



**COUNTY OF LOS ANGELES
DEPARTMENT OF AUDITOR-CONTROLLER**

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June 3, 2011

TO: Supervisor Michael D. Antonovich, Mayor
Supervisor Gloria Molina
Supervisor Mark Ridley-Thomas
Supervisor Zev Yaroslavsky
Supervisor Don Knabe

FROM: Wendy L. Watanabe
Auditor-Controller

SUBJECT: PROBATION DEPARTMENT - JUVENILE CAMP DEPARTMENT OF JUSTICE SETTLEMENT AGREEMENT MONITORING FOR THE PERIOD OF OCTOBER 26, 2010 THROUGH FEBRUARY 28, 2011

On August 17, 2010, your Board instructed the Auditor-Controller (A-C) to monitor the County Probation Department's (Probation) progress toward implementing the provisions of the federal Department of Justice (DOJ) settlement agreement. The settlement agreement covered Probation's sixteen camps and five specialized units. This is our first status report covering the period of October 26, 2010 through February 28, 2011.

We are responsible for monitoring the status of 27 of the 41 provisions from the DOJ settlement agreement. Eleven of the other 14 provisions will be monitored by the County Department of Mental Health, because they require a mental health specialist, and the remaining three provisions are administrative issues that do not require formal monitoring. Because of the differences in juvenile populations and services among Probation's camps and units, some of the settlement agreement provisions apply to only some the camps/units.

Each provision of the settlement agreement is monitored using a monitoring tool developed and agreed to by Probation and a monitor from the DOJ (DOJ Monitor). The monitoring tools include specific criteria, which result in a precise implementation score. During this monitoring review, Probation and the DOJ monitor had completed monitoring tools for 18 of the 27 provisions we are supposed to monitor. Therefore, our review was limited to those 18 provisions.

Results of Review

Our review disclosed that Probation was in substantial compliance with three of the 18 provisions we reviewed (16, 23 and 34), with an audited compliance rate of 90% or higher. Four provisions (14, 19, 25 and 29) had compliance rates of 70% to 89%, and eleven provisions (10, 11, 12, 18, 20, 21, 22, 24, 32, 45 and 46) had compliance rates of 69% or less.

Probation indicated that they expect to be in substantial compliance with more provisions during our next monitoring review.

When the DOJ Monitor determines that Probation has met most of a provision's requirements, the DOJ Monitor will note that Probation has achieved "substantial compliance" with the provision, and will then authorize placing the provision into "formal monitoring". Under formal monitoring, the DOJ Monitor will continue to track Probation's compliance with the provision. If Probation continues to meet the requirements of the provision for twelve consecutive months, the DOJ Monitor will consider Probation to have fully met the requirements of that provision. The settlement agreement requires the County to reach substantial compliance with all provisions by October 2012.

During this review period, the DOJ Monitor placed Provision 24 (Youth Movement Between Camps/Halls), in formal monitoring. However, our review indicated a compliance rate for that Provision of 42%. Probation management explained that the discrepancy between our compliance rate and the DOJ Monitor's decision to place the Provision into formal monitoring was because the areas that are emphasized in the monitoring tool we used are different from the DOJ Monitor's emphasis. As a result, the DOJ Monitor placed the Provision in formal monitoring based on the Monitor's own observations. Probation management indicated that the monitoring instrument we were given was designed to facilitate a step-by-step compliance process with the Provision's eventual outcome, with points assigned for each step of the process. However, the DOJ monitor determined that Probation had met the monitor's primary concern regarding the Provision. Probation indicated that they are working with the DOJ Monitor to revise the other monitoring instruments to ensure the instruments agree with the Monitor's primary concerns for each provision.

Six of the provisions we reviewed (11, 12, 18, 20, 32, and 45) require Probation to provide training to Department staff. Because Probation did not provide documentation (i.e., sign-in sheets and post-training tests) for the training, we rated the compliance rates for these provisions below 69%. After we completed our review, Probation provided documentation that they had trained approximately half of the staff reviewed for Provisions 18, 20, and 32. We will report on Probation's compliance with these provisions in our next status report, which will cover the period of March 1, 2011 through May 31, 2011.

Details of our monitoring results for the 18 provisions we monitored are in Attachment 1. Attachment 2 lists the compliance rates for each provision at each of the camps/units. Attachment 3 is a list of the provisions we monitored.

Review of Report

We discussed the results of our review with Probation management on April 21, 2011. They generally agreed with the results of our review, and indicated that they will continue to work with the DOJ to implement all of the provisions of the settlement agreement. We thank Probation management and staff for their cooperation and assistance during our review.

Please call me if you have any questions, or your staff may contact Don Chadwick at (213) 253-0301.

WLW:JLS:DC:AA:GH

Attachments (3)

c: William T Fujioka, Chief Executive Officer
Donald H. Blevins, Chief Probation Officer
Marvin J. Southard, D.S.W., Director, Department of Mental Health
Mitchell H. Katz, M.D., Director, Department of Health Services
Jon R. Gundry, Interim Superintendent, Los Angeles County Office of Education
Public Information Office
Audit Committee

**LOS ANGELES COUNTY PROBATION CAMPS
JUVENILE CAMP DOJ SETTLEMENT AGREEMENT MONITORING RESULTS
FOR THE PERIOD OF OCTOBER 26, 2010 THROUGH FEBRUARY 28, 2011**

Scope of Review

We are responsible for monitoring 27 of the 41 provisions from the Department of Justice (DOJ) settlement agreement. Eleven of the other 14 provisions will be monitored by the County Department of Mental Health, because they require a mental health specialist, and the remaining three provisions are administrative issues that do not require formal monitoring.

Probation's progress in implementing each provision of the settlement agreement is evaluated using a monitoring tool developed and agreed to by Probation and a monitor from the DOJ (DOJ Monitor). The monitoring tools include specific criteria, which result in a precise score. During this monitoring review, Probation and the DOJ Monitor had developed monitoring tools for 18 of the 27 provisions we are supposed to monitor. Therefore, our review was limited to those 18 provisions.

Provision 10: Use 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.

This Provision applies to sixteen camps and three specialized units.

Average Compliance Rate: 22%

Comments:

Probation revised its policy governing use of force on January 27, 2011, and has begun having staff review and sign an acknowledgement of the policy. Therefore, a substantial number of Probation staff had not yet signed an acknowledgement of the policy.

Provision 11: Oleoresin Capsicum (OC or Pepper) Spray

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

This Provision only applies to the Special Handling Unit at Challenger Memorial Youth Center.

Average Compliance Rate: 50%**Comments:**

In January 2011, Probation revised their policy/controls on the use and storage of OC Spray. In addition, Probation weighed 329 (93%) of the 353 canisters to determine if they had been used within the prior four months, as required. However, as of February 2011, the remaining 24 canisters had not been weighed. Probation needs to ensure that all OC canisters are weighed at the required intervals. In addition, during November and December 2010, Probation replaced 35 OC canisters, but staff and supervisors did not document the reason(s) for the replacements (e.g., canisters were replaced because they were lost, stolen, damaged, etc.) as required.

Probation management also developed a training class on the new policy and initiated training in February 2011. However, they did not provide documentation, such as training sign-in sheets or completed competency tests, to validate the number of staff who attended the training in February 2011, and whether the staff who attended the training understood the information presented.

Provision 12: Use of Force Review

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

This Provision applies to sixteen camps and three specialized units. Probation provided the monitoring tool in December 2010. Because of the timing of Probation completing the monitoring tool, we only reviewed this Provision at eleven camps and three specialized units.

Average Compliance Rate: 50%**Comments:**

Probation appropriately maintained a log of use of force incidents, and supervisors completed a review of each incident. In addition, Probation management developed a training class, and provided a list of supervisors and managers who attended the training. However, Probation did not provide documentation, such as training sign-in sheets or completed competency tests, to validate the number of supervisors/managers who attended the training, and whether they understood the information presented. In addition, Probation supervisors did not always complete their review of use of force incidents within five business days, as required.

Probation proposed establishing an Early Intervention System (System) as part of their corrective action plan for Provision 12. The System is supposed to improve Probation's oversight of use of force, and provide information to guide staff supervision, training and

discipline, by identifying staff who engage in a pattern of negative conduct. Probation initially planned to implement the System in January 2011. However, they later revised the implementation date to March 2011.

Provision 14: Consumption of Alcohol by Staff

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

This Provision applies to sixteen camps and two specialized units. Probation provided the monitoring tool in December 2010. As a result, we only reviewed this Provision at eleven camps and two specialized units.

Average Compliance Rate: 85%

Comments:

Probation management implemented a policy forbidding the possession of alcohol, drugs and weapons in Probation juvenile facilities. The policy states that Probation management will conduct random searches for these items. Probation staff had signed off on the policy. Our interviews indicated that staff understood the policy. However, Probation has not started the random searches, due to concerns raised by some employee bargaining units.

The DOJ Monitor approved this Provision for formal monitoring effective February 28, 2011. Probation management explained that the Monitor placed the Provision in formal monitoring with the understanding that Probation would implement searches in the immediate future. Probation management indicated that they planned to begin conducting the searches in May 2011.

Provision 16: Orientation

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

This Provision applies to sixteen camps and one specialized unit.

Average Compliance Rate: 95%

Comments:

The camps were in substantial compliance with 90% or more with this Provision. The DOJ Monitor approved this Provision for formal monitoring, effective November 30, 2010.

Provision 18: Staff Training and Supervision of Youth

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

This Provision applies to sixteen camps and three specialized units.

Average Compliance Rate: 19%

Comments:

Probation management developed training classes for staff and supervisors on effectively managing youth, including de-escalation techniques, crisis intervention, and youth development. In addition, Probation provided a list of staff who attended the classes. However, Probation did not provide documentation, such as attendance sheets or completed competency tests, to validate that number of staff who attended the classes and whether they understood the information presented.

Provision 19: Reduction of Youth on Youth Violence (YOYV)

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

This Provision applies to sixteen camps and three specialized units.

Average Compliance Rate: 83%

Comments:

Eight (42%) of the nineteen camps/units to which this Provision applies achieved substantial compliance of 90% or more. However, the remaining 11 camps/units did not achieve this level of compliance, since the required processes and procedures were not fully implemented. For example, Probation staff and supervisors did not always ensure that the minors involved in YOYV were referred for a mental health consultation after a fight.

Provision 20: Child Abuse Reporting

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

This Provision applies to sixteen camps and three specialized units.

Average Compliance Rate: 34%

Comments:

Probation developed a policy and procedures to define circumstances in which staff must report allegations of child abuse or neglect. In addition, Probation management provided a list of staff who attended training on the new policy and procedures. However, Probation did not provide documentation, such as attendance sheets and completed competency tests, to validate the number of staff who attended the training and whether they understood the information presented.

Provision 21: Child Abuse Investigation

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

This Provision only applies to the Child Abuse Special Investigations Unit (CASIU).

Average Compliance Rate: 40%

Comments:

Probation established a policy and procedures that require timely, thorough, and independent investigations of alleged child abuse. Specifically, Probation's policy requires investigators to submit their completed investigations to their supervisor within 45 days. The investigator is also required to provide the supervisor with written justification, and obtain approval when additional time is necessary to complete the investigation. In addition, the Office of Independent Review (OIR) is responsible for reviewing completed investigations and providing the Department with feedback.

The Department did not always follow their policy and procedures. For example, none of the six investigations completed in December 2010 were completed within 45 days. The investigators took an average of 93 days to complete each investigation. In addition, when investigators exceeded the 45-day timeframe, there was no documentation that staff had requested approval for the additional time.

According to Probation, the DOJ Monitor and Probation met in January 2011 and agreed to revise the policy to allow 90 days for investigators to complete their investigations, and an additional 30 days for the CASIU Director to approve and close the investigations. However, as of December 31 2010, nine (26%) of CASIU's thirty-five open investigations had been open for more than the proposed 120-day timeframe. The nine open investigations had been open an average of 181 days.

In addition, CASIU did not forward the six investigations they completed from October through December 2010 to the OIR for review and feedback. After our review, Probation management informed us that they had started submitting completed

investigations to the OIR. We will confirm this review process during our next monitoring review.

Provision 22: Classification

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

This Provision applies to sixteen camps and three specialized units. However, Probation provided the monitoring tool in January 2011. As a result, we only reviewed this Provision at six camps and two specialized units.

Average Compliance Rate: 33%

Comments:

In January 2011, Probation began implementing a new classification system that they planned to complete by March 2011. Probation fully implemented the new classification system at the Camp Assessment Unit, and our test work noted that the Camp Assessment Unit had achieved 100% compliance. Probation had not yet implemented the new system at the other seven sites we reviewed.

Provision 23: Grievance System

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

This Provision applies to sixteen camps and two specialized units.

Average Compliance Rate: 91%

Comments:

Thirteen (72%) of the eighteen camps/units achieved substantial compliance of 90% or more. The remaining five camps/units achieved an average compliance rate of 82%. The DOJ Monitor approved this Provision for formal monitoring effective February 28, 2011.

Provision 24: Youth Movement Between the Probation Camps or Between the Probation Camps and the County Juvenile Halls

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

This Provision applies to sixteen camps and one specialized unit.

Average Compliance Rate: 42%

Comments:

The camps/units did not always maintain documentation to indicate that they ensured that the movement of minors did not conflict with any scheduled medical, dental or mental health appointments. In addition, the camps/units did not always maintain documentation to validate the movement of minors.

The DOJ Monitor approved this Provision for formal monitoring effective October 31, 2010. Probation management explained that the discrepancy between our compliance rate and the DOJ Monitor placing the Provision in formal monitoring was due to differences between the monitoring tool and the DOJ Monitor's primary concerns with this Provision. Probation management indicated that they are working with the DOJ Monitor to revise this monitoring tool to align with the DOJ Monitor's concerns, while at the same time ensuring that the facilities understand the steps that must be taken and maintained to consistently achieve the desired outcomes.

Provision 25: Development and Implementation of Suicide Prevention Policy

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

This Provision applies to sixteen camps and three specialized units.

Average Compliance Rate: 88%

Comments:

Twelve (67%) of the nineteen camps/units achieved substantial compliance of 90% or more. The remaining seven camps achieved an average compliance rate of 77%. Generally, the seven camps with the lower compliance rate were reviewed at the beginning of this reporting period, and had not yet ensured that all staff who worked with youth had signed a statement indicating that they read and understood Probation's new Suicide Prevention Policy. The DOJ Monitor approved this Provision for formal monitoring.

Provision 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.

This Provision applies to sixteen camps and two specialized units. Probation provided the monitoring tool in January 2011. As a result, we only reviewed this Provision at nine camps and two specialized units.

Average Compliance Rate: 69%

Comments:

One (9%) of the eleven camps/units achieved substantial compliance of 90% or more. The remaining ten camps/units achieved an average compliance rate of 68%. Some of the staff at the remaining ten camps did not always sign the required documents acknowledging that they had reviewed DMH's comments regarding the treatment of the minors.

Provision 32: Training (Suicide Prevention)

The County shall ensure that all Camp 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 the location and use of a cut-down tool if a youth attempts to hang him/her self.

This Provision applies to sixteen camps and three specialized units.

Average Compliance Rate: 38%

Comments:

Probation management provided a list of staff who attended the training. However, Probation did not provide documentation, such as attendance sheets or completed competency tests, to validate that the number of staff who attended the training and whether they understood the information presented.

Provision 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 a youth's arrival at a Camp, or within 24 hours after a youth's arrival at a camp.

This Provision applies to sixteen camps and two specialized units.

Average Compliance Rate: 91%

Comments:

Ten (56%) of the eighteen camps/units achieved substantial compliance of 90% or more. The remaining eight camps/units achieved an average compliance rate of 82%. Probation managers at the eight camps did not always ensure that the required screening documentation was placed in the minors' behavioral charts. In addition, the Camps with Special Handling Units did not always ensure that minors were reassessed each time they were admitted to the Special Handling Unit. The DOJ Monitor approved this Provision for formal monitoring effective February 28, 2011.

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

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

This Provision applies to sixteen camps and three specialized units. Probation provided the monitoring tool in December 2010. As a result, we only reviewed this Provision at eleven camps and three specialized units.

Average Compliance Rate: 37%

Comments:

Probation management developed a training class that covered the issues in this Provision. Probation management indicated that they would begin providing the required training in March 2011.

Provision 46: Discharge Summaries

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

This Provision applies to sixteen camps and one specialized unit.

Average Compliance Rate: 53%

Comments:

Six (35%) of the seventeen camps/units achieved substantial compliance of 90% or more. The remaining 11 camps/units achieved an average compliance rate of 30%. Probation management at the 11 camps/units did not always ensure that discharge summaries were appropriately completed for each minor discharged from the camp.

**DOJ Settlement Agreement Provisions
Monitoring Results**

Camp/Unit	Date		Compliance Percentage for A-C Monitored Provisions (1)																	Average	
	Completed	Period Reviewed	10	11	12	14	16	18	19	20	21	22	23	24	25	29	32	34	45		46
Camp Gonzales	10/26/2010	Sep-2010	0%	N/A	(2)	(2)	93%	0%	46%	25%	N/A	(2)	82%	10%	70%	(2)	0%	76%	(2)	20%	38%
Camp Miller	10/27/2010	Sep-2010	0%	N/A	(2)	(2)	90%	20%	60%	25%	N/A	(2)	91%	10%	68%	(2)	0%	99%	(2)	20%	44%
Camp Kilpatrick	10/28/2010	Sep-2010	0%	N/A	(2)	(2)	89%	20%	62%	25%	N/A	(2)	84%	10%	68%	(2)	0%	89%	(2)	20%	43%
Camp Scott	11/16/2010	Oct-2010	0%	N/A	(2)	(2)	93%	20%	85%	15%	N/A	(2)	77%	10%	87%	(2)	0%	73%	(2)	20%	44%
Camp Scudder	11/18/2010	Oct-2010	0%	N/A	(2)	(2)	99%	20%	95%	20%	N/A	(2)	81%	10%	90%	(2)	0%	100%	(2)	20%	49%
Camp Munz	12/7/2010	Nov-2010	0%	N/A	48%	88%	92%	20%	79%	32%	N/A	(2)	90%	10%	90%	(2)	0%	99%	0%	20%	48%
Camp Mendenhall	12/8/2010	Nov-2010	0%	N/A	58%	79%	100%	20%	100%	34%	N/A	(2)	99%	10%	69%	(2)	0%	99%	0%	20%	49%
Camp Paige	1/11/2011	Dec-2010	0%	N/A	55%	88%	100%	20%	98%	29%	N/A	(2)	100%	52%	96%	65%	24%	99%	20%	97%	63%
Camp Afferbaugh	1/12/2011	Dec-2010	0%	N/A	54%	88%	99%	20%	92%	32%	N/A	(2)	90%	64%	96%	65%	27%	99%	20%	100%	63%
Camp Rocky	1/13/2011	Dec-2010	0%	N/A	40%	86%	96%	20%	78%	30%	N/A	(2)	97%	48%	97%	65%	34%	81%	20%	100%	60%
Camp Assessment Unit	1/24/2011	Dec-2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100%	N/A	100%							
Dorothy Kirby Center	1/25/2011	Dec-2010	0%	N/A	54%	93%	100%	20%	98%	27%	N/A	(2)	96%	72%	90%	9%	13%	92%	20%	100%	59%
Child Abuse/ Special Investigations Unit	1/26/2011	Dec-2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	40%	N/A	40%								
Camp Jarvis	2/1/2011	Jan-2011	27%	N/A	47%	76%	78%	20%	79%	45%	N/A	35%	99%	67%	87%	81%	80%	83%	60%	50%	63%
Camp Mc Nair	2/2/2011	Jan-2011	51%	N/A	58%	77%	99%	20%	98%	45%	N/A	35%	94%	64%	88%	81%	80%	93%	60%	94%	71%
Camp Onizuka	2/3/2011	Jan-2011	51%	N/A	47%	89%	96%	20%	75%	45%	N/A	35%	84%	65%	100%	100%	80%	100%	60%	77%	70%
Camp Resnik	2/9/2011	Jan-2011	71%	N/A	49%	86%	100%	20%	92%	45%	N/A	16%	93%	90%	97%	65%	80%	98%	60%	90%	72%
Camp Scobee	2/10/2011	Jan-2011	74%	N/A	54%	84%	96%	20%	93%	45%	N/A	16%	92%	69%	95%	64%	80%	80%	60%	30%	66%
Security Unit @ Challenger	2/14/2011	Jan-2011	45%	50%	52%	84%	N/A	20%	88%	42%	N/A	N/A	N/A	N/A	94%	N/A	68%	N/A	20%	N/A	56%
Special Housing Unit @ Challenger	2/14/2011	Jan-2011	66%	N/A	32%	84%	N/A	20%	71%	45%	N/A	5%	91%	N/A	96%	82%	80%	83%	60%	N/A	63%
Camp Smith	2/15/2011	Jan-2011	27%	N/A	50%	83%	97%	20%	87%	45%	N/A	21%	95%	51%	94%	82%	80%	89%	60%	30%	63%
Average Compliance Percentage			22%	50%	50%	85%	95%	19%	83%	34%	40%	33%	91%	42%	88%	69%	38%	91%	37%	53%	58%

Footnote Legend

N/A Provision is not applicable to this camp/unit.

(1) See Attachment 3 for the title of each provision.

(2) Probation and the DOJ monitors are developing the monitoring tools for these provisions. As a result, we did not perform monitoring reviews for these provisions.

**DOJ Settlement Agreement Provisions
Monitored by the Auditor-Controller**

Provision	Description
9 (1)	Protection from Abusive Practices
10	Use of Force
11	Chemical Restraint
12	Use of Force Review
13 (1)	Threat and Intimidation
14	Consumption of Alcohol by Staff
15 (1)	Staffing
16	Orientation
17 (1)	Rehabilitation & Behavior Management
18	Staff Training and Supervision of Youth
19	Youth-on-Youth Violence (YOYV)
20	Child Abuse Reporting
21	Child Abuse Investigation
22	Classification
23	Grievance System
24	Youth Movement Between Probation Camps and/or Halls
25	Development and Implementation of Policy (Suicide Prevention)
27 (1)	Management of Suicidal Youth
28 (1)	Care for Self Harming Youth
29	Documentation of Suicide Precautions
30 (1)	Supervision of Youth at Risk of Self Harm
31 (1)	Suicide Precautions for Youth Awaiting Transfer to Another Facility
32	Training (Suicide Prevention)
34	Screening
43 (1)	Substance Abuse
45	Staff Understanding of Mental Health and Developmental Disability Needs
46	Discharge Summaries

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Footnote:

(1) Probation and the DOJ monitor had not yet finalized the necessary monitoring tools to measure compliance with these provisions. As a result, these provisions were not included in our first review.