12		100%	8%	4%
Onizuka 19		97%	7	17%
North Region Average	15	94%	11	10%
Munz	4	100%	15	17%
Mendenhall	8	96%	20	8%
Scudder 24		99%	3	7%
Scott	9	99%	22	0%
Central Region Average	11	99%	15	8%
Miller 11		97%	19	0%
Gonzalez 9		75%	7	0%
DKC 8		75%	7	0%
West Region Average 8		57%	16	8%
Rockey 35		96%	15	0%
Paige 60		98%	13	2%
Afflerbaugh 19		88%	26	7%
East Region Average 38		94%	18	3%

*Note: Rate = (Average Number of Sanctions Jan.-May. / Average Population) * 100*
*(Average Number of Sanctions Accompanied by Zero Point Jan.- May. / 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.

In February, the audit tool was modified to calculate the total number of sanctions for the entire audit month in relation to the number of sanctions that were signed off by a supervisor as having been completed. All camps met expectations in this regard except for Camp Gonzales in February, Camp Afflerbaugh in March, and Camp Jarvis in May. The audits revealed that Camp Gonzales was using the old version of the Sanction Form, which did not have a Supervisor verification signature line. This was corrected in the latter months of the monitoring period. Camp Jarvis also used the old Sanction Form on 3 occasions and 4 youth refused to complete the writing assignment. Furthermore, clarity on the wording of the audit tool questions became an issue as auditors did not consistently check for written assignments, only supervisor signatures, to verify that a sanction was completed. As of April, the auditors were instructed to check for writing assignments (when applicable) to ensure that the sanctions were in fact verified as completed. Similarly, during the next monitoring period, staff will look for an indicator on the form that privilege suspension, work duty suspension, work detail and phase demotions were applied as indicated on the Sanction Form. Camp staffs have also been encouraged to be mindful of the relevancy of writing assignments in connection with the behavior. This gives the youth an opportunity to reflect on alternative socially acceptable behaviors and ensure they understand the consequences for such negative behavior. ***Table 17-6*** below gives an overview of Sanction usage across the camps. It appears that some camps may benefit from increasing their use of Sanctions with the youth to enhance rehabilitative efforts and pro-social skills (i.e. Camps Munz and Mendenhall).

Table 17-6
Use of Sanction Totals and Rates (January through May)

Camp	February total / rate per population	March total / rate per population	April total / rate per population	May total / rate per population
North Region				
Jarvis	5 / 8%	23 / 33%	19 / 26%	12 / 17%
McNair	7 / 10%	20 / 28%	11 / 16%	9 / 12%
Onizuka	21 / 43%	17 / 31%	19 / 37%	17 / 33%
Central Region				
Munz	3 / 4%	1 / 1%	4 / 6%	10 / 14%
Mendenhall	1 / 2%	6 / 1%	17 / 3%	9 / 2%

Scudder	31 / 90%	22 / 62%	23 / 68%	21 / 57%
Scott	8 / 36%	1 / 4%	17 / 53%	9 / 31%
West Region				
Miller	12 / 22%	15 / 27%	5 / 9%	10 / 18%
Gonzales	22 / 77%	4 / 14%	6 / 21%	2 / 7%
DKC	15 / 26%	27 / 46%	31 / 53%	22 / 40%
East Region				
Rockey	34 / 71%	42 / 77%	39 / 70%	23 / 41%
Paige	67 / 87%	96 / 100%	57 / 76%	18 / 25%
Afflerbaugh	23 / 31%	16 / 24%	21 / 29%	15 / 20%

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

Stage Promotions

Youth are granted privileges based on their current stage; which range 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.

Previously, documentation in regard to stage promotions was inaccurate on the Daily Merit Ladders due to lack of communication and training of the Probation night staff who tallied and calculated consecutive made day totals. According to the DML's in March, it was discovered the camps not meeting expectations; were in fact promoting youth in the allotted time frame. This information was found on the Made Day Tracker. A RTSB process enhancement resulted in the development of the Made Day Tracker, which allows the BMP Coordinators to more easily track youth's stage promotions. All camps with the exception of Dorothy Kirby Center, with whom unique monitoring tools were developed due to their tracking differences, are now utilizing the Made Day Tracker. As corrective action had been issued to camps not meeting expectations in March, the night staffs in many of these camps were trained and were coming on board with calculating consecutive made days accurately on the DML. Therefore, when the DMLs and Made Day Trackers were compared, the outcomes were found to be in compliance in the April and May audits. Stage promotions are now being audited against the Made Day Tracker rather than the DML, which resulted in a shift to all camps meeting expectations in April and May.

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 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.
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 17-7*** depends upon the type of youth housed at the facility, the population size, style of the facility, and the location of the facility to the SHU.

Dorothy Kirby Center has the lowest referral rate, 6 referrals per 100 youth, as the cottage style camp is less dependent on the SHU since youth can take a voluntary respite in their own room as opposed to all other dormitory style camps where the SHU rooms become the designated respite areas. Due to the proximity of Camps Munz and Mendenhall to the SHU, a 30 to 45 minute drive, the SHU is used sparingly. Staff at these camps comment that by the time they are able to transport the youth to the SHU, when staff are available and staffing ratios are appropriate to allow for the transport, the youth(s)' behavior is no longer a safety and/or security concern. The youth are therefore returned to the camp community. Camps Scott and Scudder are examples of how population size and staffing ratios aid in keeping SHU referral rates lower (20 and 17 referrals per 100 youth respectively). Camp Afflerbaugh houses a large number of younger youth, which may be part of the reason for their moderate rate of referral. As Camp Afflerbaugh's rates of violence are statistically out of control and require further assessment into the source of the problem (refer to ART section above), the rate of referrals to the SHU will also be explored.

Camps Rockey and Onizuka are specialty camps, housing high risk / high needs youth, and therefore their rates of referral are expected to be high (99 and 71 referrals per 100 youth respectively). Camp McNair has a high concentration of youth with mental health needs who are prescribed psychotropic medications; thus their moderate rate of referral is to be expected. Of concern, however, is Camp Jarvis, the equal counterpart to Camp McNair. Since Camps Jarvis and McNair are part of the same facility (Challenger Memorial Youth Center), house the same type of youth, have similar population averages for January through May (Jarvis 68, McNair 70),

and have a SHU on-site, it would be expected that they would have similar SHU referral rates. Camp Jarvis' rate of referral is double that of Camp McNair (88 referrals per 100 youth). Camp Jarvis' population size was substantially reduced in the month of June to address some of the issues surfacing. With the implementation of the Comprehensive Quality Assurance process as described in Paragraph 47 of this Self-Assessment, the source of the problem will be determined and targeted with corrective action during the next reporting period.

All camps are currently meeting 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 17-7
Referrals to the Special Handling Unit (Averages of January – May)

Camp	Referral rate to SHU per 100 youth	% housed less than 24 hours	% and # housed 24 hours +	% unknown
North Region				
Jarvis	88	97%	2%, 6	1%
McNair	44	100%		
Onizuka	71	90%	10%, 19	
Central Region				
Munz	19	100%		
Mendenhall	8	100%		
Scudder	17	93%	7%, 2	
Scott	20	71%		29%
West Region				
Miller 25		72%	20%, 12	
Gonzales 13		100%		
DKC 6		98%	2%, 1	
East Region				
Rockey 99		97%	1%, 3	2%
Paige 32		100%		
Afflerbaugh 40		97%	3%, 4	

*Note: Rate of referral = (average of total # of youth referred to the SHU January – May 2014 / average of total camp population January – May 2014) * 100*

Length of Stay

Only 3% (47) of the 1434 SHU referrals were documented as being in the SHU for 24 hours or longer. Camps Onizuka, Jarvis, DKC, Miller, Scudder, Rockey, and Afflerbaugh all had youth housed 24 hours or longer for a variety of reasons ranging from violent gang related behaviors to assaultive behavior (staff/minors). Camp Onizuka experienced a major disturbance in February resulting in the housing of 11 minors in the SHU for longer than 24 hours for safety and security purposes. Most camps do not house youth each month for extended periods with the exception of Camp Miller. 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.

Actual Time in Isolation

The audit tool was modified in February to better reflect true isolation in the SHU during the hours in which youth are awake and when activities can be conducted (refer to ***Table 17-8***). 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. Some camps have done very well in keeping youth out of isolation for a significant amount of time during their SHU stay by involving them in rehabilitative and learning activities. As is reported in ***Table 17-8***, Camps Onizuka, Munz, Scott and Gonzales had high averages of "awake" hours spent in non-isolation. Youth participated in school activities in the dayroom of the SHU, counseling with Mental Health staff, and casework activities with Probation staff, among other daily routines (hygiene, meal periods) that occur outside of the youth's room. As the gathering of this data has been exploratory, the goal of the Probation Department is to increase non-isolation activities within the SHU over the next reporting period.

Table 17-8
Segregation vs. Isolation Special Handling Unit (Averages of February – May)

Camp	Avg. # of hours in segregation	Avg. # of asleep hours in isolation	Avg. # of awake hours in isolation	Avg. # of awake hours non-isolation
North Region				
Jarvis	13:10	6:56	5:40	0:33
McNair	10:15	3:36	5:43	0:58
Onizuka	22:15	14:14	5:44	7:02
Central Region				
Munz	12:34	8:16	4:08	4:27
Mendenhall	12:45	7:17	6:09	0:23
*Scudder	10:35	3:36	5:01	1:57
Scott	15:29	8:13	4:32	4:03
West Region				
Miller 23:27		9:48	11:20	2:20
Gonzales 17:15		7:12	5:06	5:21
DKC	3:40	0:00	3:03	0:25
East Region				
Rockey	15:15	6:10	7:56	1:47
Paige	14:40	6:45	6:43	1:16
Afflerbaugh	18:14	8:46	7:30	1:57

*Note: *Scudder averages do not include the month of April as the sample included youth who were housed long term in SHU for SSPs rather than behavior reasons related to major rule violations.*
Averages include the sampling of up to five cases (two cases housed for longer than 24 hours when applicable) for the months of February through March. January was not included as the audit tool did not collect all of the data included in this table.

Special Incident Reports and Supervisor's Assessments

Residential Treatment Services Bureau (RTSB) staff has 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 supervisor's 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. As with all newly implemented and audited processes, the forms were not always completed or found and some did not include the supervisor's documentation of the youth's behaviors justifying continued detention. The Release Readiness form was modified in March to clarify and strengthen the documentation efforts. Only a few camps did not meet expectations: in the month March, McNair and Onizuka; and in April, Munz, Mendenhall, and Onizuka. As the previous month's audits for both camps indicated that they met expectations, this may be a result of the change in forms. The camp Directors have agreed to provide a Readiness Release Form training conference with the camp Supervisors. Due to the proximity of Camps Munz and Mendenhall to the SHU an agreement has been made with the Challenger SHU supervisor's to complete the assessment for the respective camp supervisor. Corrective action was therefore provided to the Challenger SHU supervisor's to ensure that they properly record all assessments of the youth and the time that the respective camp was notified of a youth's readiness to be released.

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, 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 an Specialized Supervision Plan (refer to *Length of Stay* section). The March audits showed that the camps housing youth over 24 hours have completed the forms, justified housing for the specified length of time and obtained director approval. There were only two instances in which Camp Miller (February) and Camp Onizuka (January) did not meet expectations. Corrective action plans were formally introduced to the camps in February.

Camp Miller has implemented a corrective action plan that ensures a Major Administrative Action Review form is initiated and completed any time a youth is housed up to the 23rd hour. Camp Miller has appropriately completed the Major Administrative Action Review form for each of the eight instances of extended housing in the months following the February audits. Camp Miller has a lower rate of referral to the SHU, 25 referrals per 100 youth, of which 20% are for extended periods of time. All other risk factors, such as youth on youth violence (YOYV), are under statistical control according to the Continuous Monitoring System control Charts (refer to Paragraph 47 for details). Camp Miller has a lower rate of YOYV as compared to other camps; an average of 8 incidents per 100 youth compared to the highest at 36 and the lowest at 4 incidents per 100 youth. This indicates that the camp uses the SHU for more egregious behavior which places the youth at risk. Coupled with the fact that Camp Miller supervisors have consistently documented justification for continued detention, meeting expectations for the entire reporting period, this suggests that this higher percentage may be appropriate for Camp Miller. However, the percentages of youth housed for extended periods will continue to be monitored.

Discussion by Monitors:

The County cam e into substantial com pliance with this provision on Nove mber 1, 2013. Thi s first six-month period of compliance monitoring focused on verifying the results of the County's own audits and on helping the County to disti ll its auditing tools into easily access ible performance m easures, each with their own ex pected level of performance. In so doing, the County shored up its internal cap acity to identif y and respond to problems that m ay arise w ith the implementation of its rehabilitative program ming and behavior m anagement system. A fe w glitches with the auditing system were id entified (e.g., how ART/SG I/DBT attendance and completion rates we re calcu lated b y auditor s; how stage prom otion tim eliness was assessed; whether auditors verified that sanctions ha d been com pleted; how SHU referral rate s an d isolation times were calculated), all of which will be refined in the upcoming monitoring period.

In order to verify the Department's audit findings, the Monitor conducted her own review at each Camp and t hen com pared the results to the previous m onths' audit reports. W ith only sm all departures c reated by the glitch es id entified abo ve, the Monitor 's resu lts lined up nicely with those the County reported in its self-assessment.

This provis ion has two requir ements and resu lts will be d iscussed sep arately: 1) r ehabilitative programming that is responsive to youth's indivi dual needs, and 2) the behavior m anagement program, which includes the Merit Ladder, sanctions process and SHU.

Rehabilitative Programming

Audit Methodology. At each of the 13 Cam ps, a sam ple of youth was id entified (i.e., the las t 5 youth released in the month prior to the Mon itor's visit) and Camp staff delivered case presentations by f ollowing written guidance pr ovided by the Monitor. The Monitor requested information on the youth's needs, the types and dos age of services received, the frequency and substance of casework, youth's perform ance in th e behavior m anagement program, and whether they were re leased to the community early/on-time/later than planned. Five cases were reviewed at each Camp, for a total of 65 cases, which is an exceptional dataset upon which to draw conclusions about the adequacy of the County' s rehabilitative programm ing. [The Monitor did not visit Camp Miller due to scheduling issues.]

Findings. As in the previous m onitoring period, the Monitor's overall finding is that youth's needs are being assessed com prehensively duri ng the Initial MDT m eetings (often adding to what was generated by the CAU) and youth are rece iving services that ar e responsive to those needs. Most often, services include DBT or AR T or one of the sm all group interventions (e.g., Moral Reasoning, Skill Stream ing), substance abuse treatm ent, and individual counseling services for a variety of issues related to a youth's m ental health diagnosis or other traum as and stressors in the youth's life. W hen needed, yout h also participated in gang program ming, tattoo removal, and parenting programs.

In addition, youth receive a wide array of "extra" programs, som e of which directly respond to risk and crim inogenic needs, othe rs that provide additional stru ctured tim e with a pro-social adult, and still others that teach y outh new sk ills and hobb ies. When the MOA was first signed,

rich program opportunities were a luxury provi ded 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 65 case presentations, the Monitor assessed a series of indicators to assess the quality of implementation. These included:

- Whether Initial MDTs were held w ithin 10 business days of adm ission. Initial MDTs were held within 10 business days for 61 of the 65 youth in the sample (94%). Among the four youth whose MDT was not within the requ ired timeframe, all but one were late for legitimate reasons.
- The proportion of youth who com pleted ART/SGI/DBT. Among the 65 youth, 23 youth needed ART (35%), 15 needed SGI (23%), and 24 needed DBT (37%). Three youth (5%) had recently completed one of the programs during a previous Camp stay.
    - Of the 23 ART youth, 20 com pleted at leas t 80% of the sessions (87%). Two of the three who did not complete were released from Camp extremely early, and the other youth's Ca mp had only one ART group at the tim e and did not have a slot available before release.
    - Of the 15 S GI youth, 12 com pleted at least 80% of the sessions (80%). The three who did not com plete had attendance pr oblems caused by schedule conflicts with other treatm ent program s. At several Ca mps, youth attend SG I throughout their entire stay (and also before and after ART), so the 80% metric is not relevant.
    - Of the 24 DBT youth, 22 com pleted at least 80% of the se ssions (92%). One of the two who did not com plete picked up a new charge, was in court, was resentenced and transferred; the othe r youth was pregnant and frequently on medical trans.

  These com pletion rates generally m irror thos e reported in the Count y's self-assessment. In only two instances (Ca mp Affle rbaugh, Camp Kilpatrick) was the lack of program completion due to system ic factors (i.e., conflict with su bstance abuse programm ing; insufficient program slots) ra ther than an unavo idable conflict, generally around m edical issues.

- The proportion of youth who com pleted substance abuse treatm ent. All but five of the 65 youth had a substance abuse treatm ent need (92%), and all but four of these 60 youth (93%) com pleted the substance abuse treatm ent 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. These com pletion rates are a bit hig her than what was repo rted in the Coun ty's self assessment, most likely due to Cam p staff's additional follow up when preparing for the ca se presentations. Auditors tended to rely only on the Individual Tracking Form , wh ich as the County reported, was often incomplete.

- The proportion of youth who received individual mental health treatm ent at a frequency consistent with th eir n eeds. Of th e 65 you th in the samp le, 55 youth (85%) needed individual mental health treatment. One youth's referral was never received by DMH, but the remaining 54 youth (98%) receiv ed the serv ices needed. The frequency of individual sessions varied—some youth were seen weekly, others were seen less often, as prescribed

by their treatment plans. Only very rarely were youth not seen for reasons related to a lack of availability of a clinician (e.g., medical leave, vacancy). Of the 10 youth who were not open to DMH, four of these youth were seen a few times to address a crisis that arose during their stay.

- 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 63 of the 65 youth in the sample (97%). The other two youth were released much earlier than expected by the Judge.

- Whether home evaluations were conducted at least 30 days prior to release. About 11% of the youth (n=7) in the sample went to placement following their release from Camp, so a home evaluation was not necessary. Among the remaining 58 youth, a home evaluation was conducted at least 30 days prior to release in 93% of the cases. In two cases, the Judge released the youth extremely early; in the other two cases, the field services PO did not meet the required timeline, even though the Camp provided release notification as required.

- 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. All of the Camps had satisfactory performance on this metric—most of them were exemplary, with rates higher than the Monitor has witnessed in previous monitoring periods. 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. In an effort to foster some healthy competition, the Camps' average ratios are listed below:
    - Kilpatrick 97%
    - Rockey 95%
    - Scudder 95%
    - Mendenhall 94%
    - Scott 93%
    - Onizuka 92%
    - DKC 89%
    - Jarvis 88%
    - Munz 88%
    - Paige 88%
    - Gonzales 80%
    - Afflerbaugh 76%
    - McNair 76%

- The level of contact between POs and youth's family members. Rough estimates were devised in an attempt to quantify the number of *substantive contacts* POs made with the youth's family, in comparison to the number of months the youth was in Camp. For most of the youth (75%), the PO made family contact at least monthly, with some Camps showing even more frequent contact for some kids. However, for about 25% of the youth, the PO made contact less than monthly. While the level of family engagement is higher

than it has been in the past, it is still an area in which improvements can be made. In addition to the frequency of contact, POs should focus on actually engaging the youth's family in decisions about the youth's treatment and programming and in planning for their release.

- 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). Across the 65 youth in the sample, all but 3 (95%) had their first casework session within 21 days. Most often, the casework sessions occurred much sooner after admission. Across all 13 Camps, the average length of time between admission and the first casework session was 8.2 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 now 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 65 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 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 recent experience at the Camps revealed quite a different picture. The formalized structures and procedures now mean that *every youth has an equal opportunity to earn this incentive*.

  Furthermore, the County submitted some compelling data showing the proportion of youth who are released early and the number of days saved (positive outcome), compared to the number of youth who had time added or a new Camp program ordered (negative outcome). These data are summarized below:

Early Releases and Time Added, January-May 2014									
	# youth released	# released early	% released early	# days early	Avg days early per youth	# youth time added	# days added	Avg days added per youth	Difference
Jan.	156 79		51%	2,559	32.4	15 1,	529	101.9	-1,030 days
Feb.	144 65		45%	2,429	37.4	13 1,	334	102.6	-1,095 days
Mar.	132 71		54%	2,336	32.9	8	1,064	133.0	-1,272 days
Apr.	168 74		44%	2,572	34.8	11 1,	549	140.8	-1,023 days
May	139 77		55%	3,376	43.8	12 1,	755	146.3	-1,621 days
AVG	*148*	*73*	*50%*	*2,654*	*36.3*	*12*	*1,446*	*120.5*	*-1,208 days*

As shown in the table above, on average, 50 % of the youth released each m onth are released early. In comparison to the number of youth released each month (average n=148 youth), a small number of youth have tim e added to their sent ence (average n=12 youth). However, in contrast to the average num ber of days early youth are released (average n=36 days), youth with time added generally have their stay lengthened abou t 4 m onths (average n=120 days). On balance, the County "saves" a significant number of days (average n=1,208 days per m onth, or about 14,496 bed days per year). The County's early release practices have many benefits:

- They provide a very powerful incentive for youth to engage in programm ing and exhibit positive behavior while in Camp.
- They provide a structured m echanism fo r assessing youth progress and rewarding it accordingly.
- They dem onstrate a commit ment to not ho lding youth in custody any longer than is necessary to m eet the youth's rehabilitative needs (although th e release decision itself i s out of the County's control).
- They provide a valuable avenue for cost savings. At a rate of approximately $505 per day in Camp, the pro jected 14,496 saved bed day s equates to $7.3 million dollars s aved in just the first five months of this year.

Behavior Management Program

The Merit Ladder**:** In 2012, the County designed an excep tional behavior management program (i.e., the Merit Ladder), created w ritten docum entation, 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 som e ti me, the Daily Merit Ladder (DML) for ms at each Camp have been under a high-level of scrutiny. Not only are they reviewed every 3 da ys 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.

Progress in this area was slower than on the technical aspects of the DMLs described above, so the Monitor did a comprehensive audit, reading all of the sanctions created since January at each Camp. The sanctions process was fully intact in some of the Camps (Rockey, McNair, DKC, Scott, Scudder and Gonzales). The sanctions were procedurally complete and the assignments were both thoughtful and proportional. Some of the other Camps, however, struggled with a variety of problems mostly related to the quality of the assignment or the effort displayed by the youth. Written assignments that are largely a theoretical exercise (e.g., " Write 500 words on Why it is Important to Follow Directions) are less effective than those designed to create insight into one's behavior (e.g., " Why were you so frustrated? What was going on with you when you disrespected the teacher?). Furthermore, even though Supervisors are now required to sign the sanctions form to indicate the sanction has been completed, some of the attached assignment evidenced very little effort on the part of the youth (e.g., one word answers to Thinking Report questions; essays that simply repeated the same sentence over and over). The effectiveness of this tool will depend on the quality of the assignments and the Supervisors need to set and

reinforce high standards. Finally, to the extent that non-writing assignments are imposed (e.g., community service, work detail, job suspension, etc.), the successful completion of these sanctions should be documented on the sanctions form. 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 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.

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 new 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. [Camp Gonzales has a SHU but it was closed during the Monitor's visit. It was scheduled to re-open when Camp Kilpatrick closed for renovation.] At each SHU facility, the Monitor reviewed a sample of 15-20 SHU folders from the month prior to the site visit (total sample about 85 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 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, particularly at the Challenger SHU, 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, Supervisors were very diligent in checking the youth frequently, usually far exceeding the once-per-shift policy requirement.

- *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 17-8, 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. Based on the Monitor's experience in other jurisdictions, the length of stay during waking hours is reasonable, and the fact that most youth have portions of the waking hours that are spent outside of their rooms helps to mitigate the harmful effects of isolation.

  That said, the County's self-assessment discusses some 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 remains in Substantial Compliance with this provision. Assuming that the same level of performance is maintained, the compliance monitoring period should end October 31, 2015.

Evidentiary Basis:

- Site visits to Camps Afflerbaugh, Paige, Rockey, Kilpatrick, Gonzales, Onizuka, McNair, Jarvis, Scott, Scudder, DKC, Munz and Mendenhall.
- Case Presentations of 5 youth most recently released at each Camp, along with the source documentation, total sample = 65 youth
- Review of program tracking logs
- Review of Merit Ladder point sheets and supporting documentation for the two months prior to the site visit at each Camp
- Review of DOJ Audit Bureau's audits, January-May 2014
- Review of Sanctions forms from January 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 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)

County's Self-Assessment:

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. As detailed below in ***Table 43-1***, DMH continues to provide services to a high percentage of the youth housed in the Probation camps:

Table 43-1

AVERAGE PERCENT OF OPEN MENTAL CASES BASED ON AVERAGE POPULATION													
CBA	***CDG***	***CFM***	***CGR***	***CJP***	***CVK***	***CEO***	***CGJ***	***CRM***	***CWM***	***CJM***	***CJS***	***CKS***	***DKC***
99%	*100%*	*98%*	*100%*	*99%*	*100%**	*100%*	*98%*	*100%*	*84%*	*50%*	*100%*	*100%*	*100%*

**Camp Kilpatrick was closed from April through the end of Monitoring Period.*

For Camps Munz, Mendenhall, Jarvis and McNair, Department of Public Health, Substance Abuse and Prevention Control (SAPC) has been providing substance use/abuse services for several years. DMH also has full time substance abuse counselors (either directly-operated or contracted) assigned to Onizuka, Munz, Mendenhall, Scott, Scudder, Miller, Kilpatrick, Gonzales, Rockey, Afflerbaugh, Paige and Dorothy Kirby Center. These staff supplement the services provided by the assigned clinician.

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.

In addition to the 10 week curriculum, DMH continues to enhance the treatment interventions for clients with co-occurring disorders by providing training in Seeking Safety, an evidence-based model that has demonstrated effectiveness in addressing substance abuse and trauma issues. On April 16, 2014, a training specifically tailored to address the unique clinical needs of youth being treated in a juvenile justice setting was provided to clinical staff. Seeking Safety refresher courses were offered on the following dates to staff who had previously taken the one-day training: 2/12/14, 2/18/14, 2/25/14 and 2/26/14. In order to ensure fidelity to the model, two separate sets of ten weekly one hour consultation calls with the Seeking Safety trainer were provided to staff using the Seeking Safety intervention.

DMH continues to utilize the auditing tools which were developed in consultation with the Monitor for the individual therapy provided to youth with co-occurring disorders. The auditing tool evaluates whether the treatment goals for co-occurring disorders address the symptoms and impairments identified in the assessment; whether the client is receiving or has received services to address his/her co-occurring disorder; whether progress notes identify the co-occurring disorder goal set forth in the treatment plan (CCCP); and whether the progress notes demonstrate

what has been attempted and/or accomplished toward the attainment of the co-occurring disorder treatment goal.

During the current Monitoring Period, DMH has maintained an average level of compliance for this Provision 43 of 97% as outlined below in ***Table 43-2***:

Table 43-2

Provision 43 - Substance Abuse	
January 1 - June 13, 2014 Summary Data	
January - March	ALL Facility - Average by Screen
1: Goals for services on the CCCP address the COD/SA symptoms & impairments (if any) identified in the Assessment.	**98%**
2: Client is receiving or has received services (group or individual) that address SA/COD issues (Yes=100) (No=0)	**100%**
3: Progress Notes for SA/COD services identify the SA/COD goal(s) as set forth in the CCCP.	**93%**
4: Progress Notes for SA/COD services demonstrate what was attempted/accomplished toward SA/COD goal(s).	**96%**
Quarterly Compliance	**97%**
April - June 13	ALL Facility - Average by Screen
1: Goals for services on the CCCP address the COD/SA symptoms & impairments (if any) identified in the Assessment.	**98%**
2: Client is receiving or has received services (group or individual) that address SA/COD issues (Yes=100) (No=0)	**98%**
3: Progress Notes for SA/COD services identify the SA/COD goal(s) as set forth in the CCCP.	**98%**
4: Progress Notes for SA/COD services demonstrate what was attempted/accomplished toward SA/COD goal(s).	**96%**
Quarterly Compliance	**98%**
January 1 - June 13, 2014	ALL Screen ALL Facility Provision 43 Average
Overall Compliance	**97%**

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 (82%) of the youth entering camp have an identified need (see ***Table 43-3***). 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 43-3

Substance Abuse Service Needs (January – May)

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	70	94%	15	43
McNair	70	97%	1	67
Onizuka	40	100%	2	38
Central Region				
Munz	78	97%	3	73
Mendenhall	54	78%	1	36
Scudder	39	97%	15	22
Scott	29	96%	5	24
West Region				
Miller 52		68%	5	28
Gonzales 20		4%	1	1
DKC	47	98%	0	46
East Region				
Rockey	41	80%	8	33
Paige	65	88%	6	23
Afflerbaugh	83	72%	12	47

*Note: % of new admits identified with need = (total # of newly admitted youth January – May 2014 / total number of youth identified with 5 or 10 week program need) * 100*

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 *Table 43.2* below). 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 92% or better compliance on a majority of the measures. Systematic issues resulting in non-compliance with PCMS documentation of session refusals in April was resolved with corrective action by May.

Figure 43-1
Substance Abuse Audit Performance Expectations Not Met (January – May)

PERFORMANCE EXPECTATIONS NOT MET																					
Camp by Region	Newly Admitted Youth Referrals					SA Session Refusals					Service Completion					Drug Related Incidents				
	Jan.	Feb.	Mar.	Apr.	May	Jan.	Feb.	Mar.	Apr.	May	Jan.	Feb.	Mar.	Apr.	May	Jan.	Feb.	Mar.	Apr.	May
EAST																				
Afflerbaugh								✓	✓				✓	✓						
Paige							✓										✓			
Rockey																				
WEST																				
DKC								✓												
Miller									✓											
Gonzales									✓											
CENTRAL																				
Scott																				
Scudder			✓																	
Munz																				
Mendenhall									✓									✓		

NORTH																				
Onizuka																				
McNair								✓	✓											
Jarvis				✓				✓	✓											

It was noted in January, that Dorothy Kirby Ce nter's (DKC) efforts to provide the youth with substance abuse services were not properly addressed by the ex isting audit tool. Due to the nature of the youth in the facility (all having co-occurring disorders), each cottage had ongoing substance abuse sess ions. Every newly adm itted youth was autom atically enrolled in the program upon entry to his or her cottage. The existing au dit too l only captured th e successful completion rates of a group and not youth who m ay have repeated m ultiple groups. Therefore, the true rate of youth success was n ot accu rately reflected and was actually m uch higher. Th e audit too l for DKC wa s consequen tly altered to capture a youth's successful co mpletion of services upon their exit from camp. As components of DKC's system were found to be unnecessary, the cam p transitioned in late March from fa cilitating Substance Abuse groups according to cottage to the standard method which all camps use; groups are now assigned based on youth needs. The standard audit tool is no w appropriate for use w ith DKCs intervention tracking system.

Newly Admitted Youth Referrals

A all of the camps have m et expectations cons istently in r eferring you th iden tified in need of services to their respe ctive five or ten week program within 14 days of a rrival ex cept for Cam p Jarvis (April) and Cam p Scudder (March) who did not meet expectations. On the occasion that expectations have not been m et, the cam p ha s identified the problem and has implem ented corrective action. It w as determ ined that Camp Jarvis' referral rate was not a pattern, but potentially due to staff vacations during the m onth. Expectations have since been m et. A procedural change caused several Ca mp Scudde r referrals to be one day late, which wa s corrected upon discovery in mid-April.

Enrollment and Attendance

The audit tool was m odified in February to allow Probation the ability to captu re attendan ce rates. It was discovered duri ng the reporting period that the In tervention Tracking Log did not necessarily match the Department of Mental Hea lth (DMH) session rosters at several camps. A lack of communication resulted in Probation "shorting" session attendance num bers. There is a need for a clearer pro cess and m anner of comm unication between Probation and Mental Health. An assessment is underway to determ ine the s ource of the problem s if any at each cam p and a suitable process whereby the attendance information can be uniformly obtained from DMH. The issues vary between cam ps; som e issues st em from the contracted providers s ession documentation on the roster, contracted prov iders differing lengths of programm ing, staff documentation on the Intervention T racking Log, and the memorialization of make-up days. As these problems have only recently come to light, corrective action will be forthcoming during the next reporting period.

Despite this oversight which ultimately reflects greater participation rates in the subs tance abuse program, the camps have made tremendous strides during the quarter to document service needs

and attendance on the shared drive Intervention Tracking Log. Some camps were previously not logging services at all, others only partially entering certain services (i.e. not entering outside provider services), while other camps did not have updated versions of the log from which the audit tool was based. Much of the information needed to be obtained from the MDT Coordinators at the camp rather than simply verified. Camp Jarvis is one of the camps that is improving in its documentation; however, its shortcomings can be seen in the higher percentage of youth enrolled and not attending services during the month. This is due, in part, to youth being out of the facility for medical appointments or court appearances, but also due to staff not updating information in the Log. This was not an issue in the March audit of Jarvis indicating that they have resolved the issue. The strides made by the camps in maintaining an updated log will assist in Probation's ability to quickly confirm whether the Intervention Tracking Log matches the information provided by DMH.

Substance Abuse Session Refusals

An area of concern for the reporting period is the documentation of caseworkers' endeavors to counsel youth refusing to attend a Substance Abuse treatment sessions (refer to *SA Session Refusals* section of ***Figure 43-1***). Staff needs to make an effort to redirect the youth to attend future SA sessions and potentially make-up the session missed. Though, in speaking with the camps, they are in fact encouraging the youths' participation, the Probation Officers are not always documenting these efforts in the Probation Case Management System (PCMS). Corrective Action Plans (CAPs) have been developed and are being monitored on a monthly basis. Documentation in PCMS has improved substantially as a result. Camps Onizuka, Rockey, Scott, Scudder, and Munz have consistently met expectations (January through May) due to zero refusals for the month or 100% documentation of refusals. Both scenarios indicate that staff are encouraging youth participation and are actively involved in case planning. Corrective action may have impacted those camps not in compliance in April as all camps met expectations the following month.

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. During the reporting period, three camps showed trends of percentages not meeting expectations in the 5 week and/or 10 week programs; Camp Onizuka, Camp Afflerbaugh and Dorothy Kirby Center (see ***Tables 43.5*** and ***43.6***). Various reasons exist for unsuccessful completion percentages (as stated in the comments section of the audit tools) including but not limited to: youth out of camp during sessions, make-up sessions not documented or communicated to Probation, or youth being transferred from other camps or juvenile halls with little confinement time remaining upon referral for services. Auditor error may have compounded the issue, as data may not have been collected properly. A few of the rates were greatly impacted by smaller group size; as can be seen in ***Table 43-3*** and ***Table 43-4***. The performance expectation for this section is determined based on the combined percentage of youth successfully graduating from the 5 and 10 week services.

Further assessment with the Comprehensive Quality Assurance process (refer to Paragraph 47 for details) may be necessary to determine the true source of the problem (i.e. process related, stemming from staff, environmental factors, or technological issue with the tracking system). As

these issues come to light and as appropriate corrective action targeted at the true source of the problem is implemented, improvement will be seen in the three aforementioned camps and will reduce the occurrences of anomalies in all camps.

Table 43-3

Substance Abuse Audit 5 Week Services (January – May)

*5 WEEK SERVICES										
Camp by Region	January		February		March		April		May	
	# youth completed	% successful	# youth completed	% successful	# youth completed	% successful	# youth completed	% successful	# youth completed	% successful
East:										
Afflerbaugh	4	**75%	5	100%	3	100%	0	0%	5	100%
Paige	0	0%	4	100%	0	0%	0	0%	6	100%
Rockey	1	100%	0	0%	1	100%	4	100%	2	14%
West:										
Miller	0	0%	0	0%	0	0%	4	100%	0	0%
Gonzales	0	0%	0	0%	0	0%	2	100%	0	0%
Central:										
Scott	0	0%	2	100%	0	0%	0	0%	1	100%
Scudder	2	100%	4	100%	1	100%	4	0%	100	0%
Munz	0	0%	0	0%	3	100%	0	0%	0	0%
North:										
Onizuka	6	**17%	0	0%	8	**75%	0	0%	6	100%
Jarvis	0	0%	5	100%	5	100%	0	0%	6	100%

*Note: *No youth were enrolled in the 5 week program during the reporting period in Dorothy Kirby Center, Camp McNair and Camp Mendenhall.*

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

Table 43-4

Substance Abuse Audit 10 Week Services (January – May)

10 WEEK SERVICES										
Camp by Region	January		February		March		April		May	
	# youth completed	% successful	# youth completed	% successful	# youth completed	% successful	# youth completed	% successful	# youth completed	% successful
East:										
Afflerbaugh	6	100%	8	*50%	10	*40%	13	*69%	3	100%
Paige	14	100%	0	0%	0	0%	0	0%	1	0%
Rockey	4	100%	11	100%	4	*75%	6	83%	14	100%
West Region:										
DKC	0	0%	3	*67% 0		0%	4	*0% 8		*75%
Miller	0	0%	0	0%	0	0%	0	0%	4	100%
Gonzales	0	0%	0	0%	0	0%	5	80%	6	50%
Central:										
Scott	5	100%	11	100%	9	89%	1	100%	7	100%
Scudder	10	100%	5	100%	11	100%	2	100%	6	100%
Munz	15	100%	15	100%	15	100%	14	100%	10	100%
Mendenhall	10	90%	7	100%	21	100% 2		100% 8		100%
North:										
Onizuka	21	*62%	2	100%	0	0%	18	100%	0	0%
McNair	5	100%	0	N/A	9	100%	1	100%	11	100%
Jarvis	5	80%	0	N/A	10	80%	7	86%	6	83%

*Note: *Percentages noted in red did not meet expectations.*
***Percentages noted in re d are be low the 80% thresh old but may ha ve met ex pectations d epending on combined average with the 5 week program.*

Drug Related Incidents

During the February au dits, the sub stance abu se a udit tool was modified to calcu late a rate of drug related incidents per cam p average population size. Meeting expectat ions was defined as the cam p not exceed ing a 5% rate of incidents per pop ulation size. All cam ps have been maintaining ra tes that m eet e xpectations with the ex ception of Cam ps Mendenhall (March and April), Scudder (May) and Gonzales (February) (see ***Table 43-5***). It was noted during the audits that these camps have increased their preventative measures including searches and random drug testing. Because of these efforts, drug paraphe rnalia have been found and youth have tested positive for drug use. Staff is also return ing yo uth to court who are repetitious ly involved in drug related incidents and jeopard izing the saf ety and reha bilitation of the you th in the c amp community. Increased rates are to be expected until the youth learn that the consequences outweigh the immediate gratification. These camps' efforts in conjunction with their higher rates of incidents have reinforced the fact that they are actively involved in safeguarding the

community and therefore in compliance with this Provision. The Continuous Monitoring System (CMS) (refer to Paragraph 47 for details) control charts showing trends of no incidents might be an indication that stronger efforts need to be taken by camp staff to search and test for controlled substances. The frequency of random drug testing and searches in those facilities with a pattern of no incidents will be explored in the next reporting period with the implementation of the CMS.

Table 43-5
Rate of Drug Related Incidents (February – May)

Camp by Region	February	March	April	May
North Region				
Jarvis	2%	0%	0%	0%
McNair	0%	3%	0%	1%
Onizuka	4%	0%	2%	0%
Central Region				
Munz	1%	0%	0%	1%
Mendenhall	4%	9%	13% 0%	
Scudder	0%	0%	0%	5%
Scott	0%	0%	0%	0%
West Region				
Miller	2%	5%	4%	2%
Gonzales	7% 0%		0%	3%
DKC	0%	2%	0%	0%
East Region				
Rockey	4%	0%	4%	0%
Paige	4%	0%	0%	1%
Afflerbaugh	0%	0%	0%	3%

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

Discussion by Monitor:

The County has made enormous progress since the MOA was signed in assessing youth's needs for substance abuse treatment, shoring up the referral process and building additional capacity for substance abuse treatment at each of the Camps. The County was found in substantial compliance in June 2013 and has successfully completed the compliance monitoring period. In particular:

- All Camps have a variety of treatment modalities available to meet the youth's needs. These can include a 5-week psychoeducational group, a 10-week group for youth with co-occurring mental health disorders, groups provided by community partners, individual treatment provided by DMH and individual treatment provided by community partners. The group curricula are rooted in evidence-based practices. All Camps have sufficient capacity to meet the demand for services. For many youth, individual treatment is the primary modality and is supplemented by the group treatment.
- Youth are screened for substance abuse treatment needs by the Camp Assessment Unit and again during the Initial MDT upon arriving at Camp. An in-depth assessment is administered by DMH to youth with a positive screen and a co-occurring mental illness.
- Youth are promptly referred for enrollment in the treatment modality that is best suited to their needs. Nearly all of the youth involved in the Monitor's case presentation sample (60 of 65 youth; 92%) were assessed as needing substance abuse treatment, and all but one (98%) were referred for treatment within 14 days of their admission to Camp.
- All but four of the 60 youth (93%) completed group substance abuse treatment. Attempts to verify the completion data delivered during the case presentations and the findings of Probation's monthly audits revealed problems with the accuracy of the Substance Abuse Tracking Logs. Probation and DMH identified the source of the problems and enacted a solution during the current monitoring period.

As required by this provision, the County reported a variety of outcomes in its self-assessment. As shown in Table 43-2, with regard to the quality of individual substance abuse treatment delivered by DMH, observed performance levels across the four measures ranged from 93-100% compliance. These data are compelling and mirror the high-quality mental health services discussed during the case presentations at each Camp. DMH also continues to track youth outcomes to assess whether youth's group treatment involvement results in different thinking about their substance using behavior. Using a 12-month timeframe, the County compared the pre-test and post-test scores on the *Attitudes and Beliefs about Substances* questionnaire for 450 youth who completed the 10-week substance abuse group. The results were statistically significant ($t(450) = -3.280, p<.0005$) , indicating that youth changed their thinking and motivation for making changes in their substance abusing behaviors.

Probation's Quality Assurance process tracked performance related to the other two outcomes required by the provision—group completion and the use of illegal substances while in Camp. These results are succinctly reported in Tables 43-3 and discussed in the subsequent bullet points of the self-assessment.

The results highlight the extremely high prevalence of substance abuse issues among the youth who are admitted to Camp, and that most of the youth have impairments caused by their substance abuse behaviors that lead to a mental health diagnosis of dependence. That DMH was able to shift resources to create additional capacity in the 10-week groups is evidence that the County is utilizing its Quality Assurance data to respond to the changing needs of its population. Furthermore, the self-assessment reveals that the County is carefully tracking program completion rates to ensure that youth maximize the benefits of these programs. The County's audit process collects and analyzes outcome related data, identifies facilities that are not meeting expectations, and mobilizes the process to address the underlying causes of the problems.

The County has demonstrated its ability and willingness to develop, implement, monitor and adjust its substance abuse programs to meet the needs of the youth served by the Camps. The Monitor believes that external oversight is no longer necessary, and thus it is appropriate to terminate compliance monitoring.

Evidentiary Basis:

- Site visits to Camps Afflerbaugh, Paige, Rockey, Kilpatrick, Gonzales, Onizuka, McNair, Jarvis, Scott, Scudder, DKC, Munz and Mendenhall.
- Case Presentations of 5 youth most recently released at each Camp, along with the source documentation, total sample = 65 youth
- Review of program tracking logs for group and individual substance abuse treatment
- Review of DOJ Audit Bureau Substance Abuse Treatment audits completed January-May 2014
- Review of DMH Substance Abuse Quality Assurance results, January-June 2014
- Lists of youth involved in drug-related misconduct during the two months prior to the Monitor's visit and whether the youth were engaged in/had been referred to treatment
- Extensive consultation with Probation and DMH administrators and other staff involved in the design and implementation of the substance abuse treatment protocols and 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: Substantial Compliance (effective November 1, 2013)

County's Self-Assessment:

QUALITY ASSURANCE

Audit Performance

In the first quarter of 2014, audit performance expectations were established and added to the audit tools. These expectations were established through collaboration between the DOJ Monitors and Bureau management to improve audit performance. The audit tools now indicate whether a facility has met audit expectations by exceeding defined percentage criteria in each audit domain. If a facility does not meet audit expectations, auditors notify and meet with the facility director to develop corrective measures to achieve the following month's expectations. The corrective measures are then documented on the audit tool to be reviewed by the auditors for

progress in the following audit months. As the audits and processes have improved over the last two quarters, the County is now preparing for the next stage of developing comprehensive quality assurance with the Continuous Monitoring System.

Continuous Monitoring System

Since the last Self-Assessment Report, a new Continuous Monitoring System has been in development by the DOJ/Quality Assurance Services Bureau. The system is designed to monitor ongoing data such as youth-on-youth violence, drug-related incidents, 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 during the next Monitoring Period. 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 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.

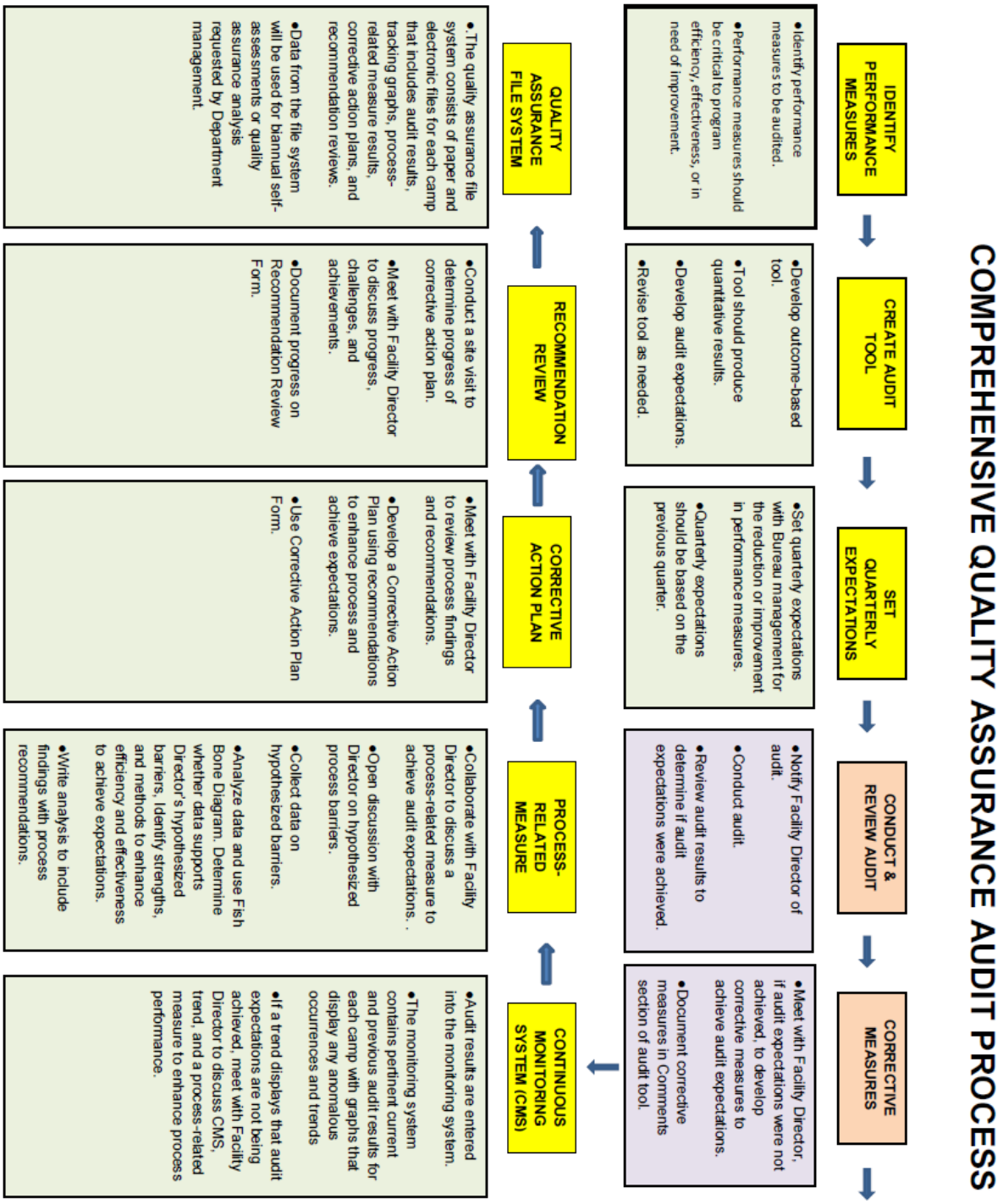
If necessary, a process-related review will be conducted to thoroughly examine program processes for barriers and possible areas for improvement. This review will consist of data collection and data analysis with a report consisting of findings and process recommendations. A widely known and used quality 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 the 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. A demonstration of CMS was given to the DOJ Monitors in May and was very well received.

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 as recommended by Monitor Kelly Dedel. 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 monitoring period.


COMPREHENSIVE QUALITY ASSURANCE AUDIT PROCESS
IDENTIFY PERFORMANCE MEASURES
•Identify performance measures to be audited.
•Performance measures should be critical to program efficiency, effectiveness, or in need of improvement.
CREATE AUDIT TOOL
•Develop outcome-based tool.
•Tool should produce quantitative results.
•Develop audit expectations.
•Revise tool as needed.
SET QUARTERLY EXPECTATIONS
•Set quarterly expectations with Bureau management for the reduction or improvement in performance measures.
•Quarterly expectations should be based on the previous quarter.
CONDUCT & REVIEW AUDIT
•Notify Facility Director of audit.
•Conduct audit.
•Review audit results to determine if audit expectations were achieved.
CORRECTIVE MEASURES
•Meet with Facility Director, if audit expectations were not achieved, to develop corrective measures to achieve audit expectations.
•Document corrective measures in Comments section of audit tool.
CORRECTIVE MEASURES REVIEW
• During next audit, review previous corrective measures to determine implementation/progress.
•Document progress on current audit tool in Comments section.
CONTINUOUS MONITORING SYSTEM (CMS)
•Audit results are entered into the monitoring system.
•The monitoring system contains pertinent current and previous audit results for each camp with graphs that display any anomalous occurrences and trends
•If a trend displays that audit expectations are not being achieved, meet with Facility Director to discuss CMS, trend, and a process-related measure to enhance process performance.
PROCESS-RELATED MEASURE
•Collaborate with Facility Director to discuss a process-related measure to achieve audit expectations. .
•Open discussion with Director on hypothesized process barriers.
•Collect data on hypothesized barriers.
•Analyze data and use Fish Bone Diagram. Determine whether data supports Director's hypothesized barriers, Identify strengths, and methods to enhance efficiency and effectiveness to achieve expectations.
•Write analysis to include findings with process recommendations.
CORRECTIVE ACTION PLAN
•Meet with Facility Director to review process findings and recommendations.
•Develop a Corrective Action Plan using recommendations to enhance process and achieve expectations.
•Use Corrective Action Plan Form.
RECOMMENDATION REVIEW
•Conduct a site visit to determine progress of corrective action plan.
•Meet with Facility Director to discuss progress, challenges, and achievements.
•Document progress on Recommendation Review Form.
QUALITY ASSURANCE FILE SYSTEM
•.The quality assurance file system consists of paper and electronic files for each camp that includes audit results, tracking graphs, process-related measure results, corrective action plans, and recommendation reviews.
•Data from the file system will be used for biannual self-assessments or quality assurance analysis requested by Department management.

DMH QA staff continues to use QA findings to inform training needs and to developed curriculum to augment staff skills. QA findings are also evaluated on an on-going basis to inform program decisions and potential staffing adjustments. QA is routinely used to provide real time feedback to program managers. Clinicians are regularly provided face to face feedback based upon the audit results and narrative summaries related to their clinical work.

Discussion by Monitors:

As reported under the individual provisions of this report, the County has developed and is utilizing a number of different auditing and reporting tools to assist in assessing their progress towards compliance with this Agreement. Over time, some have been adjusted as needed. For instance, the process involving staffing audits continues to evolve and improve from previous reports.

The County's auditing processes for 17 and 43 are now fully developed. The final adjustments to the audit tools were made early in the monitoring period and were put in use shortly thereafter. The County consulted with the Monitor to identify the key performance measures relevant to each provision, with a preference toward outcomes, rather than process-related issues. In addition, an expected performance level for each measure was identified (generally 80%). Camps falling below the expected performance level are required to craft Corrective Action Plans designed to remediate the identified deficits. The Monitor reviewed several such plans during the latter half of the monitoring period and found that they resulted in obvious improvements to practice.

In addition, the 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 County now demonstrates all of the elements of a solid quality assurance program with regard to structured rehabilitative programming, behavior management and substance abuse treatment.

With the addition of Paragraph 73 there is a need for additional auditing and reporting tools that have yet to be fully developed or implemented. Paragraph 73-7 is the controlling section for that quality assurance component.

We remain encouraged by the transition to outcome based audit tools. We hope that the process continues to provide all the audit and reporting tools necessary to allow the County to measure, and correct if necessary, the procedures and performance required to ensure their compliance with the terms of the MOA.

Full compliance will be granted when the quality assurance process in place for Paragraphs 15 and 17 is sustained through October 31, 2014.

Evidentiary Basis:

- Periodic reviews of the County's QA and Audit Reports
- Consultation between the Monitoring Team and the Quality Assurance Services Bureau.

Paragraph 73: Increased Access to Community Alternatives

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

[MONITOR NOTE #1: To facilitate reporting on Paragraph 73, each of its com ponent sections will be individually assessed and noted in the narrative. The assessments may contain comments related to the p rogress toward the ind ividual s ections com pliance, however, the actu al compliance status will be determined by compliance with the entirety of the Paragraph.]

[MONITOR NOTE #2: Although the County init ially proposed a draft Action Plan for Paragraph 73 two m onitoring peri ods ago, and indicated in the 10th Monitoring Report that the plan would be com pleted in this monitoring pe riod, no final plan has yet been issued. The Action Plan acts as the County' s com pliance blueprint and shoul d be finalized as soon a s possible.]

Status: Partial Compliance

<u>73-1: Minimize Juv enile Hall Confinement</u>: The County shall re ly on juvenile ha ll confinement only for yo uth who pose a risk to p ublic safety and where the utilizatio n of a le ss restrictive environment such as home, housin g with a re lative, assig nment to th e Community Detention Program, or assignment to a home that provides temporary overnight housing based on the youth's sta tus s uch as a Pre- Deten tion Alternativ e (for youth pending a detention hearing) or a Status Offender Deten tion Alternative (for youth who is considered to be a non-delinquent status offender), is n ot appropriate . The following pre-deten tion alternatives, conducted by qualified staff, or local police ag encies, as appropriate, sh all be co nsidered fo r youth prior to juvenile hall detention as appropriate:

- ***Divert M inors from the Juvenile Justice System: Local law enforcement agencies should consistently be e ncouraged to consid er counsel and release for first-time, lo w-risk offenders to paren ts, guardians, or other responsible adult in li eu of formal arrest and filing of criminal charges;***
- ***Availability of Community Base d Service s: Probation shall sche dule in- s ervice collaborative events with local law enforcem ent agencies and introd uce them to the availability of community -based se rvices to w hich youth and their familie s ca n be referred for assistance/service in lieu of arrest and/or de tention. For example, youth could be referred to the local School-Based Pr obation Officer who will work with the youth and his/her fa mily and alig n him/her w ith service s as well as provide in formal supervision to the youth while attending school.***
- ***Intake and Detention Control Officers shal l, after co nducting a risk assessmen t utilizing an evidence-based sc reening 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 el ectronic monitoring pending court hearing; or***
  - ***Detain in juvenile hall due to gra vity o f of fense, screen ing results, or bench***

warrant that requires detention pending court hearing in accordance with state law.

County's Self-Assessment:

LADS Validation Study[3]

During this Monitoring Period, the County, in consultation with the Monitor, continued its efforts to conduct a validation study of the Los Angeles Detention Screener (LADS) tool. Intake and Detention Control (IDC) data for the time period of January 1, 2013 through June 30, 2013 shows a total of 4,746 youths admitted into Juvenile Hall. Of the 4,746 youths admitted, 467 or 9.8% were released prior to their Detention/Arraignment Hearing (***Table 73.1-1***), and 4,279 or 90.2% were "Detained" into Juvenile Hall (***Table 73.1-2***). Two-thirds of released youth (67%) had a low LADS risk level and nearly one-third of released youth (30%) had a medium LADS risk level. In the next Monitoring Period, data regarding the subsequent arrest and violations leading to detention data for these 467 released youth will be analyzed. This data was compiled before the end of the 11th Monitoring Period but will be analyzed and cross-referenced with the risk level of the released youth to further verify the ability of the LADS to accurately classify youth and guide detention decisions.

Table 73.1-1

IDC Detention Decision Summary - Release

LADS Risk	Citation	Release CDP SODA/P	AD	Other*	Total	Percent
Low	155	134	4	18	311	66.6%
Medium	52	80	2	4	138	29.5%
High	3	13	0	2	18	3.9%
Total	210	227	6	24	467	

*Other = Cited by Law Enforcement; Courtesy Hold/Release to Agency; Adult Custody, never brought to juvenile hall; DA decline to File; WIC 602/Warrant Runaway, WIC 777 Release

Table 73.1-2

IDC Detention Decision Summary - Detain

LADS Risk	Mandatory/Legal	Probation Policy	Override	Total
Low	1,207 (50.5%)	1,029 (56.5%)	43	2,279
Medium	978 (40.9%)	705 (38.7%)	24	1,107
High	205 (8.6%)	87 (4.8%)	1	293
Total	2,390	1,821	68	4,279
Percent 55.9%		42.6%	1.5%	

Of the total 4,279 detained youth, 2,390, or 56%, were detained for Mandatory/Legal reasons such as an arrest bench warrant, weapons charges, or a Welfare and Institutions Code (WIC) 707(b) offense (***Table 73.1-3***). These categories mandate detention, regardless of the youth's

[3] After consultation with the Monitors and the Department of Justice, the "LADS Validation Study" section of the report was amended to include information that reflects the County's efforts to complete the LADS Validation Study during the 11th Monitoring Period.

score on the LADS. In the sample drawn for this study, over 50% of youth detained for Mandatory/Legal reasons scored low risk on the LADS and additional 40% scored medium risk. Since these cases require secure detention, they may further require different treatment by the LADS. Further research in the next Monitoring Period will address whether it would be useful to re-examine the weight applied to this category of offense on the LADS. Probation Policy Detentions resulted in 42.6% of detentions during the sample period (***Table 73.1-4***). This Detention category includes past Community Detention Program violations, no parent/guardian available, serious threat to community, etc. Probation Policy detentions include local, court and internal Probation policies that mandate secure detention for youth who commit specific violations or fall within specified categories. Similar to the Mandatory/Legal Detention category, over 56% of youth detained for Probation Policy detention reasons sored low risk on the LADS and, an additional 38% scored medium risk. Again, additional research in the next Monitoring Period will address whether it would be useful to re-examine the weight applied to this category of offense on the LADS. Further research and analysis could also lead to review of some of these policies, particularly if subsequent arrest data for the 467 released youth demonstrates that low and medium risk youth have low arrests and violation rates.

Table 73.1-3

Mandatory/Legal Detentions (Detail)

LADS Risk Level	Warrant	WIC 707(b)	Weapon	Camp/JH Filing	Total	Percent
Low	669	454	49	35	1207	50.5%
Medium	688	225	59	6	978	40.9%
High	147	39	18	1	205	8.6%
Total	1,504	718	126	42	2,390	

Table 73.1-4

Probation Policy Detentions (Detail) – Part 1 of 2

LADS Risk Level	Community Detention Program Violation	No Parent Available/ Appearing	Serious Threat to Community	Inter-County Transfer	Likely to Flee	Pending WIC 777 (Probation Violation)	Pending WIC 778
Low	469	10	70	39	10	110	13
Medium	252	21	71	14	4	80	4
High	13	0	0	1	0	11	1
Total	734	31	141	54	14	201	18

Probation Policy Detentions (Detail) – Part 2 of 2

LADS Risk Level	Suitable Placement Order	Victim/ Witness Safety	Likely to Flee	Replace-ment	Prosti-tution	LADS over 10	Adult Custody	Total	Per-cent
Low	8	155	3	121	9	0	12	1029	56.5%
Medium	8	133	9	99	10	0	0	705	38.7%
High	0	0	0	16	0	45	0	87	4.8%
Total	16	288	12	236	19	45	12	1,821	

During this Monitoring Period, exte nsive effort was applied to th e review and analysis of the cases in the Override category (***Table 73-1.2***). These are Discretionary Overrides m ade by Intake and Detention C ontrol staff, with approval by a Supervisor. Initia lly, 556 of the original sample of 4,746 youth were categori zed as Discretionary O verrides. After further analysis and consultation with the Monitor, it was determ ined that 488 of the 556 were actually Probation Mandatory Policy Detentions. The remaining 68, or 2%, were Overrides. This realization led to a two-hour booster training for IDC staff to clarify the use of the LADS, Probation Departm ent Mandatory Policy Detentions, Discretionary O verride decisions, defin itions, and procedures; ensuring all IDC staff have the same understanding of the aforementioned.

In the 12 th Monitoring Period, Ju ly 1, 2014 through December 31, 2014, the LADS Validation Study will be com pleted. Further exam ination and analysis of the subsequent arrest/vio lation leading to detention data for the 467 youth rel eased in the January 1, 2013 through June 30, 2013 sample will determine whether the LADS accurately classifies youth in terms of the likelihood to reoffend pending court, fail to appear in court, or receive a Probation viol ation th at results in detention. The subsequent arrest/violation leadi ng to detention data will be reviewed in two categories: arrests prior to arraignm ent hearing, and arrests prior to final disposition of the case. The LADS risk level an d demographics of rele ased youth will be exam ined as well, along with subsequent arrest and violation data, to establish the rate of failure among low and m edium risk released youth. The Validat ion Study will also examine the three override categories (Mandatory/Legal, Probation Policy, and Discretionary Overrides) and the associated LADS risk levels and dem ographics of the youth within those categories. If the LADS is shown to successfully classify y outh accord ing to the lik elihood o f re-offense/violation p rior to the arraignment hearing or final disp osition, then ef forts will be m ade to review Probation Policy detention categories. It is not anticipated tha t such a revie w of policy will be completed within the 12 th Monitoring Period, due to the length of time needed to exam ine such policies and seek buy-in from judicial and other stakeholders.

On January 31, 2014, *Directive 1355, Juvenile-Intake and Detention Control (IDC) - Detained/Non-Detained Tracking Log* was issued. In February 2014, IDC began using the ID C Detained/Non-Detained Tracking L og at all three IDC locations. P er Directive 1355, the Tracking Log is m andatory and is utilized to record information on youth referred to IDC via telephonic contact, or brought to juvenile hall for detention c onsideration by law enforcem ent personnel. IDC Supervisors were trained on th e Directive and Log usage and conducted on-site

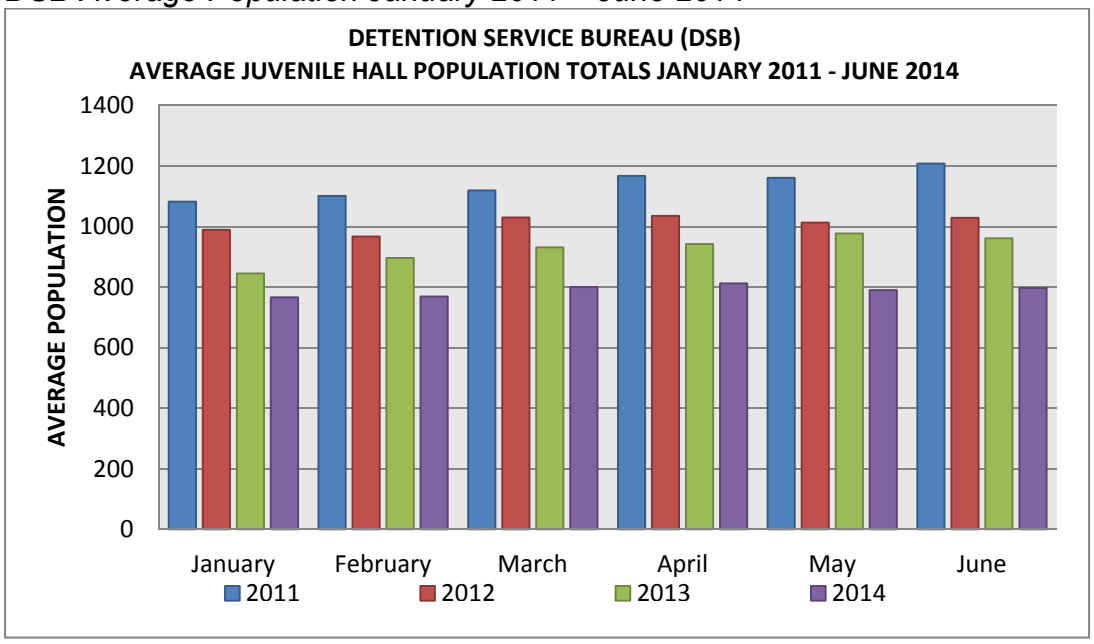
Unit training with all IDC officers beginning in April 2014 and was completed in June 2014. All IDC officers were trained during this period.

The detention discussions and outcomes related to these contacts (Non-Detained and Community Detention Program - CDP, Counseled and Rel eased, Referred S ervices, et c.) are bei ng documented in the Tracking Log and reviewed by Detention Services Bureau (DSB) on a monthly basis. In May 2014, an IDC audit tool was develope d in conjunction with DSB to ensure appropriate perform ance indicators woul d be m easured. IDC audits conducted for the months of February, March, and April 2014 reveal ed that every youth ref erred to IDC in person, is placed on the Log. However, issues rega rding duplicate entries and incom plete expanded remarks in the appropr iate sec tion of the Log will be add ressed th rough f urther train ing and supervisory review.

The Audit Tools have also been designed to tr ack and capture critical perform ance m easures, which include no m ore than 15% of the discre tionary cases being ov erridden. Additional outcome measures will be implemented during the next Monitoring Period.

As can be seen in ***Figure 73.1-1*** below, the Juvenile Hall populat ion has significantly decreased in num bers since 2011 and we anticipate it will d ecrease even m ore as fu rther alternatives to detention are explored.

Figure 73.1-1
DSB Average Population January 2011 – June 2014



Intake and Detention Control data for the ti me period of January 1, 2014 through June 30, 2014, initially reflected a total of 4,124 youth adm itted into Juven ile Hall. As shown in ***Table 73.1-5*** below, of that total, 127 (3.1%) had duplicate P CMS admit entries, therefore the actual total is 3,997. Of the 3,99 7 youths adm itted, 476 (11.9%) were released p rior to th eir Detention/Arraignment Hearing, and 3,521(88.1%) were Detained into Juvenile Hall. That is a

reduction of 761 (19%) youths for the sam e t ime period in 2013. The reported num ber of detention overrides for this monitoring period was only 351 (8.8%) youths. These results may be attributable to the aforem entioned training of IDC staff and curre nt policy, along with centralizing the IDC Tracking Log collection and increased review of override decisions.

Table 73.1-5
IDC Tracking Logs Snapshot January – June 2014 (Source: IDC)

ALL IDC'S							TOTAL	PERCENT
	JAN	FEB	MARCH	APRIL	MAY	JUNE		
TOTAL Referred	**676**	**636**	**709**	**682**	**684**	**610**	**3997**	
DET TOTAL	**593**	**560**	**623**	**594**	**604**	**547**	**3521**	**88.1%**
REL TOTAL	**83**	**76**	**86**	**88**	**80**	**63**	**476**	**11.9%**
OVERRIDES*	**50**	**55**	**60**	**75**	**61**	**50**	**351**	**8.8%**

*(*Denotes upward or downward override s. Next Mon itoring Per iod we will r etain da ta to differentiate.)*

Total Number of Minors Detained by "Override"
For IDC purposes, in the above chart, an "Overrid e" is defined as the authorization granted, by the IDC Supervising DPO and IDC Director to the IDC DP O, to detain any m inor not charged with a W IC 707(b) offense, a firearm offense or for violation of W IC602Warr – outstanding warrant for failure to appear (This does not include *Ramey* warrants) as an upward or downwar d override.

In addition, any minor detained for the following offenses,

- WIC 777 (Probation Violation);
- WIC 778 (Suitable Placement runaway, removal or replacement);
- PC 647(b) and PC 653.22 (prostitution related offenses);
- WIC 1400 (Out-of-State runaway);
- ICT (Inter-county transfers);
- Open charges while at Camp Community Placement; or
- Minors released to CDP prior to court,

are not detained per P robation Policy, and IDC does not consider them "true" overrides. Therefore those categories are not included in the override numbers.

Law Enforcement Meetings
During this Monitoring Period, seven presentations were made to law enforcem ent agencies as follows:

- February 5, 2014 – LAPD Juvenile Procedures School (LAPD Headquarters)

- March 14, 2014 – Alternatives to Detention (w ith District Attorney's Office, Public Defender's Office, Departm ent of Mental Health and Depart ment of Children and Fam ily Services)

- April 2, 2014 – LAPD Juvenile Procedures School (LAPD Headquarters)

- May 28, 2014 – LAPD Juvenile Procedures School (LAPD Headquarters)

- May 29, 2014 – Law Enforcement Meeting at BJNJH (10:00 am)

- June 2, 2014 – Law Enforcement Meeting at Central Juvenile Hall (10:00 am)

- June 13, 2014 – Law Enforcement Meeting at Los Padrinos Juvenile Hall (10:00 am)

The presentations at the LAPD Juvenile Procedures School are to veteran patrol police officers, approximately 20 per class presentation. The officers received an overview of the Probation Department's structure, the delinquency system, the legal basis for detention, and the juvenile intake process. Patrol officers were also provided information on and the toll-free telephone number for the Probation Information Center (PIC) to provide to parents of youth. The meeting on Alternatives to Detention involved partner agencies discussing the juvenile intake process and community based alternatives available through each agency.

The three regional Law Enforcement Meetings were attended by a diverse representation of local law enforcement agencies within Los Angeles County. Invitations and actual agencies represented at the meetings were as follows:

- May 29, 2014 – Law Enforcement Meeting at BJNJH (10:00 am)
    - Six agencies invited
    - Five law enforcement officers, representing three agencies attended

- June 2, 2014 – Law Enforcement Meeting at Central Juvenile Hall (10:00 am)
    - Twenty agencies invited
    - Twelve law enforcement officers, representing eight agencies attended

- June 13, 2014 – Law Enforcement Meeting at Los Padrinos Juvenile Hall (10:00 am)
    - Twenty-five agencies invited
    - Sixteen law enforcement officers, representing twelve agencies attended

The following materials were distributed at the Law Enforcement Meetings

- Power Point – general Probation information, the reasons for mandatory (legal) detention, contact information for the three IDC (Intake and Detention Control) locations), Juvenile Hall's alternatives to detention, contact number/mailing address for the citations that were formerly sent to Informal Juvenile Traffic Court, general Probation contact number (to refer parents, etc. – please ask them to speak to someone in "Juvenile"), etc.
- Delinquency Flowchart/Glossary of Terms – describes the legal process from arrest to juvenile disposition, with an accompanying glossary of legal terms (for reference)

- Literature – "Understanding the Risk Principle: How and Why Correctional Interventions Can Harm Low-Risk Offenders" – includes research regarding why low-risk offenders

should not be placed in correctional interventions (e.g. juvenile hall) as it probably exposes them to higher-risk, etc.

- Judge Nash's letter – Notification to Law Enforcement Agencies regarding New Intake Process for Non-Detained Juvenile Delinquency Matters (effective 2/1/14)

- 707 (b) Offenses Listing

- Juvenile Hall Detention – Required Documents when detaining juveniles (copies of the applicable forms)

- Statistical information regarding the number of youth each agency brings to juvenile hall, the offense committed by the youth, and the resultant detention decision

The purpose of these meetings was to provide a brief overview of the Probation Department's structure, the delinquency system, the legal basis for detention, and the juvenile intake process. In general, the agencies were provided information about alternatives to detention such as the Community Detention Program, the new Juvenile Citation Diversion Division (which replaced the Juvenile Traffic Court), the Probation Information Center contact information to share with parents, and the Probation Resources Directory. However, the question and answer period of each regional meeting varied, based on who attended those meetings. Some law enforcement agencies specifically wanted clarification about "paperwork" required when bringing a youth to the juvenile halls, while other agencies wanted to know about the new Juvenile Citation Diversion program. Following these meetings, an on-going dialogue has begun that will lead to further collaboration on community alternatives to dentation. On July 1, 2014, the attendees of the Law Enforcement Meetings received an email link to the Resources Directory located on the Probation Department Internet site. In the 12th Monitoring Period, July 1, 2014 through December 31, 2014, additional meetings will be held with local law enforcement agencies that will provide more opportunity for the Probation Department to encourage the use of juvenile halls as a last resort.

Discussion by Monitors:

Prior to the addition of Paragraph 73, law enforcement officers would either call the IDC first, or just show up at one of the IDCs in an attempt to have youth placed in Juvenile Hall. Whether contacted by phone or if a minor was brought to the IDC, the intake officers utilized the LADS to assess whether a minor could be released, placed in a non-secure alternative, or if the minor would be detained in the Probation system. While law enforcement agencies were encouraged to call before arriving at one of the IDCs, their primary guidance on the phone or at the IDC as to whether or not the juvenile would be accepted into the juvenile hall was from the conversation the arresting officer had with the IDC officer. If the decision was to not accept the juvenile at the IDC, the reasons for the decision were explained to the officer, but not always documented in the system. Those decisions should now all be documented in the IDC Detained/Non-Detained Tracking Log.

In the last monitoring report, we noted that a law enforcement officer in the field could only rely

on past experience or the evaluation of the IDC officer to determine if a juvenile should be diverted or detained. If law enforcement officers are given information about other tools available to them, it could allow them to make those initial determinations before involving the IDC intake officers. There had also been some questions raised about the way the LADS was being utilized at intake. As implementation of the intake log procedures progresses, we hope to see evidence in the logs of encouragement by IDC officers to get the law enforcement officers who attempt to get youth admitted to the Juvenile Halls, to consider counsel and release for low-risk first-time offenders.

The Probation Department is 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. The County reports that during this monitoring period it has held seven law enforcement meetings: four with the Los Angeles Police Department, and three regional meetings that included different mixes of representatives from the Los Angeles County Sheriff's Department and/or other local law enforcement agencies.

The Monitors of this provision attended the June 13, 2014 regional meeting at Los Padrinos Juvenile Hall. We were told that the meeting we attended was similar in content to the majority of the other meetings. Participants at the meeting were given a number of handouts that included: an agenda, a printed copy of the meeting's PowerPoint presentation; a chart representing the juvenile intake and related court processes with attached glossary of terms; a list of offenses under Welfare and Institutions Code Section 707(b); a package of forms required to be completed by law enforcement for the detention of minors in juvenile hall; an article about the harm of correctional interventions on low-risk offenders; and a copy of a January 8, 2014 letter to law enforcement agencies by the Presiding Judge of the Los Angeles Juvenile Court with the subject identified as "Notification to Law Enforcement Agencies Regarding New Intake Process for Non-Detained Juvenile Delinquency Matters."

The subject matter of the meeting was listed as "Probation Overview/Intake and Alternatives to Detention" in both the agenda and the title slide of the PowerPoint presentation. The meeting consisted of the presentation, including an overview of the handout material, and a question and answer period that lasted as long as long or longer than the presentation. Despite the title of the presentation, the majority of the presentation related to issues other than alternatives to detention. In fact, only one of the sixteen subject matter PowerPoint slides was devoted to alternatives to detention. The slide listed two bullet points for discussion: Community Detention Program (CDP); and Other Community Resources." The CDP allows a minor to be placed in the community with electronic monitoring. The only listing, and discussion, under Other Community Resources was to a resource directory being developed by Probation, along with contact information for a Probation Bureau Chief for further information.

The discussion portion of the law enforcement meeting provided no greater insight into suggested or available alternatives to detention. Instead it devolved into a complaint session about the difficulty the police agencies had in getting youth admitted to the juvenile halls, and the paperwork and medical clearances required to satisfy the IDC officers. For their part, the Probation representatives tried to address the law enforcement complaints and to explain the nuances of the system. The problem was that the discussion was focused on what is required to

get youth into the juvenile halls, not what alternatives were available or should have been first considered by law enforcement.

During the debriefing at the conclusion of the meeting the presenter advised the Monitors that the discussion sessions at previous meetings often had a different tenor, and did include more discussion of alternatives. Nonetheless, the structure of the presentation, the list of topics, and the focus of the presentation the Monitors attended, was on understanding the role of the Probation Department, the legal bases for detention, the process involved in the Probation Departments intake decisions, and had virtually no emphasis on the availability of alternatives to detention as required by this provision. It is no wonder that the discussion period followed a similar course.

The County reports that a link to the Resource Directory was emailed to the law enforcement officers that attended the seven meetings. During the next monitoring period we expect to see dissemination of that information to all law enforcement agencies within the County, and additional collaborative events with law enforcement that focus exclusively or primarily on a discussion of those resources to reduce detention attempts for low-risk offenders.

In its self-assessment for the 10th Report, the County indicated that it would use the results of the LADS validation study to profile typical low and medium youth so that alternative programs can be developed and marketed to law enforcement. The validation study is not yet complete, so the requirements of this part of the provision have not yet been met. However, developing these programs will be an essential part of reducing the reliance on secure detention for low- and medium-risk youth, as discussed in the next section.

With regard to the portion of this provision that pertains to **using an objective risk assessment instrument and considering alternatives to detention**, the Monitor worked closely with the RTSB's Bureau Chief for Detention throughout the monitoring period. The Chief designed and implemented an in-depth research project designed to address some of the questions raised in the previous Monitor's report about the implementation of the LADS.

The County's self-assessment provides more substantive data in this area than in past self-assessments and the Monitor applauds the County's continuing commitment to this endeavor. While an early draft of the self-assessment revealed a significant misinterpretation of the definition of "overrides," subsequent conversations with the County resulted in the version of the self-assessment presented above. This version clearly illustrates the fact that the large majority of low- and medium-risk youth are being placed into detention by overriding their LADS score via the Mandatory, Policy or Discretionary override categories. This high rate of overrides seriously compromises the County's ability to ensure that only youth for whom no less restrictive option exists are placed into detention. In the Monitor's view, the Mandatory and Policy override categories are overly broad and should be examined. The Department has indicated its commitment to review the use of these categories and to identify ways in which their impact could be limited.

The task of validating a risk assessment instrument is complex and requires expertise in the purpose, design and operation of structured decision-making tools. The County will complete the

validation during the next monitoring period, with technical assistance from the Monitor. For the purpose of highlighting the salient issues to the Parties who are not intimately involved in the validation process, the Monitor offers the following discussion.

The purpose of an objective detention risk assessment instrument is to create a score that is indicative of a youth's risk of failure (i.e., new criminal offense or failure to appear) pending adjudication. With the score comes a presumed "detention decision"— youth with high scores are presumed to require secure detention in order to prevent failure, youth with moderate scores are presumed to require a structured community program (e.g., electronic monitoring, day reporting, shelter care) to prevent failure, and youth with low scores are presumed to be at low risk of failure even if no interventions are applied. Whenever the actual "detention decision" departs from the decision that is presumed by the score, the risk score is said to be *overridden*. Overrides usually come in two forms—mandatory and discretionary. Mandatory overrides include circumstances in which the decision-makers want there to be no discretion, so that every time a youth comes to detention and one of these circumstances are present, he or she will be detained. Discretionary overrides include circumstances that *may* suggest that the detention decision should be something other than what the youth's risk score suggests, but that the decision should be made on a case-by-case basis, depending on the individual circumstances of the youth.

The study sample used to validate the LADS consists of 4,746 youth who were brought to Juvenile Hall for screening between January 1 and June 30, 2013. Of these:

- 4,211 youth (89%) were detained via Mandatory Overrides
  - *2,390 (51%) were Mandatory Detention Overrides*
  - *1,821 (38%) were Probation Policy Overrides*
- 68 youth (2%) were detained via Discretionary Overrides
- 467 youth (10%) were released or placed on CDP
  - *238 youth (5%) were released and cited to court*
  - *229 youth (5%) were placed on CDP/SODA/PAD (non-secure alternatives)*

The County has an extensive list of override options. As discussed in the County's self-assessment, these include Mandatory Detention Overrides which are legislatively determined and include warrants, 707 (b) offenses, weapons-related offenses and filing new charges while the youth is in Camp. About one-half of the youth included in the validation study were detained via a Mandatory Detention Override. Although in the Monitor's view these categories are overly broad (e.g., many jurisdictions have effective non-secure alternatives to detention for youth brought in on Warrants), discussions with the DOJ and the County have centered around the fact that these categories are legislatively derived and thus efforts to change them are beyond the scope of the MOA. That said, any youth whose LADS score is below the cut-point for detention (i.e., scores as low or medium risk) and is placed in detention via one of the Mandatory Detention Charges is counted among the overrides.

In addition to the Mandatory Detention Charges, the County also has an array of Probation Policy Overrides that also require a youth to be detained if he or she is brought to detention under any of the relevant circumstances. Fully 38% of the youth included in the validation study were detained via a Probation Policy Override. Probation exercises considerable control over how these categories are defined and utilized. The Probation Policy Overrides include Community Detention Program (EM) violations, inter-county transfers, likely to flee, probation violations, re-placement, or prostitution charges. Over one-third of the youth brought to detention meet one of these criteria. Again, the Monitor believes these categories are overly broad (i.e., many jurisdictions have effective, non-secure options for probation violators and have found non-secure options to address the unique need of girls involved in prostitution and youth with family violence), and that the County could significantly alter its detention practices by reconsidering the Probation Policy Overrides and how youth with these circumstances could be effectively managed in a non-secure setting. Again, any youth whose LADS score is below the cut-point for detention (i.e., scores as low or medium risk) and is placed in detention via one of the Probation Policy Overrides is counted as an override.

In addition to these two Mandatory Override pathways to detention, the County also has an array of Discretionary Override options. These include parents refusing custody, serious threats to community, serious threats to minor, pending probation violations, placement orders, victim/witness safety, likely to flee, or new arrest while on CDP. The first analysis of these data indicated that approximately 13% of the youth brought to detention were detained via a Discretionary Override. Subsequently, the Detention Bureau staff spent considerable time and energy to review the reasons for overrides and to categorize them into the proper category. Subsequent analysis resulted in the figures presented in the text box, above, showed that approximately only 2% of the validation sample was detained via a Discretionary Override. In other words, IDC staff had been using Discretionary categories when one of the Mandatory Detention Charges or Probation Policy Overrides would've been more accurate. Like the Policy Overrides, the County also has considerable control over how these Discretionary options are defined and applied, and the Bureau's effort to improve the application of the Discretionary overrides was an excellent and necessary piece of the validation effort.

Altogether, 90% of the youth in the validation study sample were detained via one of these three mechanisms. Many of the youth scored as low- or medium-risk on the LADS. This is far outside the generally accepted practice for the use of objective detention screening tools, as required by this portion of Provision 73. The County's self-assessment (Tables 73.1-3, 4 and 5) clearly shows the frequency with which low- and medium-risk youth are overridden into detention. In the next monitoring period, the County also needs to review override rates across gender and race/ethnicity to identify any disparities in their use. While compliance with the MOA does not require immediate modifications to the various override categories, it *does* require an accurate accounting of the cases in which the youth's risk score is overridden by one of these three mechanisms and reconsideration of how the youth's LADS score should be used to determine the most appropriate setting for youth. As noted in the County's self-assessment, considering ways that the override categories' impact could be more limited is one of the major tasks to be undertaken in the next monitoring period.

In terms of the validation study, which is designed to assess the outcomes of the youth who were released from detention either via citation or placed on CDP, the sample has been identified (n=467, or 10% of the study sample). Initial data have been collected and analyzed, and preliminary rates of failures to appear and new criminal charges pending adjudication have been calculated. These preliminary results were encouraging—only 2% of the youth who were released/placed on CDP failed to appear in court and 13% committed a new criminal offense. Some follow-up information is needed to ensure that the full range of non-compliant behavior is included (e.g., technical violations of CDP and probation violations that resulted in the youth being brought to detention). These failure rates also need to be examined across risk level, gender and race/ethnicity to identify whether any disparities exist. The County appears to be on track to complete this study by the end of the next monitoring period, and the Monitor will provide any technical assistance needed to ensure a high-quality product.

It is worth mentioning that the County's detention rate of approximately 90% means that very few youth were eligible to participate in the validation study and the results will need to be interpreted with caution. The validation should also be replicated once the County finds ways to reduce its reliance on detention for low- and medium-risk youth. During the next monitoring period, the Monitor will provide guidance to the County on the analysis and interpretation of these data with the goal of producing a credible validation study.

Recommendations:

1. Provide information to law enforcement agencies about the profiles of low and medium-risk youth and the community options available to serve these youth in lieu of secure detention through in-service collaborative event and other appropriate means.
2. Examine differences in the application of overrides across gender and race/ethnicity and make a plan to address any disparities that are evident.
3. Complete the analysis for the validation study by broadening the outcomes to include technical violations of CDP and probation violations. Also, examine the differences in outcomes across risk level, gender and race/ethnicity.
4. Draft a report that presents the results of the study and highlights the various opportunities that exist to reduce the reliance on secure detention for youth who score as low- and medium-risk on the LADS. These opportunities likely include reconsidering and narrowing the categories of Policy and Discretionary Overrides, limiting how far "up" a case can be overridden (e.g., a youth who scores low risk can only be overridden from release into an alternative) and developing additional non-secure alternative programs so that IDC staff have options for placing medium risk youth in settings that are commensurate with their risk to public safety.

Evidentiary Basis:

- Regional Law Enforcement Meeting at Los Padrinos Juvenile Hall.
- Directive 1229, "Implementation Los Angeles County Detention Screener (LADS) Assessment Tool in Detention Services Bureau, Intake and Detention Control," issued April 19, 2010.
- Bogue, B., R. Baca, R. Vanderbilt (2008) *Los Angeles County Probation's Los Angeles Detention Screener (LADS): Normed and Calibrated for Use*. J-SAT, Inc.

- "IDC Analysis of Detention Decisions, January 1-June 30, 2013," compiled at the Monitor's request
- "Los Angeles County LADS Data Summary," drafted by the Monitor and discussed with IDC staff on October 10, 2013
- "Review of Discretionary Overrides," drafted by the Monitor and discussed with IDC staff on March 12, 2014
- "Analysis of Detention Releases," produced by the IDC and discussed with the Monitor on July 31, 2014.
- Extensive consultation with the Bureau Chief for Detention Services and the Director of the Quality Assurance unit.
- 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 drafted language to insert in Juvenile Pre-Plea, Disposition, 777, and 778 Court Reports that would affirm the following:

- After considering less restrictive options, Probation believes case factors including community safety, the deterioration of the minor's behavior or function of the family, or the failure of intervention efforts to accomplish results have made it necessary to remove the minor from the home at this time. The minor's case was referred to the Out-of-Home Screening Unit, where it was determined that placement out of the home is in this minor's best interests, and the minor's case was approved for removal.

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. The addition of this language reaffirms the County's commitment to seek the least restrictive settings for treatment of youth. During the 12th Monitoring Period, this language will be finalized applicable policies and procedures updated, if needed, and staff will be trained, if needed.

Overview of Alternatives to Incarceration for Lower-Level Offenders

During this Monitoring Period, the Resources Directory was placed electronically on the Probation Department Intranet for use by all staff in March 2014. In June 2014, the Resources Directory was updated and placed on the Probation Department's Internet site. 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

One Regional Forum was held with Bench Officers at the Ed Edlem an Children's Court on March 28, 2014 during this Monitoring Period. Four bench officers attended the Forum. 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. During the March 28, 2014 Regional Forum, Probation Department Executives emphasized that DOJ MOA Paragraph 73 is a priority and supports the Department's continuing efforts to engage bench officers in identifying the best community alternatives to treat youth and their families. Probation Department Executives further shared with the bench officers that the resources directory is available on the Department's Intranet site for use by Deputy Probation Officers.

Out-of-Home Screening (OHS) Unit

In June 2014, a draft Directive to supersede the current Out-of Home Screening (OHS) Directive 1170 was in its final revision pending approval. This Directive will be implemented during the next monitoring period. It requires that all Field DPO recommendations for CCP, Suitable Placement, or DJJ be screened by OHS, without exception. The requirement will ensure 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 will review all referrals in conjunction with the referring DPO for appropriateness of the out of home recommendation within one (1) business day of receiving the OHS referral. OHS will 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 as required, there is a notification sent to the respective office Director for review, and a report of findings shall be given to the respective Bureau Chief. The OHS Database was fully implemented prior to Provision 73. In May 2014, an OHS audit tool was developed in conjunction with OHS to ensure appropriate performance indicators would be measured based on the Database and PCM entries. In the next monitoring period the audit tool will be fully implemented.

Current outcome data continues to illustrate that the OHS system is functioning as intended, with a majority of the youths' best interest being accurately represented in each camp

recommendation. ***Table 73.2-1*** below shows the majority of the CCP recommendations, resulting in a camp order, have been screened by the OHS Unit.

Table 73.2-1
Out-of-Home Screening Cases not Cleared (January – June 2014)

Region	Total # CCP orders	*# of CCP orders not cases cleared	% of CCP not cleared
1st District	218	23	11%
2nd District	194	14	7%
3rd District	27	1	4%
4th District	55	1	2%
5th District	67	7	10%
RTSB	32	9	28%
Suitable Placement	225	7	3%

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

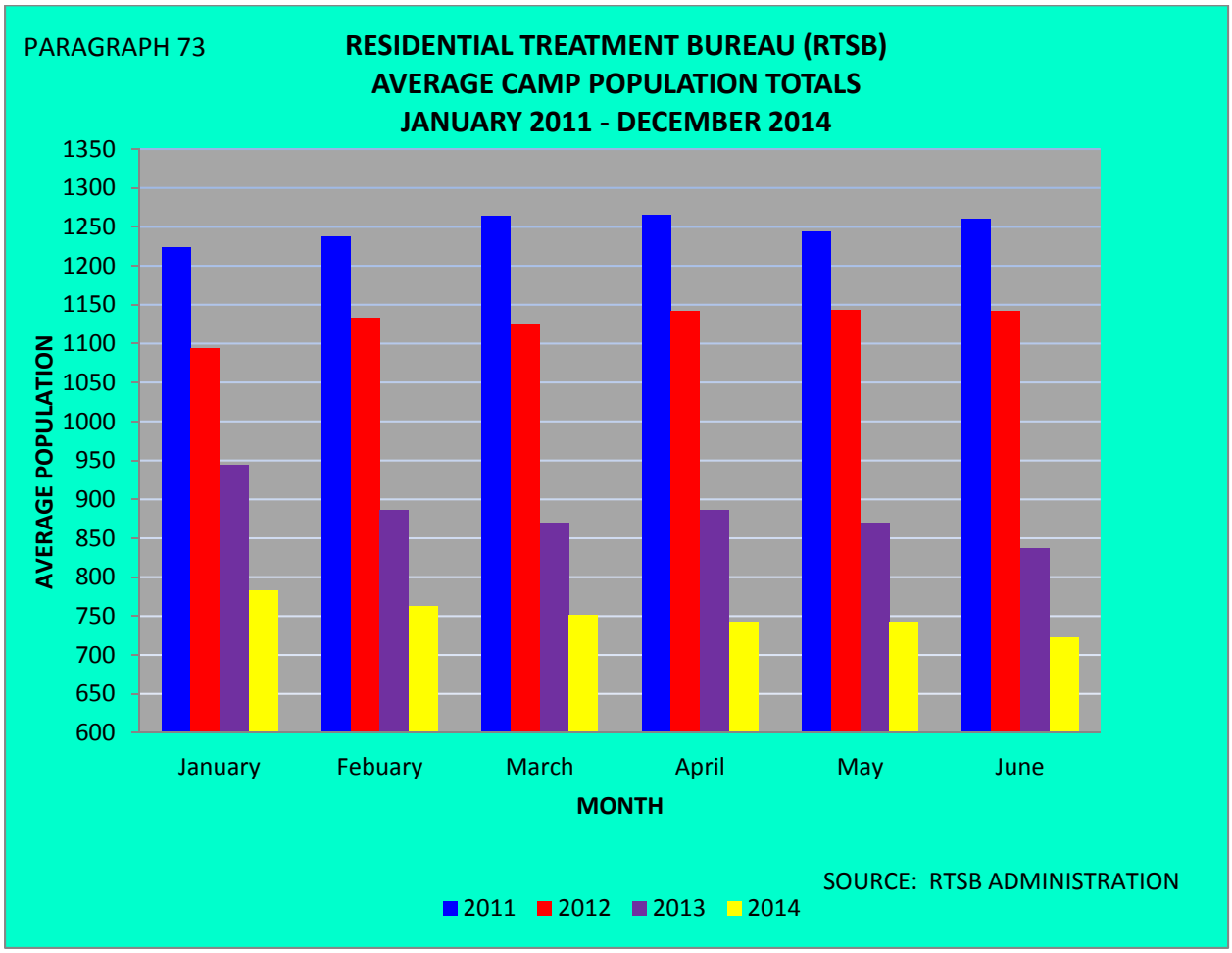
Camps Assessment Unit (CAU)

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) to determine appropriateness for camp or camp placement based on medical, mental health, substance abuse, education, criminal history, treatment needs and LARRC score, was fully implemented prior during this period. In April 2014, a CAU audit tool was developed in conjunction with CAU to ensure appropriate performance indicators would be measured. CAU audits conducted for the months of January – May 2014 indicated that all 641 CCP ordered-youth received a MDA.

As can be seen in ***Figure 73.2-1*** below, RTSB's average camp population continues to decrease in numbers and it is anticipated to decrease further upon strengthening our existing processes. This will be closely measured during the next Monitoring Period.

Figure 73.2-1

RTSB Average Camp Population (January 2011 – June 2014)



Discussion by Monitors:

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 their recommendation is reviewed and approved. Probation Department 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. Prior to the previous monitoring period there had been no formal follow-up process to determine if the recommendations to the courts were consistent with the OHS decision, although the OHS had, and continues to receive lists of camp placements (CCP). During the last monitoring period the OHS developed and implemented 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 leading to a CCP order. The Department has identified eight categories of these inappropriate recommendations that they term "exceptions."

Audit of CCP Orders Received

The OHS provided the Monitors with the results of an audit of Camp Community Placement (CCP) for the period covering January – May 2014. For the most part, the process is working well. In 92% of the 670 CCP orders received from the courts during the months audited, the CCP had been properly contacted and approved the final recommendation or found it to be okay. The remaining 8% of the cases fell into one of the exception categories described above. Of those 53 exceptions, the greatest number (52) had not been referred to OHS prior to being submitted to the court as camp recommendations. In one case that had not been submitted to OHS for evaluation, the DPO recommended something less restrictive than camp placement, but wrote the report in a manner that led the court to decide on camp placement. In two other cases, the DPO recommended CCP, even though it had been expressly denied by OHS. In the remaining case, the OHS cleared the youth for suitable placement not camp and the DPO recommended suitable placement, but wrote the report in a way that made camp placement appear to be a better choice.

The audit results show that the compliance rate with this requirement continues to exceed 90%. Even more encouraging is the report that in the last two months audited the exceptions were limited to 3% and 4% of the CCP orders received, and the compliance rate was 97% and 96%. (The Monitors were also provided with preliminary audit results from the DOJ/Quality Assurance unit that showed a higher percentage of cases "not documented as having been screened" by OHS during the same January – May 2014 period. Because we utilized the OHS audit results in the last report, we used their audit results this time also. We plan to discuss the matter further with the DOJ/Quality Assurance Director to determine the reason for the different results.)

As noted in the 10th Monitoring Report, the Probation Department now has a process to examine why the mandated protocols were not followed. The review identifies DPOs and supervisors

accountable for intentional violations of the policy and/or failure to ensure that the policy was followed.

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. During this monitoring period the Probation Department has continued to develop an electronic resource directory that will be available to bench officers and staff, Probation Department staff, and possibly law enforcement agencies.

In addition, the Probation Department and the courts are now holding collaborative regional forums to address all manner of issues between them. They have divided the County into three regions for the purposes of the forums. The County has stated their intent to hold these forums for all three regions once every four months, or more frequently if needed. In the previous monitoring period, two regional forums were held. The third regional forum was held during this monitoring period.

In the 10th Monitoring Report we noted that the minutes of the two forums held during that monitoring period indicated a discussion of Paragraph 73, but did not detail any discussion of community-based services as referenced in this section. The one forum held during this monitoring period focused more clearly on community alternatives to treat youth and their families. The regional forum, however, was only attended by four bench officers. The County needs find additional avenues for the dissemination of this information if attendance is inadequate to meet the mandates of this provision.

Camp Assessment Unit

During this 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 from prior reports.

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

Recommendations:

- Work with courts to ensure that the electronic resource directory accurately reflects available services and meets their needs. Develop a process to ensure that the resource directory consistently reflects currently available services.
- 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.
- 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.
- Meeting with OHS and CAU staff.
- Review of 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 re integration 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 reinstitution 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 March 2014, an In-Camp Services and Re-entry audit tool was developed to capture the MDT process, early release eligibility, early release referrals and case work to be used with the Camps' established tracking logs, MDT folders, shared drive, and PCMS entries.

Audits for January through March 2014 reflected that the Camps continued to exceed expectations in offering all entering youth the Initial MDT within 14 days as seen in the Figures below. However, the initial audits for this same period demonstrated the inconsistent participation of the Aftercare DPO.

Figure 73.3-1 *West Region Aftercare MDT Participation*

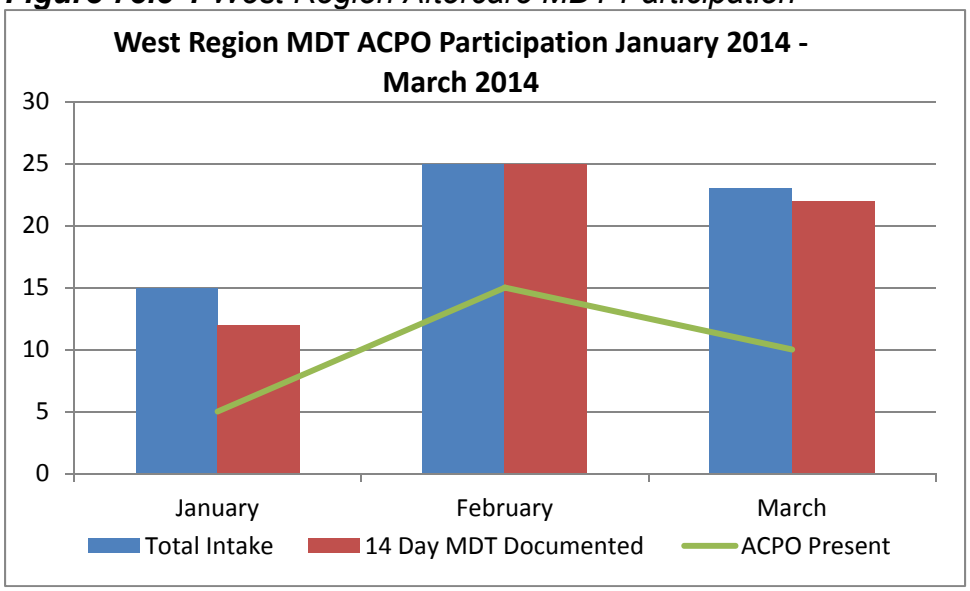


Figure 73.3-2 *North Region Aftercare MDT Participation*

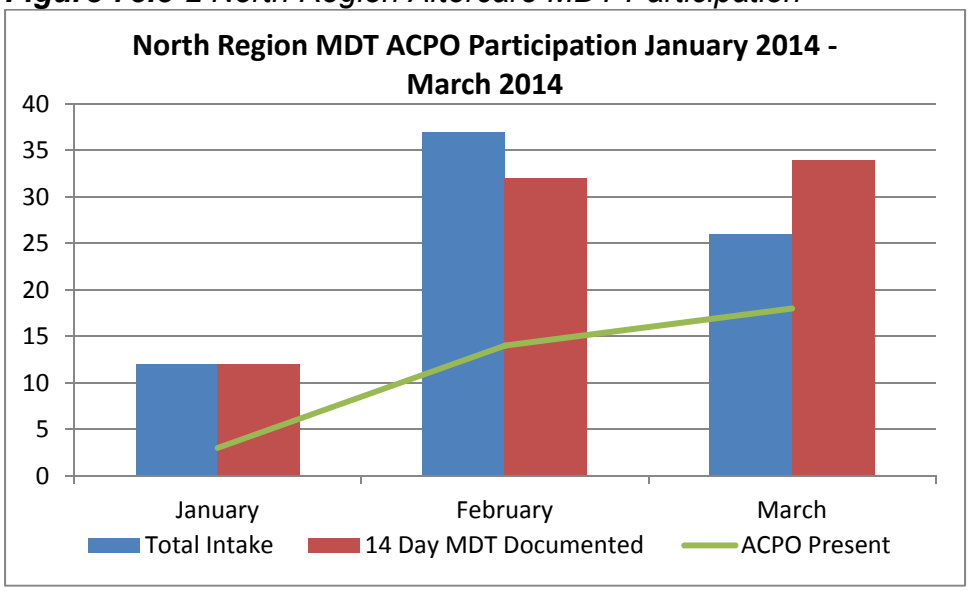


Figure 73.3-3 *East Region Aftercare MDT Participation*

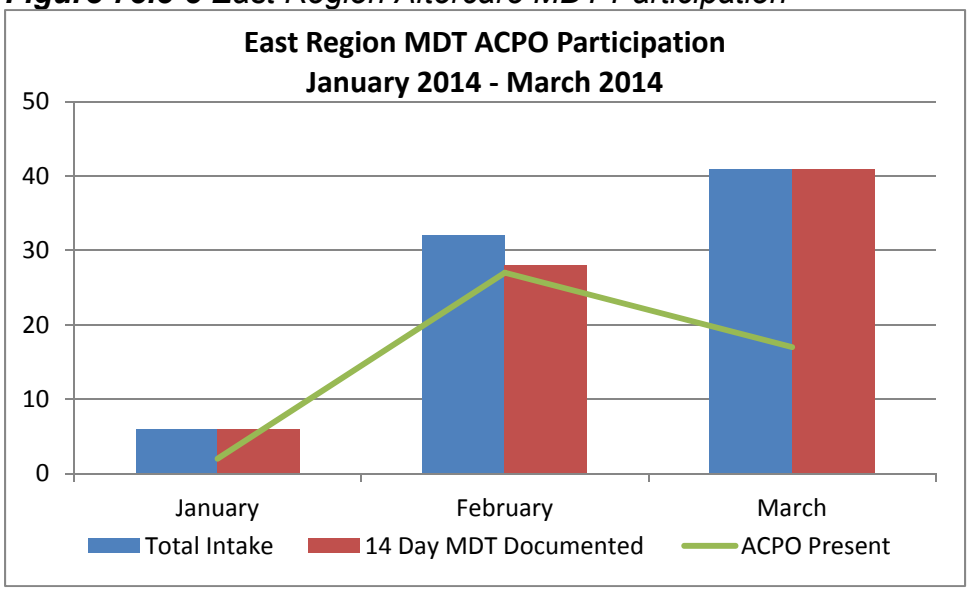
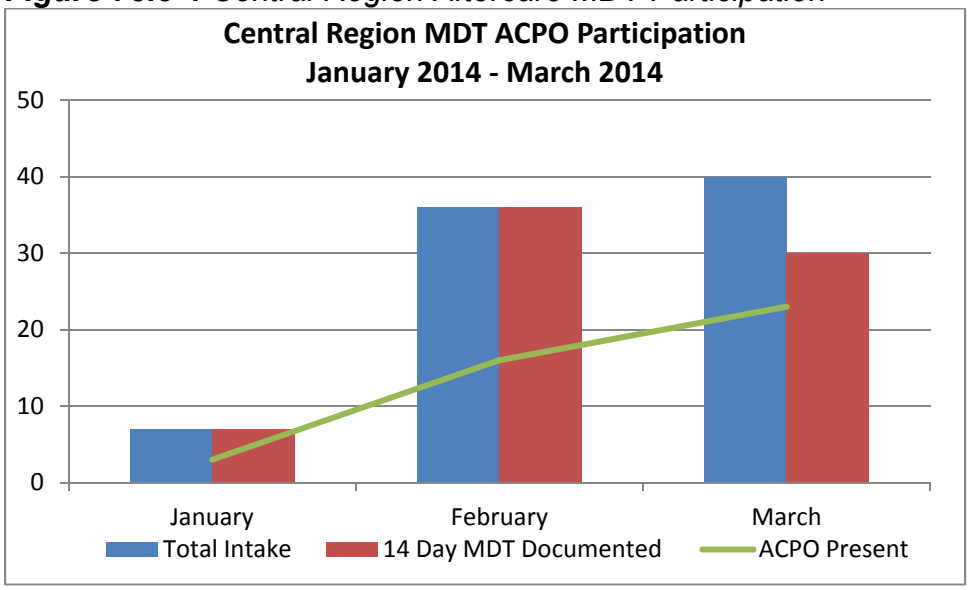


Figure 73.3-4 *Central Region Aftercare MDT Participation*



Increased training for all Aftercare DPOs (discusse d in Provision 73-4) on the required contacts with youth in cam p, and the use of PCMS, duri ng the next monitoring period should produce outcomes that meet or exceed the standard 80% compliance goal in Aftercare participation in the Initial MDT.

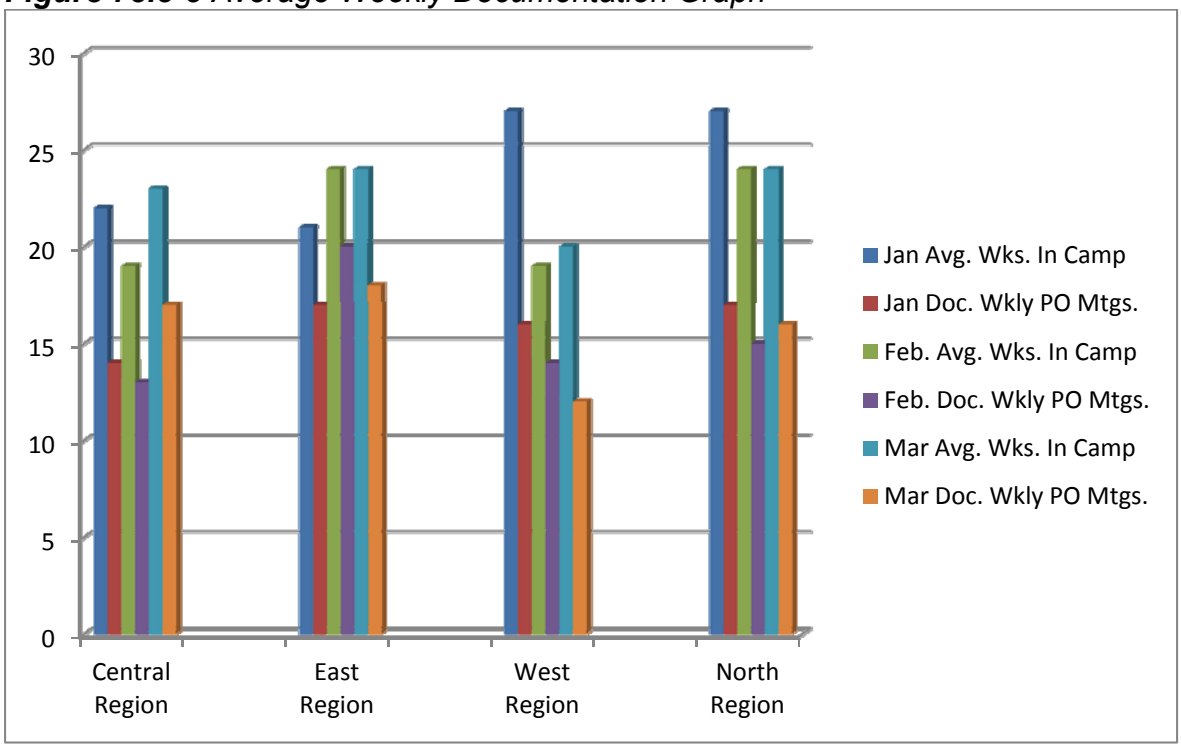
Audits of Camp DPO weekly contacts with yout h were conducted for January – March 2014. It was recommended by the Monitor that the audit tool be revised to adjust for tim e youth are in camp prior to their In itial MDT and case plans h ave yet to be developed. In the next m onitoring period the weeks in camp will be adjusted to account for dev elopment of the MDT case plan. In

the ***Table 73.3-1*** below the average weeks in cam p and average week ly documented case work meetings were gathered from a sampling of youth at each camp.

Table 73.3-1 *Camp Average Weekly Documentation*

Region	Jan 2014 Avg. Wks. In Camp	Doc. Wkly PO Mtgs.	Feb 2014 Avg. Wks. In Camp	Doc. Wkly PO Mtgs.	Mar 2014 Avg. Wks. In Camp	Doc. Wkly PO Mtgs.
Central Region	22	14	19	13	23	17
East Region	21	17	24	20	24	18
West Region	27	16	19	14	20	12
North Region	27	17	24	15	24	16

Figure 73.3-5 *Average Weekly Documentation Graph*



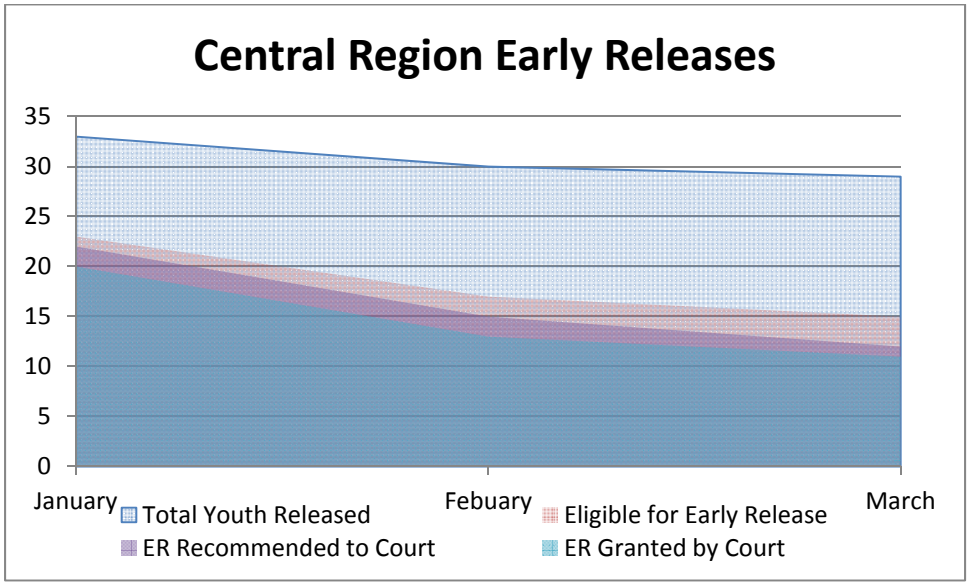
During the audit of the case/transition plan being created within 30 days of youths' arrival in camp, it was found that of the 39 sampled cases, the case/transition plan was completed 36 times within the required time frames (92%).

Provision 73-3 audits conducted for the months of January through March 2014, sampled released youth for Transitional MDT participation by the Aftercare DPO. In the chart below for example, in January 2014, nine released youth from the North Region had Transitional MDTs. Eight out of nine Aftercare DPOs were notified of the MDT. However, five Aftercare DPOs participated in those MDTs. The Aftercare DPO participation improved in all regions for the sampled youth in the following month of February. In March there was a significant drop in the Aftercare DPOs Transitional MDT participation in the Central and West Regions. This may be due to several variables including small sample sizes at each individual camp. Also, the MDTs were held in samples months prior to CCTP DPO training (discussed in Provision 73-4 section) as recommended by the Monitors in the previous report. In the next monitoring period, with nine months of collected data charted and the additional CCTP training and continued enforcement of existing procedures, there should be a significant increase in MDT participation for all regions.

Table 73.3-2 *Aftercare DPO Transitional MDT Participation January through March*

	AfterCare P.O. Notified / Total of Sample Youth Releases	AfterCare P.O Participations	Percentage %	AfterCare P.O. Notified / Total of Sample Youth Releases	AfterCare P.O Participations	Percentage %	AfterCare P.O. Notified / Total of Sample Youth Releases	AfterCare P.O Participations	Percentage %
	January			February			March		
North Region 3 Camps	8/9	5	63%	9/9	9	100%	8/9	7	88%
East region 3 Camps	9/9	6	67%	9/9	8	89%	9/9	8	89%
West Region 3 Camps	9/9	4	45%	7/7	6	86%	8/8	4	50%
Central Region 4 Camps	10/12	8	80%	8/12	8	100%	10/12	7	70%
Totals	36/39	23	64%	33/37	31	94%	35/38	26	74%

Figure 73.3-6
Central Region Early Releas es (ER) by Region (of total youth released) January through March 2014

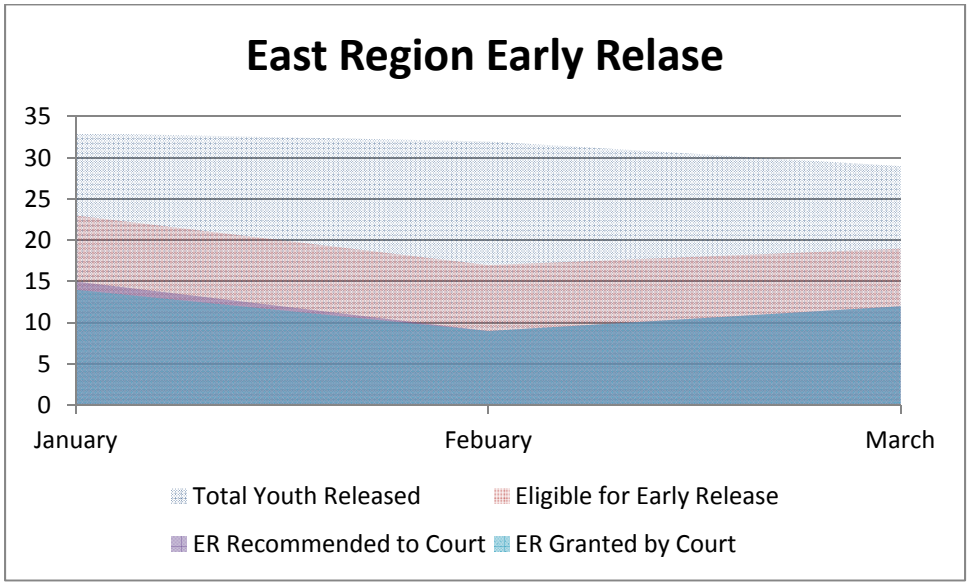


In January 2014, in the Central Region, there we re a total of 33 youth released. Of those youth, 23 were eligible for early release. Fifteen of the 23 youth had ER/Transitional MDTs documented in PCMS (this does not take into account the MDT folder or RTSB MDT shared drive). Twenty-two of the 23 youth that had E R MDTs were recomm ended to the court and 20 were granted early release.

In February 2014, in the Central Region, there were a total of 30 youth released. Of those youth, 17 were eligible for early release. Sixteen of the 17 youth had ER/Transitional MDT s documented in PCMS (this does not take into account the MDT folder or RTSB MDT shared drive). Fifteen of the 17 youth that had ER MD Ts were reco mmended to the court and 13 were granted early release.

In March 2014, in the C entral Re gion, there were a total of 29 youth released. Of those youth, 15 were eligible for early release. Fifteen of the 15 youth had ER/Transitional MDTs documented in PCMS. Twelve of the 15 youth that had ER MDTs were recommended to the court and 11 were granted early release.

Figure 73.3-7
East Region Early Releases (ER) by Region (of total youth released)
January through March 2014

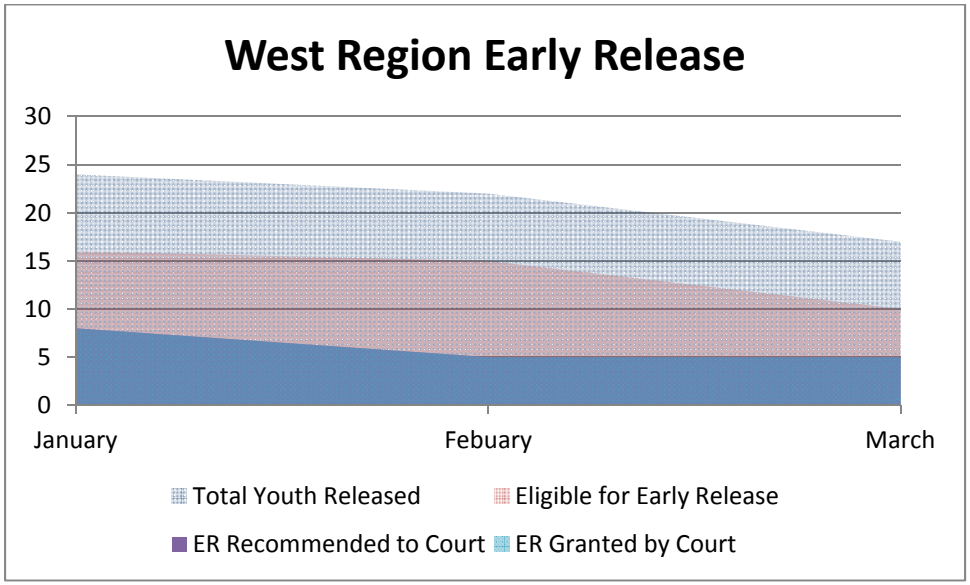


In January 2014, in the East Region, there were a total of 33 youth released. Of those youth, 2 3 were eligible for early release. Twenty-three of the 23 youth had ER/Transitional MDT s documented in PCMS. Fifteen of the 23 youth that had E R MDTs were recommended to the court and 14 were granted early release.

In February 2014, in the East Region, there were a total of 32 youth released. Of those youth, 17 were eligib le for early release. Seventeen of the 17 youth had ER/Transitional MDTs documented in PCMS. Nine of the 17 youth that had ER MDTs were recommended to the court and 9 were granted early release.

In March 2014, in the E ast Region, there were a total of 29 youth released . Of those youth, 19 were eligible for early release. Nineteen of the 19 youth had ER/Transitional MDTs documented in PCMS. Twelve of the 19 youth that had E R MDTs were recommended to the court and 12 were granted early release.

Figure 73.3-8
West Region Early Releases (ER) by Region (of total youth released)
January through March 2014

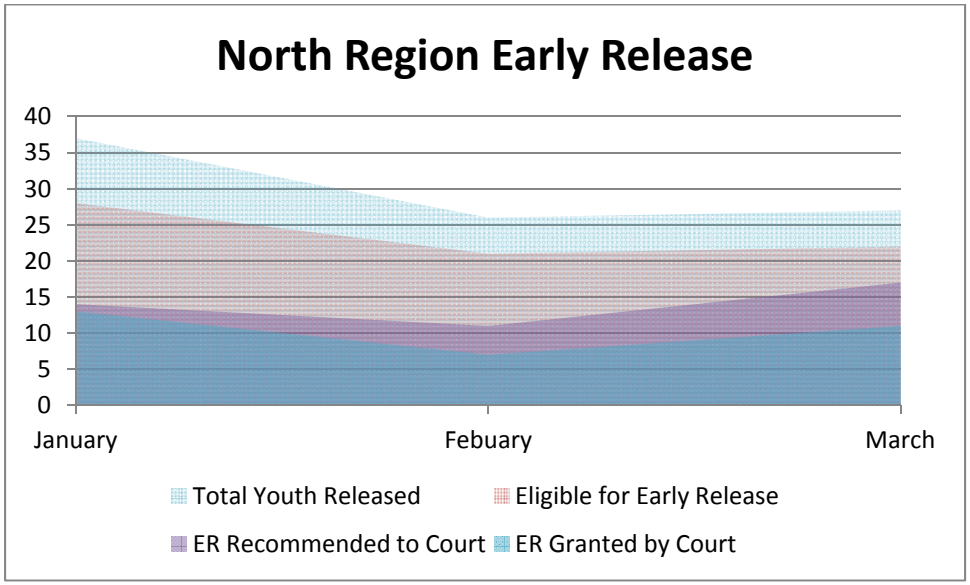


In January 2014, in the West Region, there were a total of 24 youth released. Of those youth, 16 were eligible for early release. Sixteen of the 16 youth had ER/Transitional MDTs documented in PCMS. Eight of the 16 youth that had ER MDTs were recommended to the court and 8 were granted early release.

In February 2014, in the West Region, there were a total of 22 youth released. Of those youth, 15 were eligible for early release. Thirteen of the 15 youth had ER/Transitional MDTs documented in PCMS (this does not take into account the MDT folder or RTSB MDT shared drive). Five of the 13 youth that had ER MDTs were recommended to the court and 5 were granted early release.

In March 2014, in the West Region, there were a total of 17 youth released. Of those youth, 10 were eligible for early release. Ten of the 10 youth had ER/Transitional MDTs documented in PCMS. Five of the 10 youth that had ER MDTs were recommended to the court and 5 were granted early release.

Figure 73.3-9
North Region Early Releases (ER) by Region (of total youth released)
January through March 2014



In January 2014, in the North Region, there were a total of 37 youth released. Of those youth, 28 were eligible for early releas e. T wenty-seven of the 28 youth had ER/Transitional MDTs documented in PCMS (this does not take into account the MDT folder or RTSB MDT shared drive). Fourteen of the 27 youth that had ER MDTs were recommended to the court and 13 were granted early release

In February 2014, in the North Region, there were a total of 26 youth released. Of t hose youth, 21 were eligible for early release. Twenty-one of the 21 youth had ER/Transitional MDTs documented in PCMS. Eleven of the 21 youth that had ER MDTs were recommended to the court and 7 were granted early release

In March 2014, in the North Region, there were a total of 27 youth released. Of tho se youth, 22 were eligible for early rele ase. Twenty-two of the 22 youth had ER/Transitional MDT s documented in PCMS. Seventeen of the 22 youth that had ER MDTs were recomm ended to the court and 11 were granted early release

During the audits, it was determ ined that the tota l number of days saved for youth released from camp early in the m onth of January 2014 was 1,904 days; in February 2014 it was 1,158 days; and in March 2014 it was 1,139 days for a total of 4,201 days earned.

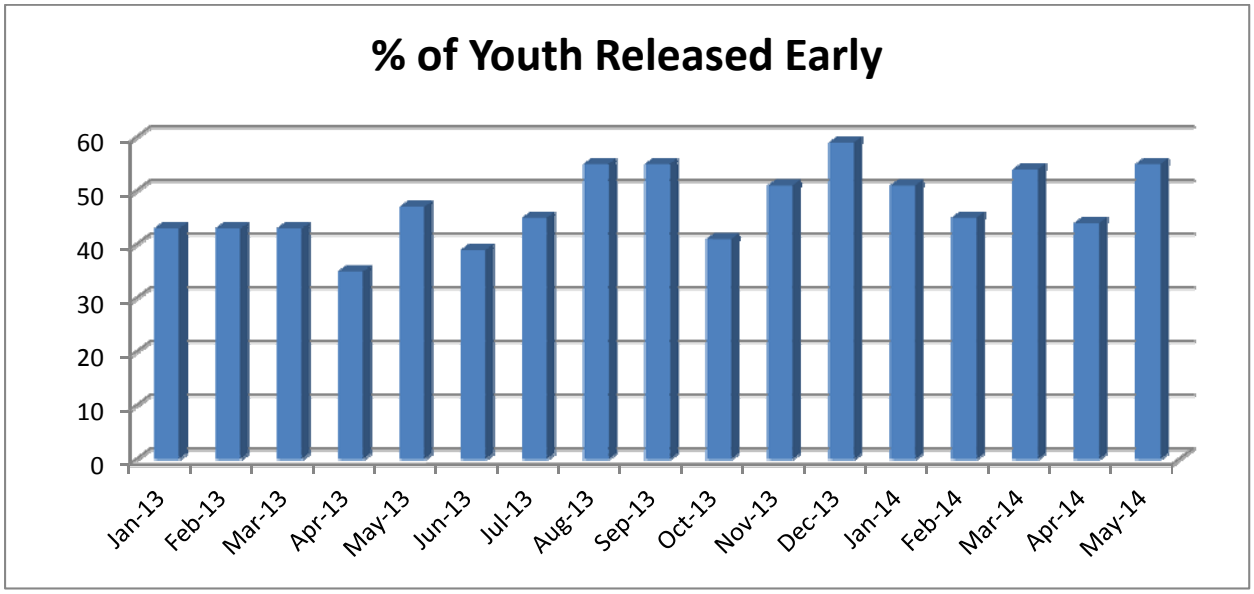
Early Releases
The Reside ntial Trea tment Serv ices Bureau co ntinues to e nsure tha t y outh eligible f or early release are reviewed by a Multi-D isciplinary Team and recommended to the court a ccordingly. These efforts have shown gradual increases in th e percentage of youth re leased early since the program's implementation. However, it is expe cted that the percentage will eventu ally stabilize as early releases are depende nt upon youth's behavior and pa rticipation in programming (see

Table 73.3-3 and ***Figure 73.3-10***). Early releases during January through May 2013 yielded an average of 42%, which increased in the last two quarters of 2013 to 51%. An average of 50% was maintained through May of 2014.

Table 73.3-3
Youth Released Early from Camp (January through May 2013 & 2014)

Camps	# of youth released from Camp	# of youth released early from Camp	% of youth released early (2014)	% of youth released early (2013)
January	156	79	51%	43%
February	144	65	45%	43%
March	132	71	54%	43%
April	168	74	44%	35%
May	139	77	55%	47%
Average	**148**	**73**	**50%**	**42%**

Figure 73.3-10
Percentage of Youth Released Early from Camp (January 2013 through May 2014)



An Early Release audit tool was created and implemented during the reporting period in response to Paragraph 73-3. The tool and results of January through March 2014 audits will be discussed in further detail in section 73-3, *In-Camp Services/Re-entry* (Page XX). 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 73.3-4***)

Table 73.3-4
Amount of Time Saved by Early Releases (January through December 2013)

Camps	Time Saved
January	(985 Days), 32 months; 24 Days
February	(1095 Days), 36 Months; 15 Days
March	(1272 Days), 42 Months; 12 Days
April	(2572 Days), 85 Months; 21 Days
May	(3376 Days), 112 Months; 15 Days

Discussion by Monitors:

As discussed in the County's self-assessment, audit tools were drafted to assess the various outcomes required by this provision and a retrospective audit was conducted to assess performance during January-March 2014. This is an enormous improvement over the previous self-assessment and highlights the County's ability to implement quality assurance procedures to identify and respond to problems in delivering services to youth. However, the audit tools for some of the Paragraph's sections need additional refinement.

Recall that the audit tools for the other provisions in the MOA (particularly 17 and 43) took several iterations to reach the point at which they accurately captured the performance on the key indicators related to the MOA and Department policy. The time available for such reconsideration and revision has been much shorter for this provision, but the same steps are proving to be fruitful. The County is encouraged to continue the process of testing and revising the audit tools until the key managers are satisfied that they capture the most useful information to enhance performance. Toward that end, the Monitors suggest a few revisions that are discussed in detail in Provision 73-7.

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 65 youth across 13 Camps (Camp Miller was not visited due to scheduling reasons). When applicable, results from the County's audits are also summarized, albeit in a slightly different fashion than as presented in the self-assessment. Two additional Monitors responsible for parts of this section reviewed PCMS Case Notes and MDT Minutes for 122 youth released from all Camps in March and April 2014.

73-3(a) requires Initial MDTs to be held within 14 days of admission to Camp. Overall, the Initial MDTs for 61 of the 65 youth (94%) were held within the required timelines. When exceptions occurred, they were usually for legitimate reasons (e.g., youth on medical trans ; Camp evacuation). The County's audits revealed similar performance levels—89% of the Initial MDTs conducted between January-March 2014 occurred within the requirement timeline. Only Camp Gonzales and Jarvis did not reach at least an 80% compliance level. 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 the vast majority of the 65 youth, the Initial MDT meetings include 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. Of the 65 cases reviewed by the Monitor, 62 (95%) 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.] This is a significant improvement over the 64% performance level reported in the 10th Monitor's Report and now meets the requirements of this part of Provision 73. A measure to assess the timeliness of the first meeting with the DPO of record/caseworker should be added to the audit tool for 73-3.

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 significantly during the current monitoring period. Among the 65 cases sampled by the Monitor, casework sessions were held between the youth and the DPO during 89% of the weeks the youth were in Camp. 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 65 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.

The County's audit data provides some interesting comparisons across regions, which are not immediately evident as presented in the self-assessment. The table below reformats the presentation of these data.

Early Release Practices, by Region				
Region	Month	% eligible for ER	% recommended for ER	% ER granted
Central	Jan 14	70	96	91
	Feb 14	57	88	87
	Mar 14	52	80	92
	Average	*60%*	*88%*	*90%*

Early Release Practices, by Region				
Region	Month	% eligible for ER	% recommended for ER	% ER granted
East	Jan 14	70	65	93
	Feb 14	53	53	100
	Mar 14	66	63	100
	Average	*63%*	*60%*	*98%*
West	Jan 14	67	50	100
	Feb 14	68	38	100
	Mar 14	59	50	100
	Average	*65%*	*46%*	*100%*
North	Jan 14	76	52	93
	Feb 14	81	52	64
	Mar 14	81	77	65
	Average	*79%*	*60%*	*74%*

This table reveals some distinct differences across regions. The Monitor recommends that these data be reviewed *by Camp* to refine the understanding of why these differences exist. First, youth who are in Camp on a 3-month program are not eligible for early release. Similar proportions of eligible youth were observed in Central (60%), East (63%) and West (65%) regions, with higher proportions of eligible youth evident in the North (79%). Once the MDT reviews the youth's Made Days, program completion, education status and recent behavior, a decision is made about whether to recommend the youth for early release. Although Camps dependably *review* every youth for early release, as they are required to do by this provision and by Provision 17, there are wide disparities in the proportion of youth *recommended* for early release. The East and North recommended 60% of the eligible youth, while the West recommended only 46% and Central recommended 80% of the eligible youth. These differences are ripe for further review to determine whether there are differences in the rate of program completion, standards for recommendation, etc. across the Camps. Finally, most regions exhibited a high rate of approval for early release recommendations (Central 90%; East 98%; West 100%), with more moderate rates in the North (74%). The grant rate is likely due to differences in judicial philosophies about such things, but again, these data should be generated at the Camp level to better understand the differences (e.g., the region with the lowest recommendation rate, West (46%) had the highest approval rate (100%), which may indicate the Camps in that region only recommend youth who are a "sure thing"). None of these differences will be particularly meaningful absent a Camp-level analysis.

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 65 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 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 audits reveals a 90% performance level across all Camps for the three-month period, with only Mendenhall, Gonzales and DKC not meeting the 80% threshold. The County appears to meet 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 63 of the 65 cases sampled (97%). The other two youth were released earlier than anticipated and so the Transitional MDT fell inside the 30-day window. Even when this occurred, all of the supports and services needed to encourage a successful re-entry were in place prior to the youth's early release. 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 assessed participation in Transitional MDT meetings for each of the 65 youth involved in the Case Presentation sample, and also through a review of PCMS Case Notes and MDT Minutes for 122 youth released from the camps during March and April 2014. The Aftercare/Placement PO participated, either by phone or in person, in only 90 of the 122 meetings (74%) documented in the Case Notes and Minutes. The Aftercare/Placement PO participated, either by phone or in person, in 78% of the Transition MDT meetings reviewed in the Case Presentation sample. This is a significant improvement over the 62% performance level reported in the 10th Monitor's Report. Camps with more persistent Transitional MDT Coordinators appeared to have greater success obtaining Aftercare PO participation. Participation rates were also higher at Camps visited toward the end of the monitoring period, as the new procedures had been in place longer.

The County's audits reviewed cases from the beginning of the monitoring period and found that the APO participated in the transitional MDT meeting in only 63% of the cases. This is consistent with the Monitors' review of the March and April PCMS Case Notes and MDT minutes for APO in-person participation in the Transitional MDT. When telephone/video participation was included, that number increased to 74% compliance. In the County's audit, only 3 Camps met or exceeded 80% compliance: McNair, DKC and Scott. The County needs to increase Aftercare PO participation in Transition MDTs in order to comply with this part of Provision 73. Given the timeframe for these audits (early 2014), the Monitors anticipate that the observed level of performance in the second half of 2014 will be significantly improved.

The County's audits also found that the family attended the Transition MDT in 76% of the cases. The Monitor noted that the family was *invited* to attend 100% of the MDTs but often could not attend because of work schedules or geographical distance. The County's current level of performance appears to meet 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 65 Case Presentation, 58 youth were returning home. A home visit was conducted within 30 days of the youth's release in 54 of the 58 cases (93%). The March and April PCMS Case Notes

documented the required home evaluations were timely conducted in 118 of 119 cases (99%). 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 appears to be meeting 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 data in Provision 17 and also presented the data above in the section that discusses early release consideration. The County is meeting the requirements of this portion of Provision 73.

Recommendations:

1. Increase Aftercare PO participation in Transitional MDTs.
2. Interpret the differences in early release practices that are evident across regions by drilling down to the Camp level and investigate the underlying causes of the differing practices.
3. Continue to refine audit tools to measure current performance levels on each of the key performance measured required by this provision. Require corrective action plans in those cases where observed performance levels do not meet expectations.

Evidentiary Basis:

- Site visits to Camps Afflerbaugh, Paige, Rockey, Onizuka, McNair, Jarvis, Scott, Scudder, DKC, Kilpatrick, Gonzales, Munz and Mendenhall.
- Case Presentations of 5 youth most recently released at each Camp, along with the source documentation, total sample = 65 youth
- Data culled from audits of 73-3 covering January through March 2014
- Extensive consultation with Probation and DMH administrators and other staff involved in the design and implementation of aftercare protocols.
- Review of PCMS Case Notes and MDT Minutes for all Camp releases during March and April 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:

During this period the CCTP DPO Tracking Form and shared drive was finalized for use. On-site training was conducted and completed at the nine (9) CCTP area offices March 25 – 28, 2014. In April 2014, an audit tool was developed with CCTP with a majority of the performance measures paralleling the Tracking Form. The tool is also designed to track appropriate case note entries in PCMS regarding contact with youth and service providers. In May 2014, additional refresher training was held with all CCTP staff to review the Tracking Form as it relates to this portion of Provision 73. All CCTP supervision DPOs are now aware of the requirement, when notified, to participate in both the *Initial* MDT and the Transitional MDT either in-person, conference call, or video conference. CCTP DPOs failing to participate in the MDT must notify

their Supervisor and document the reason in PCMS. This may allow enough notification time for an alternate DPO to attend the MDT. However, the assigned DPO must have one face-to-face meeting with the youth at least 21 days prior to release to discuss their transitional case plans. Additionally, CCTP DPOs are also required to document, in PCMS, family contacts in which the youth's case plan was discussed. CCTP DPOs are required to perform at least one home visit and one school visit within 30 days of the youth's release, in addition to meeting with youth bi-monthly once they are released from camp.

Figure 73.4-1 CCTP MDT Participation (Source: CCTP)

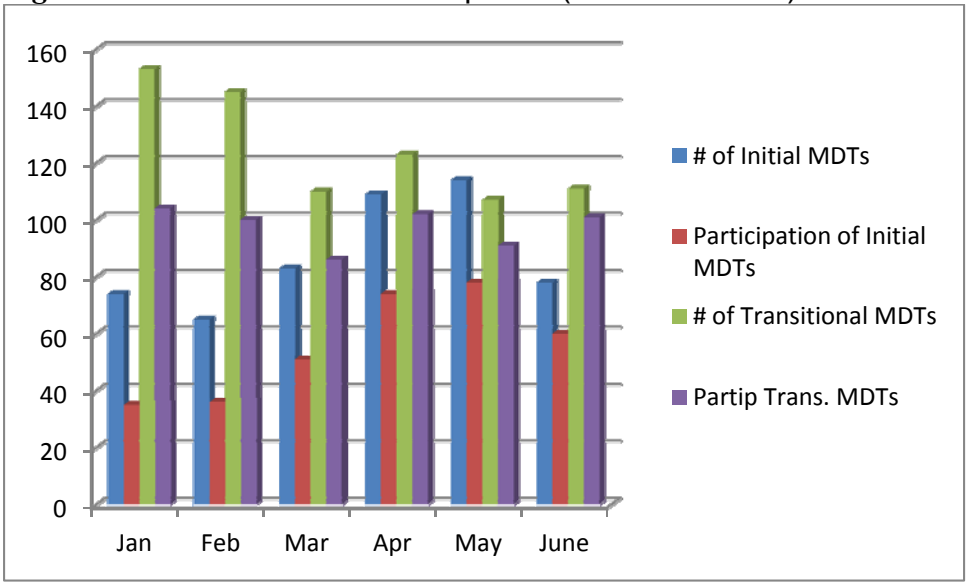


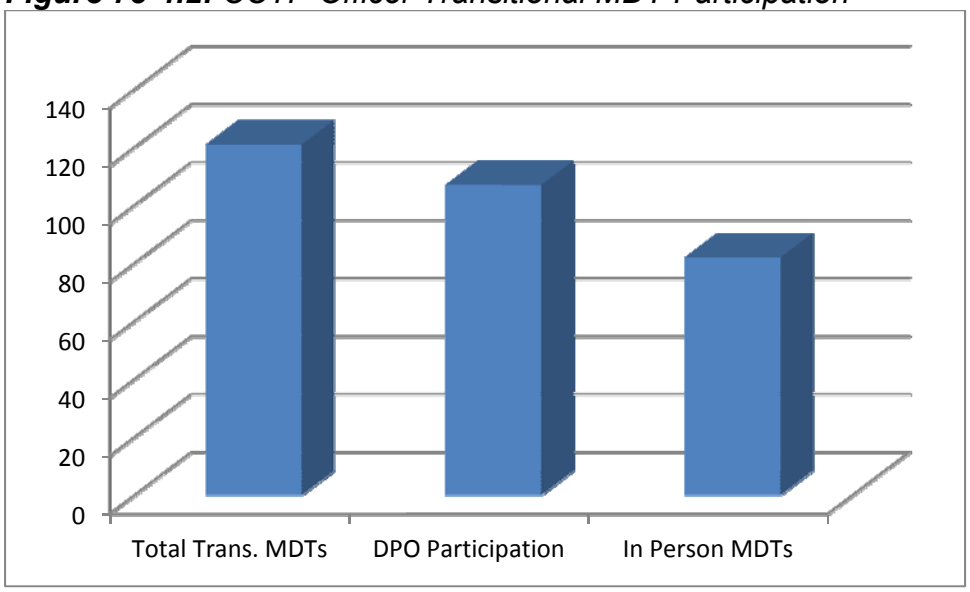
Table 73.4-1 CCTP MDT Participation

	Jan	Feb	Mar	Apr	May	June	Total
# of Initial MDTs	74	65	83	109	114	78	523
Participation Initial MDTs	35	36	51	74	78	60	334
# of Transitional MDTs	153	145	110	123	107	111	749
Participation Transitional MDTs	104	100	86	102	91	101	584

In April 2014, an audit of CCTP for the months of January and February 2014 was completed. The data sample was generated based on the youths' Transitional MDTs and not their release dates. For the tool to work in conjunction with the DPO Tracking Form, the youth must be released from camp for at least thirty (30) days. During the next monitoring period the data will be collected only on released minors for the remainder of 2014. The audit findings concluded that there were 121 Transitional MDTs held for youth released to CCTP during the audit months (January and February 2014). Of the 121 Transitional MDTs held, the CCTP officers participated in 107, which 82 were face-to-face participation. Further review of the data suggested that limitations with the CCTP officers' participation in the Transitional MDTs was

attributed to the youths' cases being transferred to another unit (Suitable Placement or the Gang Unit) prior to the Transitional MDTs, late notification, no notification, or CCTP officers' schedule conflicts.

Figure 73-4.2: *CCTP Officer Transitional MDT Participation*



(January and February 2014; Total Trans MDTs = 121; DPO Participation = 107; In Person MDTs = 82)

According to the Tracking Forms there were 105 out of 121 cases that the CCTP Officer ensured pertinent information about the youth's case plan was communicated to the youth and/or parent prior to release. There were 99 out of 121 cases that the CCTP Officer documented having a face-to-face meeting with youth and family within three working days post camp. There were also 65 out of 121 cases that the CCTP officer *documented* home visits within 30 working days post youth's camp release. The CCTP trainings in April in May were in part, to reinforce the requirement that home visits are to be made within 30 days of release, and to decrease the lack of documentation on the Tracking Form of services provided.

There was additional data collected during the audit period (January and February 2014) in which PCMS was utilized as the primary source to locate data for sample cases. After the review of ten sample cases of youth released to CCTP, it was found in ten out of ten cases that the youths' transition plan was documented in PCMS as consistent with their service needs. There were ten out of ten cases that the CCTP officer referred the youth to aftercare services, and ten out of ten cases that included documentation of enrollment in services. There were also ten out of ten cases that the CCTP officer documented the youth's behavior and progress with the case plan. There were seven out of ten cases that the CCTP officer maintained contact with the community service provider. During the next monitoring period CCTP will reassess and revise, where necessary, their Tracking Form and train all CCTP officers on its proper usage. The CCTP audit tool will also be reassessed to ensure the Tracking Form and CCTP PCMS entries are capturing the appropriate performance measures.

In May 2014, The Intensive Gang Supervision Program (IGSP) Management and CCTP Management held a P73 joint-training session for supervisory staff, in which IGSP was

introduced to the CCTP DPO Tracking Form . Prior to this training in May, IGSP was already involved in many of the Provision 73 requirements. IGSP officers were participating in the Transitional MDTs for youth identified to be released to their program. IGSP officers have always maintained enhanced field supervision of identified youth in the community through regular home visits, family contacts, school visits and service provider contacts. The joint training included information on development and completion of the Tracking Form, utilization of the shared drive, and requirement that IGSP officers attend the *Initial* MDT when a new camp youth (not previously assigned to IGSP) has been identified to be released to their supervision. In June 2014, IGSP was added to the CCTP shared drive. Also in June 2014, IGSP and the DOJ Bureau developed a draft audit tool, and recognized the need to develop an IGSP Tracking Form. By the next monitoring period, both the Tracking Form and audit tool will be finalized and implemented.

Provision 73-4 requires that a Residential Based Service (RBS) Officer assigned to the Placement Administration Services Office (PAS) attend Transitional MDTs of youth that, absent identification of a suitable home in the community, may be transitioning to Placement upon release from camp. In April 2014, a Placement audit tool was developed in collaboration with Placement Services Bureau (PSB) to be used in conjunction with PCMS case notes and their previously implemented PSB Transition Process Tracking Form (2013). Audits for the months of January – June, 2014 captured data on the RBS officers' participation in Transitional MDTs. The data findings concluded that there were 34 Transitional MDTs held for youth released to Placement during the Audit months (January-June 2014). Of the 34 Transitional MDTs held, the RBS officers attended 12. However, further review of the data suggested that limitations with the RBS officers' participation in the Transitional MDTs can be attributed to 20 of the 34 youths' Transitional MDTs being held *prior* to the initial placement order. Therefore the RBS officer would not have been expected to participate in the initial MDT.

Additional data was collected during the Audit period (January – June 2014) in which PCMS was utilized as the primary source to locate data for the audit sample cases. The PCMS case notes were reviewed to verify the RBS officers' involvement with providing continuum of care to youth and their families. Thirteen sample cases indicated that 11 out of 13 cases demonstrated the RBS officer documented in PCMS the youths' service needs and transitional plans. Also, 11 out of the 13 cases involved the RBS officer explaining the Placement process to the youth and/or family. There were 12 out of 13 cases that included coordination with the RBS officer and Zero Incarceration Placement Program (ZIPP) unit regarding youth's placement needs. There were 11 out 13 cases that the RBS Officer completed a face-to-face visit within seven days of youth being released. Although, the tool has been implemented it will be reassessed before the next monitoring period, to ensure it is capturing all of the substantive data for Provision 73.

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 POs assigned to the schools the youth attend or, if they had been heavily involved in gang activity, to specialized Gang POs. Until recently, for the purpose of providing the in-camp aftercare services, CCTP took the lead for all these youth. A small number of youth released from Camps

go directly to placement in a group home or some other form of non-family setting. The aftercare POs for these youth are assigned to the Placement Unit. At some point during this monitoring period each separate unit was made 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 of those youth. In addition to the Transitional MDT, 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. Although there has been improvement, the level of compliance with this portion of Paragraph 73-4 continues to be inadequate.

The Monitors reviewed PCMS Case Notes and MDT Minutes for 122 youth released from the Camps during March and April 2014. Of the 122 cases reviewed where aftercare services would be required, the required level of pre-release contact between the youth and the aftercare PO was observed in only 60% of the cases. While a huge improvement over the 15% compliance rate of the prior monitoring period, it still falls short of the compliance required. [The level of participation by APOs during Camp stays varied widely. Although the required minimum number of contacts overall was insufficient, some APOs conducted many more than the required minimum number of contacts with the youth. That is an encouraging sign.]

Aftercare POs are also required to ensure that the families of youth about to be released from the camp system are aware of the release and transition planning. This can be done at any time, but is probably easiest when the aftercare PO and family participate in the Transitional MDT, or when the PO conducts the pre-release home inspection. The 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.

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 March and April Case Notes review, this occurred in 107 of the 114 applicable cases (94%).

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. During initial

discussions with the Monitors, the Probation Department had set an internal requirement of one meeting per week with the youth and/or family. That may have been overly ambitious considering the additional contact requirements placed on the APOs. During this monitoring period the County provided the Monitors with a draft CCTP manual. The draft manual requires the aftercare PO to "(m)ake contacts 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.

The first month or two after release from Camp are critical to a youth's successful transition into the community. We reviewed files for March and April 2014 releases. We chose that time period to ensure that all the files reflected a minimum of eight weeks from the time of release until the records were pulled for Monitoring review.

Some of the case files reviewed by the Monitors were for youth who were released from formal probation at, or shortly after release, and some who were released to probation in other jurisdictions. Only 102 of the files reviewed for March and April Camp releases involved youth who remained in the aftercare system long enough for analysis. The PCMS Case Notes document 69% of the March cases and 58% of the April cases meeting the twice a month meeting requirement. Those numbers mirror our review of November and December cases during the last monitoring period, but fall far short of the rate required for compliance at this point in the monitoring process.

The Case Notes reviewed by the Monitors were 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. Although some Gang and CCTP aftercare DPOs conducted many home visits, the overall compliance level for this part of 73-4 is insufficient. In 27 of the applicable 105 cases (26%) there was no documented home visit. In 15 of the 105 cases (14%) the home visit was outside the 30-day window. In only 63 of the 105 cases (60%) was the home visit timely conducted and documented as required.

The youth and family meeting and PCMS recording requirements are no longer new to aftercare Probation Officers who received training related to this portion of the MOA during the previous and current monitoring period. The Department now has a tracking form that identifies the key areas described above, but the auditing and reporting related to them is still a work in progress. We look forward to the refinement and utilization of the audit tools that will track compliance and lead to corrective action where deficiencies are noted.

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

Recommendations:

- Increase the involvement of aftercare Probation Officers in the pre-release transition process.
- Ensure that aftercare POs meet the minimum pre-release meeting with youth set forth in this section, and that those meetings are properly documented.
- Ensure that aftercare POs meet with family or community placement in advance of a youth's release to assure awareness of the release date and transition plan, and that those meetings are identified as relating to transition planning in the PCMS Case Notes..
- Ensure that aftercare POs conduct a home visit within 30 days after a youth's release from Camp.
- Ensure that all staff and supervisors that have contact with youth, and/or service providers related to those youth, properly document those contacts and their observations and recommendations in the Case Notes.
- Refine necessary audit tools, and report on results and corrective action.

Evidentiary Basis:

- Review of PCMS Case Notes and MDT Minutes for all camp releases during March and April 2014.
- Meetings with the CCTP and DOJ/QA Directors and staff.

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 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.

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. Eleven parents attended the Orientation. 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, will be reduced at this location as Probation youth are phased in. As of June 30, 2014, one Senior Probation Director, one Director, one Supervising Deputy Probation Officer, and one Deputy Probation Officer are on staff. Nine youth have been transferred to the East LA JDRC. Academic teachers and other support services are in place at the East Los Angeles JDRC. 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. Eleven parents attended the Orientation. 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. Eleven youth are enrolled in the Lynwood JDRC. The four classrooms are under renovation and will be fully operational early in the 12th Monitoring Period, and on time for the start of the regular academic year. As of June 30, 2014, one Senior Probation Director, one Director, one Supervising Deputy Probation Officer, and one Deputy Probation Officer are on staff.

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 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, as well as 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.

During this monitoring period, the County had one operational Juvenile Day Reporting Center (JDRC) in Van Nuys, and was in the process of opening two additional JDRCs in East Los Angeles and Lynwood. Members of the monitoring team visited all three sites, had an opportunity to speak with the Directors and staff, review materials used or to be used, and were briefed on the programming that will be offered at each facility. The Van Nuys JDRC was again between cycles at the time of the monitoring visit. The ELA and Lynwood JDRCs will offer comprehensive educational services, will include family support services, and will utilize direct services and referrals as needed to approximately 60 youth each. The Van Nuys JDRC can offer similar programming, but no school component, to approximately 30 youth. All sites plan to provide transportation services for the youth.

The ELA and Lynwood JDRCs were set to begi n accepting youth during the twelfth monitoring period. The new JDRCs will start at partial cap acity, but sh ould reach full capacity during that time.

At this tim e, the County is in partial com pliance with the requirem ents of this sub-section of Paragraph 73.

Recommendations:

- Fully open and staff the additional DRCs in tim e f or the Monitor s to be able to asses s them relative to the requirements of this provision.
- Sufficiently staff and train JDRC staff so that they are able to ensure that youth receive and participate in all appropriate services.
- Collect and analyze d ata necessary to audit and report on com pliance with the requirements of this section.

Evidentiary Basis:

- Meetings with Gang, CCTP and Placement DPOs, supervisor, managers and staff.
- Meetings and discussions with Probation Department managers and executives.
- Review of files, MDT m inutes and PCM not es for a sample of youth released from Camps during March and April.
- Review of the citation diversion program.
- Site visits to the Van Nuys, ELA and Lynwood JDRCs.
- Site visits to the Boys Republic Group Ho me and the Optim ist Group Hom e in Los Angeles.

<u>73-6: External Partnership</u> : The County agrees to engage an external research entity to conduct a longitudinal study and develop baseline dat a tracking systems to assist in evaluating systemic ou tcomes for youth. This collabor ation is in tended to improve the timelines s, coordination, and effectiveness of Probation serv ices for youth who come in co ntact with the juvenile jus tice sys tem, and the ir families. T he study shall as sess youth outcomes in both Camp and alternative settings.

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

- ***One-year r ecidivism/arrest rates ; school g raduation r ates or GED achievement; employment; substance abuse treatment serv ice availability and participation; drug-testing partic ipation and resu lts; stability of liv ing s ituation, including fa mily relationships; and youth self-repo rts regardin g success in his/her home community, which may include self-reported drug use in the community.***
- ***The role of aftercare in youth's post-placem ent 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 effectiv e 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. In a meeting on June 5, 2014, Monitors were informed by CSULA that the County is fully cooperating with the terms of the Agreement by providing ready access to all data, documentation, and staff needed to move forward with the Study. CSULA further reported completing the collection and analysis of data on the 500 youth that exited placement (250 youth) and camp (250) in 2011. By June 30, 2014, CSULA was in preparations to begin collecting data on current youth exiting camps and placement to compare to the original group.

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 met with Dr. Denise Herz of CSULA and discussed the scope, intent, and progress to date of the study. It is clear from that meeting that the study will provide all the data and analysis required, plus a good deal more. 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 graciously offered 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 latter half of the 11th Monitoring Period, Paragraph 73 audit tools were developed in collaboration with the responsible Probation Managers that oversee operations for 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). While some tools have been fully implemented and data captured for the first half of the Monitoring Period, other tools remain to be finalized during the 12th Monitoring Period, and the Paragraph 73 audit process will be fully implemented. Every Paragraph 73 tool was subject to review and revision during this audit period to adjust to all programmatic changes. During the next Monitoring Period the tools will continue to be revised and reviewed for appropriate collection of data as additional Tracking Logs, Forms, and Databases are created and/or modified throughout the various offices and camps to meet full compliance with Paragraph 73. Performance expectations were established and added to the audit tools according to each operations/camps function within 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. Additionally, each tool will be reviewed for the appropriate audit scheduling to capture the most relevant data (monthly, every 45 days, quarterly, etc.). 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 in development by the DOJ/Quality Assurance Services Bureau as noted in Provision 47. The system is designed to monitor ongoing data such as youth-on-youth violence, drug-related incidents, 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 during the next auditing period.

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.

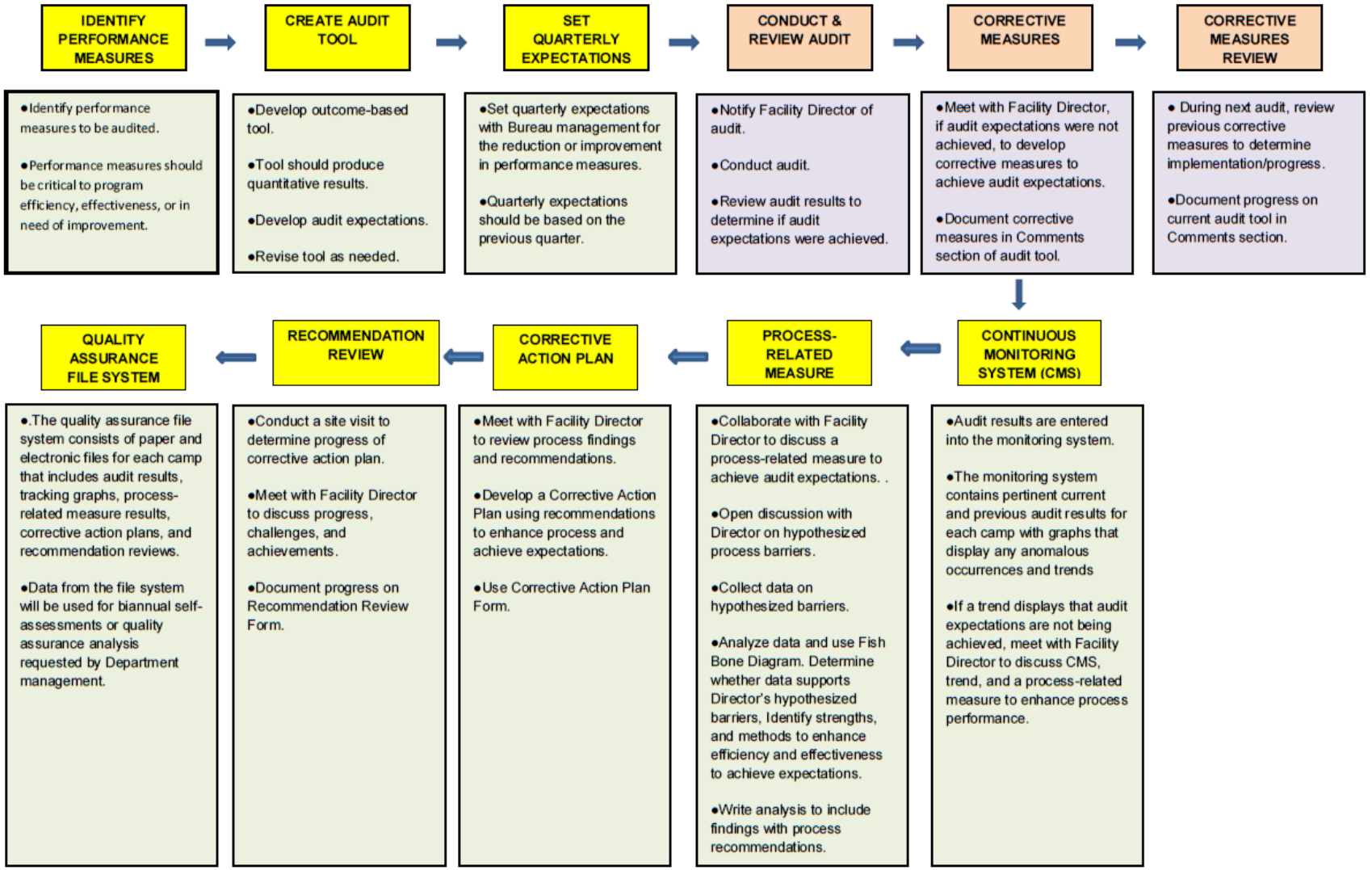
To ensure accountability and implementation of recommendations, a recommendation review will be conducted at a specified time after the corrective action plan has been agreed upon. The recommendation review may consist of a site visit, process observation, file review, or interviews to determine if recommendations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

The monitoring tool for 73-1 covers the key issues necessary to monitor the implementation of the LADS and the detention decisions that flow from the screening process. As noted previously, the January-March 2014 data is the first test of the usefulness of the tool and therefore small modifications are an expected part of the process. This tool would benefit from a more comprehensive accounting of the way in which youth ended up in detention. It currently tracks the proportion of youth who are screened and then released, placed on SODA/PAD/CDP, or detained. From there, it tracks the proportion of youth who scored into detention (i.e., 10+ points on the LADS) versus those who were detained based on one of the various types of overrides. The override list is not exhaustive (e.g., it omits the Policy Overrides) and therefore the total number of youth in the score/override subcategories do not equal the total number of youth who were detained. This is an easy fix that will provide an enhanced ability to monitor override problem that is currently undermining the implementation of the LADS (see discussion in 73-1 for more detail).

The monitoring tool for 73-3 covers most of the indicators that are necessary to assess the quality of aftercare services delivered while the youth is still in Camp. The tool could be further refined in the following ways:

- Fix the formula associated with calculating the proportion of Initial MDTs attended by the ACPO. Currently, the formula uses the number of meetings in which the ACPO was notified (Q2) as the denominator, instead of the total number of meetings (Q1). Using the total number of meetings will give a truer assessment of the proportion of cases in which the ACPO was present. The question of whether the ACPO was notified would be an important area to examine if the overall performance indicator were not being met at the 80% level.
- In the section that examines participation in the Initial MDT meeting by the various agencies, count only the number of meetings in which a representative attended, not the total number of representatives, as is currently the practice. Using the total number of representatives risks overestimating the proportion of meetings that actually had representation, if multiple representatives went to some meetings while others did not have a representative at all.
- In the sampled cases section, add a question about whether the first casework session between the youth and caseworker was timely.
- In the sampled cases section, add a question about whether the ACPO met with the youth within 30 days of his admission to Camp (as is required by Department policy).
- In the sampled cases section, revise Q22 to assess whether the <u>parent</u> was present at the transition MDT (in person or by phone), rather than the <u>parent and youth</u> (the youth is almost always there, but statistics on parent participation will show more variation).

The monitoring tools for 73-4 are less fully developed and require further refinement. The Monitors will meet with the Quality Assurance Director and staff to finalize those tools.

The County's track record with the audit tools for other provisions demonstrates its commitment to refining the audit tools to the point that they are most useful for the purpose of quality improvement. As shown in the self-assessments for Provision 17 and 43, in particular, once the

refinement process is underway, the County uses the audits to identify the Camps in which performance is not at the expected levels, and then enacts a problem-solving process to identify the underlying causes of the problem. From there, corrective action plans are developed and overseen until the expected level of performance has been achieved. The Monitor is confident that the process will be no different for Provision 73.

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

Recommendations:

1. Consider the revisions suggested for audit tools 73-1 and 73-3, as described above.
2. Meet with Monitors to refine and finalize the audit tools for 73-4.

Paragraphs in Full Compliance (Monitoring Completed)

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 Probatio n 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 ensu re tha t s taff at the Pr obation Ca mps do not main tain or consume alcohol at the Camps.

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

Paragraph 16: Orientation

The County shall ensur e that all yo uth, includ ing those wh o are disabled or L imited English Proficient, r eceive orien tation sufficient to communicate important in formation s uch as how to access the grievance sys tem, medica l ca re and men tal health serv ices, or report staff misconduct.

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

Paragraph 18: Staff Training and Supervision of Youth

The County shall ensure that sta ff who work with youth residents have the knowledge and skills need ed to effectively ma nage youth, including de-escala tion 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 implemen t strategies for reducing youth on youth violence th at includes training s taff in appropriate beha vior manag ement, reco gnition 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 pr ocedures to define those circumstances in which staff must report allegations of child abuse or neglect to the appropriate extern al agencies.

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

Paragraph 21: Child Abuse Investigation

The County shall develop and implement a system for the timely, thor ough, and independent investigation of alleged child abuse. Staff who ar e the subject of an allegation of child abuse shall be removed fro m direct yo uth supervis ion pendin g the outco me of the referra l or investigation.

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

Paragraph 22: Classification

The Count y shall develop and implement a cla ssification system that considers factors including youth age, committing offense, gan g affiliation, delinquency history and treatment needs to reasonable en sure that youth are sa fety plac ed 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 effect ive grievance system to which youth have access when they have comp laints, ensur e that g rievances may be filed co nfidentially, and ensure that they receive appropriate fo llow-up, including info rming the author of the grievance about its outcome an d tracking implementation of reso lutions. The County shall ensur e that the grievance s ystem 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 provisio n of med ical, mental he alth, or edu cational ser vices a t the camps, unless court proceedings, treatment, or security needs require such movement.

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

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 ensur e that licens ed men tal h ealth pro fessionals p rovide timely a ssessment and daily reassessment of youth deemed at risk for suicidal behavio rs, or more frequent reassessment as appropriate, as well as appr opriate 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 implemen t policies, procedures, and practi ces to ensure that mental hea lth s taff is sufficien tly involved with prob ation and education s taff in the management of youth exhibiting suicidal behavi ors, 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 n eeds of self-harming youth, including revised supervis ion practices to minimize incidents o f 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)

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 dev elop and imple ment a syst em to provide for adequate tracking of laboratory results and response to medication includin g side effects, adequate documentation of mental health services, including adequate tracking to identify youth receiving menta l health services, and youth on psychotropic medica tions, and compila tion of comp lete 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 ha lls to the Pro bation Camps ar e time ly fo rwarded 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 supervisio n of, men tal health care clinicians at the Probation Camps.

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

Paragraph 39: Evaluations and Treatment

The County shall ensure that a ll 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 d evelop and imp lement policies, procedures, and pr actices for interdisciplinary treatment planni ng for youth with serious mental hea lth needs, w hich 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 dev elop and imple ment polic ies, procedures, and practices for case management, which would allow f or the impleme ntation of the trea tment 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 implemen t policies, procedures, and prac tices to ensure the availability of su fficient and adequate counseling services that meet th e goal of ameliorating target symptoms of identified mental illness.

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

Paragraph 44: Monitoring of Psychotropic Medication

The County shall d evelop and imp lement policies, procedures and practic es 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 workin g with yo uth resid ents have the skills and information necessary to understand behaviors of, engage in appropriate in teractions 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 afterc are planning and discharge su mmaries for youth leaving the facility who have, or ha ve had, open mental health cases a t a Camp to facilitate treatment in future placements.

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

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 Agreemen t. The implementation p lans shall be subject to r eview and approval by DOJ. If DOJ finds that an imp lementation plan is no t cons istent w ith the te rms o f this Agreement, DOJ shall promptly notify the County and provide technical assistance in revising the plan. The format a nd contents, to the extent possible, shall be con sistent with previously approved implementation plans submitted under the Memorandum of Agreement between the United States, Los Angeles County, and the Los Ange les 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 with in 180 days of the execution of this Agreement. All other written documents, including procedures, protocols and other items identified in Paragraph 7 of this Agreemen t, shall be submitted to DOJ pursuant to deadlines to be determined by the Monitor.

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

Compliance Level Quick Reference

Para.	Description	Compliance Level
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)	Substantial
16	Orientation	Full
17	Rehabilitation and Behavior Management	Substantial
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	Substantial
58	Implementation Plans	Full
59	Document Review	Full
73	Increased Access to Community Alternatives	Partial

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

Second Amendment to the Memorandum of Agreement Between the United States and the County of Los Angeles Regarding the Los Angeles Probation Camps

I. INTRODUCTION

A. On October 31, 2008, the parties entered into a Memorandum of Agreement ("MOA") to resolve the Department of Justice's investigation of alleged unlawful conditions at the Los Angeles County Probation Camps ("Probation Camps" or "Camps"), commenced pursuant to the Civil Rights of Institutionalized Persons Act, 42 U.S.C. ' 1997 ("CRIPA"), and the Violent Crime Control and Law Enforcement Act of 1994, 42 U.S.C. ' 14141 ("Section 14141"). The MOA was the result of a cooperative effort by the Department of Justice ("DOJ") and the County of Los Angeles, the Los Angeles County Probation Department, and the Los Angeles County Department of Mental Health (collectively, "the County") to guarantee and protect the federally protected rights of youth committed to the Probation Camps.

B. MOA paragraph 48 requires that the County achieve and maintain substantial compliance with the terms of the MOA for a period of one year. The MOA further provides, at paragraph 62, that the MOA shall terminate four years from its effective date, or October 31, 2012. Accordingly, to fully satisfy the MOA, the County was required to reach substantial compliance with the MOA by October 31, 2011, and maintain this compliance until October 31, 2012. The parties jointly selected a Monitoring Team to evaluate and report on the County's compliance. Under MOA paragraph 62, DOJ reserved the right to initiate a civil action pursuant to CRIPA and/or Section 14141 to enforce the MOA and protect the federal rights of youth if the County failed to fully satisfy the MOA within the four-year period.

C. The County has implemented significant reforms in furtherance of the MOA, as reflected in the Monitoring Team's biannual reports. Based on these reports, the County has achieved substantial compliance with all but four paragraphs in sections III through VI, which set out the substantive terms of the MOA (the substantive paragraphs). Despite these accomplishments, the County is unable to maintain one year of substantial compliance to fully satisfy the terms of the MOA by the bright-line termination date of October 31, 2012.

D. In light of the County's significant strides toward compliance and its ongoing commitment to reform, the parties agree to modify the MOA, pursuant to paragraph 72, as set forth below. The modification is intended to focus attention on resolving the MOA paragraphs not yet in compliance by eliminating the October 31, 2012 bright-line termination date and building on reforms already in place, as verified by the Monitoring Team's most recent compliance evaluations. Section III of this Amendment clarifies the four remaining substantive paragraphs to achieve desired outcomes and facilitate ongoing compliance assessments. Section IV of this Amendment adds paragraph 73 to increase youth's access to community-based services to promote rehabilitation, consistent with

public safety and the best interests of youth.

II. AMENDMENTS TO SECTION VII OF THE MOA REGARDING MONITORING AND ENFORCEMENT

Pursuant to MOA paragraph 72, the parties hereby agree to modify the monitoring and enforcement paragraphs as follows:

1. Termination and Enforcement: The parties agree to eliminate the four-year termination requirement of MOA paragraph 62. The parties further agree that the MOA may terminate on December 31, 2014, subject to the following conditions:

    1 The County has maintained one year of substantial compliance with the following substantive paragraphs in sections III through VI of the MOA: 11, 13, 14, 16, 23, 24, 25, 26, 34, 42, 46, 58 and 59. Accordingly, these paragraphs are fully satisfied and shall terminate as of the effective date of this Amendment. Paragraph 59 has been deemed to be substantially compliant in prior Monitoring Reports. The County, consistent with the requirements of paragraph 59, shall continue to provide any newly created or revised policies to the DOJ, for review and approval for the duration of this agreement for any substantive paragraphs that have not yet completed the twelve-month substantial compliance monitoring period.

    2 The County must achieve substantial compliance with all remaining substantive paragraphs in sections III through VI of the MOA by December 31, 2013. The County will make all reasonable efforts to comply prior to this date.

    3 The MOA, as amended, will terminate when the County: (1) implements all paragraphs in MOA sections III-VI pursuant to paragraph 48, and (2) implements paragraph 73 as set forth in Section IV.A.9. The requirements of paragraph 48 shall not apply to paragraph 73. Should the County fail to implement this Amendment or otherwise fail to satisfy its terms, DOJ reserves the right to initiate a civil action pursuant to CRIPA and/or Section 14141, or take other appropriate enforcement action, to protect the constitutional and federal statutory rights of youth committed or supervised by the County.

2. Implementation of Remaining Paragraphs: In accordance with the Monitoring Team's compliance assessments, and to ensure the full implementation and sustainability of reforms, the parties agree to the following implementation schedule for the remaining substantive paragraphs in sections III through VI of the MOA:

    1. Paragraphs that Must Maintain Substantial Compliance: According to the Monitoring Team, the County has achieved substantial compliance with the following substantive paragraphs of the MOA: 9, 10, 12, 18, 19, 20, 21, 22, 27, 28, 29, 30, 31, 32, 33, 35, 36, 37, 38, 39, 40, 41, 44, and 45. The parties agree that the County has achieved substantial compliance with these paragraphs, but has yet to maintain one year of substantial compliance.

a. If paragraphs 12, 18, 20, 21, 22, 27, 28, 29, 30, 31, 32, 33, 35, 36, 38, 39, 40, 41, 44, and 45 maintain substantial compliance through October 31, 2012, these paragraphs shall be fully satisfied and shall terminate as of that date.

b. For paragraphs 9, 10, 19, and 37, to ensure the sustainability of reforms, the parties agree that, notwithstanding the date on which each paragraph was deemed to be in substantial compliance by the Monitoring Team, the County shall maintain substantial compliance with each paragraph through December 31, 2012. The Monitoring Team shall continue to evaluate and report on the status of these paragraphs through December 31, 2012. Thereafter, based on the Monitoring Team's assessment, if the County has maintained substantial compliance by December 31, 2012, the paragraphs will no longer be subject to status reporting by the Monitoring Team, pursuant to MOA paragraph 54. The County agrees to continue to implement the policies, procedures, and practices related to these paragraphs for the life of the MOA to ensure that the constitutional and federal statutory rights of youth in the County's custody or supervision are upheld.

c. If any paragraph falls out of substantial compliance prior to termination of that paragraph, the County shall bring such paragraph into substantial compliance no later than December 31, 2013, and shall maintain such substantial compliance for a period of one year. The County shall make all reasonable efforts to bring all paragraphs into substantial compliance at the earliest possible date.

2. Paragraphs that Must Achieve Substantial Compliance: According to the Monitoring Team, the County has not achieved substantial compliance with the following substantive paragraphs of the MOA: 15, 17, 43, and 47. The County agrees to achieve substantial compliance with these paragraphs by December 31, 2013. Once substantial compliance is achieved, the County agrees to maintain one year of substantial compliance. The paragraphs will continue to be subject to status reporting by the Monitoring Team until each paragraph maintains one year of substantial compliance and is terminated. Any paragraph that does not achieve substantial compliance by December 31, 2013, shall be subject to enforcement under Section II.A.3 of this Amendment. To ensure the sustainability of reforms, the parties agree to retain paragraph 47 until such time as all other substantive paragraphs of the Agreement, except for paragraph 73, are in full compliance.

C. All other monitoring and enforcement paragraphs in section VII of the MOA shall remain unchanged and in full force and effect for the life of this MOA, subject to further joint modification by the parties, pursuant to MOA paragraph 72.

AMENDMENTS TO SUBSTANTIVE P ARAGRAPHS IN MOA SECTIONS III THROUGH VI

Pursuant to MOA paragraph 72, the par ties a gree to m odify th e following four substantive paragraphs to clarify expect ations and facilitate ongoing compliance assessm ents by the Monitoring Team.

A. **Paragraph 15,** Staffing: The County shall provide sufficient staff supervision to keep residents reasonably safe from ha rm and allow rehabilitative ac tivities to oc cur successfully.

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

2. The County agrees to strengthen its curre nt 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 hiri ng process and are othe rwise qualified to work with youth. The hiring process shal l include a background check, including a federal crim inal history check and consultatio n of State and local ch ild abuse registries, and a reference check. For current employees, the County shall either conduct crim inal background record checks at least every five years or have in place a system for capturi ng such inform ation. The C ounty shall directly ask applicants for, and employees in, positions that result in contact with youth in the County's juvenile justice system , about prior crim inal m isconduct during interviews and review s. The County shall ensure that e mployees have a continuing affirmative duty to disclose any criminal misconduct.

3. On a monthly basis, the County shall ga ther and analyze data including, but not limited to, staffing ratio s at each facility, vacan cy rates, an d staff turnover. The County shall adjust existing policies and prac tices as needed to com ply with this paragraph based on analysis of this data.

B. **Paragraph 17,** Rehabilitation and Behavior Management:

1. Rehabilitation: The County shall provide adequa te rehabilitative and gender-specific pro gramming, as necessary. Th e County shall continue to conduct appropriate individualized assessments by qualified staff.

a. The County shall develop and provide in tegrated treatm ent services that m eet the rehabilitative needs of youth at all Probation Ca mps. These services shall adequately: (i) address youth's educational needs (including access to spec ial e ducation ser vices); (ii) provide access to m edical and m ental health services, including substanc e abuse treatm ent; (iii) provide a structured living environm ent that facilitates, reinforces, and provides opportunities for youth to practice pro- social skills and pro-social relationships with other youth an d adults; (iv) prov ide access to

meaningful recreational and enrichment activities; (v) provide opportunities for family involvement; (vi) encourage development of new skills; and (vii) include Camp staff as positive role models.

b. 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.

c. 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 described in Section III.B.1.b. above. Such offerings shall include, but shall not be limited to, group therapy or individual counseling for each youth, as necessary.

d. 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.

e. In the Camps that do not offer DBT, the County shall implement an integrated treatment program that uses an interdisciplinary approach to identify and meet youth's individualized rehabilitation needs.

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

g. 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.

h. The County shall ensure that its rehabilitation and intervention programs

continue to address youth's needs related to peer pressure and gang affiliation.

2. 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.

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

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

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

      (iii) 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.

   b. 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.

   c. 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.

   d. 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.

i. 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 written justification for sending a youth to isolation, maintaining the youth in isolation, and removing the youth from isolation.

ii. 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.

3. 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:

(i) Use of isolation and reasons thereof;

(ii) Rate of youth-on-youth and youth-on-staff violence;

(iii) Progress toward meeting treatment goals as determined by the multidisciplinary team ("MDT");

(iv) Youth transfers to other Probation Camps for security or safety purposes;

(v) Rate of self-harming behaviors;

(vi) Number of youth sent to outside facilities for mental health evaluation or treatment;

(vii) Use of behavior management rewards and consequences; and

(viii) Number of early or on-time releases.

C. **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:

1. Identify youth with substance abuse disorders.

2. 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.

3. 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:

   a. youth has a positive screening on the substance abuse scale of any screening or assessment measure used by the County;

   b. youth self reports a significant history of substance use;

   c. youth has used illegal drugs at the Camps or in County custody; and/or

   d. youth has been referred for substance abuse treatment by staff.

4. Ensure that each Camp offers evidence-based substance abuse treatment services or programs by:

   a. identifying the evidence-based treatment service or program to be used at each Camp;

   b. implementing the service or program at each Camp; and

   c. ensuring that the service or program has sufficient capacity to ensure that all eligible youth at each Camp may participate.

5. Take reasonable steps to prevent youth from having access to illegal drugs at the Camps.

6. 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:

   a. number of incidents of youth previously treated for substance abuse treatment at the Camps who subsequently use illegal drugs at the Camps;

   b. Progress toward meeting substance abuse treatment-related goals, as determined by the MDT;

   c. Number of youth referred for substance abuse treatment;

d. Number of youth who complete substance abuse treatment programming;

e. Results of County-administered pre- and post-tests regarding substance abuse.

D. **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.

IV. ADDITIONAL PARAGRAPH

Pursuant to MOA paragraph 72, the parties hereby agree to add paragraph 73 to the MOA. As set forth below, the County agrees to promote the rehabilitation of youth by increasing access to community-based alternatives, consistent with public safety and the best interests of the youth.

A. **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:

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:

   a. 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;

   b. 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 se rvices as well as pro vide inf ormal supervision to the youth while attending school.

c. Intake and Detention Control Offi cers shall, after con ducting a risk assessment utilizing an evidence-based s creening too l, consider the following interventions options for youth:

i. Cite-back and release to parents, guardians, or other relatives with a future court date within 60 days;

ii. Community Detention Program with electronic monitoring pending court hearing; or

iii. Detain in ju venile hall due to g ravity of offense, screening results, or bench warrant that requires de tention pending court hearing in accordance with state law.

2. Minimize Camp Confinement: Prior to the pre-plea being accepted or the petition being sustained, the County shall evalua te all p lacement options and recommend Camp confinement only for youth who pose a legitim ate risk to public safety and where the utilization of a less restric tive environm ent (e.g., hom e on probation; housing with a court-approved relative, while on probation; or a specialized community placement, while on probation) is not appropriate. The follo wing pre-Camp-assignment review processes, conduc ted by qualified staff, shall be used prior to clearing a youth for Camp assignment:

a. Court Reports: Prior to Disposition, the County shall ensure that Probation staff com pletes a detailed as sessment of the youth that will includ e pertinent, available inform ation a bout the youth to produce a detailed recommendation to the court regard ing the youth's m ost appropriate disposition in the least re strictive setting, consistent with public safety, the best interests of the youth, and the goal of rehabilitation.

b. Overview of Alternativ es to Inca rceration for Lower-l evel Offenders: Probation s hall ac tively collabor ate (on an on-going basis) with Bench Officers (ju dges) and affir m the av ailability of a for mal grant of Community-Based Prob ation that will be enh anced th rough ref erral to community-based services for youth and their fam ilies for assistance/service/support as an alternative to incarceration.

c. Out of Hom e Screening Unit: All cour t rep orts recomm ending Cam p Community Placem ent ("CCP") shall be reviewed by the "Out of Hom e Screening Unit." This unit shall assess the se recommendation s and determine the appropriateness of the recommendation. T his unit shall endeavor to recomm end placement of youth in co mmunity-based alternatives to incarceration to the maximum extent possible.

d. 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.

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:

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

i. 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

ii. 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;

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

i. Meet with the youth upon the case plan being initiated;

ii. 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;

iii. 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

iv. In instances where the youth appears eligible for early release: 1) make the appropriate recommendation to the court; and 2) alert the facility's MDT Coordinator regarding the potential early release.

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

i. 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.

ii. 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;

iii. 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;

iv. Coordinate ongoing reviews of youth confined in Camps to evaluate and identify youth who otherwise may be eligible for early release;

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

vi. Coordinate the Transitional MDT process at the facility at least 30 days prior to the youth's anticipated release date.

vii. 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.

d. 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;

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.

a. 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.

b. The community Aftercare Probation Officer shall:

i. Participate in the pre-release transition planning process for the youth;

ii. Ensure that the transition plan is consistent with the youth's service needs;

iii. 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;

iv. Coordinate with family or community placement for the youth to assure awareness of: 1) anticipated date of release, 2) the post release transition plan, and 3) the youth's service needs;

v. Facilitate the youth's reintegration into the community and collaborate with community service providers, including educational providers, and coordinate referrals to mental health

providers;

vi. Conduct an in-person meeting with the youth and youth's family within three (3) working days after the youth's release from Camp;

vii. Conduct a home visit within 30 days after the youth's release from Camp; and

viii. 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.

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.

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

i. 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;

ii. non-secure residential services, including supervised independent living programs, respite, specialized foster care, and group homes; and

iii. 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.

b. 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:

i. 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

ii. Regional Occupation Centers and other similar centers.

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.

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

i. 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.

ii. The role of aftercare in youth's post-placement experience, including ways to enhance the design and resources of the aftercare system.

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

c. 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.

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.

8. The County shall, as appropriate, provide necessary support and funding to facilitate the implementation of paragraph 73.

9. Paragraph 73 shall terminate once the County has fully implemented

paragraph73, as verified by the Monitori ng Team. The County shall endeavor to fully implement paragraph 73 by Decem ber 31, 2014, so as to resolv e this matter in this entirety.

County's Appendix of Selected Source Documents

I. ***Department of Justice Out-Briefings/Site Notes***

Monitor Kelly Dedel Out-Brief for Site Visit to Camp Kilpatrick – March 4, 2014
Monitor Kelly Dedel Out-Brief for Site Visit to Camp Gonzales – March 5, 2014
Monitors Graham & Spierer Site Visit to Downey – March 12, 2014
Monitor John Trzcinski Out-Brief for Site Visit to Camp Paige – April 8, 2014
Monitor John Trzcinski Out-Brief for Site Visit to Camp Afflerbaugh – April 9, 2014
Monitor John Trzcinski Site Notes for Site Visit to Camp Rockey – April 10, 2014
Monitor Kelly Dedel Out-Brief for Site Visit to Camp Afflerbaugh – April 29, 2014
Monitor Kelly Dedel Site Notes for Site Visit to Camp Paige – April 30, 2014
Monitor Kelly Dedel Site Notes for Site Visit to Camp Rockey – May 1, 2014
Monitors Graham & Spierer Site Visit to Downey – May 12, 2014
Monitor Kelly Dedel Out-Brief for Site Visit to CMYC - May 13, 2014 and May 14, 2014
Monitors Graham & Spierer Site Visit to Hall of Administration Meeting – May 14, 2014
Monitor Kelly Dedel Out-Brief for Audit Recommendation Discussion in Downey – May 15, 2014
Monitors Graham & Spierer Site Visit to Van Nuys JDRC – May 29, 2014
Monitors Graham & Spierer Site Visit to Boys Republic Group Home – May 30, 2014
Monitors Graham & Spierer Site Visit to Optimist Group Home – May 30, 2014
Monitors Graham & Spierer Site Visit to Camp Afflerbaugh – June 4, 2014
Monitors Graham & Spierer Site Visit to Camp Paige – June 4, 2014
Monitors Graham & Spierer CCTP Presentation in Downey – June 5, 2014
Monitors Graham & Spierer Site Visit to SEA/East LA JDRC – June 5, 2014
Monitors Graham & Spierer Site Visit for Probation Outcome Study – June 5, 2014
Monitors Graham & Spierer Site Visit for Out-of-Home Screening- Lynwood – June 6, 2014
Monitors Graham & Spierer Site Visit to Lynwood JDRC-Gang Unit Presentation – June 6, 2014
Monitor Kelly Dedel Out-Brief for Site Visit to Camp Scott – June 17, 2014
Monitor Kelly Dedel Out-Brief for Site Visit to Camp Scudder – June 18, 2014
Monitor Kelly Dedel Out-Brief for Site Visit to DKC – June 19, 2014

II. ***Conference Call Minutes***

Monitor County Conference Call Minutes for February 4, 2014
Monitor County Conference Call Minutes for February 27, 2014
Monitor County Conference Call Minutes for March 19, 2014
Monitor County Conference Call Minutes for April 29, 2014
Monitor County Conference Call Minutes for May 27, 2014
Monitor County Conference Call Minutes for June 24, 2014

III. ***Reports/General Supporting Information***

DOJ County-Department's Self-Assessment – 10th Monitoring Report
Behavior Management Program Analysis, January – March 2014

Special Housing Unit Analysis, January – March 2014
Substance Abuse Program Analysis, January – March 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 1/10/14
RTSB – Provision 17: Rehabilitation and Behavior Management – DKC ONLY, Rev 1/10/14
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 1/9/14
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 10/7/13
RTSB – Provision 43: Substance Abuse, Rev 12/11/13
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