County of Los Angeles
Sheriff's Department Headquarters
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LEROY D. BACA, SHERIFF

September 28, 2006

The Honorable Board of Supervisors
County of Los Angeles
383 Kenneth Hahn Hall of Administration
Los Angeles, California 90012

Dear Supervisors:

RESPONSE TO SPECIAL COUNSEL'S REPORTS

This correspondence is in regards to your Board's August 29, 2006, motion wherein you requested a response to the Special Counsel's *22nd Semiannual Report.* Additionally, an update of pending recommendations in the Los Angeles County Sheriff's Department's (Department) January 2006, *Status of Recommendations Made in the November 2004, Merrick J. Bobb Special Report,* is submitted for your review.

SPECIAL COUNSEL'S 22ND SEMIANNUAL REPORT

The following are the Special Counsel's recommendations (bolded text) followed by the Department's response.

Continue progress toward a truly centralized housing unit in which CHU [Central Housing Unit], not individual jail facility staff, provides each inmate with a specific housing assignment. CHU should have the sole authority to make initial housing assignments and to review and approve all housing moves.

The Department created CHU in order to accomplish this goal. It currently assigns all inmates to a housing module by their security and special handling levels. Additionally, CHU audits all general population inmate housing areas to ensure that reclassifications and "harmony" moves (inmate transfers for their safety) have not impacted the security level integrity of the housing areas. The Custody Operations and Correctional Services Divisions loaned a total of 25 personnel to CHU: 2 sergeants, 2 bonus I deputies, 11 deputy sheriff generalists and 10 custody assistants.

Centralized housing of inmates is a new program within the Los Angeles County Jail and, as the program is in its infancy, the Department accordingly adjusts its housing policies and procedures. As we continue to grasp the full magnitude of this massive and innovative undertaking, there may be a need for the funding of new personnel.

The Centralized Housing Unit as its own bureau.

Inmate intake, housing, and classification are all handled by the Inmate Reception Center (IRC). These functions are highly interrelated. Private industry has recognized that the creation of multiple management layers tends to paralyze communication, teamwork, and efficiency. Currently, these functions are handled under one umbrella, and the IRC Captain makes decisions regarding duties and procedures. Crisis events and sudden procedural changes are a common occurrence in the custody environment and the absence of bureaucratic layers ensure appropriate and timely decisions.

The Department recognized the need for an independent housing authority, but because of budgetary and staffing issues, the formation of the CHU was delayed. In April 2006, Department policy was created to grant IRC the authority to assign inmates to facilities. CHU was organized under a completely separate command structure from housing facilities, giving it the autonomy to make appropriate housing decisions devoid of external pressure from the jails. Extending this assignment authority down to the individual bunk is a natural result of improving and centralizing the housing assignment system. As the Jail Information Management System (JIMS) evolves, bunk assignments will be handled much like hotel reservations.

Creating a separate command will only serve to increase the number of problems faced in implementing centralized housing. Lieutenants on the Department are expected to be able to command a specialized unit, such as Classification and CHU, and to make it function within the organization of a larger unit, such as IRC.

Modify the current system of security level assignments and special handling codes to create a more unified classification system. If special handle codes can be eliminated, they should be. If classification factors reflected in special handle codes are absent from the Northpointe JICS [Jail Inmate Classification System] software, the LASD [Los Angeles County Sheriff's Department] should work with Northpointe to customize JICS to more accurately classify the Los Angeles County Jail Population.

Continue to reevaluate the K-10 designation [keep away from all other inmates] to determine, first, how to reduce the K-10 population by managing some current K-10s as level nine inmates; and, second, whether some current K-10 inmates, particularly of those who have been classified K-10 for their own protection and

have no history of violence, could live together in a less restrictive environment, isolated from other inmates.

The response for these two concerns is interrelated. The Department concurs with the Special Counsel that unnecessary special handle codes be eliminated. The special handle policy is currently being revised to address outdated and conflicting portions of the Department's classification procedures. It is anticipated that the policy and associated logistical issues will be finalized around December 1, 2006.

There is no current need for the Department to work with Northpointe Objective Classification System (Northpointe) to customize JICS to reflect special handle codes. This will not result in more accurate classification of the Los Angeles County Jail population. Although both concepts are routinely referred to as "classification," *security level classification* and *special handle designations* are two completely different concepts, which sometimes overlap. The Northpointe system is designed to **predict** an inmate's **tendencies** toward violence and other safety-related issues. Special handling issues relate to facts and situations **specific to an individual inmate.** As an example, a security level 9 inmate with no special handle designation (maximum security) has a **high potential** for violence. A K-10 H inmate (highly dangerous special handle) has shown that he **will** be violent, in addition to being a level 9. As such, these two inmates are treated differently in how they are escorted and transported.

The Department is considering a distinct or different uniform for level 8 and 9 inmates. Making level 8 and 9 inmates more readily identifiable will improve safety for inmates and staff, and will add an additional and highly visible means of identifying high and maximum security inmates in our custody.

The Department is currently reviewing the entire K-10 classification, declassification, and housing process to determine its effectiveness. The declassification process that determines if an inmate should be classified as a K-10, now handled by Men's Central Jail (MCJ) personnel, will be moved to the IRC Classification Unit. All inmates assigned the K-10 designation will be reviewed to determine if they are appropriately classified according to current policy. This effort will also include a feasibility study of whether certain segments of the K-10 population can be housed together. This interim review and any necessary policy changes will be accomplished by December 1, 2006. The Department will also consider any recommendations made in the upcoming jail security and staffing audit, which is discussed later in this report.

Centralize control of the assignment of special handle codes, including K-10 designations, and JICS security level classification in the Central Housing Unit.

The Department concurs that the assignment of special handle codes, including K-10 designations, JICS security level classification, and housing determinations be centralized in one location, that being CHU. Training will be necessary for CHU personnel in the very complex identification, management, and housing of K-10 inmates, such as high ranking members of prison gangs and informants. We are in the process of determining the best method for implementing this plan and its timeline.

Assign to CHU the responsibility for performing both disciplinary and periodic classification reviews for all inmates.

It is the Department's intent to centralize all classification and reclassification duties within IRC Classification. Many of the reclassification functions are performed as collateral duties by various personnel at the different jail facilities. In order to centralize these functions and ensure timely reclassifications, the following staff requirements were identified: one sergeant, two deputy sheriff generalists and three custody assistants, at a cost of $386,000.

The custody assistant items are needed to complete periodic, disciplinary, staff request, and inmate request security level reviews. The deputy sheriff generalists are needed to conduct daily audits of reclassified inmates. Audits should consist of random inmate interviews at all the custody facilities, as well as a review of other data used during the classification process. These audits can also be used to validate the effectiveness of the entire classification process. Finally, the proposed CHU Reclassification Unit will require a sergeant to perform supervisory functions, including conducting regular audits under the direction of the IRC Classification Lieutenant. The sergeant will also be responsible for investigating and resolving inmate complaints regarding security level changes, which are anticipated to increase once the program is completely implemented.

The Northpointe system has pre-programmed auditing programs, which the Department has not purchased. These auditing programs would greatly enhance the ability of supervision and management to audit inmate classification. The Department is in contact with Northpointe to determine audit functionality and costs.

Perform more frequent and meaningful classification reviews to avoid both overclassifying and underclassifying inmates and to better realize the behavior modification goals of the classification system. Modify LASD policy to require initial reclassifications on all inmates within 30 or 45 days of their arrival at the

jail. For maximum and close [high] security inmates (levels eight and nine), require reclassifications at least every 30 days.

The Department has already modified the reclassification interval for security level 8 and 9 inmates (high and maximum security) to 30 days. Ninety-day reclassifications were initially instituted due to the high turnover of inmates and the number of reclassifications caused by changes in legal status or inmate discipline. We believe the 90-day interval for reclassification of medium and low security level inmates is still valid. However, the Department is willing to review the practice and will monitor the effectiveness of 90-day intervals, particularly after the centralization of reclassifications.

The concept of behavior modification is central to Northpointe. David Wells, the creator of Northpointe and an expert in the field, recommends that privileges and programs be interrelated with an inmate's security level. The lowest security level inmates have the greatest access to privileges and programs, while the highest security level inmates receive minimal privileges and programs. The outline for implementation of this part of the centralized housing plan has been created by our Inmate Services Unit, and the program should be finalized and implemented by October 1, 2006.

Engage a research analyst to evaluate and validate the Northpointe Classification System as it has been implemented in the Los Angeles County jails to ensure that security level designations are being applied appropriately and efficiently.

The Department welcomes the opportunity to evaluate the JICS classification system through an independent research analyst. However, the Northpointe JICS classification model is an objective system recognized as the national standard by the American Correctional Association, the National Institute of Corrections and the American Jail Association. Furthermore, the Special Counsel's expert, Steve J. Martin, has studied it and his recommendations have been implemented and followed. Finally, the upcoming jail security and staffing audit will further examine the Northpointe system as it applies to the Los Angeles County Jail. The Department will consider any additional recommendations that are made as a result of this independent audit.

Assess the effectiveness of the JICS decision tree in classifying women and make all necessary modifications to ensure that female inmates are being fairly and consistently classified and that the LASD is making the best use of available resources in classifying and housing them.

The Century Regional Detention Facility (CRDF) utilizes the JICS decision tree during the classification process to assign a security level to each female inmate as an initial guide for handling and housing consideration. While a security level number is assigned to each inmate, overriding factors may determine housing, such as medical

status or program requirements. For example, all mentally ill inmates, as well as court ordered drug rehabilitation program inmates, are housed together regardless of security level. All female general population inmates are assigned housing and work statuses based upon their classification and in many instances, upon further review by the Prisoner Personnel Office, their security levels are actually lowered. Due to CRDF's physical plant, all general population inmates are housed in direct supervision modules, wherein jail staff are assigned inside the inmate housing areas. Gang-related concerns and violent tendencies have not been a factor for placement of female inmates into housing, since these issues are not prevalent among the female population.

Our finding is that the JICS process may, very well, over-classify females. Therefore, the Department welcomes a full review of the classification system as it applies to female inmates. As referenced in the previous section, the Department will consider any recommendations made as a result of the pending jail security and staffing audit.

Replace AJIS [Automated Justice Information System]. CHU's progress is dependent on the effective use of information technology, and this aging system currently prevents the unit from fully utilizing available programs to coordinate security housing designations and housing assignments both within and among all Los Angeles County Jail facilities.

The current AJIS system was implemented in the early 1980s and it interacts with 19 other criminal justice systems in Los Angeles County, as well as the Department's Jail Health Information System. Although still operating efficiently, the system was programmed with software that is now 20 years out-of-date and for which the available pool of programmers is rapidly declining. The needed changes to AJIS will be cost prohibitive compared to the benefit received. The database management system behind AJIS is simply not designed to have the flexibility or sophistication to meet the future needs of the Department or the County of Los Angeles.

Replacement of AJIS is key to increasing the capability of the Department to manage the inmate population. In 2003, the Department began a three-phased replacement of AJIS with the Jail Information Management System (JIMS). Phase one consists of:

- Inmate Cashiering (completed)
- Medical Co-pay (completed)
- Inmate Property Management (in implementation)
- Inmate Records Management (design phase)
- Title 15 Compliance Tracking Pilot (in implementation)

Phase two of JIMS will consist of:

- Agency Billing and Inmate Pay-for-Stay
- Automated Daily Activity Log
- Inmate Classification and Movement
- Visitation
- Court Scheduling
- Special Handling Functions

Phase three will consist of transitioning the AJIS interface and consolidated booking to JIMS. At this time, only phase one has been funded.

Maintain the newly implemented housing plan to house inmates according to their security levels.

It is the Department's intent to continue the use of inmate security level designations to direct housing decisions.

Develop a comprehensive classification plan and operations manual governing classification and housing assignments.

A manual regarding classification exists in printed form at the IRC Classification office and in electronic form on the Department's network. Policies regarding housing assignments are being modified to reflect implementation of the CHU. The manual will be made available to all employees via the Department's intranet, which should occur by December 1, 2006.

Monitor critical statistics by housing module to identify problem areas and devise early solutions.

The Sheriff's Department concurs with this recommendation. Custody Support Services currently tracks many statistics relating to the safety and security of inmates in the various jail facilities. Appropriate statistics will be identified and provided to CHU. It is anticipated that these numbers may help define problem areas and required adjustments in the Department's housing plan.

RECOMMENDATIONS MADE IN THE NOVEMBER 2004 SPECIAL REPORT

The following updates are for those sections of the January 2006, *Status of Recommendations Made in the November 2004, Merrick J. Bobb Special Report*, which had pending recommendations.

Comprehensive Security Audit

The Special Report recommended a comprehensive security audit based primarily on observed security lapses at MCJ, which were attributed to inadequate staffing. On August 8, 2006, your Board approved an agreement with Crout and Sida Criminal Justice Consultants (Crout and Sida) for jail security and staffing audit services for the entire Los Angeles County Jail system. The audits will thoroughly review numerous operational areas including inmate and personnel safety, staffing, physical plans, inmate classification and housing, transportation and emergency procedures.

The on-site security audits are scheduled to commence on October 2, 2006, beginning with MCJ, and will then proceed onto the Pitchess Detention Center facilities. It is estimated the entire process will take 12 to 15 months to complete.

Increase Staffing Levels

The Special Report recommended an increase in MCJ's personnel complement and that ". . . a detailed staffing analysis by a qualified professional jail manager or corrections expert is the only way to determine precisely MCJ's ideal staffing level." A key component of the Crout and Sida audit will be to conduct on-site inspections of all jail facilities, identifying the current use of buildings designated for inmate housing, programming, medical and ancillary space required for the confinement of inmates in each facility. This on-site inspection will include a review of the average daily inmate population and classification of inmates confined in the facility to determine safety and security issues as they relate to current staffing plans.

Additionally, Crout and Sida will inspect facility staffing plans that identify security and support personnel, along with rational relief factors necessary to ensure the safety of the facility. These audits will encompass a review of real time activities of jail personnel as they relate to security. There has been a practice in the correctional field of identifying staff to inmate ratios in broad strokes, such as comparing one jail facility or corrections system to another in terms of a single ratio (e.g., one jail having a staff to inmate ratio of 1:4 versus another with 1:10).

Crout and Sida's philosophy is that no two jails are alike and, as such, must be individually evaluated on many factors including their unique physical plants, inmate demographics, and security levels. Therefore, the crux of the staffing audit is to focus on individual operational areas and determine whether or not there is sufficient staffing to meet minimum jail standards as enumerated in Title 15 of the California Code of Regulations.

Electronic Scanning Technology and Fixed Security Cameras

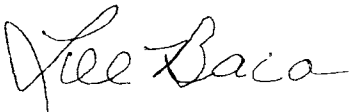
In May 2006, the Department established the Correctional Innovative Technology Unit (CITU) to develop, implement, and manage high tech solutions to various problems within the custody environment. The CITU has undertaken a comprehensive review of all technology related projects currently being implemented or planned to determine how best to apply that technology. The main goals of the review were to determine methods to: (1) increase staff and inmate safety, (2) increase the efficiency of the current staff to allow them more time for direct supervision of inmates, (3) to provide a reliable and compressive source of information for management to use in the decision making process, and (4) risk management. The secondary goals of the review were to determine ways to combine various individual technologies into synergistic and comprehensive tools for use in the custody environment, and to leverage the implementation of those technologies in ways that will provide cost savings when compared to separately purchasing specialized solutions.

Currently, the Department is looking at new technologies such as digital analytics – the ability for closed-circuit television (CCTV) cameras to capture unusual image patterns, such as inmates fighting, to enhance operations within the custody environment. The Department is also evaluating or implementing improved versions of established technologies, electronic scanning, and CCTV. Individually, each one of these technologies can be a useful means for monitoring or tracking inmate activity. By merging digital analytics, CCTV, and electronic scanning, they can become a powerful tool to detect and alert personnel, to deter and control undesirable inmate behavior, or prosecute criminal acts after the fact.

Your Board recently appropriated $14 million for the installation of a CCTV system at MCJ. Preliminary work has begun on the scope and requirements document to purchase and deploy an all-digital CCTV system to run across the Sheriff's Data Network. The MCJ CCTV installation and its supporting infrastructure will be the backbone of an advanced custody-wide surveillance and monitoring system capable of incorporating emerging technologies.

Should you have any questions, please contact Chief Marc L. Klugman, Correctional Services Division, at (213) 893-5017, or Chief Sammy L. Jones, Custody Operations Division, at (213) 893-5001.

Sincerely,



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