COUNTY OF LOS ANGELES
DEPARTMENT OF AUDITOR-CONTROLLER

KENNETH HAHN HALL OF ADMINISTRATION
500 WEST TEMPLE STREET, ROOM 525
LOS ANGELES, CALIFORNIA 90012-3873
PHONE: (213) 974-8301 FAX: (213) 626-5427

WENDY L. WATANABE
AUDITOR-CONTROLLER

JUDI E. THOMAS
CHIEF DEPUTY

ASST. AUDITOR-CONTROLLERS

ROBERT A. DAVIS
JOHN NAIMO
JAMES L. SCHNEIDERMAN

September 14, 2012

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

FROM: Wendy L. Watanabe
Auditor-Controller

SUBJECT: **PROBATION DEPARTMENT JUVENILE CAMPS – DEPARTMENT OF JUSTICE SETTLEMENT AGREEMENT MONITORING FOR MARCH 1, 2012 THROUGH MAY 31, 2012 – SIXTH STATUS REPORT**

On August 17, 2010, your Board instructed the Auditor-Controller (A-C) to monitor the County Probation Department's (Probation) progress in implementing the provisions of the federal Department of Justice (DOJ) settlement agreement. This is our sixth status report. The settlement agreement covers 18 Probation camps and six specialized units. However, five of the Probation camps were not open during the current review period. In addition, we are no longer responsible for monitoring one specialized unit. As a result, our review covered 13 camps and five specialized units.

We are responsible for monitoring the status of 22 of the 41 provisions from the DOJ settlement agreement. Twelve of the other 19 provisions are being monitored by the County Department of Mental Health (DMH) because they require a mental health specialist; three provisions are administrative issues that do not require formal monitoring; and Probation indicated that we are no longer responsible for monitoring the four remaining provisions. Specifically, Probation indicated that the DOJ is relying on their own observations and the results of Probation's internal reviews to evaluate compliance with Provision 9 - Protection from Abusive Institutional Practices; Provision 13 - Threats and Intimidation; Provision 15 - Staffing; and Provision 22 - Classification.

We evaluated Probation's progress in implementing the provisions we are responsible for using monitoring tools developed by Probation and the DOJ Monitor (Monitor). The monitoring tools include specific criteria, which result in a precise score. Prior to the start of our review, Probation and the Monitor had not developed monitoring tools for two provisions, and Probation had fully implemented eight provisions. As a result, we only reviewed 12 of the 22 provisions we are responsible for monitoring. In addition, because of the differences in juvenile populations and services among Probation's camps and units, some of the settlement agreement provisions only apply to some of the camps/units.

When the Monitor determines that Probation has met most of a provision's requirements, the Monitor will then authorize placing the provision into "formal monitoring", and will continue to track Probation's compliance. If Probation continues to meet the requirements of the provision for 12 consecutive months, the Monitor will consider Probation to have completed formal monitoring (fully implemented) for that provision. The settlement agreement requires the County to fully implement all of the provisions by October 2012.

Results of Review

Our review disclosed that Probation continues to make progress in complying with the 12 provisions we monitored. As noted in the following table, Probation completed the formal monitoring process for eight provisions, meaning the DOJ considers those eight provisions to be fully implemented. In addition, our current review indicates that Probation was in substantial compliance (compliance level of 90% or more) with nine (75%) of the 12 provisions; and Probation had a compliance level of 70% to 89% for the other three (25%) provisions.

	Number of Provisions			
Compliance Level	**As of Aug 31, 2011**	**As of Nov 30, 2011**	**As of Feb 29, 2012**	**As of May 31, 2012**
Fully Implemented	0	3	8	8
90% or higher	9	10	9	9
70% to 89%	5	5	2	3
69% or less	3	1	1	0

Attachment 1 is the detailed results of our monitoring each provision. Attachment 2 shows the compliance level for each provision in our current review, and the compliance levels from our prior reviews. Attachment 3 lists the compliance levels for each provision at each camp/unit.

Review of Report

We discussed the results of our review with Probation management, who generally agreed with the results of our review. They also indicated 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

Attachments

c: William T Fujioka, Chief Executive Officer
Jerry E. Powers, Chief Probation Officer
Marvin J. Southard, D.S.W., Director, Department of Mental Health
Mitchell H. Katz, M.D., Director, Department of Health Services
Arturo Delgado, Ed.D., Superintendent, Los Angeles County Office of Education
Public Information Office
Audit Committee

LOS ANGELES COUNTY PROBATION CAMPS
JUVENILE CAMP DOJ SETTLEMENT AGREEMENT MONITORING RESULTS
MARCH 1, 2012 THROUGH MAY 31, 2012

Scope of Review

We are responsible for monitoring 22 of the 41 provisions from the Department of Justice (DOJ) settlement agreement. Twelve of the other 19 provisions will be monitored by the County Department of Mental Health (DMH) because the provisions require a mental health specialist; three provisions are administrative issues that do not require formal monitoring; and the County Probation Department (Probation) indicated that we are no longer responsible for monitoring the four remaining provisions. Specifically, Probation indicated that the DOJ is relying on the results of their own observations, and Probation's internal reviews to evaluate compliance with Provision 9 - Protection from Abusive Institutional Practices; Provision 13 - Threats and Intimidation; Provision 15 – Staffing; and Provision 22 - Classification.

We evaluate Probation's progress in implementing each provision using monitoring tools developed by Probation and the Monitor (Monitor). The monitoring tools include specific criteria, which result in a precise score. Prior to the start of our review, Probation and the Monitor had not developed the monitoring tools for two provisions, and Probation had fully implemented eight provisions. As a result, we only reviewed 12 of the 22 provisions we are responsible for monitoring.

Our review covered the 13 camps and five specialized units that were open from March 1, 2012 through May 31, 2012.

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 13 camps and three specialized units.

Average Compliance Level: 99%

Comments:

Fifteen (94%) of the 16 camps/units achieved substantial compliance of 90% or more. The remaining camp (Jarvis) achieved a compliance level of 88%. The Camp Director did not ensure that all staff had signed off on Probation's Safe Crisis Management (SCM) policy. Specifically, nine (17%) of the 54 active staff at the Camp had not signed-off on the policy.

The Monitor approved this Provision for formal monitoring effective October 31, 2011.

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 is only applicable to the Challenger Memorial Youth Center (CMYC) Security Unit, which administers the pepper spray canisters at three camps and two specialized units located at CMYC.

Comments:

During our last review, we noted that the Security Unit was in substantial compliance with this Provision. In addition, the Monitor indicated that Probation fully implemented this Provision by maintaining "substantial compliance" with the Provision for 12 consecutive months. As a result, we reduced our review of this Provision to once a year. We will review this Provision again during our December 2012 through February 2013 quarterly review.

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 13 camps and four specialized units.

Average Compliance Level: 96%

Comments:

Fifteen (88%) of the 17 camps/units achieved substantial compliance of 90% or more. The remaining two camps (Miller and Scudder) achieved an average compliance level of 81%. The directors at the two camps did not ensure that supervisors completed their reviews of use of force incidents within five business days, as required. Specifically, the two use of force reviews performed during our review period were completed an average of 12 days late.

In addition, the Camp Scudder Director did not ensure that supervisors conducted a Child Safety Assessment within the required two-hour timeframe. Specifically, the one Assessment performed during our review period was completed 14 days late.

The Monitor approved this Provision for formal monitoring effective October 31, 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 ten camps and two specialized units, including the CMYC Security Unit, which covers the three camps and two specialized units at CMYC.

Comments:

During our last review, we noted that the camps/units were in substantial compliance with this Provision. In addition, the Monitor indicated that Probation had fully implemented this Provision by maintaining "substantial compliance" with the Provision for 12 consecutive months. As a result, we reduced our review of this Provision to once a year. We will review this Provision again during our December 2012 through February 2013 quarterly review.

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 13 camps and one specialized unit.

Comments:

During our September through November 2011 quarterly review, we noted that the camps/units were in substantial compliance with this Provision. In addition, the Monitor indicated that Probation had fully implemented this Provision by maintaining "substantial compliance" with the Provision for 12 consecutive months. As a result, we reduced our review of this Provision to once a year. We will review this Provision again during our September through November 2012 quarterly review.

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 13 camps and three specialized units.

Average Compliance Level: 74%

Comments:

The 16 camps/units achieved an average compliance level of 74%. Probation management developed an initial 24-hour training class for staff and supervisors on effectively managing youth, including de-escalation techniques, crisis intervention, and youth development. However, Probation is required to provide an annual 16-hour refresher training class after the initial training has been completed. We noted that Probation management did not ensure that all supervisors and Probation Officers completed the annual refresher training. Specifically, 10% of the supervisors and 34% of the Probation Officers assigned to the 16 camps/units did not complete the training.

The Monitor approved this Provision for formal monitoring effective October 31, 2011. However, our review indicated a compliance rate of 74%. Probation explained that the discrepancy was because of the timing of our review. Specifically, the Department anticipated training all staff by September 2012, and our review only covered the training records through May 2012.

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 13 camps and three specialized units.

Average Compliance Level: 99%

Comments:

All 16 camps/units achieved substantial compliance of 90% or more. The Monitor approved this Provision for formal monitoring effective October 31, 2011.

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 13 camps and three specialized units.

Average Compliance Level: 96%

Comments:

Fifteen (94%) of the 16 camps/units achieved substantial compliance of 90% or more, and the remaining unit (CMYC Security Unit) achieved a compliance level of 89%.

The Monitor approved this Provision for formal monitoring effective October 31, 2011.

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).

Compliance Level: 98%

Comments:

The CASIU was in substantial compliance with this Provision. The Monitor approved this Provision for formal monitoring effective October 31, 2011.

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 13 camps and two specialized units.

Comments:

During our last review, we noted that the camps/units were in substantial compliance with this Provision. In addition, the Monitor indicated that Probation fully implemented this Provision by maintaining "substantial compliance" with the Provision for 12 consecutive months. As a result, we reduced our review of this Provision to once a year. We will review this Provision again during our December 2012 through February 2013 quarterly review.

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 13 camps and one specialized unit.

Comments:

During our September through November 2011 quarterly review, we noted that the camps/unit were in substantial compliance with this Provision. In addition, the Monitor indicated that Probation fully implemented this Provision by maintaining "substantial compliance" with the Provision for 12 consecutive months. As a result, we reduced our review of this Provision to once a year. We will review this Provision again during our September through November 2012 quarterly review.

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 13 camps and three specialized units.

Comments:

During our September through November 2011 quarterly review, we noted that the camps/units were in substantial compliance with this Provision. In addition, the Monitor indicated that Probation had fully implemented this Provision by maintaining "substantial compliance" with the Provision for 12 consecutive months. As a result, we reduced our review of this Provision to once a year. We will review this Provision again during our September through November 2012 quarterly review.

Provision 27: Management of Suicidal Youth

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

This Provision applies to the ten camps/units that had minors on Level 2 or Level 3 Enhanced Supervision at the time of our review. Level 2 Supervision is required for minors who are not actively suicidal, but may experience persistent suicidal ideations. Level 3 Supervision is required for minors who are at high risk of suicide.

Average Compliance Level: 97%

Comments:

Nine (90%) of the ten camps/units achieved substantial compliance of 90% or more. The remaining camp (Scudder) achieved a compliance level of 88%. Specifically, the

manager did not ensure that one (50%) of two Special Incident Reports (SIR) was completed for a minor who had a change in supervision level.

The Monitor approved this Provision for formal monitoring effective October 31, 2011.

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 13 camps and two specialized units. Specifically, Provision 29 is comprised of three separate monitoring tools covering mental health needs (29A), and suicidal minors requiring an increased level of supervision (29B and 29C). The overall compliance percentage for this Provision is calculated by averaging the scores for the three tools at each of the applicable camps/units. Because of the differences in juvenile populations and services provided among Probation's camps and units, Tools 29B and 29C only apply to some of the camps/units.

Average Compliance Level: 83%

Comments:

29A – Mental Health Needs

Six (40%) of the 15 camps/units achieved substantial compliance of 90% or more. The remaining nine camps achieved an average compliance level of 70%. Specifically, staff at the nine camps did not always initial the required documents acknowledging that they reviewed DMH's mental health assessments describing the minors' mental health needs. In addition, for seven (78%) of the remaining nine camps, DMH staff did not indicate the recommended type or level of housing for the minors on the Mental Health Recording Forms.

29B – Enhanced Supervision Level 3

This Provision applies to the six camps/units that had minors housed in a Special Housing Unit (SHU) and on Level 3 Supervision at the time of our review.

Five (83%) of the six camps/units achieved substantial compliance of 90% or more. The remaining camp (Afflerbaugh) achieved a compliance level of 58%. Camp Afflerbaugh managers did not always ensure that Enhanced Supervision Observation Forms were completed for each eight-hour shift a minor was on Level 3 Supervision and

housed in a SHU. Specifically, the Camp Afflerbaugh managers did not ensure that Enhanced Supervision Observation Forms were completed for five (83%) of the six shifts reviewed.

29C – Enhanced Supervision Level 2

This Provision applies to the four camps/units that had minors housed in a SHU and on Level 2 Supervision at the time of our review.

Two (50%) of the four camps/units achieved substantial compliance of 90% or more. The remaining two camps/units (Gonzales and Dorothy Kirby Center) achieved an average compliance of 87%. The managers at the two camps/units did not always ensure that Safety Check Sheets were completed entirely for minors requiring Level 2 Supervision and housed in a SHU.

The Monitor approved this Provision for formal monitoring effective October 31, 2011.

Provision 30: Supervision of Youth at Risk of Self-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.

This Provision applies to the four camps and two specialized units that had minors housed in a SHU and on Level 1 Enhanced Supervision (Level 1 Supervision) at the time of our review. Level 1 Supervision is required for all minors who are not at risk of suicide or self-injury.

Average Compliance Level: 94%

Comments:

Four (67%) of the six camps/units achieved substantial compliance of 90% or more. The remaining two camps/units (Gonzales and Dorothy Kirby Center) achieved an average compliance level of 89%.

The Monitor approved this Provision for formal monitoring effective October 31, 2011.

Provision 31: Suicide Precautions for Youth Awaiting Transfer to Another Facility

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

This Provision applies to the one camp and two specialized units that had minors on Level 4 Enhanced Supervision (Level 4 Supervision) at the time of our review. Level 4 Supervision is required for minors who are actively suicidal, or have engaged in serious

self-harming behavior, and have been transferred from the camps/units to a higher level of care (e.g., psychiatric emergency care facility) for psychiatric assessment.

Average Compliance Level: 76%

Comments:

One (33%) of the three camp/units achieved substantial compliance of 90% or more. The remaining two camps/units (Afflerbaugh and Dorothy Kirby Center) achieved an average compliance level of 65%. The Camp Afflerbaugh manager did not ensure that an Enhanced Supervision Observation Form and a SIR were completed for the one minor who was on Level 4 Supervision and was transferred out of the facility. In addition, the Dorothy Kirby Center manager did not document the date and time they authorized the removal of the minor from the facility.

The Monitor approved this Provision for formal monitoring effective October 31, 2011. However, since our last review, Probation's average compliance level for this Provision decreased from 93% to 76%. Probation indicated that this was primarily due to a reduction in the compliance with the documentation requirements, and that the Department has re-trained staff on the requirements.

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 13 camps and three specialized units.

Average Compliance Level: 94%

Comments:

Fifteen (94%) of the 16 camps/units achieved substantial compliance of 90% or more. The remaining unit (CMYC SHU) achieved a compliance level of 86%. Probation management developed a training class on suicide prevention. However, Probation management did not ensure that all staff at the unit received the training. Specifically, 14% of Probation Officers assigned to the unit did not complete the training.

The Monitor approved this Provision for formal monitoring effective October 31, 2011.

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 13 camps and two specialized units.

Comments:

During our last review, we noted that the camps/units were in substantial compliance with this Provision. In addition, the Monitor indicated that Probation had fully implemented this Provision by maintaining "substantial compliance" with the Provision for 12 consecutive months. As a result, we reduced our review of this Provision to once a year. We will review this Provision again during our December 2012 through February 2013 quarterly review.

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 13 camps and three specialized units.

Average Compliance Level: 91%

Comments:

Twelve (75%) of the 16 camps/units achieved substantial compliance of 90% or more. The remaining four camps achieved an average compliance level of 85%. Probation management developed a training class to understand behaviors of, engage in appropriate interaction with, and respond to needs of, youth with mental illness and developmental disabilities. However, Probation management did not ensure that all staff at the four camps completed the training. Specifically, 18% of Probation Officers and 9% of non-peace officer staff from Probation, LACOE, and JCHS assigned to the four camps did not complete the training.

The Monitor approved this Provision for formal monitoring effective October 31, 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 13 camps and one specialized unit.

Comments:

During our last review, we noted that the camps/unit were in substantial compliance with this Provision. In addition, the Monitor indicated that Probation fully implemented this Provision by maintaining "substantial compliance" with the Provision for 12 consecutive months. As a result, we reduced our review of this Provision to once a year. We will review this Provision again during our December 2012 through February 2013 quarterly review.

DOJ Settlement Agreement Provision
Monitored by the Auditor-Controller
Compliance Level Summary
For Monitoring Reviews Completed August 31, 2011 Through May 31, 2012

Provision	Description	Monitoring Results			
		Aug 31, 2011	Nov 30, 2011	Feb 29, 2012	May 31, 2012
9 (3)	Protection from Abusive Practices	N/A	N/A	N/A	N/A
10	Use of Force	96%	96%	99%	99%
11 (1)	Chemical Restraint	93%	90%	96%	N/A
12	Use of Force Review	89%	94%	95%	96%
13 (3)	Threat and Intimidation	N/A	N/A	N/A	N/A
14 (1)	Consumption of Alcohol by Staff	82%	93%	98%	N/A
15 (3)	Staffing	N/A	N/A	N/A	N/A
16 (1)	Orientation	99%	99%	N/A	N/A
17 (2)	Rehabilitation & Behavior Management	N/A	N/A	N/A	N/A
18	Staff Training and Supervision of Youth	89%	90%	57%	74%
19	Youth-on-Youth Violence (YOYV)	92%	96%	98%	99%
20	Child Abuse Reporting	88%	89%	93%	96%
21	Child Abuse Investigation	62%	84%	98%	98%
22 (3)	Classification	N/A	N/A	N/A	N/A
23 (1)	Grievance System	98%	97%	98%	N/A
24 (1)	Youth Movement Between Probation Camps and/or Halls	98%	96%	N/A	N/A
25 (1)	Development and Implementation of Policy (Suicide Prevention)	96%	98%	N/A	N/A
27	Management of Suicidal Youth	N/A	N/A	98%	97%
29	Documentation of Suicide Precautions	66%	82%	89%	83%
30	Supervision of Youth at Risk of Self Harm	N/A	94%	98%	94%
31	Suicide Precautions for Youth Awaiting Transfer to Another Facility	N/A	82%	93%	76%
32	Training (Suicide Prevention)	86%	88%	89%	94%
34 (1)	Screening	97%	99%	100%	N/A
43 (2)	Substance Abuse	N/A	N/A	N/A	N/A
45	Staff Understanding of Mental Health and Developmental Disability Needs	8%	7%	90%	91%
46 (1)	Discharge Summaries	97%	97%	99%	N/A
	Average Overall	85%	88%	93%	92%

Footnote Legend

(1) The DOJ Monitor (Monitor) indicated that Probation fully met the requirements of this provision by maintaining "substantial compliance" with this provision for 12 consecutive months. As a result, we plan to reduce the frequency that we monitor this provision to once a year.

(2) Probation and the Monitor had not finalized the monitoring tools needed to measure compliance with the Provision. As a result, the Provision was not included in our review.

(3) Probation indicated that we are no longer responsible for monitoring this provision. Specifically, Probation indicated that the DOJ is relying on their own observations and the results of Probation's audits to evaluate compliance.

DOJ Settlement Agreement Provision
Monitoring Results
For The Monitoring Period March Through May 2012

	Date		Compliance Percentage for A-C Monitored Provisions (1)												
Camp/Unit	Review Date	Period Reviewed	10	12	18	19	20	21	27	29	30	31	32	45	Average
Camp Gonzales	3/15/2012	Feb-March 2012	100%	98%	42%	100%	99%	N/A	100%	87%	89%	N/A	99%	97%	91%
Camp Miller	3/20/2012	Feb-March 2012	100%	88%	70%	100%	98%	N/A	96%	78%	N/A	N/A	99%	96%	92%
Camp Kilpatrick	3/22/2012	Feb-March 2012	99%	93%	83%	100%	96%	N/A	N/A	95%	94%	N/A	96%	91%	94%
Camp Scott	3/27/2012	Feb-March 2012	100%	100%	74%	100%	95%	N/A	95%	84%	100%	N/A	96%	87%	93%
Camp Scudder	3/29/2012	Feb-March 2012	100%	73%	79%	100%	94%	N/A	88%	91%	N/A	N/A	96%	96%	91%
Camp Munz	4/10/2012	March-April 2012	100%	96%	82%	100%	97%	N/A	N/A	100%	N/A	N/A	93%	92%	95%
Camp Mendenhall	4/12/2012	March-April 2012	98%	98%	64%	100%	94%	N/A	100%	58%	N/A	N/A	95%	95%	89%
Camp Paige	4/17/2012	March-April 2012	100%	100%	76%	96%	99%	N/A	100%	38%	N/A	N/A	92%	85%	87%
Camp Afflerbaugh	4/19/2012	March-April 2012	100%	98%	82%	98%	95%	N/A	100%	57%	N/A	50%	90%	82%	85%
Camp Rockey	4/24/2012	March-April 2012	99%	100%	79%	97%	93%	N/A	100%	93%	97%	N/A	91%	85%	93%
Dorothy Kirby Center	4/26/2012	March-April 2012	100%	93%	86%	98%	95%	N/A	96%	94%	89%	80%	94%	90%	92%
Special Housing Unit @ CMYC	5/8/2012	April-May 2012	100%	100%	74%	100%	94%	N/A	97%	93%	96%	98%	86%	90%	93%
Security Unit @ CMYC	5/8/2012	April-May 2012	96%	100%	56%	100%	89%	N/A	N/A	N/A	N/A	N/A	91%	91%	89%
Camp McNair	5/10/2012	April-May 2012	97%	98%	78%	98%	97%	N/A	N/A	85%	N/A	N/A	96%	96%	93%
Camp Onizuka	5/15/2012	April-May 2012	100%	100%	87%	96%	97%	N/A	N/A	95%	N/A	N/A	100%	96%	96%
Camp Jarvis	5/17/2012	April-May 2012	88%	100%	73%	98%	97%	N/A	N/A	90%	N/A	N/A	93%	94%	92%
CASIU	5/17/2012	Feb-April 2012	N/A	N/A	N/A	N/A	N/A	98%	N/A	N/A	N/A	N/A	N/A	N/A	98%
DOJ Compliance Bureau	5/18/2012	January 2012	N/A	90%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	90%
Average Compliance Percentage			**99%**	**96%**	**74%**	**99%**	**96%**	**98%**	**97%**	**83%**	**94%**	**76%**	**94%**	**91%**	**92%**

Footnote Legend

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

(1) See Attachment 2 for the title of each provision.