COUNTY OF LOS ANGELES
DEPARTMENT OF AUDITOR-CONTROLLER

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WENDY L. WATANABE
AUDITOR-CONTROLLER

March 5, 2013

TO: Supervisor Mark Ridley-Thomas, Chairman
Supervisor Zev Yaroslavsky
Supervisor Gloria Molina
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 JUNE 1, 2012 THROUGH AUGUST 31, 2012 – SEVENTH 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 seventh 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 nineteen 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 four 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 monitor 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. 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.

The settlement agreement required the County to fully implement all of the provisions by October 2012. However, in October 2012, the County and the DOJ amended the agreement to require all of the provisions to be fully implemented by December 2013. When the Monitor determines that Probation has met most of a provision's requirements, the Monitor will 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.

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, our current review indicates that Probation was in substantial compliance (compliance level of 90% or more) with ten (83%) of the 12 provisions; and Probation had a compliance level of 70% to 89% for the other two (17%) provisions. In addition, Probation completed the formal monitoring process for eight provisions, meaning the DOJ considers those eight provisions to be fully implemented.

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

Attachment I is the detailed results of our monitoring each provision. Attachment II shows the compliance level for each provision in our current review, and the compliance

levels from our prior reviews. Attachment III 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 DEPARTMENT OF JUSTICE SETTLEMENT AGREEMENT
MONITORING RESULTS
JUNE 1, 2012 THROUGH AUGUST 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 evaluated Probation's progress in implementing each provision 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 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 June 1, 2012 through August 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:

All sixteen camps/units achieved substantial compliance of 90% or more. The Monitor approved this Provision for formal monitoring effective October 31, 2011. However, the amended agreement extended the formal monitoring period an additional two months to December 31, 2012. Probation management indicated that the DOJ Monitor is currently evaluating this Provision to determine whether Probation successfully completed the formal monitoring process.

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 fifth quarterly 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 ninth 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: 95%

Comments:

Sixteen (94%) of the 17 camps/units achieved substantial compliance of 90% or more. The remaining camp (Afflerbaugh) achieved a compliance level of 81%. Specifically, the camp managers did not have written minutes for the monthly Safe Crisis Management (SCM)/Youth on Youth Violence (YOYV) meetings to document the discussion and assessment of SCM and YOYV incidents that took place at the Camp.

In addition, the Camp Afflerbaugh managers did not ensure that their reviews of use of force incidents were completed within five business days, as required. Specifically, two (67%) of the three reviews sampled were completed an average of seven 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 fifth 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 ninth 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 fourth 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 next 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: 94%

Comments:

Fifteen (94%) of the 16 camps/units achieved substantial compliance of 90% or more. The remaining camp (Paige) achieved a compliance level of 85%. 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, 50% of the supervisors and 14% of the Probation Officers assigned to Camp Paige did not complete the training.

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

Provision 19: Reduction of Youth on Youth Violence

The County shall develop and implement strategies for reducing 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: 97%

Comments:

Fifteen (94%) of the 16 camps/units achieved substantial compliance of 90% or more. The remaining camp (Afflerbaugh) achieved a compliance level of 83%. Specifically, the camp managers did not have written minutes for the monthly SCM/YOYV meetings to document the discussion and assessment of SCM and YOYV incidents that took place at the Camp.

The Monitor approved this Provision for formal monitoring effective October 31, 2011. However, the amended agreement extended the formal monitoring period an additional two months to December 31, 2012. Probation management indicated that the Monitor is currently evaluating this Provision to determine whether Probation successfully completed the formal monitoring process.

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: 95%

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 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 fifth quarterly 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 ninth 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 fourth 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 next 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 applied to 13 camps and three specialized units.

Comments:

During our fourth 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 next 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 11 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: 100%

Comments:

All 11 camps/units achieved substantial compliance of 90% or more. 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: 88%

Comments:

29A – Mental Health Needs

Ten (67%) of the 15 camps/units achieved substantial compliance of 90% or more. The remaining five camps achieved an average compliance level of 66%. Specifically, staff at the five 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, DMH staff at four camps 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 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 (Mendenhall) achieved a compliance level of 88%. Camp

Mendenhall managers did not always ensure that Enhanced Supervision Observation Forms (ESOF) were completed entirely for minors requiring Level 3 Supervision.

29C – Enhanced Supervision Level 2

This Provision applies to the five camps/units that had minors housed in a Special Housing Unit (SHU) and on Level 2 Supervision at the time of our review.

Two (40%) of the five camps/units achieved substantial compliance of 90% or more. The remaining three camps/units achieved an average compliance level of 84%. The managers at the three camps/units did not always review Safety Check Sheets 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: 90%

Comments:

Three (50%) of the six camps/units achieved substantial compliance of 90% or more. The remaining three camps/units achieved an average compliance level of 84%. The camp managers did not always ensure that Safety Check Sheets were completed for each eight-hour shift a minor was on Level 1 Supervision and housed in a SHU. Specifically, the managers did not complete Safety Check Sheets for nine (15%) of the 60 shifts reviewed.

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 three camps and one specialized unit 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: 82%

Comments:

All four camps/units did not achieve substantial compliance of 90% or more. Three (75%) of the four camp managers did not document the date and time they authorized the removal of minors from their facility. The remaining camp manager did not ensure that an ESOF and a Special Incident Report were completed entirely for one minor who was on Level 4 Supervision and was transferred out of the facility.

The Monitor approved this Provision for formal monitoring effective October 31, 2011. However, since our fifth quarterly review, Probation's average compliance level for this Provision decreased from 93% to 82%. 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: 93%

Comments:

Thirteen (81%) of the 16 camps/units achieved substantial compliance of 90% or more. The remaining three camps/units achieved an average compliance level of 88%. Probation management developed a training class on suicide prevention. However, Probation management did not ensure that all staff at the three camps received the training. Specifically, 8% of Probation Officers and 16% of non-peace officer staff from DMH, LACOE, and JCHS assigned to the three camps/units 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 fifth 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 ninth 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: 93%

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 87%. 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, 12% of Probation Officers and 15% 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 fifth 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 ninth quarterly review.

DOJ Settlement Agreement Provision
Monitored by the Auditor-Controller
Compliance Level Summary
For Monitoring Reviews Completed November 30, 2011 Through August 31, 2012

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

Footnote Legend

(1) The DOJ Monitor indicated that Probation fully met the requirements of this Provision by maintaining "substantial compliance" with the 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 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.

(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.

Attachment III

DOJ Settlement Agreement Provision
Monitoring Results
For The Monitoring Period June 1, 2012 Through August 31, 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	6/13/2012	April-June 2012	100%	100%	96%	94%	97%	N/A	100%	71%	91%	N/A	97%	94%	94%
Camp Miller	6/19/2012	March-June 2012	100%	100%	100%	96%	100%	N/A	98%	68%	N/A	N/A	100%	97%	95%
Camp Kilpatrick	6/20/2012	May-June 2012	100%	95%	92%	100%	94%	N/A	100%	68%	87%	N/A	90%	95%	92%
Camp Scott	6/26/2012	April-June 2012	100%	100%	100%	100%	96%	N/A	100%	98%	100%	80%	91%	91%	96%
Camp Scudder	6/28/2012	May-June 2012	100%	93%	96%	100%	96%	N/A	100%	93%	N/A	N/A	97%	97%	97%
Camp Munz	7/10/2012	June-July 2012	100%	96%	94%	100%	94%	N/A	100%	93%	N/A	N/A	89%	89%	95%
Camp Mendenhall	7/12/2012	April-July 2012	100%	95%	97%	98%	95%	N/A	100%	89%	N/A	88%	90%	94%	95%
Dorothy Kirby Center	7/17/2012	June-July 2012	100%	95%	91%	100%	95%	N/A	100%	87%	75%	80%	93%	96%	92%
Camp Rockey	7/19/2012	June-July 2012	100%	93%	100%	96%	93%	N/A	100%	91%	100%	N/A	91%	89%	95%
Camp Paige	7/24/2012	June-July 2012	100%	95%	85%	96%	97%	N/A	100%	95%	N/A	80%	91%	89%	93%
Camp Afflerbaugh	7/26/2012	April-July 2012	97%	81%	90%	83%	91%	N/A	N/A	100%	N/A	N/A	88%	82%	89%
Special Housing Unit @ CMYC	8/6/2012	July-Aug 2012	100%	93%	92%	92%	97%	N/A	98%	93%	89%	N/A	100%	96%	95%
Security Unit @ CMYC	8/6/2012	July 2012	100%	100%	90%	100%	93%	N/A	N/A	N/A	N/A	N/A	87%	90%	94%
Camp McNair	8/8/2012	July-Aug 2012	98%	98%	100%	99%	95%	N/A	N/A	80%	N/A	N/A	96%	98%	96%
Camp Onizuka	8/10/2012	July-Aug 2012	99%	98%	97%	98%	90%	N/A	N/A	95%	N/A	N/A	94%	96%	96%
Camp Jarvis	8/15/2012	July-Aug 2012	97%	95%	91%	100%	98%	N/A	N/A	95%	N/A	N/A	90%	94%	95%
CASIU	9/12/2012	May-July 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	9/12/2012	May 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%**	**95%**	**94%**	**97%**	**95%**	**98%**	**100%**	**88%**	**90%**	**82%**	**93%**	**93%**	**94%**

Footnote Legend

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

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