COUNTY OF LOS ANGELES
DEPARTMENT OF AUDITOR-CONTROLLER

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July 28, 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 MARCH 1, 2011 THROUGH MAY 31, 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. This is our second status report. The settlement agreement covers eighteen Probation camps and six specialized units. However, six of the Probation camps were closed for all or part of our review period. As a result, our review was limited to twelve camps and six specialized units. Probation re-opened one of the closed camps on May 15, 2011. We will resume monitoring of that camp during our next review period.

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 of 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 score. Of the 27 provisions we are responsible for monitoring, we could only review 18 of them because

Probation and the DOJ monitor had not developed the monitoring tools for the remaining nine provisions.

Results of Review

Our review disclosed that Probation is making progress in complying with the settlement agreement provisions. As noted in the following table, the Department was in substantial compliance (90% or greater compliance level) with six of the eighteen provisions reviewed. Seven provisions have a compliance level of 70% to 89%, and only five provisions have a compliance level of 69% or less.

	Number of Provisions	
Compliance Level	**As of Feb 28, 2011**	**As of May 31, 2011**
90% or higher	3	6
70% to 89%	4	7
69% or less	11	5

Only one provision (Provision 34 related to mental health screening of youths) had a lower compliance level in our current review, compared to our prior 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 fully meet the requirements of all provisions by October 2012.

Attachment 1 is the detailed results of our monitoring for the 18 provisions. Attachment 2 shows the compliance level of each provision in our current review and the compliance levels from our prior review. 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 indicated general agreement 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: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
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
FOR THE PERIOD OF MARCH 1 THROUGH MAY 31, 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. 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. Out of the 27 provisions we are responsible for monitoring, we could only review 18 provisions because Probation and the DOJ monitor had not developed the monitoring tools necessary to review the remaining nine provisions.

Our review covered the twelve camps and six specialized units that remained open throughout our monitoring period of March 1 through May 31, 2011. We did not review four camps that Probation closed since our last review.

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 twelve camps and three specialized units.

Average Compliance Level: 95%

Comments:

Twelve (80%) of the fifteen camps/units achieved substantial compliance of 90% or more. The remaining three camps/units achieved an average compliance level of 87%. The managers at the three camps did not ensure that all staff signed-off on Probation's Safe Crisis Management policy. Specifically, 31 (18%) of the 176 staff at the three camps did not sign-off on 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 is only applicable to the Security Unit at the Challenger Memorial Youth Center (CMYC), which administers the Pepper spray canisters at three camps and two specialized units located at CMYC.

Average Compliance Level: 95%

Comments:

The Security Unit was in substantial compliance with this Provision. The DOJ Monitor approved this Provision for formal monitoring effective February 28, 2011.

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 twelve camps and four specialized units. However, Probation and the DOJ did not complete the monitoring tool used to measure compliance with this Provision at one unit (DOJ Compliance Bureau). As a result, we only reviewed this Provision at twelve camps and three specialized units.

Average Compliance Level: 88%

Comments:

Seven (47%) of fifteen camps/units achieved substantial compliance of 90% or more. The remaining eight camps/units achieved an average compliance level of 83%. Generally, the managers at the eight camps/units did not always ensure that supervisors completed their reviews of use of force incidents within five business days, as required. Specifically, the supervisors completed their reviews an average of nine days late for 24 (65%) of the 37 incidents we examined.

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 nine camps and two specialized units including the Security Unit at CMYC, which covers the three camps and two units located at CMYC.

Average Compliance Level: 85%

Comments:

Probation management implemented a policy forbidding the possession of alcohol, drugs and weapons in Probation juvenile facilities. Probation staff had signed off on the policy. Our interviews indicated that staff understood the policy.

In addition, Probation planned to conduct random searches for these items. 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.

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 twelve camps and one specialized unit.

Average Compliance Level: 97%

Comments:

Twelve (92%) of thirteen camps/units achieved substantial compliance of 90% or more. The remaining camp (Kilpatrick) achieved a compliance level of 79%. The staff at Kilpatrick did not always provide orientation to newly admitted minors within the required timeframe. Specifically, the staff provided orientation an average of 19 days late to five (18%) of twenty-eight newly admitted minors reviewed. 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 twelve camps and three specialized units.

Average Compliance Level: 61%

Comments:

Probation management developed training classes for staff and supervisors on effectively managing youth, including de-escalation techniques, crisis intervention, and youth development. Probation management reported that 74% of their staff received training. However, Probation did not provide training documentation (i.e., sign-in sheets and post tests) for 37 of the 111 (33%) staff we reviewed, to validate that the staff received and understood the training.

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 twelve camps and three specialized units.

Average Compliance Level: 92%

Comments:

Eleven (73%) of fifteen camps/units achieved substantial compliance of 90% or more. The remaining four camps/units achieved an average compliance level of 82%. The managers at the four camps did not always ensure that minors signed a YOYV contract agreeing not to engage in fights. Specifically, the four camps did not provide YOYV contracts for nine (17%) of fifty-two minors we reviewed. In addition, staff at the four camps did not always refer minors for a mental health consultation after the fight, as required. Specifically, the staff did not provide documentation for nine (20%) of the forty-five minors reviewed, who were involved in a fight, to show the minors were referred for mental health consultation.

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 twelve camps and three specialized units.

Average Compliance Level: 51%

Comments:

Probation developed a policy and procedures to define circumstances in which staff must report allegations of child abuse or neglect. Probation management reported that they trained 77% of their staff. However, Probation did not provide training

documentation (i.e., sign-in sheets and post tests) for 54 of the 88 (61%) staff we reviewed, to validate that staff received and understood the training.

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 Level: 48%

Comments:

Probation staff did not always submit completed investigations to their supervisors for approval within the established 90-day timeframe. Specifically, 13 (62%) of the 21 investigations completed from January through April 2011 were not submitted to the supervisors within 90 days. Investigators took an average of 110 days to submit the 13 investigations to their supervisors.

Probation is also required to complete investigations, including supervisor review, within 120 days. As of April 30, 2011, 23 (41%) of CASIU's 56 open investigations had been open for more than the 120-day timeframe. The 23 open investigations had been open an average of 185 days.

In addition, for five (83%) of six cases we reviewed, OIR and Probation did not provide documentation to show that OIR reviewed the investigations and provided Probation with feedback as required.

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 twelve camps and three specialized units.

Average Compliance Level: 76%

Comments:

Five (33%) of the fifteen camps/units achieved substantial compliance of 90% or more. The remaining ten camps achieved an average compliance level of 66%. Specifically,

managers at the ten camps did not schedule and hold reclassification meetings on a weekly basis, as required.

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 twelve camps and two specialized units.

Average Compliance Level: 92%

Comments:

Ten (71%) of the fourteen camps/units achieved substantial compliance of 90% or more. The remaining four camps/units achieved an average compliance level of 77%. Managers at the four camps did not ensure that grievance boxes were located in all areas where minors congregate (e.g., dining hall). In addition, two of the camps did not always ensure that staff responded to minors' grievances. Specifically, the staff did not respond to four (21%) of the nineteen grievances they received during our review period.

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 twelve camps and one specialized unit.

Average Compliance Level: 80%

Comments:

Five (38%) of the thirteen camps/units achieved substantial compliance of 90% or more. The remaining eight camps/units achieved an average compliance level of 70%. Managers at the eight camps did not always ensure that the movement of minors did not conflict with the minors' scheduled appointments with the Department of Mental

Health (DMH), or Juvenile Court Health Services, or testing with Los Angeles County Office of Education. Specifically, the camps moved 195 (37%) of 523 minors without verifying there were no scheduled conflicts. The DOJ Monitor approved this Provision for formal monitoring effective October 31, 2010.

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 twelve camps and three specialized units.

Average Compliance Level: 96%

Comments:

Fourteen (93%) of the fifteen camps/units achieved substantial compliance of 90% or more. The remaining unit (Security Unit at CMYC) achieved a compliance level of 89%. The unit did not achieve substantial compliance because 34 (17%) of 200 camp staff assigned to the Unit did not sign-off on the suicide prevention policy. The DOJ Monitor approved this Provision for formal monitoring effective October 31, 2010.

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 twelve camps and two specialized units.

Average Compliance Level: 85%

Comments:

Seven (50%) of the fourteen camps/units achieved substantial compliance of 90% or more. The remaining seven camps/units achieved an average compliance level of 73%. Staff at the seven camps did not always initial the required documents acknowledging that they reviewed DMH's comments describing the minor's mental health needs for the minors under their control.

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 twelve camps and three specialized units.

Average Compliance Level: 57%

Comments:

Probation management developed a training class on suicide prevention and reported that 77% of their staff received the training. However, Probation did not provide training documentation (i.e., sign-in sheets and post tests) for 54 of the 88 (61%) staff we reviewed, to validate that staff received and understood the training.

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 twelve camps and two specialized units.

Average Compliance Level: 89%

Comments:

Six (43%) of the fourteen camps/units achieved substantial compliance of 90% or more. The remaining eight camps/units achieved an average compliance level of 82%. Probation managers at the eight camps did not always ensure that the minors were screened upon admission to the camp, and/or ensure that the required screening documentation was placed in the minors' behavioral charts. Specifically, 15 (12%) of 127 minors were not screened upon admission to the camps. In addition, 50 (76%) of 66 behavior charts we reviewed did not contain a copy of the initial screening results. 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 twelve camps and three specialized units.

Average Compliance Level: 42%

Comments:

Probation management developed a training class that covered the requirements contained in this Provision, and reported that approximately 38% of the staff completed the training. However, they did not provide documentation to validate that staff received and understood the training

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 twelve camps and one specialized unit.

Average Compliance Level: 87%

Comments:

Nine (69%) of the thirteen camps/units achieved substantial compliance of 90% or more. The remaining four camps/units achieved an average compliance level of 61%. The managers at the four camps did not always ensure that discharge summaries were completed for each minor discharged from the camp. Specifically, the camp managers did not provide discharge summaries for 23 (59%) of 39 minor released from the four camps. The DOJ Monitor approved this Provision for formal monitoring effective February 28, 2011.

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

Provision	Description	Monitoring Results (2)	
		Feb 28, 2011	May 31, 2011
9 (1)	Protection from Abusive Practices	N/A	N/A
10	Use of Force	22%	95%
11	Chemical Restraint	50%	95%
12	Use of Force Review	50%	88%
13 (1)	Threat and Intimidation	N/A	N/A
14	Consumption of Alcohol by Staff	85%	85%
15 (1)	Staffing	N/A	N/A
16	Orientation	95%	97%
17 (1)	Rehabilitation & Behavior Management	N/A	N/A
18	Staff Training and Supervision of Youth	19%	61%
19	Youth-on-Youth Violence (YOYV)	83%	92%
20	Child Abuse Reporting	34%	51%
21	Child Abuse Investigation	40%	48%
22	Classification	33%	76%
23	Grievance System	91%	92%
24	Youth Movement Between Probation Camps and/or Halls	42%	80%
25	Development and Implementation of Policy (Suicide Prevention)	88%	96%
27 (1)	Management of Suicidal Youth	N/A	N/A
28 (1)	Care for Self Harming Youth	N/A	N/A
29	Documentation of Suicide Precautions	69%	85%
30 (1)	Supervision of Youth at Risk of Self Harm	N/A	N/A
31 (1)	Suicide Precautions for Youth Awaiting Transfer to Another Facility	N/A	N/A
32	Training (Suicide Prevention)	38%	57%
34	Screening	91%	89%
43 (1)	Substance Abuse	N/A	N/A
45	Staff Understanding of Mental Health and Developmental Disability Needs	37%	42%
46	Discharge Summaries	53%	87%
	Average Overall	58%	78%

Footnotes

(1) Probation and the DOJ 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.

(2) Provisions that are in substantial compliance (achieved a 90% or better compliance level) are highlighted in green. Provisions with compliance levels that dropped from the previous review are highlighted in red.

Attachment 3

DOJ Settlement Agreement Provision
Monitoring Results
For The Monitoring Period March Through May 2011

Camp/Unit	Date		Compliance Percentage for A-C Monitored Provisions (1)																		
	Review Date	Review Period	10	11	12	14	16	18	19	20	21	22	23	24	25	29	32	34	45	46	Average
Camp Scudder	3/14/2011	Feb-Mar 2011	93%	N/A	86%	87%	95%	39%	85%	55%	N/A	20%	87%	39%	98%	100%	68%	86%	32%	100%	73%
Camp Scott	3/15/2011	Feb-Mar 2011	90%	N/A	78%	84%	99%	41%	95%	48%	N/A	67%	90%	90%	96%	100%	62%	87%	30%	100%	79%
Camp Mendenhall	3/23/2011	Feb-Mar 2011	98%	N/A	88%	85%	99%	86%	93%	64%	N/A	62%	76%	100%	90%	100%	90%	99%	38%	95%	85%
Camp Munz	3/28/2011	Feb-Mar 2011	100%	N/A	93%	87%	100%	82%	91%	55%	N/A	68%	100%	86%	91%	81%	66%	100%	45%	93%	84%
Camp Gonzales	4/4/2011	Feb-Apr 2011	86%	N/A	91%	87%	100%	85%	92%	29%	N/A	96%	79%	99%	96%	60%	61%	83%	38%	100%	80%
Camp Miller	4/6/2011	Feb-Apr 2011	100%	N/A	78%	89%	100%	38%	76%	48%	N/A	68%	100%	57%	98%	92%	47%	100%	37%	100%	77%
Camp Kilpatrick	4/13/2011	Mar-Apr 2011	87%	N/A	74%	83%	79%	20%	100%	38%	N/A	43%	65%	55%	94%	62%	65%	54%	34%	79%	64%
Camp Afflerbaugh	4/26/2011	Mar-Apr 2011	100%	N/A	89%	88%	100%	60%	82%	33%	N/A	91%	100%	98%	94%	82%	63%	100%	60%	100%	84%
Camp Rockey	4/28/2011	Mar-Apr 2011	100%	N/A	97%	88%	99%	64%	97%	75%	N/A	88%	100%	73%	98%	98%	76%	99%	34%	100%	87%
Security Unit @ Challenger	5/4/2011	Mar-May 2011	88%	95%	80%	74%	N/A	44%	100%	39%	N/A	N/A	N/A	N/A	89%	N/A	53%	N/A	45%	N/A	71%
Special Handling Unit @ Challenger	5/4/2011	Mar-May 2011	93%	N/A	91%	N/A	N/A	78%	86%	62%	N/A	99%	99%	N/A	100%	78%	52%	83%	66%	N/A	82%
Camp McNair	5/5/2011	Mar-May 2011	96%	N/A	89%	N/A	98%	78%	95%	63%	N/A	89%	100%	79%	98%	74%	29%	88%	20%	100%	80%
Camp Onizuka	5/10/2011	Apr-May 2011	100%	N/A	99%	N/A	98%	80%	94%	54%	N/A	88%	96%	87%	100%	97%	19%	94%	60%	70%	82%
Camp Jarvis	5/11/2011	Apr-May 2011	100%	N/A	90%	N/A	100%	51%	93%	63%	N/A	69%	100%	87%	100%	74%	38%	86%	60%	53%	78%
DOJ Project Bureau	(2)	(2)	N/A	N/A	(2)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	(2)
Dorothy Kirby Center	5/18/2011	Apr-May 2011	100%	N/A	94%	82%	100%	72%	100%	32%	N/A	95%	97%	96%	96%	95%	66%	86%	35%	40%	80%
Camp Assessment Unit	5/31/2011	April 2011	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	93%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	93%
Child Abuse/ Special Investigations Unit	5/31/2011	Jan-Apr 2011	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	48%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	48%
Average Compliance Level			**95%**	**95%**	**88%**	**85%**	**97%**	**61%**	**92%**	**51%**	**48%**	**76%**	**92%**	**80%**	**96%**	**85%**	**57%**	**89%**	**42%**	**87%**	**78%**

Footnote Legend

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

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

(2) Probation management indicated that they are currently working with the DOJ monitor to develop a monitoring tool to measure compliance with this Provision at this unit. As a result, we did not perform a monitoring review for this Provision at this unit.